# Compiled Public Comments on the Request for Information on Maximizing Research Funds by Limiting Allowable Publishing Costs

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## 1. The University of Alabama in Huntsville

**Submit date:** 7/30/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Gloria Greene

**Name of Organization:** The University of Alabama in Huntsville

**Type of Organization:** Academic Institution

**Role:** Organizational Official

**1. Proposed policy options:**
While transparency for taxpayer investment is essential, strict constraints on publication cost recovery limit researchers' ability to disseminate high-quality, peer-reviewed work, disproportionately affecting early-career researchers and those at under-resourced institutions. Rather than imposing blanket cost ceilings, NIH should continue to allow reasonable publication costs within the budget cap and emphasize open-access mandates without penalizing legitimate publication fees. National-level agreements or centralized open-access platforms can also reduce costs and maintain quality.

**2. Available evidence related to publication costs and proposed options:**
Studies by SPARC and AAU show that high-quality open-access journals often charge fees higher than NIH's proposed limits. The 2023 STM Association report shows rigorous peer review and fraud detection make publishing more expensive. These steps are needed for research integrity. Internal data show researchers lack low-cost publishing options in niche or high-impact fields. This policy would block scientific communication.

**3. Peer review compensation:**
Peer review is central to scientific integrity and needs proper resources. Paying reviewers respects the time, expertise, and opportunity cost required. NIH should consider these points:

a. The time needed to review each manuscript.

b. Specialization or scarcity of expert reviewers in emerging fields.

c. The ethical burden of asking underpaid academics to volunteer while industry profits from the system.

d. Reviewers from underrepresented institutions and communities often cannot afford to contribute unpaid time, exacerbating disparities in influence and access.

**4. Publishing best practices:**
Fraud detection, plagiarism checks, and retraction protocols now cost more. This is because threats to research integrity, such as paper mills, are rising. NIH should see investments in publishing integrity as essential safeguards—not luxuries. Some other factors for NIH to consider in allowing higher publication costs are:

a. Publication quality and long-term access.

b. Data and code repository integration, which promotes reproducibility but requires infrastructure.

Language access and global reach require translation and editorial services. This is especially true for global health research.

**5. Other Comments:**
Fraud detection, plagiarism checks, and retraction protocols now cost more. This is because threats to research integrity, such as paper mills, are rising. NIH should see investments in publishing integrity as essential safeguards—not luxuries. Some other factors for NIH to consider in allowing higher publication costs are:

a. Publication quality and long-term access.

b. Data and code repository integration, which promotes reproducibility but requires infrastructure.

Language access and global reach require translation and editorial services. This is especially true for global health research.

## 2. Mary Cushman

**Submit date:** 7/30/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Mary Cushman

**Name of Organization:** University of Vermont

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
It is important that research results are freely available and open access publishing is an important part of the equation on this. It is a reasonable thing to consider that APCs should be capped so more money is spent on research. I would claim that NIH should not be limiting investigator flexibility on where to publish their research. By imposing limits on APCs this will happen. As supported by the analysis you shared, most investigators, myself included, will not pay egregious fees unless the journal is of such high quality that this will (1) provide the best dissemination of their research, and (2) publish in a journal with the esteem needed to impress reviewers of our grant resubmissions / submissions. You reported that the median APC is $2000, which supports this position and is a very reasonable median (please don't pay attention to the mean value as the data is skewed.

Yet another rule that we need to follow will add to our already very stressed system. Please give us the ongoing academic freedom to make choices in publishing that are best for us and our research. As there is a clear desire to reduce administrative costs of NIH, why would you implement another policy that needs to be governed and monitored for compliance. the cost of that would be huge.

**2. Available evidence related to publication costs and proposed options:**
You provided good data

**3. Peer review compensation:**
No journals in my field compensate peer reviewers. The idea is a good one though. Tying a cap difference for APCs to how a journal compensates reviewers is intriguing. However, the costs of monitoring compliance with this would be egregious and not worth implementing such a policy. if you are trying to reduce administrative costs, this isn't work paying administrative costs to implement and enforce.

**4. Publishing best practices:**

**5. Other Comments:**

## 3. Gail Bishop

**Submit date:** 7/30/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Gail Bishop

**Name of Organization:** The University of Iowa

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
It seems to many of us who regularly publish our NIH-funded research results that we are receiving a mixed message from NIH leadership. The mandate to publish all such work with immediate open access was suddenly moved up by 6 months under the new leadership. Despite various agreements of institutions with publishers, overall this can substantially increase the fees authors must pay to publish papers - fees that have increased substantially over the past 10-15 years, with the huge explosion that OA policy has stimulated in 'for-profit' publishers. Thus, authors have increased publication costs, but no designated source of funds to pay for them.

**2. Available evidence related to publication costs and proposed options:**
My own Department is trying to help its faculty by giving each of us an 'allowance' that assists in paying for publication fees each year. I know colleagues who have had to pay such fees from their own personal household budgets, because they want to preserve their NIH funds for research.

**3. Peer review compensation:**
I have thought a great deal about this, as I am the Editor in Chief of the journal of a scientific society. Such non-profit entities could likely not afford to pay peer reviewers - this would put us at an even greater disadvantage than we already suffer compared to journals of large, for-profit commercial publishers. I also question the message provided - that what was long considered part of being a 'good scientific citizen' should now be yet another role that everyone expects to be paid to do. And what would you do when (as is all too often the case) the review provided is useless or substandard in quality? I think such a policy would open a Pandora's Box of ill effects for science in general.

**4. Publishing best practices:**
A good point. The journal I edit now uses multiple tools to detect image manipulation, papers written by paper mills, etc. This does add to a journal's costs, and is likely part of what has driven the substantial rise in author fees. But I do think with the explosive rise of AI tools, it is very important to do whatever we can to preserve the integrity of the scientific record, so this cost does need to be considered.

**5. Other Comments:**
A good point. The journal I edit now uses multiple tools to detect image manipulation, papers written by paper mills, etc. This does add to a journal's costs, and is likely part of what has driven the substantial rise in author fees. But I do think with the explosive rise of AI tools, it is very important to do

whatever we can to preserve the integrity of the scientific record, so this cost does need to be considered.

## 4. N/A

**Submit date:** 7/30/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Non-profit Research Organization

**Role:** Investigator/Researcher

**1. Proposed policy options:**
of the options proposed, I'd pick Option 4

**2. Available evidence related to publication costs and proposed options:**
Most APCs that I look up when considering journal choice are at least $2800.

Small labs cannot afford to publish in the most expensive journals.

**3. Peer review compensation:**
In 30 years as a researcher, I've never been compensated (or offered compensation) for reviewing manuscripts.

**4. Publishing best practices:**

**5. Other Comments:**

## 5. Dmitriy Sheyn

**Submit date:** 7/30/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Dmitriy Sheyn

**Name of Organization:** Cedars-Sinai Health Sciences University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
If the policy will force the publishers to reduce APCs, that' great, but if the policy will only restrict the researchers and will force to come up with alternative funding for publishing the work, it will be counter productive.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
This a great idea, because currently the peer review is huge burden on the reviewers, editors and investigators, that spend time finding reviewers and the work is being shelved. Pain reviewers will be more diligent, time compliant and responsible. NIH should encourage that, even if it will mean higher APCs.

**4. Publishing best practices:**

**5. Other Comments:**

## 6. Alex M

**Submit date:** 7/30/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Alex M

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Organizational Official

**1. Proposed policy options:**
I think public access to publicly funded work is theoretically a positive thing, but there are many things that are funded with public money that are not then yet made free to consumers. Imagine, for instance, a farmer that gets a grant to support their potato farming business. One wouldn't expect the farmer to then give the potatoes away for free just because things were done partly with public money.

Also, and significantly more important, the paper resulting from journal-organized peer review is NOT JUST THE RESULT OF THE WORK OF THE FUNDEE. It involves the work and expenses of a journal (which are varied), so it makes no sense that a funder would make any mandates regarding how that piece of work, that is not just the product of the funding provided by the funder, to be made freely available, through any means.

As such, if a funder wanted to make the work funded publicaly available, they should only have a say on the only piece of work that is SOLELY the product of the fundee: and that is a preprint. In other words, if the funder wanted to have a publicly available mandate, it should require that a preprint of the work, which again, is the only product that is the direct output of the fundee (with no intervention from third parties), should be poster.

Having satisfied the requirement of access to the work funded, authors would have NO need to then go to a journal and pay open access fees: they could just submit to subscription journals that don't charge authors anything.

This approach addresses many current issues: 1) the access problem of publicly funded work would be IMMEDIATELY solved, via preprints, 2) no more APCs, which not only create inequalities as not everyone has funds to cover publishing fees, but have resulted in the proliferation of substandard/questionable journals that just aim to publish as many articles as possible with little to no review (e.g. those published by Frontiers, MDPI, and the like) and predatory journals, and have further consolidated the market in the big publishers, as they are the only ones with the economies of scale required for Gold OA-based publishing, and 3) publishers can go back to an economy where the reader is the client and not the author, which results not only in a more sustainable business model, but also allows small non profit and society publishers, which arguably deliver the best-quality peer review, to continue existing. They would be able to continue offering their highly-curated and high-standard services of peer review, because they would be able to just focus on publishing what they think is good instead of trying to survive in the current "article economy" that APCs create, where unless you publish many articles, you don't make

money, creating perverse incentives for accepting more and more articles instead of just accepting what you think your community would want.

Access to journals is significantly less of a problem now, with the internet, that when the whole OA movement started 20 years ago; people can typically get access to journal articles, either via institutional or personal subscriptions, emailing authors asking for copies, downloading copies from institutional repositories, and more. But even if they can't access one, a free, OA version would be available, as a preprint, representing the direct output of the fundee.

As such, I support Option 1: Disallow all publication costs, with the provision that access is achieved via a preprint, deposited either in a newly created NIH repository or another vetted preprint service provider, for free. Authors would then be free to submit to journals that offer publication options at no cost, as almost all subscription-based journals and some diamond OA journals.

In this scenario, NIH fundees would no longer need to pay for open access fees, as the access problem would be solved by the preprints, and thus would not need additional funds. Now, some subscription journals charge page or color charges, and those would still need to be allowed, but there would be no exception for 'article processing fees' or any fees required to make an article open access or free to read, as such requirement would be superfluous.

This system has the added benefit that publishers like MDPI, Frontiers, and the like, would either disappear, or would need to offer an option for NIH fundees to publish at no cost.

**2. Available evidence related to publication costs and proposed options:**
Support for a system similar to my proposal can be found here:
https://pmc.ncbi.nlm.nih.gov/articles/PMC6548351/

**3. Peer review compensation:**
Not only is this a bad idea (wrong incentives), but it is also logistically very difficult and would come at a huge cost. Imagine if you had to make wire transfers to 3 people for each article you receive, each with their own fees. Also imagine the time an admin would need to spend on this a year!

There are many other considerations, some discussed here:
https://scholarlykitchen.sspnet.org/2021/06/16/whats-wrong-with-paying-for-peer-review/

Two other problems, as discussed by D Crotty:

1) The largest commercial publishers will be able to invest in and build the most efficient payment mechanisms, and amortize their costs over a larger number of journals than smaller, independent or non-profit publishers. These reduced costs will, once again, unwittingly favor consolidation of the market around the largest and most profitable entities.

2) Those large and profitable publishers will be able to afford to outbid smaller, community-run journals for the best peer reviewers. Why review for a society journals for $100 when you could review for a for-profit, commercial journal for $500? Again, the unintentional consequence of what seems like a good idea is to do further harm to the smaller, independent publisher.

**4. Publishing best practices:**
If you want journals to do more (more in ethical screenings and investigations, more on peer review

innovations, etc), that costs money: and the best way to fund that, is through stable funding via subscriptions. That way, you can select the journals you want to support, and fund them via your subscriptions, for them to then test and implement new policies and procedures . A key role of journals is enforcing standards, and they should continue to do it if possible. And this whole system can continue alongside preprints. Preprints and journals are not mutually exclusive.

**5. Other Comments:**

If you want journals to do more (more in ethical screenings and investigations, more on peer review innovations, etc), that costs money: and the best way to fund that, is through stable funding via subscriptions. That way, you can select the journals you want to support, and fund them via your subscriptions, for them to then test and implement new policies and procedures . A key role of journals is enforcing standards, and they should continue to do it if possible. And this whole system can continue alongside preprints. Preprints and journals are not mutually exclusive.

## 7. N/A

**Submit date:** 7/30/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
While I share NIH's concern about the rising costs of scholarly publishing—particularly the exorbitant APCs charged by some for-profit journals—I believe that simply capping allowable costs on NIH grants is a blunt instrument that is likely to produce more harm than good.

All proposed options risk shifting costs to authors or institutions, exacerbating inequities rather than resolving them. Researchers at under-resourced institutions or in high-APC fields would be disproportionately affected, forced to choose between paying out-of-pocket or settling for lower-visibility venues. Early-career investigators in particular may face new barriers to dissemination and career advancement.

Moreover, the policy may inadvertently strengthen the market position of large publishers who can absorb short-term losses, while squeezing smaller, more principled open-access journals. Without systemic reform or collective bargaining mechanisms, a cap alone is unlikely to curb exploitative pricing—and may instead worsen the very economic distortions it aims to fix.

A more constructive path would involve supporting sustainable alternatives (e.g., diamond open access), promoting consortial publishing agreements, and increasing transparency around publishing costs. But capping allowable fees in isolation is a policy likely to backfire—costing researchers more, not less.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
NIH should treat grant peer review as serious, skilled labor—because it is. The current honoraria undervalue the time, effort, and expertise required, and create structural disincentives for participation by underrepresented and early-career researchers. Meaningful compensation should reflect the time commitment, not merely a nominal gesture. If NIH wants high-quality, equitable, and sustainable peer review, it must acknowledge and support the labor it demands.

**4. Publishing best practices:**
Rather than capping APCs arbitrarily, NIH should consider whether a journal adopts demonstrable best practices—such as open peer review, data and code sharing policies, fraud detection tools, and methodological rigor standards—as criteria for allowing higher publication costs. These investments serve scientific integrity and transparency. A journal's profit model and editorial practices are more relevant to justifying cost than the sticker price alone.

**5. Other Comments:**

Rather than capping APCs arbitrarily, NIH should consider whether a journal adopts demonstrable best practices—such as open peer review, data and code sharing policies, fraud detection tools, and methodological rigor standards—as criteria for allowing higher publication costs. These investments serve scientific integrity and transparency. A journal's profit model and editorial practices are more relevant to justifying cost than the sticker price alone.

## 8. Brittany Lasseigne

**Submit date:** 7/30/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Brittany Lasseigne

**Name of Organization:** UAB

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 4

**2. Available evidence related to publication costs and proposed options:**
NA

**3. Peer review compensation:**
NA

**4. Publishing best practices:**

**5. Other Comments:**

## 9. Shruti Chaturvedi

**Submit date:** 7/30/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Shruti Chaturvedi

**Name of Organization:** Johns Hopkins University

**Type of Organization:** Non-profit Research Organization

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Prefer option 4 or 5

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 10. Feng Li

**Submit date:** 7/30/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Feng Li

**Name of Organization:** University of California, Los Angeles

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I would choose option 5 and strongly against option 1. Pubishing is very important to the research which needs support from the grant.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 11. Philip Bayly

**Submit date:** 7/30/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Philip Bayly

**Name of Organization:** Washington University in St. Louis

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I would support either a limit on publication cost per article or a total cost limit. The publication cost per article would be easier to manage. I do not support a mechanism that penalizes peer-reviewed articles vs preprints.

**2. Available evidence related to publication costs and proposed options:**
My articles have been published with costs that are typically under $1000/article

**3. Peer review compensation:**
I think it is difficult to fairly compensate reviewers of journal articles for their time, financially. It is an activity that is currently framed as service to the field and scientific community. It requires a lot of time from highly skilled and well compensated people. Capturing aggregate activity and valuing it appropriately would be good.

**4. Publishing best practices:**

**5. Other Comments:**

## 12. Charles Lowenstein

**Submit date:** 7/30/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Charles Lowenstein

**Name of Organization:** Johns Hopkins University School of Medicine

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 5: Set a limit on both the per publication cost and the total amount of an award that can be spent on publications. NIH could limit both the total amount of an award that could be spent on publication costs to the greater of 0.8% of the award's direct costs or $20,000.00 over the life of the award, in addition to limiting the amount per publication to $6,000.00.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 13. Kristin RIekert

**Submit date:** 7/30/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Kristin RIekert

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
In my field, publishing costs are usually >3K and rising, and I cannot remember the last time I saw one <$1,500. I assume that the amounts vary by scientific area and publishers. Similarly, the number of expected important papers that a study will generate will vary by the research question and study design. Given that NIH requires all papers published under their funding to be immediately publicly available, I assume that publishers will capitalize on this requirement and increase their fees. This means more investigators will require even more funding year after year. The other challenge is that often secondary papers are published after the funding has ended, and it appears that NIH intends to be more restrictive on approving no-cost extension requests. Combined, having a fixed upper limit and a shortened time for getting a paper accepted will negatively impact the timely dissemination of results.

Rather than the options suggested, I propose that NIH require applicants to name the main papers that will come from the study, name their target journal, and provide the publication cost. Then require that the main papers be immediately publicly available, while allowing secondary ones to follow the old rule (public after a 12-month embargo). I think that would make the grant stronger because they have to have a really clear research question to name the paper and think about the level of journal that would be interested in publishing the study. If they propose too many papers, then perhaps the scope of the study is too large. Reviewers can consider this in their reviews-- does the study design have a realistic chance of making it into the named journal? Are the investigators proposing to diffuse a study to be successful?

**2. Available evidence related to publication costs and proposed options:**
I would not require that investigators funded by training or mentored grants be required to follow the NIH immediately publicly available rule at all OR at least not on papers that don't use data from their grant. For example, a person on a K award did a secondary analysis of my foundation-sponsored study that ended before she received her K. The work contributed to her training goals, but now we are searching for a journal without publication fees because her grant officer told her that this paper must comply with the NIH rule. This may prevent senior investigators from including trainees/mentees on projects (or worse, they do the work and then are left off as an author) to avoid publication fees.

**3. Peer review compensation:**
I have reviewed for >30 different journals and received requests to review from countless more. I have never been offered payment for my review. While the idea of paying reviewers is tempting, it opens the opportunity for more misconduct. E.g., editors repeatedly offering friends paid reviewing opportunities despite the provision of sub-par reviews. Journals offering payment for reviews will increase publication

fees by justifying that not all authors have NIH money, but they need to pay all reviewers. They will then keep the extra money.

**4. Publishing best practices:**
Rather than paying reviewers. I would prefer that NIH advocate that journals offer publication fee discounts for serving as a reviewer. I was once offered this by a journal.

**5. Other Comments:**
Rather than paying reviewers. I would prefer that NIH advocate that journals offer publication fee discounts for serving as a reviewer. I was once offered this by a journal.

## 14. Gary L. Westbrook, MD

**Submit date:** 7/30/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Gary L. Westbrook, MD

**Name of Organization:** Vollum Institute. Portland OR

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
NIH should stay out of the publishing business, but requiring publication of preprints in e.g. BioRxiv or MedRxiv is justifiable as well as some max on grant funds for publication (see 2 below).

**2. Available evidence related to publication costs and proposed options:**
Commercial publishers, particularly Cell Press and Springer are falsely elevating the costs of manuscript publishing just to make a profit. The actual costs are in the 2-3K range not the 12K charged by e.g. Nature or Cell. Limiting publication fees on single grants to e.g. 5K (2 papers per year per grant) is a reasonable level. We dont need to pad the pockets of commercial publishers. I am very familiar with these issues have severed as a Senior Editor then Editor-in-Chief (J Neurosci) and for 8 years as Senior Editor at eLIfe.

**3. Peer review compensation:**
There is no reason to pay for peer review as it is part of the academic enterprise. Paying will likely decrease the quality of reviews as the reason to review is not to be reimbursed but rather to maintain high standards of published work.

**4. Publishing best practices:**
These factors are not the contributing cause of high publication charges by commercial publishes - it is profit pure and simple.

**5. Other Comments:**
These factors are not the contributing cause of high publication charges by commercial publishes - it is profit pure and simple.

## 15. Jodi Segal

**Submit date:** 7/30/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Jodi Segal

**Name of Organization:** jhu

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I favor option 5.

**2. Available evidence related to publication costs and proposed options:**
I am an editor at a journal that has no publication fees. I would like to know more about whether NIH funded authors are publishing in the so-called predatory journals. I would not like NIH monies going to these journals.

**3. Peer review compensation:**
I have never been paid for peer review; I think it is just part of being a member of the scientific community. Volunteer to give back to the community.

**4. Publishing best practices:**

**5. Other Comments:**

## 16. Aleksandar Rajkovic

**Submit date:** 7/30/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Aleksandar Rajkovic

**Name of Organization:** University of California, San Francisco

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Among the proposed options, Option 5, which combines a total award-based limit (greater of 0.8% direct costs or $20,000) with a per-publication limit, provides the optimal balance of flexibility and fiscal responsibility. A per-article cap of $6,000, as proposed, would best serve researchers and publishers. A $6,000 cap accommodates the publishing costs of most high-quality biomedical journals, ensuring researchers can publish in reputable outlets without compromising dissemination quality.

**2. Available evidence related to publication costs and proposed options:**
Recent analyses of biomedical journal publishing indicate substantial editorial and quality-control expenses justify higher APCs. NIH's own data found that NIH applicants routinely anticipate publication fees around $3,226–$3,647 per publication. Additional public data (Coalition S, 2022) indicates median APCs around $3,000, with premium journals typically charging $4,000–$5,000 or more. Many hybrid journal incur significant costs due to comprehensive editorial processes, associate editor compensation, manuscript management systems, and stringent quality-control measures to weed out plagiarism, ensure integrity and reproducibility of results. Setting a realistic cap at $6,000 recognizes these legitimate operational costs, ensuring sustainability without inflating APCs unreasonably.

**3. Peer review compensation:**
Compensation for peer reviewers is a good idea, partly because it is hard to find reviewers these days. While potentially valuable, it may also inadvertently inflate APCs substantially beyond current norms. Instead, NIH should recognize other peer-review investments—such as associate and chief editors' compensation, extensive editorial oversight, reviewer training programs, and transparency measures like public review summaries—as equivalent factors warranting higher allowable APCs. These indirect investments demonstrably improve peer-review quality and reviewer engagement without significantly increasing costs or reducing reviewer impartiality.

**4. Publishing best practices:**
Beyond reviewer compensation, NIH should consider additional best practices justifying higher publication costs, including the implementation of robust automated fraud detection tools, plagiarism detection software, comprehensive editorial screening processes, transparent peer review reporting, archiving and indexing services, and compliance with rigorous open-access standards. These practices significantly enhance research integrity and reproducibility, justifying APCs approaching $6,000. Such measures, widely implemented by reputable journals, directly align with NIH's goals to support high-quality, trustworthy dissemination of federally funded research.

**5. Other Comments:**

Beyond reviewer compensation, NIH should consider additional best practices justifying higher publication costs, including the implementation of robust automated fraud detection tools, plagiarism detection software, comprehensive editorial screening processes, transparent peer review reporting, archiving and indexing services, and compliance with rigorous open-access standards. These practices significantly enhance research integrity and reproducibility, justifying APCs approaching $6,000. Such measures, widely implemented by reputable journals, directly align with NIH's goals to support high-quality, trustworthy dissemination of federally funded research.

## 17. Cathy Stein, Ph.D.

**Submit date:** 7/30/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Cathy Stein, Ph.D.

**Name of Organization:** Case Western Reserve University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
The goal of regulating publication costs is good. Journal costs have increased quite a bit over the last few years, and if investigators hope to publish more than one paper per year, budgeting that much in each grant year budget appears excessive even when it is not. The other side of this issue is that some funders (like the Gates foundation) have stopped allowing for publication costs at all, forcing investigators to either publish in free journals or non-peer reviewed outlets like bioRxiv / medRxiv. The concern is if the NIH limits the amount of money that can be budgeted towards papers, could that also result in investigators not being able to pay costs, since there are many universities that do not have discretionary dollars for faculty?

**2. Available evidence related to publication costs and proposed options:**
The minimum that I have spent recently on a paper publication cost is $3000. Some journals charge much more. What's worse, is journals charge even more for "open access" (~$2000 on top of the standard publication cost), when that can be done through the investigator uploading the paper themselves to NCBI. If someone has a goal of publishing just 5 papers per year (my colleagues do double that, at least), that's a minimum of $15,000. That's absurd.

**3. Peer review compensation:**
I've never been paid to peer review a journal paper. I don't know anyone that has, honestly. Supposedly there are journals that do that? I've also had junior investigators refuse to review papers without pay - but that's not how the system works. On the other hand, we have a problem in peer review with finding reviewers, people waiting months to get a paper reviewed. Would that problem improve if reviewers were paid? But would that cost be passed on to the authors, and they are already paying too much? Does this create inequity - can all authors afford this additional cost?

**4. Publishing best practices:**
There are many journals that will accept anything as long as it meets basic scientific rigor. So journals are being flooded now, and there aren't enough reviewers to keep up with the demand. Maybe that standard needs to be raised. There is also a flood of papers coming out of re-analysis of publicly available datasets. Lots of genetic Mendelian randomization papers like this - change the phenotype, change the gene name, and *poof* new paper. And yes, many of these are coming out of China. Maybe that needs to be regulated better. (PLoS Genet just published a editorial on this topic.)

**5. Other Comments:**
There are many journals that will accept anything as long as it meets basic scientific rigor. So journals

are being flooded now, and there aren't enough reviewers to keep up with the demand.  Maybe that standard needs to be raised.  There is also a flood of papers coming out of re-analysis of publicly available datasets.  Lots of genetic Mendelian randomization papers like this - change the phenotype, change the gene name, and *poof* new paper.  And yes, many of these are coming out of China. Maybe that needs to be regulated better.  (PLoS Genet just published a editorial on this topic.)

## 18. Vanessa Brown

**Submit date:** 7/30/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Vanessa Brown

**Name of Organization:**

**Type of Organization:** Not Applicable

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Limiting high publication costs is a good idea. However, all the proposed options in the RFI are seriously flawed.

First of all, the described analysis does not reflect how APCs actually function. APCs are generally higher for higher impact factor journals. Rather than take the average of all possible journals, a better option would be to calculate a weighted average APC based on where NIH-funded research is being published. Since publications are linked to grants, this would not be difficult to do. Such an analysis would add up the journal APC for each NIH-linked publication, and average by the total number of publications. This would be a more realistic calculation of APCs.

Secondly, NIH now requires all publications to be immediately open access. Open access APCs are higher than APCs in general. Only APCs compliant with NIH policy (that is, APCs for immediate open access) should be used in the calculation.

Another concern is who will be able to publish in journals with APCs above the allowed amount. As noted above, high impact factor journals have very high APCs. Unless they reduce their APCs, only researchers with independent sources of funds will be able to publish in these journals. Urging reviewers to consider other research products besides publications, as noted in the RFI, is not a realistic view of how grant review works. Until a shift in what products reviewers value in grant review can be made -- and shown to be made, rather than just "encouraged" -- a limit on APCs will punish researchers from less well-funded institutions and labs by forcing them to forgo high-impact publications.

Lastly, given that peer review is almost entirely uncompensated now, tying allowable publication costs to peer review compensation could create unintended consequences. Just as open access journals were seen as a good thing, but have spawned many questionable "pay-to-publish" journals, allowing higher APCs for journals that compensate peer reviewers could lead to situations (for example) where journals claim to compensate peer reviewers but actually rely on only a small number of people for all reviews, or where some researchers complete many low-quality peer reviews in order to make as much money as possible. Compensating peer review is a good idea, but should be pursued separately from this policy.

Of all the proposals, having a per-publication limit (option 2) is the best idea. Having, instead, an overall limit per grant will contribute to reproducibility issues in science by forcing researchers to focus on a few impactful publications from each grant, rather than publishing less splashy but useful findings. However, the per-publication limit should be based on calculations using the factors above. Few well-regarded journals have open-access APCs below the limits specified.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**
Whether the publication costs are going to a for-profit company or to support a non-profit scientific society.

**5. Other Comments:**
Whether the publication costs are going to a for-profit company or to support a non-profit scientific society.

## 19. Richard K. Miller, PhD

**Submit date:** 7/30/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Richard K. Miller, PhD

**Name of Organization:** University of Rochester

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
First, Thank you for requesting input from the Research Community.

I wish to provide some thoughts on my 50 years of association with NIH.

1. The previous systems seemed to work rather well for NIH, the investigative team and the journals.

A. More than 20 years ago, the authors could publish any where their article passed peer review. We should not comprise this process. There was no a publication cost for the authors but rather a charge for reprints, Institution choose to purchase subscriptions, but no charge to author to publish.

B. As paper copies of journals began to disappear, libraries found that virtual copies were being purchased. The advantage of each institution that the Library would hold the ability for their authors to review the literature through subscriptions. This provides the well of knowledge for all investigators at that institution but not world wide.

C. The previous institutions and their investigators were able to have many publications available probably through purchases via indirect NIH dollars. However,

D. The US Government managed to publish somehighly rated journals that did not require publications fees - e.g., ENVIRONMENTAL HEALTH PERSPECTIVES. However, among the first actions of the new administration was the cancel the journal.

E. Many investigators (especially international or ones on pilot grants) can not afford to publish in journals to have free access. Either they do not pay for free access or publish in a less costly journal.

F. SUGGESTION - The NIH, NSF, EPA, NCI develop a pool of monies distributed to publishing houses to publish the best publications at no cost to the investigative team. Such a model would be applied among all world countries on a percentage basis adjusted yearly base upon publications from those countries. This way the best research would be published and the investigators would not have to bear the cost of publication. Yes, this may create a competitive environment for publications but it already is. New Journals could come on board and after a few years of successful publications be award contracts to publish by this world entity.

**2. Available evidence related to publication costs and proposed options:**
None to share publically

**3. Peer review compensation:**
For so many years, it has been an expectation of peer reviewers to assume the responsibilities for providing reviews. I disagree with the concept of paying for reviews. When a person applies for government funding, the PI and other investigators should list the number of peer reviewed works in specific journals be listed as demonstration of pay back to the research community.

**4. Publishing best practices:**
Best Practices is a tangled network of complications. A few years ago, I submitted a review to a publication, which wrote to me that I had copied some other work in the manuscript. I requested to learn the publication because it would a previous publication of mine. To my surprise it was another international author, who copied my work in a later publication and used it without reference. As the world turns. My article was published.

I do not consider compensating peer reviewers as best practices. This is the give back to the scientific community for the opportunity of the individual to do research.

**5. Other Comments:**
Best Practices is a tangled network of complications. A few years ago, I submitted a review to a publication, which wrote to me that I had copied some other work in the manuscript. I requested to learn the publication because it would a previous publication of mine. To my surprise it was another international author, who copied my work in a later publication and used it without reference. As the world turns. My article was published.

I do not consider compensating peer reviewers as best practices. This is the give back to the scientific community for the opportunity of the individual to do research.

## 20. N/A

**Submit date:** 7/30/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
1

**2. Available evidence related to publication costs and proposed options:**
Author should chose journals that do not require publication fees or APC... There are thousands of them. Publishing with so called elite journals does not make any better impact. While we are struggling to pay our students summer salary which is only less than 10k, how could we allow to pay such high APC for publishing the data produced by the grad students!

**3. Peer review compensation:**
Peer reviewer should be compensated. While publisher making billions from subscription fees, peer reviewer and most cases editors are free labor!!

**4. Publishing best practices:**

**5. Other Comments:**

## 21. Thomas Dowling

**Submit date:** 7/30/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Thomas Dowling

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Organizational Official

**1. Proposed policy options:**
article processing charges (APC) or publications costs should not be allowable expenses on NIH grants.

**2. Available evidence related to publication costs and proposed options:**
article processing charges (APC) or publications costs should not be allowable expenses on NIH grants.

**3. Peer review compensation:**
No compensation for peer review should be allowable.

**4. Publishing best practices:**
article processing charges (APC) or publications costs should not be allowable expenses on NIH grants.

**5. Other Comments:**
article processing charges (APC) or publications costs should not be allowable expenses on NIH grants.

## 22. N/A

**Submit date:** 7/30/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Options 4 and 5 are ideal.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 23. N/A

**Submit date:** 7/30/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:** University of Wyoming

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 1: Disallowing publication costs would cause considerable damage researchers, particularly early stage investigators. Grant reviews, tenure decisions, job applications, and additional opportunities highly depend on the quality of work an investigator puts out. Although preprints have become a valuable tool to disseminate findings, they lack: (1) Expert peer-review (2) ease in reaching a target audience (3) gauging the quality and impact of the work. Although there are issues with the current model, this is an extreme approach with many repercussions.

Option 2: A cap on allowable costs is only reasonable if there is buy in from publishers to cap fees. Otherwise, it widens the gap between senior well funded investigators and damages early stage investigators. Those with more flexible funds will have the resources to still publish in top-tier journals, while newer investigators with less resources are relegated to low-impact obscure journals. It should be noted that new NIH policies have limited cost-effective publication options as some require open-access to forgo embargo. It's unclear if NIH understands that it would be much more cost-effective to allow preprints to count as public domain. Original and corrected manuscripts are still freely available to the public and allows for cheaper publication options.

Option 3: Same comments as Option 2

Option 4: This option would hinder the speed of science. Results are disseminated through publication and by limiting the total funding for publications will encourage researchers to cram more findings into a single paper, which will take more time to disseminate, even if there are timely discoveries. Further, it could also limit the amount of data researchers are willing to share at conferences due to concerns of getting scooped before publications.

Option 5: See option 4.

**2. Available evidence related to publication costs and proposed options:**
It is unclear if NIH considers the direct and indirect impact of rolling out multiple conflicting policies with haste. Recent policies requiring manuscripts to be submitted to PMC has increased publication costs, limited the tier of journals one can 'afford' to publish in due to open access requirements, all while most researchers submit preprints to free open-source repositories. It is difficult to grasp the logic of simultaneously adding unnecessary expenses for researchers, while reducing funding.

Science is a global community and not all of the best-fit and top-tier journals are located in the U.S. Thus, even if U.S. publishers have buy-in, these issues still persist. We recently published in a top-tier

journal and although the entire manuscript was freely available via preprint, we had to pay $3,500 instead of $0 due to open-access requirements for rights to upload to PMC. Tax payers paid $3,500 for material they had free access to.

Although far-fetched, it would be appreciated if NIH could develop consistency among new policies and give broader considerations through a phased in approach instead of haphazardly rushing sweeping changes out. The U.S. is losing its leadership in science, top scientists are leaving the U.S. four better opportunities in foreign nations, less students are considering careers in science, and a large portion of our tax payer funded time is now spent in administrative meetings and performing more administrative tasks, instead of doing the science NIH falsely claims is the rationale for these changes.

If NIH still has top decision makers that actually care about advancing science, then a brief look at the history of what has failed and succeeded in models across the globe could benefit their decision making process.

**3. Peer review compensation:**
I have received a combined compensation of $0 for reviewing manuscripts throughout my career. While appropriately compensating reviewers is a valuable subject, isn't saving tax payer money the focus of solicited input for new policies? The rationale for simultaneously increasing publication costs, decreasing allowable publication expenditures, slashing indirects, while inquiring about compensation for reviewers is above my cognitive abilities. NIH has been effective at decreasing productivity, morale, dissemination of science, while proposing new NIH journals to facilitate political gatekeeping of real science to bolster false narratives and talking points.

A more effective route to NIH's perceived end goal would be to dismantle public funding for science. Then we wouldn't have to publish, peer-review, write grants. This helps the goal of leaving science up to the bias of private industry and our politicians that promote debunked conspiracy theories based on poorly executed pseudoscience. Why drag out the pain and suffering? Just rip the band-aid off already and finish moving all the funds for science, education, and health care to the Department of Defense so we can fight more wars and kill more innocent civilians throughout the globe.

**4. Publishing best practices:**
NIH should shift the burden policy and negotiation from researchers to the publishers. It is essential to have publishers on board if creating policies on publication costs. Without publisher buy-in, NIH is simply punishing researchers instead of focusing on the root problem of excessive publication fees. Us academics don't set the price to publish - that is decided by profit margin goals of private companies.

**5. Other Comments:**
NIH should shift the burden policy and negotiation from researchers to the publishers. It is essential to have publishers on board if creating policies on publication costs. Without publisher buy-in, NIH is simply punishing researchers instead of focusing on the root problem of excessive publication fees. Us academics don't set the price to publish - that is decided by profit margin goals of private companies.

## 24. Catherine Murphy

**Submit date:** 7/30/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Catherine Murphy

**Name of Organization:** University of Illinois Urbana-Champaign

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I would favor your option 4, allowing up to a certain percentage or dollar amount, for publication charges. That way a PI can decide whether they want to spend $12,000 to publish open-access in Nature once, or 4 x $3000 in smaller journals.

**2. Available evidence related to publication costs and proposed options:**
The American Chemical Society's journals are more expensive than your averages; see https://acsopenscience.org/researchers/oa-pricing/.

**3. Peer review compensation:**
In chemistry, I hear zero about compensating peer reviewers. The standing idea has been that as part of a community of researchers, we all have obligations to publish good papers and then peer-review 2-4x as many as we publish so the system works (since the average paper is reviewed by 2-4 peers). But, if everything becomes transactional, then this becomes a mess. The quality of peer review is hugely important, and it is not clear to me how much one should pay a peer reviewer to ensure a high-quality product from them. And, with AI, how can we be sure peer reviewers are really doing the peer reviewing? Many PIs also have their senior grad students and postdocs help them with peer reviewing - how will those junior researchers be compensated, if compensation is on the table? (Some journals allow this, and others do not).

**4. Publishing best practices:**
My default assumption is that journals will charge authors whatever they can get away with. Nature is up to $12,000 or so for an open-access paper. I have been an editor for two different journals, and far more time is spent now by the editors triaging papers; less than half go out for peer review. Science supposedly only sends out 10% of its submitted papers for review. So the charge to authors now bears little resemblance to the actual costs of publishing.

**5. Other Comments:**
My default assumption is that journals will charge authors whatever they can get away with. Nature is up to $12,000 or so for an open-access paper. I have been an editor for two different journals, and far more time is spent now by the editors triaging papers; less than half go out for peer review. Science supposedly only sends out 10% of its submitted papers for review. So the charge to authors now bears little resemblance to the actual costs of publishing.

## 25. Cynthia Monaco

**Submit date:** 7/30/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Cynthia Monaco

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
From my experience, with the move to open access publishing, the cost of publications has increased substantially. My publication costs for my last 4 publications submitted this year have averaged over $4000 (though none over $6000), but significantly more than that reported in this request for information. I would also recommend going back and checking the numbers posted in this request for information, specifically the line "the average reported APC was $2,176.84 ($30.00 to $2,040.00), and the median reported APC was $2,040.00" specifically the, presumably, min and max listed in parentheses since the "max" number listed is less than the "average" reported and much less than amounts I have paid recently for US based open access publishing. Some journals also offer "open access," but this is at a higher cost than their base APC, I recommend making sure this was taken into account and not just the base APC, along with the cost added by color figures which some journals still charge $500 per color figure (average of 5 figures, that increases the cost from the base APC by $2500).

If there are no allowable costs for publication, this would drastically impede my ability to publish as this is not an insubstantial cost, and often there are no other sources that could support it. Preprints are not peer reviewed and therefore have not been scrutinized for reproducibility, accuracy or any other metric important in scientific sharing. Therefore Option 1 is out.

A set limit is also unable to reflect inflation increases in prices, so I would not be in favor of that (options 2-3). The only option that works as a percentage (0.8% or up to $20,000 whichever is greater, OPTION 4 or 5) would be my preference, but the 0.8% figure also seems low (would be $8,000 for a $1 million grant direct cost, or ~2 papers). With the upper limit $20,000 and the reported average 5-7 publications, if these publications averaged $4000 (as mine have), that could be from $20,000-$28,000 at today's publishing prices. Again, I would expect these prices to continue to increase, so the set upper limit of $20,000 may be very low in 5-10 years. Similarly a cap of no more than $6000 seems reasonable now (option 5), but in 10 years will it be? Consider adding in inflation increases/regular review required into the upper limit of Option 4, and that would be my choice.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Peer reviewers aren't compensated in general. Sometimes there are publication offset offers to that journal or a lower impact journal in that journal family. I think a requirement for them to offer that to reviewers would be reasonable. I am concerned that requiring paid compensation for reviewers would

further inflate the price of publication. I agree however, that scientists are being taken advantage of -- high publication costs and no compensation for their valuable time for peer review.

**4. Publishing best practices:**
AI generation detection and fraud detection are important with publication and maintaining the public's trust in published studies.

**5. Other Comments:**
AI generation detection and fraud detection are important with publication and maintaining the public's trust in published studies.

## 26. Erin Cram

**Submit date:** 7/30/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Erin Cram

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I recommend leaving this as flexible as possible, so that PIs can make the appropriate publishing decisions for themselves. This is not something to waste taxpayer dollars and time micromanaging. Publication costs are a product of capitalism. Top journals are very expensive because they are an (artificially) limited resource and under high demand. As long as publishing in prestige journals improves one's chances of grant funding success and promotion and tenure, then PIs are going to push to publish in the best (and often most expensive) journals they can. This is a reality. Putting a limit on publication cost expenditures is not the way to fix this.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
I have never been paid to peer review a journal. It is something I do because I care about science, science communication, and the scientific enterprise.

**4. Publishing best practices:**

**5. Other Comments:**

## 27. Jean Liew

**Submit date:** 7/30/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Jean Liew

**Name of Organization:** Boston University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 3. The benefits of this option are in not limiting the proportion or amount of the award that are budgeted towards publication fees. The number of resulting publications may differ by proposal, and this option allows flexible. This option also seeks to curb the increasing article processing charges from journals, as well as incentivizing them paying reviewers at least an honorarium. Paying reviewers will improve the quality of review as well as the time for reviews to be completely. This would benefit the scientific enterprise.

**2. Available evidence related to publication costs and proposed options:**
I do not have formal evidence but anecdotally, I avoid submitting manuscripts to journals where the article processing charges are over $2000, which is the currently proposed limit in option 3.

**3. Peer review compensation:**
As a peer reviewer, I have only been compensated by The Lancet family of journals, and only on high priority manuscripts for which they request rapid review. The amount was an honorarium and not for an hourly rate, but it was appreciated. As a journal reviewer, I also believe compensation will increase the quality of review and the rapidity that the reviews are returned.

**4. Publishing best practices:**
Journals moving to more lenient formatting for initial submissions may also reduce costs in journal editorial staff. This is another consideration for improving the timeline for manuscript submission to review to decision.

**5. Other Comments:**
Journals moving to more lenient formatting for initial submissions may also reduce costs in journal editorial staff. This is another consideration for improving the timeline for manuscript submission to review to decision.

## 28. N/A

**Submit date:** 7/30/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
For highly regarded, high impact medical journals the prices are often in excess of 2,000-3,000. Therefore, I think a more reasonable limit, if any, would be 5,000. The 6 publication limit (e.g., 30,000) seems reasonable. The NIH should forbid using taxpayer funds in for profit journals not associated with a professional organization. It is ridiculous that as a researcher and taxpayer to spend $4,000 plus overhead for a journal to simply post your PDF online in 2025 after minimal/automated copywriting/etc.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 29. N/A

**Submit date:** 7/30/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 1, to disallow all publication costs on NIH grants would be highly counter-productive, as there is currently not a robust enough and easily searchable collation of open data, therefore, option 1 would make it more difficult for research to be made available to the public and other researchers.

Option 3: Set a limit on allowable costs per publication and allow a higher amount to be paid when peer reviewers are compensated, would be the most impactful for the scientific community, as many reviewers are not be compensated for their work as journal reviewers. This option would pressure journals to begin paying their reviewers ~$50/hr (or ~$300/review), while also keeping the amount of tax payer dollars going to publication fees low.

The other options are fine, but would not have the same impact as Option 3.

**2. Available evidence related to publication costs and proposed options:**
It should be considered that many data repositories are funded by NIH grants, and also come with an associated cost related to the validation of the data and curation of the data. These costs come out to be close to publication costs, so the amount of money spent would be consistent.

**3. Peer review compensation:**
Currently, as a reviewer for various journals, I have only been compensated in vouchers that cover a small amount of the APC for that journal should I choose to submit my next manuscript to them. I have never been financially compensated for a journal review.

**4. Publishing best practices:**
I think this is a good first step.

**5. Other Comments:**
I think this is a good first step.

## 30. Laura Bowering Mullen

**Submit date:** 7/30/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Laura Bowering Mullen

**Name of Organization:** Rutgers University

**Type of Organization:** Academic Institution

**Role:** Other

**Role – Other:** Science Librarian; OA Specialist Emerita

**1. Proposed policy options:**
Make clear at every point that repository deposit if necessary and why when discussing all APC issues. Researchers conflate OA with payment of APCs and it would be so helpful if NIH could continue to emphasize use of the repository ecosystem.

Leverage the Federal Purpose License in order to make publications (and other research outputs) resulting from taxpayer funding freely available (at least to read- if not reuse) to the public that paid for the underlying research. In addition, support universities that have passed university "Harvard style" (and other similar) Open Access Policies that allow authors to retain some rights and disallow signing away all rights in publication agreements with publishers.

Support the use of "Diamond" Open Access options where available (realizing that most often, this option is not available)only for journals listed "without any charges" in the Directory of Open Access Journals (DOAJ). However, state that journal choice is always up to the author/PI. Support authors in their publication journeys while always making clear that research results MUST be available to readers that require the information.

Do not allow ANY funds to support "Hybrid" journals where the publication is supported by subscriptions as universities and others are already paying for the costs of publication and NIH should not! DOAJ does not include hybrid journals, only "fully OA journals." Any hybrid journal must allow NIH published papers to be deposited with zero fee, zero embargo in a publicly available repository (PMC) and ALSO deposited in the author's institutional repository where desired or required by the author.

Allow publication costs for "credible" OA journals (listed in DOAJ) ONLY for fully OA journals where the costs of publication are only monetized by authors paying APCs. Otherwise, quality OA journals could not exist. Use the "reasonable" amount as a guideline and every year, publish the amount considered by NIH to be a "reasonable" APC. Support non-profit OA publishing.

Do not get into the whole calculus involved with where and whether peer reviewers are compensated. The peer review situation is evolving all the time and this caveat about compensation of peer reviewers and keeping track as that evolves will just add administrative burden for NIH.

If NIH decides to mandate that papers are peer reviewed, keep in mind that many papers may be "editorially reviewed" rather that peer reviewed (strictly speaking). If being peer reviewed is a necessity, tell authors/PIs where they can verify that publication status for their article. Even in peer reviewed

journals, some articles are not peer reviewed. This is messy and it is imperative to be specific about how authors can verify this information for their articles. All sources to verify (for instance, Ulrich's) must be free to access and not under library subscription.

Allow all preprint publication since disciplines differ so much on practices. However, identify preprints as such and not as "final publication or "version of record." Accepted Manuscripts publicly available from repositories must be labeled as such with a recommendation (not requirement) to link to any subsequent Version of Record (VoR) Make sure NISO JAV terms such as Version of Record (VoR) and Accepted Manuscript (AM) are part of all metadata. Clear labels as to whether the publication is "final" are needed by the public. NISO JAV new version will be out soon.

Do not disallow book chapters in credible publications from funding assistance as book chapters now represent "article level" scholarship in various disciplines, especially in some fields of social sciences. Fund book chapters as as "articles" where appropriate. However, OA books that present research results (whose publishers charge BPCs) can be awarded the "reasonable" amount that articles get for now, and other funding sources can make up any shortfall in a BPC. OA is also needed for chapters and books that report results from NIH funding. Book chapters may, in time, be included in rules around self-archiving in PMC. I am not sure if this is a current issue but will likely become one.

Be specific about CC licenses allowed and provide quick information for the many authors that are unlikely to know how to compare and contrast the choices that you offer. Consider AI concerns in your directive on licenses, especially CC-BY.

Keep all policies as simple as possible to allow authors to experience less confusion! Have really efficient help/contact options for authors/PIs/universities. Suggest that authors/PIs contact their libraries for assistance also.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
In my opinion, this factor is too messy to be considered at this time.

**4. Publishing best practices:**
NIH can support the repository ecosystem by continually working on, and participating in, all repository efforts at innovation. An example is the USRN (US Repository Network), Invest in Open Infrastructure (IoI), etc. NIH can continue to be a model for excellence in the repository space, saving authors/PIs, taxpayers and NIH itself money in making publications as available to the world as possible. This not only helps the US, but all in the world that need to read (and in some cases, reuse) the results of research. Public access for the world is a laudable goal.

**5. Other Comments:**
NIH can support the repository ecosystem by continually working on, and participating in, all repository efforts at innovation. An example is the USRN (US Repository Network), Invest in Open Infrastructure (IoI), etc. NIH can continue to be a model for excellence in the repository space, saving authors/PIs, taxpayers and NIH itself money in making publications as available to the world as possible. This not only helps the US, but all in the world that need to read (and in some cases, reuse) the results of research. Public access for the world is a laudable goal.

## 31. N/A

**Submit date:** 7/30/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 4 is the best among all the proposed options

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 32. Richard Bowen

**Submit date:** 7/30/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Richard Bowen

**Name of Organization:** Colorado State University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Like all aspects of human behavior, I am confident that there are abuses by some in what they budget to NIH for publication costs. I strongly believe that reasonable publication costs should be supported. If the work NIH supports is not published, it is essentially meaningless and I don't think that is what you want.

**2. Available evidence related to publication costs and proposed options:**
I think the fees associated with publication in PLOS journals are representative of what should be supported by federally-funded awards. Those fees are between $2,400 and $2,600.

**3. Peer review compensation:**
I am an academic editor for PLOS Neglected Tropical Diseases and frequently have difficulty recruiting reviewers for manuscipts - it can be difficult. However, I am strongly opposed to paying referees for reviewing papers - that should be their way of giving back to the scientific community and should not require compensation.

**4. Publishing best practices:**
No comment

**5. Other Comments:**
No comment

## 33. N/A

**Submit date:** 7/30/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 4, Set the limit on the total amount of an award that can be spent on publication costs of $20,000 per award provides the best flexibility and maximizes taxpayer funds in support of research. This permits scientists the opportunity to pay for publications in higher or lower tiered open access journals (i.e. impact factor) and determine the number of publications to target based on the novelty of their findings.

**2. Available evidence related to publication costs and proposed options:**
The past 5 manuscripts my lab has published over the past 6 months ranged in cost from $2,200-$2,700, for an average cost of $2,420/publication, which equals to $12,100 in publications costs for 5 manuscripts. We are in year 3 of a 5 year R01 award and anticipate an additional 4-5 manuscripts from this award. This would equate to an additional $9,680-$12,100 in publication costs for this award. This is a total of $21,780-$24,200 in publication costs for one 5-year NIH award.

**3. Peer review compensation:**
Compensation for the review of manuscripts is an excellent idea, yet should not significantly reduce available funds to publish findings from NIH awards.

**4. Publishing best practices:**
Publication costs continue to rise in spite of increased editorial burden on authors, i.e. journals are requiring authors to manage most of the editorial components on their own. This includes requirements for images, figures, tables, etc.

**5. Other Comments:**
Publication costs continue to rise in spite of increased editorial burden on authors, i.e. journals are requiring authors to manage most of the editorial components on their own. This includes requirements for images, figures, tables, etc.

## 34. Carl Yeoman

**Submit date:** 7/30/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Carl Yeoman

**Name of Organization:** Montana State University

**Type of Organization:** Academic Institution

**Role:** Organizational Official

**1. Proposed policy options:**
Among those provided, I am most in favor of option 3, with the below indicated concerns. I would more favor a model where no funding is provided directly to the PI for publication, but either publications directly resulting from an NIH grant are covered directly by NIH (perhaps up to a limit) or where a sum is provided to the institution with the expectation that the institution covers publication costs.

**2. Available evidence related to publication costs and proposed options:**
In favor of option 3, I would point to the fact that it has become extremely difficult to secure reviewers and the peer review process has slowed significantly.

**3. Peer review compensation:**
I am in favor of incentivizing mass adoption of paid peer reviews, my only concern is that it will either lead to professional reviewers that are not experts in any field and/or lead to AI peer reviews.

**4. Publishing best practices:**
I would love to see a funding model that favors publication in American Science Society journals over off shore, and in particular the slew of predatory journals. This way fraud detection, plagiarism, and the review process could be more easily monitored and validated and money would flow back to these important groups that promote and foster scientific integrity and advancement.

**5. Other Comments:**
I would love to see a funding model that favors publication in American Science Society journals over off shore, and in particular the slew of predatory journals. This way fraud detection, plagiarism, and the review process could be more easily monitored and validated and money would flow back to these important groups that promote and foster scientific integrity and advancement.

## 35. Dr. Oluwatoyin Asojo

**Submit date:** 7/30/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Dr. Oluwatoyin Asojo

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option #5 is the most reasonable, also all NIH funded research should not be behind a pay-wall.

**2. Available evidence related to publication costs and proposed options:**
In my early career, I submitted to JMB and ActaD instead of JBC because of publication costs. The first two were free.

**3. Peer review compensation:**
Peer reviewers are currently uncompensated by top journals, and they should be. Also, all journals should list the scientific editors and reviewers for the manuscripts after acceptance.

**4. Publishing best practices:**
From experience, specialty journals like Acta D are more stringent in terms of data quality, reproducibility, and methodological details than high-impact journals like Nature and Science, which means that there is more room for error. Raw data deposition in NIH-supported repositories, such as the PDB, and sharing clones with repositories within a specified term, as well as general access to cell lines and animals, are important for the reproducibility of research.

NIH-funded scientists should also generate and publish lay summaries that are understandable to someone with a 5th-grade education, thereby minimizing the potential for misinterpretation of their work.

These lay summaries should be accompanied by graphical summaries that outline what was done, why it was done, how it was done, when it was done, and future directions. The roles of all authors and funders should also be clearly delineated.

**5. Other Comments:**
From experience, specialty journals like Acta D are more stringent in terms of data quality, reproducibility, and methodological details than high-impact journals like Nature and Science, which means that there is more room for error. Raw data deposition in NIH-supported repositories, such as the PDB, and sharing clones with repositories within a specified term, as well as general access to cell lines and animals, are important for the reproducibility of research.

NIH-funded scientists should also generate and publish lay summaries that are understandable to someone with a 5th-grade education, thereby minimizing the potential for misinterpretation of their work.

These lay summaries should be accompanied by graphical summaries that outline what was done, why it was done, how it was done, when it was done, and future directions. The roles of all authors and funders should also be clearly delineated.

## 36. Sergey Kryazhimskiy

**Submit date:** 7/30/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Sergey Kryazhimskiy

**Name of Organization:** UC San Diego

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 4 (set a limit on the total amount dedicated to publication costs) is reasonable since it achieves a reasonable balance between several conflicting constraints: (i) the desire of NIH to limit the funds not going directly towards research, (ii) the desire of PIs to publish in more prestigious (hence, more expensive) journals, (iii) promotes open access (which is important for the progress of science).

Problems with other options.

Option 1 will stifle scientific progress by incentivizing NIH-funded PIs to publish only in subscription-based journals. [If the goal is to move to entirely pre-print based ecosystem, it is not achievable in the near future.]

Option 2 will incentivize NIH-funded PIs to publish papers in lower-tier journals (which are cheaper), which will reduce the overall quality of published research and again will slow down progress.

Option 3 has to be avoided no matter what since it has the potential to massively derail the current publication system. See next box for more reasoning.

Option 5 is a slight modification of Option 4, but it is unclear what it aims to achieve. It does not actually change the amount of money that will go toward publications, but put additional unnecessary constraints on the PIs. Furthermore, it is unlikely that it would push publishers to lower their prices. My guess is that its effect will be similar to Option 2, but weaker.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
I think incentivizing the payment of reviewers is a potentially dangerous policy which will likely encourage parasitic behaviors at large scale. For example, it is almost certain that shady companies will form that will hire "professional reviewers" that will take on many review assignments and produce extremely poor quality (most likely AI-assisted) reviews.

**4. Publishing best practices:**

**5. Other Comments:**

## 37. Richard H. Ebright

**Submit date:** 7/30/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Richard H. Ebright

**Name of Organization:** Rutgers University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
My first choice is Option 1. My second choice is option 2.

Either, especially Option 1, would result in the closure of most current journals and end the corrupt current system of science publishing.

**2. Available evidence related to publication costs and proposed options:**
Almost all high-impact journals charge "page fees," "figure fees," and/or "color image fees" of approximately $2,000-4,000 per paper. Publishing an average of 4-6 papers per year in high-impact journals thus results in total publication costs of $8,000-$24,000 annually. None of these "page fees," "figure fees," and "color image fees" is justifiable an era of online journals and online publication. I consider these fees to be exploitative and indefensible..

I do not pay optional "article processing charges" (APCs) for open-access publication. If I did, my total publication costs would be at least two times higher.

**3. Peer review compensation:**
My standard consulting rates are $400/hour for science consulting and $600/hour for science-policy consulting. At these rates, with an average of 1-2 hours per pre-peer review report, each uncompensated peer review report I generate equates to an average of $400-1,200 of uncompensated labor. Preparing uncompensated peer review reports for an average of 10 papers per year thus results in total uncompensated labor of $4,000-12,000 annually. I consider this demand for uncompensated labor to be exploitative and indefensible.

**4. Publishing best practices:**
None. Science publishing companies perform no service that justifies their costs.

**5. Other Comments:**
None. Science publishing companies perform no service that justifies their costs.

## 38. Andrew Belmont

**Submit date:** 7/30/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Andrew Belmont

**Name of Organization:** University of Illinois, Urbana-Champaign

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
NIH so far has identified only the explicit cost of publication fees and the drain on research budgets. But there is also an indirect additional cost of our current scientific publication model that I would argue is a far larger drain on the NIH budget. Namely, this cost is the fraction of a grant budget that is devoted to doing additional experiments that peer reviewers and editors as the gatekeepers for journals require for publication.

I'd say some fraction of experiments done for paper revisions are desirable by responding to logical critiques to obviously strengthen the significance and rigor of the paper conclusions. But a large fraction are not. They are only done to satisfy the concerns of 1-3 individuals that many of the 100s to 1000s of readers of the articles would not have.

I suggest NIH give serious thought and debate to evolving our publication model to a system that would minimize these hidden costs. Because I would estimate very roughly that anywhere from 10% to 25% of a grant budget is consumed doing unnecessary and unproductive/uninformative experiments required for publication acceptance which otherwise would be spent on advancing the research grant aims further by new investigations.

I say this as someone who has frequently had a student or postdoctoral fellow spend anywhere from 6 months to an additional 2 years doing work whose aim is ONLY to satisfy the concerns of one or two reviewers. In my 30+ year experience as a PI, I'd say in retrospect that most of that additional work contributed little and certainly much less than the contribution of new research that could have been started that much earlier.

Putting this in perspective, the typical R01 grant with modular budget supports only 2-3 graduate students. If you translate that to a combined 10 man years effort, if each student spends 6 months on experiments for one paper revision out of their 5 year Ph.D, that is a combined 10% cost of the entire grant budget, assuming 2 students per grant. That increases to 20% of the NIH grant budget for 1 year of additional experiments.

Furthermore, I would provide the history that nearly everyone of the few most highly cited publications of my career required from 1-2.5 years of additional experiments during the paper revision stage.

Thus, this hidden cost of publication is far higher than the explicit cost of publication charges. I would suggest future consideration of encouraging new systems of scientific publication, such as what eLife has been attempting, as a way of more significantly increasing the efficiency of NIH-supported research.

**2. Available evidence related to publication costs and proposed options:**
As a more extreme example, we spent an additional 2.5 years to publish our paper on a new genomics method, TSA-seq. We did additional experiments and analysis for three paper revisions to try to get the paper accepted first at Nature. We then submitted the paper to Cell, which reviewed it, and after that to JCB to publish it using the Cell reviews. The paper was finally published in 2018 and has been cited 421 times (Google Scholar) since.

I'd say revisions in response to one reviewer during the first several months for our first revision significantly improved the final paper and science. Revisions during the next ~2 years produced marginal improvements.

The cost of these additional paper revisions, corresponding to ~1 person's effort over ~2 years would be roughly 1/3 the cost of the grant for two of the 5 years of the grant, which would translate to 2/15th the total budget of the grant more or less (assuming proportional percentage of services and supplies budget).

**3. Peer review compensation:**

I'd argue it would be counterproductive. Paying reviewers would further increase paper costs and thus reduce grant productivity. Moreover, paying reviewers would increase the amount of time NIH PIs spent on grant review which would decrease their productivity. Additionally paying reviewers might actually encourage more reviewing which would further increase page costs and decrease productivity of the PIs.

**4. Publishing best practices:**
As scientists, we have abdicated our responsibility to evaluate new science. Instead we turn it over to the impact factor of journals in which the science is published. This leads to a large fraction of grant costs going to support research for the sake of publishing in a "high-impact" journal rather than to advance scientific knowledge per se.

I suggest looking to other fields such as chemistry and physics that increasingly have gone to a preprint model combined in many cases with lower cost journals for essentially the "revision of record". I'd be interested in the publication model of other fields to see what would be the best practice to maximize scientific progress while minimizing costs.

**5. Other Comments:**
As scientists, we have abdicated our responsibility to evaluate new science. Instead we turn it over to the impact factor of journals in which the science is published. This leads to a large fraction of grant costs going to support research for the sake of publishing in a "high-impact" journal rather than to advance scientific knowledge per se.

I suggest looking to other fields such as chemistry and physics that increasingly have gone to a preprint model combined in many cases with lower cost journals for essentially the "revision of record". I'd be interested in the publication model of other fields to see what would be the best practice to maximize scientific progress while minimizing costs.

## 39. N/A

**Submit date:** 7/31/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
As an early career faculty member, I am in most favor of Option 3 (Set a limit on allowable costs per publication and allow a higher amount to be paid when peer reviewers are compensated) as it places a reasonable cap on APC charge and incentivizes peer review compensation (for which early career faculty members, that are paid lower salary and are building labs, do not get adequately compensated for).

**2. Available evidence related to publication costs and proposed options:**
I am particularly in favor of an APC cap because many journals that are viewed as "top tier" by review committees, including NIH study sections, have exorbitant APCs. In particular, Nature Publication Group.

**3. Peer review compensation:**
The Fast & Fair initiative at Biology Open is particularly compelling and benefits both the reviewers and the researchers submitting manuscripts for review

**4. Publishing best practices:**
Tools to identify use of AI are appreciated.

**5. Other Comments:**
Tools to identify use of AI are appreciated.

## 40. Sarah Keller

**Submit date:** 7/31/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Sarah Keller

**Name of Organization:** University of Washington

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I am in favor of Option 4: Set a limit on the total amount of an award that can be spent on publication costs. Example: NIH awardees may not request more than $20,000.00 from their award or 0.8% of the direct costs of the award, whichever is higher, with no limit on the per publication costs, until the maximum allowable amount is reached.

**2. Available evidence related to publication costs and proposed options:**
I prefer to publish papers that represent a single, long, complete work rather than to "salami slice" my papers into smaller ones. I usually publish in journals associated with non-profit scientific groups (e.g., the Biophysical Journal, run by the Biophysical Society). Their publication charges are usually assessed per page. If the NIH imposed a limit per paper, then I would have to break my long papers into many smaller papers, each of which would have significantly less impact. This would be an inefficient use of time and taxpayer dollars. It would force the end-users who read my papers to have to look up many more papers and possibly to have to pay much higher access fees.

**3. Peer review compensation:**
Unfortunately, I have never been compensated in any way for peer reviewing a manuscript. Moreover, to my knowledge, I do not know anyone else who has been compensated in any way for peer reviewing a manuscript.

**4. Publishing best practices:**
I am in favor of the NIH financially supporting fraud detection. Fraud detection is more efficacious if it is done by a combination of automated and human effort. For more information, see presentations by Dr. Elisabeth Bik.

**5. Other Comments:**
I am in favor of the NIH financially supporting fraud detection. Fraud detection is more efficacious if it is done by a combination of automated and human effort. For more information, see presentations by Dr. Elisabeth Bik.

## 41. N/A

**Submit date:** 7/31/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:** Massachusetts General Hospital

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 6. Leave it as is but require publishers to make papers available immediately without paywall.

If not, option 5.

I do not believe that limiting the allowable costs per publication will help. The literature is full of poor quality publications in part because there are many cheap options to publish. If expensive, PIs may think twice about submitting 20 low quality papers per year because quantity counts more than quality.

Reducing costs will require journals to publish more papers reducing the quality.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Unclear to me. I do a fair amount of peer review and I've never been compensated. It'd be nice to get compensated for my time but I'm not sure compensation will increase the quality of peer review. I suspect that for established experts a small compensation will not make a difference but it may drive young folks to do more peer reviewing. Some young folks can do very good reviews but it may also increase non-experts reviews and lower the quality. Overall, I think it'd be worth trying.

**4. Publishing best practices:**
If the journal has paid scientific editors (as opposed to volunteer professors) they should be able to charge more.

If the journal can demonstrate excellency they should be about to charge more. Not sure how excellency would be measured but it should include: not having retractions, fast handling and publication, knowledgeable editors and reviewers, track record of publishing good papers (based on readers rating) and track record of not rejecting good papers.

**5. Other Comments:**
If the journal has paid scientific editors (as opposed to volunteer professors) they should be able to charge more.

If the journal can demonstrate excellency they should be about to charge more. Not sure how excellency would be measured but it should include: not having retractions, fast handling and publication, knowledgeable editors and reviewers, track record of publishing good papers (based on readers rating) and track record of not rejecting good papers.

## 42. Pasqual Trombetti

**Submit date:** 7/31/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Pasqual Trombetti

**Name of Organization:** University of Oxford

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 1. with following modifications

All costs paid to profit publisher must be immediately abolished.

Elsevier and others must not make money off the work of investigators and government funds.

Academy publishers like PNAS, Science, EMBO should have their APC fully covered.

**2. Available evidence related to publication costs and proposed options:**
https://www.theguardian.com/science/2017/jun/27/profitable-business-scientific-publishing-bad-for-science

**3. Peer review compensation:**
Peer reviews should be compensated with donations to laboratories (3000-5000£ / review) from profit publishers.

**4. Publishing best practices:**
Fraud detection is not the issue. A lot of paper are published containing incorrect information but not fraud. It is necessary to continue with the policies ensuring best practices: sharing all reagents and protocols to ensure accurate reproduction of experimental data.

**5. Other Comments:**
Fraud detection is not the issue. A lot of paper are published containing incorrect information but not fraud. It is necessary to continue with the policies ensuring best practices: sharing all reagents and protocols to ensure accurate reproduction of experimental data.

## 43. N/A

**Submit date:** 7/31/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Not Applicable

**Role:** Member of the Public

**1. Proposed policy options:**
This appears to be yet another attempt by an authoritarian administration to undermine science by promoting pseudoscience. It's deeply concerning to see such a blatant disregard for evidence-based research and academic integrity.

Contrary to the misleading claims being circulated, taxpayer contributions account for less than 1% of the total funding provided through grants for publishing. Once again, we're seeing deliberate misinformation used to justify harmful policies.

**2. Available evidence related to publication costs and proposed options:**
This appears to be yet another attempt by an authoritarian administration to undermine science by promoting pseudoscience. It's deeply concerning to see such a blatant disregard for evidence-based research and academic integrity.

Contrary to the misleading claims being circulated, taxpayer contributions account for less than 1% of the total funding provided through grants for publishing. Once again, we're seeing deliberate misinformation used to justify harmful policies.

**3. Peer review compensation:**
You do not understand peer review

**4. Publishing best practices:**
This appears to be yet another attempt by an authoritarian administration to undermine science by promoting pseudoscience. It's deeply concerning to see such a blatant disregard for evidence-based research and academic integrity.

Contrary to the misleading claims being circulated, taxpayer contributions account for less than 1% of the total funding provided through grants for publishing. Once again, we're seeing deliberate misinformation used to justify harmful policies.

**5. Other Comments:**
This appears to be yet another attempt by an authoritarian administration to undermine science by promoting pseudoscience. It's deeply concerning to see such a blatant disregard for evidence-based research and academic integrity.

Contrary to the misleading claims being circulated, taxpayer contributions account for less than 1% of the total funding provided through grants for publishing. Once again, we're seeing deliberate misinformation used to justify harmful policies.

## 44. Shirley Curtis

**Submit date:** 7/31/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Shirley Curtis

**Name of Organization:**

**Type of Organization:** Non-profit Research Organization

**Role:** Investigator/Researcher

**1. Proposed policy options:**
This seems like a classic way to further control and limit science, and particularly to cripple the high impact journals that have higher average publication costs. If a scientist includes publication fees as part of their grant submission, then it is within their purview to spend that money on whatever journal they are able to publish in. Perhaps the NiH should spend more time curbing junk journals who accept garbage, unfounded pseudoscience

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Peer review has become increasingly burdensome with the expansion of journals and overall submissions. Reviewers have traditionally performed this role as a part od the overall process and as a service to science. Paying reviewers outright would complicate this process and create a pool of "professional" reviewers who may attempt volume for profit with less quality, ultimately diminishing the value of peee review. A small token from a. Publisher could be to offer a discount on future publications in that journal for service.

**4. Publishing best practices:**

**5. Other Comments:**

## 45. Jeff Twiss

**Submit date:** 7/31/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Jeff Twiss

**Name of Organization:** Univ South Carolina

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I am confused. Admittedly, the publishers have an amazing business model -- we pay them to publish a paper, we review for free (because we would like to publish in those journals), and advertisers pay them! Still, peer review for funding expects that we publish in high impact journals that often come with high fees (3-4 times what the mean you calculated -- and notably, I have not paid anywhere close to that mean in many years). Though we are allowed to include pre-prints in grant references and biosketches, those are quickly dismissed by grant reviewers as not having undergone peer review (and sentiment is that likely will not end up in high impact journal). So as a PI, I am stuck -- if I cannot cover page charges for high impact journals, I will not get funded. At the same time, we have funders pushing open publishing models, which bring additional costs!

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Assuming you are indicating paying for peer review of manuscripts -- that will only elevate costs for publication.

**4. Publishing best practices:**
Perhaps your efforts would be better served by negotating lower publication costs with the journals -- NIH has much more weight to do that than individual institutions, which is how it seems to be done now (and not with much luck at my institution).

**5. Other Comments:**
Perhaps your efforts would be better served by negotating lower publication costs with the journals -- NIH has much more weight to do that than individual institutions, which is how it seems to be done now (and not with much luck at my institution).

## 46. Katherine Martucci

**Submit date:** 7/31/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Katherine Martucci

**Name of Organization:** Duke University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I believe Option 2 outlines in the request is ideal.

**2. Available evidence related to publication costs and proposed options:**
$2000 per article limit would help defray costs while not limiting the number of publications paid for

**3. Peer review compensation:**
It is extremely rare to have peer review paid. I have never been compensated and I don't see this becoming common practice to pay reviewers.

**4. Publishing best practices:**
No comment

**5. Other Comments:**
No comment

## 47. Mark Peifer

**Submit date:** 7/31/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Mark Peifer

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I agree that we need to reign in profiteering mega-journals and their obscene APCs. However, in the process, we need to avoid killing the solid, non-profit journals, often run by scientific societies, that are the bedrock of scientific publishing. Publication does cost money, in reasonable staff salaries, proof-reading and site maintenance and long term storage. Force journals to lay out costs per paper, and, like the process with indirect costs, negotiate reasonable prices.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Forcing this will only benefit the mega-journals like Springer-Nature and Elsevier, whose ridiculous profits can cover the costs. Non-profits cannot afford this.

**4. Publishing best practices:**
Once again, make journals account for the costs of each aspect of publication and use comparisons to determine reasonable costs.

**5. Other Comments:**
Once again, make journals account for the costs of each aspect of publication and use comparisons to determine reasonable costs.

## 48. N/A

**Submit date:** 7/31/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I am not against a cap on the total amount of the grant that can go to publishing (Option 4), however as the NIH recently mandated that research paid for with NIH funding must be available immediately upon publication, authors are currently required to pay OA fees for many journals, which becomes quite expensive quickly. I have no other source of funding to pay these fees if I cannot use my grants. Thus, all NIH policies must be considered in whole prior to implementation of a new rule.

**2. Available evidence related to publication costs and proposed options:**
Regarding the averages noted, these take into account all possible points of publication, however, it's well known that there are many predatory journals and most high tier journals have much higher OA costs than noted. If those with NIH funding want their research to be well regarded, read, and shared for the good of public knowledge, data used to set any budgetary limits should be inclusive of good quality journals.

**3. Peer review compensation:**

**4. Publishing best practices:**
As funders and journals move towards requiring data be shared, it's important to keep funding limits for publishing separate from data repository limits

**5. Other Comments:**
As funders and journals move towards requiring data be shared, it's important to keep funding limits for publishing separate from data repository limits

## 49. Kristen Naegle

**Submit date:** 7/31/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Kristen Naegle

**Name of Organization:** University of Virginia

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I foresee a serious issue in limiting APC coverage without interacting with journals and publishers. Limiting costs to NIH without a decrease in costs charged by the journals will result in a serious bias towards well funded institutional and private institution investigators publishing in what are sometimes considered "higher" prestige journals since they will have the money necessary to pay beyond what the institution allows.

I do believe that the entire industry needs to consider a cap on what is reasonable and that the NIH has an important role in influencing this since much of the publishing world depends on NIH-funded research.

Based on comments in #2, my advice is to be reconsider the new NIH mandate that does not allow an embargo period and instead allows and encourages pre-prints to be connected in the meantime by authors (as updated that match peer review). The requirement to make work available immediately and this policy to control costs of publishing are at complete odds with each other. On the one hand NIH is stating they would like taxpayer money to be limited in not being spent on absurd publication costs, but on the other are forcing researchers into spending even more absurd costs than necessary for immediate open access, diminishing the publication buying power of publication costs by 75 to 90%.

**2. Available evidence related to publication costs and proposed options:**
Here is a current example, especially as it relates to another new policy at the NIH related to no embargo period.

My lab has a paper that has been in peer review for 2 years with imminent acceptance (we are waiting on the editor to go through editorial review). My lab always provides papers that match our peer reviewed paper on BioRxiv. Hence, to save money on publication, we never select the OA option, knowing that our work is available even during an embargo period. In this journal, that APC is $1500. However, now without allowing an embargo or the BioRxiv (preprint) to stand as a record of note, that is $5,450, costing the taxpayer and the grant (diminishing the overall science we can do) by $4,000. That $4,000 could have covered an additional 3 papers at the non-OA fees - so that is only 25% of the publishing power. This is at a journal with what I consider relatively reasonable publication charges. A place like nature communications as a fee of $7,000.

In another recent paper from my lab, by choosing one year embargo (and a current record available in BioRxiv), we paid no charges. That same journal would charge us $9,340 to have published without the embargo period.

**3. Peer review compensation:**
In my 15 years as a PI, I have never been compensated as a peer reviewer. I've served two years as an editor and one of the hardest issues is recruiting enough reviewers for works. Improving the ecosystem for compensation would significantly improve the uptake of peer reviewers. NIH would have to consider how to enforce transparency that if a journal was charging more because they compensate peer reviewers than it would be universal and all peer reviewers were compensated (i.e. instead of editors providing "reviewer service" and pocketing the extra money).

Here are some issues though in thinking about a flat fee that is allowable:

- Some papers go out for peer review many times (e.g. a major revision and two minor revisions can occur before acceptance).

- Sometimes reviewers are unable to take part in the reviews on revisions, that means recruiting another reviewer

- By a flat fee and creating reviewer compensation, it might encourage editors to have 2 instead of 3 peer reviewers and it would disincentivize more than 3 reviewers for sure.

- How would one consider the quality of peer review? As an editor I've had peer reviews that I've had to disregard since it's clear they did not have the expertise or the ability to provide a good review. Would I have to compensate them?

- Journals would send out fewer papers to peer review they might deem risky if they are forced to pay peer reviewers, but only recover the charges for manuscripts accepted and published. Conversely, they might push through publications in order to collect the fees to be able to compensate reviewers.

**4. Publishing best practices:**

**5. Other Comments:**

## 50. N/A

**Submit date:** 7/31/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Part of the research cycle is presenting the findings of our work back to the taxpaying public. I don't agree necessarily that these funds are not being wisely spent. Publishing does cost money, and is providing a service that is essential for the dissemination of our research back to the taxpayers. I think it is appropriate to use some amount of award funds towards publishing. It is not clear who would pay for these things otherwise. At the same time, I think the Open Access fees for some journals have become excessive and this might help provide some pressure on the publishers to set more reasonable costs. If fees were capped at $2000, I would probably not be able to publish in any of the journals I normally do. most of their fees are higher than that cap. I also need to publish more frequently, at my career stage. This low of a cap would cause problems for my career trajectory.

**2. Available evidence related to publication costs and proposed options:**
The last journal I published in cost ~USD $3550 to publish Open Access, which is required for NIH funded research. We published 2 papers that year.

**3. Peer review compensation:**
I have never in my career seen a journal that compensates its peer reviewers.

**4. Publishing best practices:**

**5. Other Comments:**

## 51. N/A

**Submit date:** 7/31/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Institutional Information Sciences Professional/Librarian

**1. Proposed policy options:**

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Although the idea of compensating reviewers for their work is a good one, I suspect that if this were to happen publishers would begin to argue that the ~2000 USD APC they presently charge is insufficient for covering the new additional expense of tracking the payment to reviewers. The APC cost could continue to increase not just to include reviewer compensation, but also to support additional "administrative fees".

**4. Publishing best practices:**
Best publishing practices, especially for taxpayer-funded research that reaches publication via publisher APCs, should be coupled to immediate open access. ESPECIALLY when considering allowable APC costs approaching 10,000 usd per publication.

**5. Other Comments:**
Best publishing practices, especially for taxpayer-funded research that reaches publication via publisher APCs, should be coupled to immediate open access. ESPECIALLY when considering allowable APC costs approaching 10,000 usd per publication.

## 52. Kuan-lin Huang

**Submit date:** 7/31/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Kuan-lin Huang

**Name of Organization:** Icahn School of Medicine at Mount Sinai

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
(1) Working with and regulating journals--Cost-transparency first, then caps. (In conjunction with Options 1-5 in the RFI)

Require itemized, machine-readable invoices at the article level (DOI, journal/ROR, breakdown: editorial triage, peer review management, production, integrity checks, platform, overhead) as a condition of allowability. Use those data to set field-adjusted caps (e.g., by NIH activity code, journal model, and service bundle) and to revise caps annually. Alternatively and simplistically, a cap can be determined by the top 20% low-cost journals for a given publisher, considering that the publisher still has sufficient margin for those journals and basically delivers the same product. That pricing for Elsevier, for example, has an Open Access APC of $2070 USD, compared to the $11,400 charged by their premium journal Cell.

Service-tiered reimbursement.

Define reimbursable “publishing service packages” (e.g., Core: editorial management + typesetting + indexing; Enhanced: + open peer review + integrity checks + data/code curation; Premium: + statistical audit + image forensics). Reimburse only for verifiably delivered services documented on the invoice.

Model-aware pricing rules.

a) Hybrid journals: require price parity with fully OA journals for equivalent services and prohibit “double-dipping” (subscription + high APC) unless a transparent offset is shown on the invoice;

b) Diamond/community OA: permit direct support (below) in lieu of per-article APCs;

c) Transformative agreements: allow only if the publisher provides article-level cost disclosure and NIH authors’ APCs are ≤ NIH caps.

Direct support for community infrastructure.

Allow a portion of publication funds to flow to open infrastructure that reduces per-article costs and improves integrity (Crossref/DOAJ/ORCID/OpenAlex/Retraction Watch DB, image-forensics tools, data repositories). Tie eligibility to open governance and public APIs.

Time-to-public-access guarantees.

Tie allowability to immediate OA and deposit of the VoR or AAM to PubMed Central within a fixed window (e.g., ≤14 days post-acceptance), with penalties for noncompliance.

2. Working through NIH: Grant proposal-connected preprint reviews.

NIH has a unique opportunity to leverage its already-established grant review mechanisms. Here I propose a method to kill two birds in one stone to enhance both paper & grant review:

(1) Applicants should submit preliminary data as 1-3 most relevant, unpublished preprint (arXiv, bioRxiv, medRxiv)

(2) Reviewers review preliminary data preprints & provide detailed reviews on the paper as an NIH paid service, which can lead to the preprint's certified review by NIH (can replace journal prestige)

(3) The same reviewers then review the grant proposal; this review will also be higher quality

**2. Available evidence related to publication costs and proposed options:**
APC levels (observational data).

OpenAPC reports mean APCs ≈ €1.8k–€2.7k depending on cohort; recent snapshots show averages around €2.0k–€2.7k, highlighting wide dispersion by publisher and model. These public datasets can seed NIH's cost models and percentile-based caps.

openapc.net

http://mendelity.com/ (disclaimer, I built and maintain this website)

Hybrid APCs are consistently higher.

A 2024 analysis estimating APCs paid to six major publishers found median APCs paid per hybrid article in the ~$3.5–$4.0k range, higher than fully OA medians—evidence to justify stricter hybrid caps or parity rules. https://arxiv.org/pdf/2407.16551

Publisher profitability indicates headroom for efficiency.

RELX (Elsevier's parent) reported 2024 adjusted operating profit of ~£3.2B, with the Scientific, Technical & Medical segment contributing materially; press and investor reports note continued margin expansion. This supports negotiating caps without risking solvency of the largest vendors.

relx.com

https://www.thetimes.com/business-money/companies/article/relx-profit-rises-11-percent-as-ai-and-live-events-boost-business-h3x8tqjkr?utm_source=chatgpt.com&region=global

Diamond OA cost benchmarks.

The OA Diamond Journals Study and follow-ups indicate very low median per-article operating costs (≈$200, many journals <€10k annual costs), implying that modest direct infrastructure support can replace high APCs for some fields.

coalition-s.org

**3. Peer review compensation:**
Pay for verified effort and quality, not outcomes.

Compensate per review completed and verified (ORCID-linked, timestamped), with modest add-ons for methods/statistical or data/code reviews. Prohibit any “pay on acceptance” incentive that could bias decisions.

Quality signals and audits.

Require journals to collect reviewer-quality feedback (editor/author rubrics), maintain conflict-of-interest declarations, and spot-audit a sample of paid reviews for depth and correctness.

Multiple payment routes, including marketplaces.

Permit payments via:

(a) the journal (likely NOT unless they agree with all other items above);

(b) certified third-party review platforms with escrow (happy to help build this); or

(c) NIH. NIH has a unique angle as described in "Working through NIH" point in Response to 1. This enables competition on efficiency and quality while ensuring auditability.

**4. Publishing best practices:**
NIH could declare the following practices eligible for enhanced caps only if journals submit machine-readable logs proving they occurred for the specific article:

Automated integrity checks with human verification.

a) Image-forensics screening (e.g., duplication/manipulation),

b) text similarity/plagiarism,

c) reference integrity checks,

d) statistics anomaly screens (e.g., p-hacking flags),

e) papermill pattern detection. Provide the tools used, versions, thresholds, and pass/fail results per article. (Aligns with rising retraction/papermill trends.)

Reproducibility services.

a) Mandatory data/code availability with persistent identifiers (DOI-minted archive),

b) environment capture (e.g., containers),

c) independent code run-through for computational papers,

d) data-use compliance checks (IRB/DUA). Journals can claim the Enhanced tier only when artifacts are verified accessible and runnable.

Open peer review / publish reviews.

Publishing the named reviews, decision letters, and author responses; assigning DOIs to reviews; linking all to ORCID. This confers public value and should qualify for a higher tier.

Persistent contributor & venue identities.

Require ORCID, ROR (institutions/journals), CRediT roles, funder IDs, and grant numbers in machine-readable metadata; Crossref updates within 72 hours of acceptance.

Ethics and transparency.

a) Full COI reporting and data-availability statements;

b) AI-use disclosures for authors and editorial offices;

c) clinical trial registration and data-sharing plan checks where applicable.

Turnaround SLAs.

Allow modest surcharges for journals that maintain publicly audited service-level commitments (e.g., median time to first decision ≤ 21 days; accept-to-publication ≤ 14 days) and meet integrity and openness criteria above.

**5. Other Comments:**
NIH could declare the following practices eligible for enhanced caps only if journals submit machine-readable logs proving they occurred for the specific article:

Automated integrity checks with human verification.

a) Image-forensics screening (e.g., duplication/manipulation),

b) text similarity/plagiarism,

c) reference integrity checks,

d) statistics anomaly screens (e.g., p-hacking flags),

e) papermill pattern detection. Provide the tools used, versions, thresholds, and pass/fail results per article. (Aligns with rising retraction/papermill trends.)

Reproducibility services.

a) Mandatory data/code availability with persistent identifiers (DOI-minted archive),

b) environment capture (e.g., containers),

c) independent code run-through for computational papers,

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Publishing the named reviews, decision letters, and author responses; assigning DOIs to reviews; linking all to ORCID. This confers public value and should qualify for a higher tier.

Persistent contributor & venue identities.

Require ORCID, ROR (institutions/journals), CRediT roles, funder IDs, and grant numbers in machine-readable metadata; Crossref updates within 72 hours of acceptance.

Ethics and transparency.

a) Full COI reporting and data-availability statements;

b) AI-use disclosures for authors and editorial offices;

c) clinical trial registration and data-sharing plan checks where applicable.

Turnaround SLAs.

Allow modest surcharges for journals that maintain publicly audited service-level commitments (e.g., median time to first decision ≤ 21 days; accept-to-publication ≤ 14 days) and meet integrity and openness criteria above.

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/article-publishing-charge_ELSEVIER.pdf

## 53. jen gewandter

**Submit date:** 7/31/2025

**I am responding to this RFI:** On behalf of myself

**Name:** jen gewandter

**Name of Organization:** University of Rochester Medical Center

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
i prefer option 3. it puts a reasonable limit on per article cost and requires the investigators to give a reasonable estimate of the number of publications that they will produce from a single grant.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
There are many peer-review journals that are free to publish in and then the article can be deposited on pubmed central so it will be accessible by everyone. Hopefully, the research performed by NIH-sponsored grants is of sufficient quality that the main publications that come from it will be publishable in peer-reviewed journals that do not require a fee so not all publications from a grant require funds to publish. I usually estimate about 3 publications per grant that will require funds and use the fee of $3000/article because the open access articles that i would want to publish are about that much. One thing i would think about in your analysis is whether you have taken into consideration the quality of the journal when figuring out the average fee. I would want to exclude low-quality predatory journals.

**4. Publishing best practices:**

**5. Other Comments:**

## 54. Russell Van Gelder

**Submit date:** 7/31/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Russell Van Gelder

**Name of Organization:** University of Washington

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Agreed

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Paying for peer review, while simultaneously capping publication fees, will put severe pressure on publishing industry and ultimately reduce outlets for publication. This will add ~$1B to research costs while not demonstrably improving quality. Frankly, it would be better to consider implementation of AI for review as a means to provide better access to higher quality reviews.

**4. Publishing best practices:**
We need tools to detect AI-generated papers with accuracy. Use of watermarks for AI-generated content would help in this regard.

**5. Other Comments:**
We need tools to detect AI-generated papers with accuracy. Use of watermarks for AI-generated content would help in this regard.

## 55. N/A

**Submit date:** 7/31/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Non-profit Research Organization

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I think it would be reasonable if the NIH capped the total amount that can be spent on publications from any award to 0.03% of the direct costs of the award, without the additional $20,000 cap. Investigators should then be able to spend the 0.03% of the award on publications flexibly in any of the award years. So, for example, for a modular 5-year R01 with a direct cost budget of $250,000/year, the PI would have $37,500 to spend on publications, which s/he could spend as $7,500 per year, $37,500 in Year 05, or any other allocation across years.

**2. Available evidence related to publication costs and proposed options:**
My recommendations are based on my own efforts to publish most of my work in open access journals and the fact that such costs have continually increased. Instead of "squeezing" the investigators and applicant institutions, the NIH should lean hard on publishers to lower their fees.

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 56. N/A

**Submit date:** 7/31/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 1: I am against this. Peer-review adds value, so does formatting and copy-editing. It is fair that a publisher gets paid for adding this value.

Option 2: Yes, this is OK. Perhaps this number could vary depending on whether the journal has high or low subscription costs. For journals with low subscription or open access one could consider $ 2500.

Option 3: No. The cost of administrating payments is too much of a burden to publisher. See comment below.

Option 4: No, this penalizes more productive scientists and favors researchers who have other funds (like HHMI or private well-endowed universities or research institutions).

Option 5: No, This penalizes more productive scientists.

**2. Available evidence related to publication costs and proposed options:**
I have been publishing papers for 40 years.

Thirty or forty years ago, most of the professional society journals used to have "page" charges and charged extra for color or half-tones. These costs were reasonable and appeared fair in the sense that increased production costs translated to increased charge to the authors. The professional societies were non-profits. It used to cost between 1500$ to 2000$. Surprisingly, 30-40 years later, most of the professional society journals still have reasonable APCs and charges have not gone up with inflation even though the product is significantly improved, presumably because of technological capabilities that allowed economies to be implemented in the publishing industry. Also, APCs replaced the previous page and production charges. This model seems reasonable to me. In general, professional society journals also had reasonable subscription rates. Therefore, the model of 2,000$ per article or 3,000$ if reviewers are paid seems reasonable.

Another basis for considering reasonable APCs can be offered by the Proc. Natl. Acad. Sci. USA, another non-profit enterprise, which by charter is not allowed to make a profit (or loss). They must break even. They publish papers in all types of science and engineering. The APCs are around $ 2500. They use volunteer editors (who are members of the National Academy of Sciences). If this journal can break even at $ 2500, then the NIH model of 2,000 to 3,000$ (with paid reviewers) seems to be in the right range.

I am against the substantial APCs from commercial publishers like Elsevier and Nature/Springer especially for their "high value" journals like the Nature "brand". The push for open access and the

European Plan S has these publishers rubbing their hands with glee. Now they can justify exorbitant open access fees so that authors (or the NIH grants) have to pay between 5000$ and 12000$ to publish in some of those journals. Ouch! How can they justify that? Huge profits. On top of that their subscriptions are very very highly priced. I believe the University of California pays over 10 million a year to read Elsevier journals. (Can the NIH get numbers for how much each university system is paying Elsevier? one publisher!) How much does a download of a PNAS paper cost the University of California compared to the download of an Elsevier paper? This can be calculated based on subscription fee divided by downloads. This will give us an idea of profit margin. The institutions are paying for publishing and paying again to read what they publish.

**3. Peer review compensation:**
I am against paying reviewers because it adds administrative burden and cost to the publisher. Reviewers come from all over the world. Each country has its own tax code and the publisher will have to comply with reporting requirements. There can be hundreds and even thousands of reviewers per publisher and so the publisher will have to deal with administration of potentially thousands of contractors in many countries. Not practical.

It can take me much more than 6h (counting re-review) to review a paper if I really want to do it well and offer constructive feedback. One has to read, analyze and then construct a written document. Then i have to read the author's response and re-review and re-write. Multiply that by 2 to 3 reviewers per paper and not to mention the editor's time. The NIH estimate of 6h per paper is an unreasonably low value.

I often ask my co-workers to also read and comment on the paper (with the permission of the journal), so how do we account for junior co-worker time and how might they be compensated. I am seeing considerable complexity for paying reviewers.

As an editor, I can say that the quality of reviews is quite varied. A fixed reviewer fee is then meaningless for a reviewer who devotes a lot of time and writes a valuable review vs. one who agrees to review in order to get compensated and simply says "This work is great, publish immediately."

**4. Publishing best practices:**
Option 2 is fine, don't open the door to allow big commercial publishers to make us pay for their bells and whistles.

**5. Other Comments:**
Option 2 is fine, don't open the door to allow big commercial publishers to make us pay for their bells and whistles.

## 57. Björn Brembs

**Submit date:** 7/31/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Björn Brembs

**Name of Organization:** University of Regensburg

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I suggest option #1:

Option 1: Disallow all publication costs. NIH could no longer support publication costs through any funding mechanism. Some private funders have disallowed costs for peer-reviewed publications as they seek to place increased value on preprints.

**2. Available evidence related to publication costs and proposed options:**
Evidence #1: corporate publishing is not cost effective

Corporate publishers parasitize the public purse by charging on the order of 5-10 times their production costs:

https://f1000research.com/articles/10-20/v2

Decentralized, digital solutions stand to save about 90% of current publishing payments.

Evidence #2: corporate publishing promotes unreliable science

The more the prestige of a corporate journal, the lower the reliability of the research published there:

https://www.frontiersin.org/journals/human-neuroscience/articles/10.3389/fnhum.2018.00037/full

https://www.frontiersin.org/journals/human-neuroscience/articles/10.3389/fnhum.2013.00291/full

Without funding, these journals would have to close, removing the prime source of unreliable science.

Executive summary: by withholding federal funding for publications costs, the NIH could hit two birds with the same stone: save funds and quell a source of unreliable science.

**3. Peer review compensation:**
https://bjoern.brembs.net/2016/07/peer-review-is-not-free-its-a-subsidy-for-publishers/

https://bjoern.brembs.net/2023/02/how-about-paying-extra-for-peer-review/

**4. Publishing best practices:**
Experts agree that the journals have to be replaced with modern technology, so a stop in funding publication costs would be a highly evidence-based decision:

https://royalsocietypublishing.org/doi/10.1098/rsos.230206

Instead, the NIH should cooperate with other stakeholders, e.g., the EU for a replacement infrastructure. In this example, the NIH's PubMed and the EU's ORE could form a nucleation point for a decentralized infrastructure that eventually is funded entirely by institutions with no federal funds at all. Following this trajectory, the NIH would eventually only fund reliable research without any other costs.

**5. Other Comments:**
Experts agree that the journals have to be replaced with modern technology, so a stop in funding publication costs would be a highly evidence-based decision:

https://royalsocietypublishing.org/doi/10.1098/rsos.230206

Instead, the NIH should cooperate with other stakeholders, e.g., the EU for a replacement infrastructure. In this example, the NIH's PubMed and the EU's ORE could form a nucleation point for a decentralized infrastructure that eventually is funded entirely by institutions with no federal funds at all. Following this trajectory, the NIH would eventually only fund reliable research without any other costs.

## 58. Dan Arking

**Submit date:** 7/31/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Dan Arking

**Name of Organization:** Johns Hopkins University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 5 represents a reasonable approach to managing publication costs within NIH grants. It balances the need for researchers to publish their work in a landscape that often incurs significant fees for publishing in appropriate specialty journals, while also maintaining a fiscal responsibility that protects taxpayer investments in science. By limiting both the total allowable expenses and the per-publication costs, NIH can foster an environment that prioritizes research output while ensuring efficient use of resources.

**2. Available evidence related to publication costs and proposed options:**
Journals I publish in typically charge as much as $7000 for open access publication (e.g., Nature / Springer publishing group), which is required to be compliant with new NIH policies.

**3. Peer review compensation:**
I would be in favor of pushing towards peer review compensation for journals that charge high publication fees. My preference would to just have journals lower fees, and not compensate reviewers.

**4. Publishing best practices:**

**5. Other Comments:**

## 59. N/A

**Submit date:** 7/31/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Set a limit on allowable costs per publication and allow a higher amount to be paid when peer reviewers are compensated

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 60. Yamini Dalal

**Submit date:** 7/31/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Yamini Dalal

**Name of Organization:**

**Type of Organization:** Non-profit Research Organization

**Role:** Investigator/Researcher

**1. Proposed policy options:**
There is no justification whatsoever for 5000-13,000$ APCs to publish open access papers. Notably, the scientific work is done by the scientists at all levels (authors, reviewers, and in many cases volunteer editors), most of whom are funded by taxpayers and charitable foundations of various countries.

Scientific discoveries supported by the pubic domain should be available immediately for the public to read, analyze and build upon.

In the era of free preprint servers, such APCs would appear simply to serve the bottom-line of for-profit publishing companies rather than the public good.

**2. Available evidence related to publication costs and proposed options:**
My lab and I have published ~65 papers cumulatively over a 20 odd year span. Each paper costs us between 2500-13,000$. That's a sum total of nearly quarter of a million US dollars that I could use those precious funds towards my science. Critically during budget shortfalls, such funds can be used for innovative and cutting edge experiments; to maintain and expand technology and tools in aging infrastructure of most universities and research institutes; and most importantly- support outstanding young scientists, who are the future of biomedicine. It is galling to spend an average of 4000$ for papers that are already out on pre-print servers. While paying a modest APC was understandable in the pre-electronic era, as it supported the actual cost of type-setting, publishing and sending paper copies to universities, it is definitely inexplicable in the modern era where almost everyone reads papers on computers, phones or tablets, and most type-setting could probably be done using templates and automated processes. It is also not ok when APCs are now approaching 3 times the average monthly mortgage just to publish a single paper.

**3. Peer review compensation:**
Publishers have long benefited from somewhat of a pyramid scheme where everyone who actually does the science, is paying them in one way or another, while the journals main job is to act as a middleman in the modern scientific enterprise. Experts who evaluate scientific progress should be adequately and fairly compensated for their time and expertise.

**4. Publishing best practices:**
Fraud detection is available widely as freeware developed by universities; and smaller society journals use these quite effectively without charging huge APCs.

Therefore, it is hard to imagine why each paper needs to be charged a huge APC only by specific publishers for what has now a routine task. Furthermore, the real problem is not the small amount of peer reviewed papers that contain fraud- these will be inevitably be corrected by lack of reproducibility. The biggest issue is paper mills who actively game the current system. These will not be resolved by fraud detection- the incentive structure for publishing is the main driver of the major source of bogus science found in those predatory journals. This will require more serious public policy debate how to dissuade such bad actors.

**5. Other Comments:**

Fraud detection is available widely as freeware developed by universities; and smaller society journals use these quite effectively without charging huge APCs.

Therefore, it is hard to imagine why each paper needs to be charged a huge APC only by specific publishers for what has now a routine task. Furthermore, the real problem is not the small amount of peer reviewed papers that contain fraud- these will be inevitably be corrected by lack of reproducibility. The biggest issue is paper mills who actively game the current system. These will not be resolved by fraud detection- the incentive structure for publishing is the main driver of the major source of bogus science found in those predatory journals. This will require more serious public policy debate how to dissuade such bad actors.

## 61. Matthew Garth Brewer

**Submit date:** 7/31/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Matthew Garth Brewer

**Name of Organization:** University of Rochester

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
From my publishing history article charges and fees end up costing between 3-5K (impact factor ~5-10 journals), so in my opinion Option number 4 seems the most fair and will allow for a substantial number of publications (4-6)

**2. Available evidence related to publication costs and proposed options:**
Recently published in JID (journal of investigative dermatology) and the APC was 2600 and the page cost was 900. So that falls within the range of what I would anticipate is fair for a publication in a decent impact factor (6.5).

**3. Peer review compensation:**
I have never been paid for my peer reviews and have reviewed for a plethora of journals. In my opinion as a scientist this is your duty to make sure science is being done correctly, whether compensated or not.

**4. Publishing best practices:**
There clearly needs to be some type of AI screening. Since the NIH just put in place limits on grant submissions because of AI considerations the same thing will hold true for manuscripts.

**5. Other Comments:**
There clearly needs to be some type of AI screening. Since the NIH just put in place limits on grant submissions because of AI considerations the same thing will hold true for manuscripts.

## 62. Roman Eliseev

**Submit date:** 7/31/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Roman Eliseev

**Name of Organization:** University of Rochester

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Set a limit of 2200 USD per publication per year and a maximum of 6600 (3 publications per year) based on the average for US published journals' APC of 2,177.

**2. Available evidence related to publication costs and proposed options:**
In my experience with publishing in US-based journals, 2200 USD will cover the majority of US and European journals with high impact factors. The limit will discourage US researchers from publishing in obscure international journals that have very lenient acceptance criteria in exchange for exuberant publication costs

**3. Peer review compensation:**
My opinion is that peer review should not be compensated

**4. Publishing best practices:**
no opinion

**5. Other Comments:**
no opinion

## 63. Olivia Lanier

**Submit date:** 7/31/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Olivia Lanier

**Name of Organization:** University of New Mexico

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Disallow publication costs or cap at $1000 or below. Reviewers should also be paid a small stipend for their time.

**2. Available evidence related to publication costs and proposed options:**
The journals have charged me more than $2000 to publish with them, even though they also require paid subscriptions from universities or individuals. They also have never paid me for doing a review and I have done more than 20, where each one takes at least 4 hours to do a reasonable job.

**3. Peer review compensation:**
It takes a lot of time to do a good review so I often decline unless it is a paper I am very interested in. I have also gotten reviews back that were not good, leading me to believe people don't spend much effort. It could be a paid review based on if the editor believes it took effort or not for the reviewer to complete it.

**4. Publishing best practices:**
They can get this money from the subscribers who read the journal, or they can post it with ads like instagram. Researchers who spend a lot of time and money to complete their article and research should not have to pay the journal to publish it, especially given that the articles give the journal all of their business.

**5. Other Comments:**
They can get this money from the subscribers who read the journal, or they can post it with ads like instagram. Researchers who spend a lot of time and money to complete their article and research should not have to pay the journal to publish it, especially given that the articles give the journal all of their business.

## 64. N/A

**Submit date:** 7/31/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Other

**Type of Organization - Other:** Consulting Organization

**Role:** Organizational Official

**1. Proposed policy options:**
Thank you for considering this issue. Investigators use funding from grants and OTs as a source to apay salaries for team members AND for journal costs. I strongly encourage NIH to consider an incentive system for journal submissions. This might include:

1. For low impact journals perhaps the investigator is provided with 25% of the publishing fees; for high impact journals the investigator is provided with 100% of the publishing fees.

2. Limit the number of article submissions that will be funded through a grant / OT

3. Ensure that the key papers from the grant / OT including methods, biomarker, and results and published within reasonable time after award or they do not receive any funding for publications. For example, a methods paper should be published within 1 year, etc.

Using some of these metrics for publication funding will improve the efficiency of sharing research results, rather than keeping results locked away.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
No, in most cases there is no compensation. Moreover, NIH employees are in many cases prohibited by leadership from participating or being remunerated for such activities.

**4. Publishing best practices:**

**5. Other Comments:**

## 65. Daniel Sloan

**Submit date:** 7/31/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Daniel Sloan

**Name of Organization:** Colorado State University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
One element that does not appear to be considered amongst the current options is variation among journals/publishers with respect to their operational model and for-profit status. There are some journals/publishers that operate in quasi-predatory space with very high profit margins from APCs, investing little in peer review, editorial improvements, or formatting of the final publication. The family of MDPI journals would be an example. Other journals/publishers operate in a non-profit fashion, using the publication charges to improve the scientific quality/rigor of publications and to reinvest back into the scientific community. I support limits on publications fees for NIH-funded research, but I feel that those limits should be more stringent for publications in journals run by for-profit publishers.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 66. N/A

**Submit date:** 7/31/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Other

**Role – Other:** Grants Manager

**1. Proposed policy options:**
What a journal charges for a publication is not something researchers can control and there are many institutions who do not have alternative funding available to cover publication expenses. Applying a cap to the amount of funds that can be spent on the publication of research supported by NIH funding would prevent many researchers from being able to disseminate important scientific discoveries to the public, which would in turn slow the progress of scientific discovery as sharing scientific findings is a critical aspect of advancing knowledge. Researchers build upon the work of prior studies which they cannot do if those findings are not made public. As such, being able to publish research funded by taxpayer funds are not only expenses in direct support of grant-funded research, but are arguably among the most important expenses for a grant to cover. No cap on publication expenses that can be charged to NIH funded research should be implemented.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 67. Juan Aguilera

**Submit date:** 7/31/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Juan Aguilera

**Name of Organization:** UTHealth Hosuton

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
In response to the proposed policy options, I support Option 3, which sets a reasonable cap on allowable costs per publication while permitting higher costs in cases where peer reviewers are compensated. This option strikes a pragmatic balance between fiscal responsibility and academic integrity. It acknowledges the growing burden placed on peer reviewers—many of whom contribute their time without compensation while journals profit from their labor—and offers a mechanism to account for quality-enhancing practices. By formally recognizing peer review as labor worthy of compensation, this policy would help reduce reviewer fatigue, improve accountability, and incentivize wider participation, especially among early-career researchers and scientists from underrepresented backgrounds.

Option 3 also provides needed flexibility for researchers working with journals that uphold best practices in editorial transparency, fraud detection, and ethical oversight. By tying higher allowable costs to these quality criteria, NIH would incentivize responsible publishing rather than funneling taxpayer resources toward opaque or predatory platforms. While limiting allowable costs ensures stewardship of public funds, providing conditional exceptions ensures that scientific rigor and fairness are not compromised.

**2. Available evidence related to publication costs and proposed options:**
There is growing empirical evidence that publishing costs are both variable and increasingly opaque. As an NIH-funded researcher with an active portfolio of publications, I have routinely encountered high publication fees despite producing work supported by public funds. Furthermore, many of these journals provide little justification for the pricing structure and continue to rely on unpaid labor for the critical peer review process.

My own work, which spans high-impact venues such as Journal of Allergy and Clinical Immunology, Environmental Pollution, and Seminars in Immunology, has often been published in journals that impose high APCs without compensating reviewers. This raises important equity concerns, especially for researchers at less-resourced institutions or those engaged in community-based participatory research that may not attract commercial interest but is highly relevant to NIH's mission. These experiences underscore the need for cost caps and the value of Option 3 in creating an incentive structure aligned with NIH's goals.

**3. Peer review compensation:**
The current peer review system relies on the voluntary contributions of scientists, yet the demands of reviewing have increased significantly alongside the complexity of research. My own service, which

includes reviewing for over a dozen journals and serving on the NIH Board of Scientific Counselors, has demonstrated firsthand how time-intensive and rigorous peer review must be in order to maintain standards of scientific quality and public trust.

Compensating peer reviewers is not only a matter of fairness but also a means to improve review quality and broaden participation. Compensation may help reduce bias by enabling more diverse participation from individuals who might otherwise not be able to allocate uncompensated time to peer review tasks. In determining appropriate compensation, NIH should consider factors such as review length, complexity, and timeliness, as well as whether the reviewer is early-career or senior faculty. In my view, aligning reviewer compensation with publication cost allowances is a thoughtful and scalable approach. Also, pushing for established systems that track the number of peer reviews done by faculty would promote interest.

**4. Publishing best practices:**
Journals that employ tools for fraud detection, data validation, and transparent peer review should be eligible for higher allowable publication charges. These services are essential in maintaining the credibility of scientific literature and in preventing the dissemination of fraudulent or poorly vetted research. However, such value-added services should be clearly documented by publishers and verifiable by funding agencies.

Option 3 provides a pathway for recognizing these legitimate costs while limiting excessive or unsubstantiated charges. For example, when journals demonstrate the use of image forensics tools, open data policies, or preprint integration with DOI versioning, NIH could consider these features as part of a structured rubric that justifies higher publication costs. I recommend that NIH develop criteria for evaluating such services and include them in grant audits to ensure transparency and efficiency.

**5. Other Comments:**
Journals that employ tools for fraud detection, data validation, and transparent peer review should be eligible for higher allowable publication charges. These services are essential in maintaining the credibility of scientific literature and in preventing the dissemination of fraudulent or poorly vetted research. However, such value-added services should be clearly documented by publishers and verifiable by funding agencies.

Option 3 provides a pathway for recognizing these legitimate costs while limiting excessive or unsubstantiated charges. For example, when journals demonstrate the use of image forensics tools, open data policies, or preprint integration with DOI versioning, NIH could consider these features as part of a structured rubric that justifies higher publication costs. I recommend that NIH develop criteria for evaluating such services and include them in grant audits to ensure transparency and efficiency.

## 68. Sarah Lindsey

**Submit date:** 7/31/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Sarah Lindsey

**Name of Organization:** Tulane School of Medicine

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I am in support of this Option 3: Set a limit on allowable costs per publication and allow a higher amount to be paid when peer reviewers are compensated.

However, the amount that is used as the limit should be informed by actual publication costs and not an average of what journals are charging. How much does it actually cost to publish an article versus how much are these companies making a profit? The cost to publish should be profit-neutral. Journals could instead make profit from advertisements and other options, not from NIH dollars.

I also considered Option 5, but I think this will limit the number of publications from a grant rather than encouraging more dissemination of results. If a principal investigator does not have any more money in their publication budget, they may consider delaying publication.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
I think the estimation of $50/hour for 6h is a good approximation of what reviewers should get paid. Personally, I would agree to review more paper if I was compensated for my time. However, I wonder if this system could potentially be exploited; would there be a vetting system by which reviewers are paid or could non-scientists somehow get into this system with the only purpose of getting money? Is there a way that reviewers are required to provide proof that they are eligible to review?

**4. Publishing best practices:**
As mentioned above, there needs to be transparency about where publications costs are going.

**5. Other Comments:**
As mentioned above, there needs to be transparency about where publications costs are going.

## 69. N/A

**Submit date:** 7/31/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Organizational Official

**1. Proposed policy options:**
Option 2: Set a limit on allowable costs per publication.

This would be the easiest administratively on both the the grantee and grantor to track and manage, and still allow researchers to publish variable number of articles.

A total cap would punish the projects that have more active publishing and capping the total number of articles would harm the sharing of scientific knowledge. But a cap on the amount reimbursable on the grant per publication would limit the amount funded by taxpayers without capping the total number of grants. It would also be easier to stay in compliance as each invoice that came in for a publication would just need to be split up to $2000 (or whatever set amount allowable) on the grant and remaining amount on a non-sponsored account, without the need to track total publication amounts throughout the life of the award.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 70. Dr Brooks

**Submit date:** 7/31/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Dr Brooks

**Name of Organization:** Tulane University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Shouldn't allow NIH proposals to pay for profit journals

Shouldn't allow NIH grants to fund papers in "predatory" journals such as MDPI

**2. Available evidence related to publication costs and proposed options:**
Society journals are not for profit, 800-2500 for publication. Promote these

**3. Peer review compensation:**
It's part of our service to our discipline, there is no need to pay reviewers, if you support society journals it's rewarded by editorial board membership:

Scientists should avoid reviewing for Elsevier, Nature and for profit journals

I don't review for journals who make profits

I only review for society based journals

**4. Publishing best practices:**
Blind reviews and publishing names  of reviewers doesn't work. The system is not broken if editors do their jobs

Publishing names targets younger scientists for retaliation

Blind reviews are ridiculous, we always know who is writing the paper as you have to cite your own work

**5. Other Comments:**
Blind reviews and publishing names  of reviewers doesn't work. The system is not broken if editors do their jobs

Publishing names targets younger scientists for retaliation

Blind reviews are ridiculous, we always know who is writing the paper as you have to cite your own work

## 71. Angel Algarin

**Submit date:** 7/31/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Angel Algarin

**Name of Organization:**

**Type of Organization:** Not Applicable

**Role:** Investigator/Researcher

**1. Proposed policy options:**
While I view most of the proposed options as meaningful steps toward addressing the excessive costs charged by some research publishers, I do not find Option 1 either feasible or beneficial. Eliminating NIH support for all publication costs would place undue burden on researchers—particularly those without institutional resources—and could limit equitable access to high-impact outlets.

I see particular value in Options 2 through 5, with Option 3 standing out for its incentive structure that rewards journals for compensating peer reviewers. This is an important shift that not only acknowledges the labor of peer review but also has the potential to strengthen the review process overall.

Option 5 offers flexibility by combining per-publication and total award caps, which may reduce disruption to the current publishing landscape and preserve author choice. However, I worry that its broader scope may not exert the same pressure on publishers to reduce APCs as Options 2 and 3 would.

For these reasons, I most strongly endorse Options 2 and 3, as they are more likely to create meaningful change in both cost control and the fairness of the publishing system.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
As someone who has served as a peer reviewer for more than 30 academic journals, I can say with confidence that I have never received compensation for my reviews—and I believe this reflects a broader structural problem in academic publishing. At present, reviewers are expected to provide detailed, time-intensive feedback entirely without pay. This model is not sustainable.

Editors frequently note the increasing difficulty of securing reviewers, often sending invitations to dozens of potential candidates just to secure a single acceptance. Implementing Option 3—by allowing higher APCs for journals that compensate reviewers—could be a meaningful step toward addressing this challenge. It would not only recognize the value of peer review labor but could also improve reviewer availability and the overall quality of the peer review process.

**4. Publishing best practices:**
While I support NIH's effort to limit publication costs and explore conditions under which exceptions might be warranted, I do not support allowing higher allowable publication costs based on the inclusion of fraud detection technologies.

Fraud detection should be a core responsibility of publishers, not a service that warrants additional charges. Just as editorial oversight, formatting, and archiving are part of the baseline expectation of ethical publishing practices, safeguarding the scientific record through fraud detection must be standard—not monetized.

Furthermore, the RFI does not define what types of fraud detection would qualify for a higher APC threshold. This ambiguity makes it difficult to assess which tools are effective, necessary, or even meaningfully implemented. Without clear standards and oversight, this provision risks becoming a loophole for publishers to justify excessive fees under the broad and ill-defined banner of “fraud prevention.”

I urge NIH to reconsider this condition and to treat fraud detection as a non-negotiable publisher obligation—not a premium add-on at the expense of research budgets.

**5. Other Comments:**
While I support NIH's effort to limit publication costs and explore conditions under which exceptions might be warranted, I do not support allowing higher allowable publication costs based on the inclusion of fraud detection technologies.

Fraud detection should be a core responsibility of publishers, not a service that warrants additional charges. Just as editorial oversight, formatting, and archiving are part of the baseline expectation of ethical publishing practices, safeguarding the scientific record through fraud detection must be standard—not monetized.

Furthermore, the RFI does not define what types of fraud detection would qualify for a higher APC threshold. This ambiguity makes it difficult to assess which tools are effective, necessary, or even meaningfully implemented. Without clear standards and oversight, this provision risks becoming a loophole for publishers to justify excessive fees under the broad and ill-defined banner of “fraud prevention.”

I urge NIH to reconsider this condition and to treat fraud detection as a non-negotiable publisher obligation—not a premium add-on at the expense of research budgets.

## 72. N/A

**Submit date:** 7/31/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 5 seems the most reasonable given the the variation in publication costs.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Although appealing, paying peer-reviewers may lead to inappropriate practice of journals inviting non-expert peer reviewers to review manuscripts for compensation without adequately ensuring the invited reviewer has the appropriate expertise. This could lead to bad faith actors making peer-reviewing into a business/career (i.e., a few folks doing a lot of peer reviews), without appropriate expertise.

**4. Publishing best practices:**

**5. Other Comments:**

## 73. Delphine Lee

**Submit date:** 7/31/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Delphine Lee

**Name of Organization:** Harbor UCLA

**Type of Organization:** Other

**Type of Organization - Other:** Community County academic hospital

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Governmental-sponsored publications/journals could allow the dissemination of research supported by taxpayer funds.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
peer reviewers are poorly compensated, if at all. This affects the quality of reviews and there should be more support of proper well qualified peer review. A proper review takes time.

**4. Publishing best practices:**

**5. Other Comments:**

## 74. omid khorram

**Submit date:** 7/31/2025

**I am responding to this RFI:** On behalf of myself

**Name:** omid khorram

**Name of Organization:** Lundquist Institute

**Type of Organization:** Non-profit Research Organization

**Role:** Investigator/Researcher

**1. Proposed policy options:**
NIH should make a deal with all reputable journals to cover the publication costs so investigators don't have to worry about spending precious research money on APC

**2. Available evidence related to publication costs and proposed options:**
I try to find journals with no APC but their number is quite limited these days. Some journal allow you not to have Open Access in which case there are no charges and I use such journals also. However APC charges are a signficant drain on the funds.

**3. Peer review compensation:**
I beleive more than the pay consideration it is important to have qualified reviewers and reviewers should be rated based on the depth of their review and those with poor ratings should not be alllowed to serve

**4. Publishing best practices:**

**5. Other Comments:**

## 75. Tyson Hedrick

**Submit date:** 7/31/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Tyson Hedrick

**Name of Organization:** University of North Carolina at Chapel Hill

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I reviewed the options presented and believe Option 3 is by far and away the best of those presented.

Option 1 presumes that preprints are the appropriate vehicle for science publishing going forward. I strongly disagree, and think the preprint publishing mechanism is wide open to fraud and abuse. I often find serious errors when refereeing papers, and think only the peer review mechanism provides sufficient motivation for authors to make the needed corrections.

Option 2 is helpful, as limits should be signaled to publishers to prevent ever-escalating costs.

Option 3 is better, because peer review is a crucial part of science and it is increasingly clear that paying reviewers is one way to ensure rapid and quality reviews. This is a new cost, and one that should be considered in addition to basic staffing and publishing costs already presumably covered in the Option 2 fees.

Option 4 leads to further gamesmanship of which journals get publication costs, and still allows potentially exorbitant costs for single papers.

Option 5 might be helpful as an add-on to Option 3, but might also end up limiting the amount of work published from successful but low-cost research.

**2. Available evidence related to publication costs and proposed options:**
Anecdotally, as a journal editor I've found that recruiting referees for submitted papers has become increasingly difficult over the last decade, and models that monetarily compensate referees should be considered. A recent effort by the journal Biology Open found that compensating referees decreased the review time while maintaining quality; I suspect it also eased the difficulty of recruiting quality referees.

**3. Peer review compensation:**
Anecdotally, as a journal editor I've found that recruiting referees for submitted papers has become increasingly difficult over the last decade, and models that monetarily compensate referees should be considered. A recent effort by the journal Biology Open found that compensating referees decreased the review time while maintaining quality; I suspect it also eased the difficulty of recruiting quality referees.

**4. Publishing best practices:**
I think the specific example used here, automated fraud detection, is a poor use of funds and should not

be used to demand additional compensation. As an editor I've found the fraud reports for submitted papers to be nearly useless.

**5. Other Comments:**

I think the specific example used here, automated fraud detection, is a poor use of funds and should not be used to demand additional compensation. As an editor I've found the fraud reports for submitted papers to be nearly useless.

## 76. Marc Aaron Guest

**Submit date:** 7/31/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Marc Aaron Guest

**Name of Organization:** Arizona State University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I support Option 2: setting a fixed payment limit for publication costs. I recommend establishing this limit at $2,500 per article. As NIH policy will likely influence industry standards, this cap can help prevent unchecked increases in publishing fees. Currently, publishers benefit from a system that depends on the unpaid labor of researchers and peer reviewers, while taking advantage of the fact that publication is essential for academic advancement and often subsidized by funders. This has contributed to rising costs. Implementing a per-article cap of $2,500—alongside a total cap of 0.8% of the award—would help ensure greater accountability, transparency, and sustainability in research publishing.

As many publishers are now converting their journals to open access to squeeze even more money, it is limiting the ability of emerging scientists to publish due to the lack of funding to support publishing.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Currently, most journals do not compensate peer reviewers, and I do not believe this should factor into NIH's considerations when setting publication cost limits—unless NIH intends to require that journals receiving NIH-funded submissions provide compensation for peer review. If such a requirement were adopted, an honorarium of $50 per review would be more than reasonable.

I would encourage NIH to take this position. However, if NIH is not going to take the position that reviewers should be compensated, I do not believe it should be part of this decision-making.

**4. Publishing best practices:**
As NIH considers setting publication cost limits, it should also account for the growing challenges related to research integrity. This includes the rise of generative AI tools that are enabling some scholars to accelerate their publication output—often at the expense of rigor and quality. Additionally, the emergence of fraudulent publication practices, including "paper mills," poses a serious threat to the credibility of scientific publishing. These entities often operate with minimal peer review or quality control, allowing faster but less reliable publication, particularly in international contexts where oversight may be less stringent.

This dynamic creates an uneven playing field for U.S.-based researchers who are held to more rigorous standards, potentially disadvantaging them in terms of productivity metrics and academic advancement. NIH should consider mechanisms to identify and monitor publishers engaged in questionable practices

or operating without transparent peer-review processes. For example, concerns have been raised about publishers such as MDPI, which has faced criticism regarding review quality and editorial oversight.

To protect the integrity of publicly funded research, NIH might consider limiting the use of federal funds for publication in outlets that do not meet clearly defined standards for editorial independence, peer review, and transparency. Prioritizing publishers based in the U.S. or in allied nations with shared standards of scientific integrity could help ensure that taxpayer dollars support credible, high-quality dissemination of research findings.

**5. Other Comments:**
As NIH considers setting publication cost limits, it should also account for the growing challenges related to research integrity. This includes the rise of generative AI tools that are enabling some scholars to accelerate their publication output—often at the expense of rigor and quality. Additionally, the emergence of fraudulent publication practices, including “paper mills,” poses a serious threat to the credibility of scientific publishing. These entities often operate with minimal peer review or quality control, allowing faster but less reliable publication, particularly in international contexts where oversight may be less stringent.

This dynamic creates an uneven playing field for U.S.-based researchers who are held to more rigorous standards, potentially disadvantaging them in terms of productivity metrics and academic advancement. NIH should consider mechanisms to identify and monitor publishers engaged in questionable practices or operating without transparent peer-review processes. For example, concerns have been raised about publishers such as MDPI, which has faced criticism regarding review quality and editorial oversight.

To protect the integrity of publicly funded research, NIH might consider limiting the use of federal funds for publication in outlets that do not meet clearly defined standards for editorial independence, peer review, and transparency. Prioritizing publishers based in the U.S. or in allied nations with shared standards of scientific integrity could help ensure that taxpayer dollars support credible, high-quality dissemination of research findings.

## 77. Isabella Rauch

**Submit date:** 7/31/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Isabella Rauch

**Name of Organization:** OHSU

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 3 Set a limit on allowable costs per publication and allow a higher amount to be paid when peer reviewers are compensated.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
peer review should be compensated

**4. Publishing best practices:**

**5. Other Comments:**

## 78. Eric Schares

**Submit date:** 7/31/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Eric Schares

**Name of Organization:** Iowa State University

**Type of Organization:** Academic Institution

**Role:** Institutional Information Sciences Professional/Librarian

**1. Proposed policy options:**
I would like to provide feedback on several limitations of the methods outlined in the RFI analysis to estimate recent publication costs. The Directory of Open Access Journals (DOAJ) does indeed provide publicly available data on APC prices. However, it is limited in scope to only cover academic journals which are 100% OA, meaning those which publish all articles open access.

Another category of journal is missed by the DOAJ data source – hybrid OA journals which publish both open access articles (upon payment of an APC ) and closed access articles (which require a current year's subscription to read). Hybrid journal APCs are typically higher than fully OA journal APCs, which itself is counter-intuitive since Hybrid journals are already fully supported by subscription fees.

The RFI's second estimate looks at grant proposals, an interesting and unique dataset that only the NIH has access to. However, estimates of publishing activity submitted by applicants prior to a grant award may not be a reliable predictor of actual publication output. I would recommend undertaking a study to match articles to grants and find the actual number of publications resulting from each NIH grant. In my experience, 5.7-6.9 peer-reviewed academic journal publications per grant seems high, although I admittedly have never received or participated in an NIH grant (though have for other US federal agencies). Conducting a more robust analysis of actual publication output may reveal that applicants overestimate their plans for future productivity.

My personal view is that any APC cap by the NIH should be set low, around $500 to $1000 only. This is intentionally below the average and median APCs reported in the NIH RFI analysis to prevent lower-priced journals from immediately raising their APC to meet the cap level. If the intention is to "maximize the value of each research grant," the NIH should not incentivize any journal to raise their APC, and a cap set above a current journal's APC would do just that.

This is also why the example limit of $6,000 in Option 5 of the RFI is an alarmingly bad idea, as "the mid-point of the range of applicants' estimated per publication costs" being pulled up by the very "unreasonably high fees" this policy seeks to deter.

I would urge the NIH to

- Remove support for publishing OA in Hybrid journals.
- Emphasize Diamond OA journals as a viable route to compliance that carry no author nor reader-side fees (no APCs or subscription costs).

- Better support making publicly available preprints, peer-reviewed preprints, or the author accepted manuscript (that is, the version that has gone through peer review, made changes, and is accepted by the editor, but which lacks the final formatting, layout, and copy editing of the journal). The content of the author accepted manuscript is the same as the final version posted to the publisher's website, but the author retains control and can deposit in any number of repositories or websites.

**2. Available evidence related to publication costs and proposed options:**
I have conducted extensive research on the topic of APC prices and academic journal publishing. Together with several international collaborators, we released an open dataset of APC list prices tracking six academic publishers over five years 2019-2023, covering both fully OA and hybrid OA journals (https://doi.org/10.7910/DVN/CR1MMV). The dataset can be used to see the evolution of APC prices from these academic publishers and monitor the yearly increase.

We then used this dataset to estimate the amount of APC revenue taken in by these publishers over the years studied, by combining the journal-specific APC for a year with that journal-year's article count as shown in the Dimensions or OpenAlex databases (they agreed to a large degree). We arrived at an estimate of $8.349 billion ($8.968 billion in 2023 US dollars) spent on APCs between 2019 and 2023 with these six publishers, and $2.5B in the single year 2023 (https://arxiv.org/abs/2407.16551).

Additionally, in anticipation of this proposed NIH APC policy, a collaborator and I are currently working on an analysis to better quantify the impact of such a cap. Using the Dimensions database, we are looking at NIH-funded journal articles published in 2024 or 2025, recording what journal they were published in, and entering the current APC for that journal. While the analysis is still in progress, we intend to answer questions such as:

- What percentage of NIH-funded journal articles were published in journals with an APC over a given cap (say, $1,000)?
- What journals publish the largest volume of NIH-funded research?
- What is the most common APC level of journals in which NIH-funded research is published?

Many studies have reported researchers and authors generally supporting open access publishing but find the current APC levels unreasonable (for example, https://doi.org/10.31274/jlsc.18184).

**3. Peer review compensation:**
Paying peer-reviewers, while it sounds like a positive development on the face of the issue, would actually create more problems than it solves. With the rise of LLM-generated content, reviewers would simply upload the article manuscript to an LLM, get a review report, and collect the fee. Working with more journals to make peer reviews publicly viewable as mentioned in #3 of the RFI, signed or unsigned by the reviewer, would help with this. Stronger protections need to be in place to prevent or disallow LLM-generated reviews, and it is unclear to me whether those protections are realistic at this current moment.

The fee is also stipulated to be for reviewers who worked on "accepted" manuscripts. This means reviewers would have an incentive to recommend acceptance, and any articles that are rejected from the process will not allow the reviewers to receive the payment.

**4. Publishing best practices:**

**5. Other Comments:**

## 79. Melissa Caughey

**Submit date:** 7/31/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Melissa Caughey

**Name of Organization:** Johns Hopkins University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
I am a statistical editor for one of the American Heart Association journals (Circulation: Heart Failure). The AHA journals pay the statistical editors to review articles.

**4. Publishing best practices:**
Journals requiring a statistical review by a paid statistical editor may be a consideration for higher publication cost.

**5. Other Comments:**
Journals requiring a statistical review by a paid statistical editor may be a consideration for higher publication cost.

## 80. N/A

**Submit date:** 7/31/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Not Applicable

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I do not agree with APC limits - in order to publish in reputable journals with rigorous peer review processes, the APC charge is still high to support their own journal operations. Consequently, until journals offer discounts or offer no-cost publication options for NIH-funded research, allowing flexibility in APC charges is needed in order to permit publication and sharing of products of funded research. Perhaps an alternative is that the NIH can negotiate with major publishers to request discount eligibility to cut costs for APCs across the board in multiple disciplines (similar to how institutions will negotiate with publishers for these codes).

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 81. N/A

**Submit date:** 7/31/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I favor option 3. This seems to be the fairest option on the table for all  parties involved..

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
The payment proposal outlined in the RFA seems reasonable.

**4. Publishing best practices:**

**5. Other Comments:**

## 82. N/A

**Submit date:** 8/1/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
option 3 sounds the most reasonable

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
yes yes and yes

option 3 sounds the most reasonable

**4. Publishing best practices:**

**5. Other Comments:**

## 83. Erik Imel

**Submit date:** 8/1/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Erik Imel

**Name of Organization:** Indiana University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Here is the problem. Publishing has become more expensive, both open access and closed access. The best practice has become open access for broad dissemination of research funded by NIH. The proposed restrictions to NIH fund use for publication costs means that investigators cannot afford to submit their publications. Where will the funds come from to publish NIH supported research? The journals are still charging the amounts they charge. This may result in NIH funded research being relegated to journals of lesser stature, which may be interpreted by the scientific community and the lay public as meaning of lesser importance or lesser quality studies, even when they are rigorous and important studies. This policy is likely to lessen the impact of NIH funded research instead of increasing it. Publication with peer review is a critical and necessary part of good and effective research.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
If this is peer review for journals, they are not typically paying for Peer review. I have peer reviewed for many journals and never received any kind of compensation for this. It would be nice to be paid for peer review for journals but to my knowledge that is not happening.

Indeed if journals are paying for peer review, that will increase the cost of publication.

But the proposal to restrict publication costs runs entirely counter to that and would not let us meet the costs of publication now, let alone if those costs went up.

If this is payment for peer review of grants on study section, the payment for that activity from the NIH is inadequate to the amount of work that it entails, and the professional experience level necessary to conduct appropriate grant reviews.

**4. Publishing best practices:**

**5. Other Comments:**

## 84. James Berger

**Submit date:** 8/1/2025

**I am responding to this RFI:** On behalf of myself

**Name:** James Berger

**Name of Organization:** Johns Hopkins University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Suggest a blend of options 2 and 5, with the limit being $4000 per publication and a total of up to $25000 per year on any one grant.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
PIs should be compensated for review. It is outrageous that PIs (and the taxpayers) pay journals for publishing but do the review work for free.

**4. Publishing best practices:**

**5. Other Comments:**

## 85. N/A

**Submit date:** 8/1/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Currently, I believe that the costs for publication are quite high - astronomically so. It should not cost thousands of dollars to publish research that should be made freely available to the public. While I understand that publishers should recompense the costs of publication, employees, and managing websites, the simple fact is that publications currently cost a minimum of $2000-$3000 to publish for a low tier journal. In fact, I recently paid around $4000 to publish my research in what I consider a top-tier journal in my field.

If NIH is considering completely removing the ability to pay for publications via grants, they need to take into consideration enforcing policy on publishers to drastically reduce costs of publication. Only in this way would the proposed policy work. As it stands, removing the ability to pay for publications would mean that researchers ultimately would not publish their work in journals. I doubt this is the intended result of the proposed policy.

I heavily suggest that policy makers pressure publishers to reduce costs, then implement the proposed policy.

**2. Available evidence related to publication costs and proposed options:**
I believe the above suggestion I gave, which suggests mandating that publishers reduce costs, then implementing a cost reduction strategy for publications, is the most feasible way to accomplish this.

As I mentioned before, publications should not cost thousands of dollars for what is intended to be publicly available research (for example, a recent publication I submitted cost approximately $4000). Considering that journals do not monetarily compensate editors or peer reviewers, this cost is astronomical. I believe NIH needs to pressure publishers to adhere to reasonable costs, and then implement the proposed policy.

**3. Peer review compensation:**
I do not think that at this time, peer reviewers are properly compensated. Some manuscripts take a significant amount of time to properly review, and while this is seen as a service to the scientific community, the sheer fact is that publishers do not compensate individuals for this. Considering the high costs of publication currently, they should more than be able to compensate both peer reviewers and editors.

I know that this could cause concern of encouraging improper behavior in review (such as using AI tools to review a manuscript), but I believe that at least some small compensation should be considered, given the time and effort peer reviewers must commit to properly reviewing a manuscript.

**4. Publishing best practices:**
Currently, I am unaware of costs that are incurred by publishers for automatic fraud detection capabilities - this information should be made public if publishers are using this as a justification for higher costs. I would believe higher costs would be more acceptable if compensation of peer reviews, or a clear explanation of cost breakdown per publication were made. As it currently stands, there is no transparency in what publication costs go to paying for.

**5. Other Comments:**
Currently, I am unaware of costs that are incurred by publishers for automatic fraud detection capabilities - this information should be made public if publishers are using this as a justification for higher costs. I would believe higher costs would be more acceptable if compensation of peer reviews, or a clear explanation of cost breakdown per publication were made. As it currently stands, there is no transparency in what publication costs go to paying for.

## 86. Georgios Kotsakis

**Submit date:** 8/1/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Georgios Kotsakis

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
While there is a major interest in limiting taxpayer burden towards publication costs, the reality is that most high impact journals require substantial publication costs. Thus, the question arises on where are these funds going to come from. Rather than limiting publication costs it may be a better option to enforce publication costs cap to journals for taxpayer-funded researc.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
The level of peer review compensation is far less than the hourly rate of the reviewers at their professional positions or industry-equivalent consulting hourly rates. As such, in the long-term underpaying the reviewers can result in limited commitment. The rates should be raised to industry standards to reflect the time commitment required.

**4. Publishing best practices:**
The greatest challenge is the rise of semi-predatory publishing groups with high publication costs that will accept articles without rigor. This is a formidable challenge that is not easy to solve.

**5. Other Comments:**
The greatest challenge is the rise of semi-predatory publishing groups with high publication costs that will accept articles without rigor. This is a formidable challenge that is not easy to solve.

## 87. Meredith Tennis

**Submit date:** 8/1/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Meredith Tennis

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
The option currently proposed for caps on publishing fees paid for with NIH funded awards may decrease the amount of government funds used to pay for publications but will also make it even more likely that wealthy academic institutions are the only ones who can afford to publish in higher-tier journals. With a cap on publication fees in NIH awards, institutions with less discretionary funding will not be able to cover the fee gap for investigators who have work accepted to higher-tier journals but cannot afford the open access fee. Wealthy institutions will be able to cover these fees, further increasing the discrepancy in opportunities for institutions and investigators with less funding. The proposed approach punishes investigators and institutions who are simply trying to survive in a system established by publishers and the government. We are required to have strong publication metrics to get government funding, but everything about the publishing system is controlled by for profit companies. Perhaps the NIH could work with publishers to establish discounts for publications of NIH-funded work, which would achieve NIH goals without punishing investigators. Alternatively, NIH could develop their own journals at lower cost or support establishment of more non-profit publications.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
The established publication peer review system attempts to serve the lofty goals of bias-free scientific publications, but this is built on the backs of uncompensated reviewers and mostly benefits the profit interests of publishers. The burden of review falls on the investigators who feel obligated to support the broader community of investigators who are required to publish to achieve continued funding and career success. Peer reviewers of publications do not receive appropriate compensation. The nominal compensation from NIH for grant study section peer review at least acknowledges that investigators are contributing to a system that would not succeed without their time and expertise. If a publishers is non-profit, reviewing work might be an acceptable donation to support ethical publication of science, but since publishers are by far for profit, there are few opportunities to do this.

**4. Publishing best practices:**

**5. Other Comments:**

## 88. N/A

**Submit date:** 8/1/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I think all options are worse than the status quo. See comment below.

**2. Available evidence related to publication costs and proposed options:**
I think it's a bad idea to disincentivize publishing, which all these options will do. The point of federally funded research is that the results should be made available to the public! The best way to do this is peer-reviewed publishing.

In general, publication costs are a small percentage of the total costs of a grant. What is the real goal here?

**3. Peer review compensation:**
I don't think it's a good idea to pay for peer review. The incentives are already in place for scientists to do peer review in order to stay up to speed on the latest research and uphold rigor in their field, as well as receive recognition for their efforts. Studies show that people will oftentimes do a worse job once it's been incentivized by money. People will then start to sacrifice quality and go for quantity.

I predict the quality of science will decline if we incentivize for peer review.

**4. Publishing best practices:**
I think we should require that journals have peer reviewers remain anonymous. Reviewers are more objective and honest if they can remain anonymous.

**5. Other Comments:**
I think we should require that journals have peer reviewers remain anonymous. Reviewers are more objective and honest if they can remain anonymous.

## 89. Lucy Popova

**Submit date:** 8/1/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Lucy Popova

**Name of Organization:** Georgia State University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
"Option 4: Set a limit on the total amount of an award that can be spent on publication costs" is the most reasonable. Setting "per publication" limits will make it really hard to handle in real life. Few journals have that exact charge, so if the charge is less, what can the PI do with the leftover money? If the charge is higher, where should the extra be covered from? Setting a total limit per award allows for flexibility and publication in journals that are the best fit for research.

**2. Available evidence related to publication costs and proposed options:**
It was very interesting to see the summary of the NIH findings on average APCs. However, the costs are different for different fields and for top-tier vs. low-tier journals. For example, the journals I've recently published in were in the $3,500-$4,700 range. Giving the PIs the flexibility to decide how to spend the publication budget would be the most appropriate.

**3. Peer review compensation:**
Peer review is a service to the profession. You write articles and others review them. Others write articles and you review them. What goes around comes around. Putting the money into the system will not produce better peer reviews or peer reviewers. Having served as an editor for a journal and doing a lot of reviews myself, I can attest that it is not the money, but the collegiality and skills. Rather than putting money towards paying the reviewers, NIH should invest in training young scholars on how to be good peer reviewers (including explaining to them how being a good reviewer also makes one a better writer and makes them more likely to publish in the journals that they review in.) For example, peer review training and/or service can be made part of K awards. Anybody receiving a K award will need to provide (and document as part of their annual report) several peer reviews per year.

**4. Publishing best practices:**
Part of peer review cost will be administrative processing of these costs.

**5. Other Comments:**
Part of peer review cost will be administrative processing of these costs.

## 90. Rita Serda

**Submit date:** 8/1/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Rita Serda

**Name of Organization:** UNM

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Cap both: $6,000 per article and 0.8%/$20,000 total per award

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Peer review should not be financially compensated.

**4. Publishing best practices:**

**5. Other Comments:**

## 91. N/A

**Submit date:** 8/1/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I support either Option 4, set a limit on the total amount of an award that can be spent on publication costs, or Option 5, set a limit on both the per publication cost and the total amount of an award that can be spent on publications.

As an implementation researcher, I have only a handful of journals specific to the field: Implementation Science (Springer Nature), Implementation Science Communications (Springer Nature), Implementation Research and Practice (Sage), and sometimes BMC Health Services Research (Springer Nature). The first three journals only have open-access publication and cost $3390, $3390, and $1500, respectively. The fourth journal, though less aligned with the field, costs $3290 for open access.

Limiting the total amount of an aawrd that can be spent on an individual publication to $2000 or even $3000 (Options 2 or 3) would prevent me from being able to publish in the two most prominent journals in my field--Implementation Science and Implementation Science Communications. Options 4 and 5 provide flexibility for researchers to use their awards depending on their fields while still imposing some limits to the total amount of awards spent on publication costs.

**2. Available evidence related to publication costs and proposed options:**
In Implementation Science, there are only a handful of journals specific to the field: Implementation Science (Springer Nature), Implementation Science Communications (Springer Nature), Implementation Research and Practice (Sage), and sometimes BMC Health Services Research (Springer Nature). The first three journals only have open-access publication and cost $3390, $3390, and $1500, respectively. The fourth journal, less aligned with the field, costs $3290 for open access.

**3. Peer review compensation:**
I have never been compensated for peer review, even when on an editorial board.

**4. Publishing best practices:**
I have not encountered these in my experience.

**5. Other Comments:**
I have not encountered these in my experience.

## 92. Ronald Tjalkens

**Submit date:** 8/1/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Ronald Tjalkens

**Name of Organization:** Colorado State University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I would be supportive of a reasonable limit to publication charges. $2,000 - $3,000. Many journals charge exorbitant fees.

**2. Available evidence related to publication costs and proposed options:**
I have been funded by NIH for more than 20 years and have more than 80 peer-reviewed research publications. Fees are charged by journals are too high, particularly for so-called 'high impact' journals such as Nature, Science, and Cell, etc.

**3. Peer review compensation:**
I have never been compensated for peer review of manuscripts.

**4. Publishing best practices:**
Fraud detection is serious and appropriate and should be considered when identifying a reasonable limit for publication charges.

**5. Other Comments:**
Fraud detection is serious and appropriate and should be considered when identifying a reasonable limit for publication charges.

## 93. Brian O'Rourke

**Submit date:** 8/1/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Brian O'Rourke

**Name of Organization:** Johns Hopkins University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
(Option 4) My opinion is that setting a limit on per publication cost will not help investigators when it comes to publishing in high impact (or otherwise expensive) journals. I don't think these journals will change their "for profit" models to accommodate the NIH cap - there are too many willing authors that will still pay. This could create a bias towards those authors who have large alternate or discretionary funds to pay for higher impact journals. As such, I think a total amount cap per grant retains more flexibility for the PI.

Of course, if there was a way that the NIH could compel journals to lower publication costs, as well as make the publications immediately available to the public, then a per publication cap would work. The latter could be accomplished by treating a Pubmed listing as a priviledge instead of a right, i.e., delay any publication's entry into PubMed until the full manuscript is made available. However, this could also have negative effects on the authors; a delicate balance.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Peer reviewers in my field are never compensated, unless they are associate editors of a journal, nor is their effort towards this process acknowledged by their department.

**4. Publishing best practices:**
Costs could be lowered by eliminating printed journals and decreasing the amount of junk mail generated by the journals. Automated fraud detection costs should be inexpensive compared to these factors.

**5. Other Comments:**
Costs could be lowered by eliminating printed journals and decreasing the amount of junk mail generated by the journals. Automated fraud detection costs should be inexpensive compared to these factors.

## 94. Nicot

**Submit date:** 8/1/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Nicot

**Name of Organization:** KUMC

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Limiting funds for publication is a very bad idea. Looks good on paper (maybe), but it will continue to phagocyte research. Big labs with multiple grants will be able to publish many papers, thereby getting more grants, and small labs with a single grant will be able to publish a single paper, therefore becoming less competitive for new grants.

There is a direct positive correlation between the cost of APC and the impact factor.

Another issue with this policy is that the US research would be at a disadvantage with China and the EU. There is a reason why PubMed used to be called "Publish or Perish"

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Most peer reviewers do not care about compensation for study sections

**4. Publishing best practices:**
Acceptance of new journals and new publishers into PubMed has been more and more restricted, further reducing competition and allowing big publishers to charge more money per APC.

Opening competition by allowing more (not less) new journals into PubMed without extensive delays would help increase competition between journals and reduce costs over time. More journals are not a bad thing, so long as these are good quality, automated AI periodic review every 2-3 years for compliance can easily be done to remove bad actors.

**5. Other Comments:**
Acceptance of new journals and new publishers into PubMed has been more and more restricted, further reducing competition and allowing big publishers to charge more money per APC.

Opening competition by allowing more (not less) new journals into PubMed without extensive delays would help increase competition between journals and reduce costs over time. More journals are not a bad thing, so long as these are good quality, automated AI periodic review every 2-3 years for compliance can easily be done to remove bad actors.

## 95. Daniel McGrail

**Submit date:** 8/1/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Daniel McGrail

**Name of Organization:** Cleveland Clinic

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
In my opinion, if funding for publications is to be limited, "Option 2: Set a limit on allowable costs per publication." is the most feasible. Please see rationale below--

**2. Available evidence related to publication costs and proposed options:**
My biggest concern is that restricting publication fees ultimately dissuades researchers from publishing papers. Science already faces a large problem in lack of publication of negative results, and further restricting funding for publications will only exacerbate this issue. If there is an overall cap for maximum allowable (regardless of number of papers), this will likely drive researchers publishing only the impacts they view as likely to be their highest impact work. Research that turns out less "flashy", but still potentially informative, could potentially no longer be viewed as financially worth publishing, making it so tax payers never see the results of research performed, and likely leading to unnecessary duplication of studies.

I have seen a similar phenomenon occur with a related policy at my prior institution--they decided that only papers published in journals with an impact factor (IF) above 10 mattered for purposes of promotion/etc. While I believe the intent was to make sure people were trying to focus on publishing good work instead of just dumping a large number of mediocre papers, the unintended side effect was if a trainee's project was not going to be publishable in a journal with an IF>10, many PIs either stopped supporting these projects, often leaving trainees with a wasted 1-3 years of effort. I'm concerned that discouraging publication by limiting allowable dollars could have this same impact on a much wider scale, ultimately leading to more waste.

**3. Peer review compensation:**
They are not appropriately compensated, but if you start paying for peer reviews I worry people would start accepting reviews far outside their areas to simply make money, and decrease overall peer review quality. Also likely would drive publication costs even higher.

**4. Publishing best practices:**
It would be easy (and logical) to say "you can spend more money to publish in a good journal", but what a good journal is is very hard to define. Maybe there should be a waiver to spend more money that could be filed? Or maybe there could be a "white list" of journals where the fee is recognized as acceptable (e.g. Science/Nature/Cell and their daughter journals).

**5. Other Comments:**
It would be easy (and logical) to say "you can spend more money to publish in a good journal", but what

a good journal is is very hard to define. Maybe there should be a waiver to spend more money that could be filed? Or maybe there could be a "white list" of journals where the fee is recognized as acceptable (e.g. Science/Nature/Cell and their daughter journals).

## 96. Amanda Luff

**Submit date:** 8/1/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Amanda Luff

**Name of Organization:** Advocate Health

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Scientists should be allowed to determine the most appropriate venue for research dissemination based on their professional expertise and knowledge of reputable venues in their field. By using such reductive measures as the median APC, this RFI ignores that there are inherent differences in publication venues. Extreme outliers such as the one cited in the RFI should be thoroughly scrutinized, but arbitrary cut points create unnecessary barriers to dissemination of science. This is especially relevant as many researchers have encountered barriers to publishing their NIH-funded research following the recent elimination of the open access waiting period. Previously, most subscription-only journals allowed NIH-funded research to be published under the subscription model and posted on PMC following a one-year embargo, so researchers who did not have funding for OA fees were still able to publish. Now publishers are eliminating this option because the embargo period cannot be enforced under the new NIH policy, which means many researchers are not able to publish their NIH funded research at all. If the NIH would like to encourage immediate access to all NIH-funded research, it is essential that the NIH support funding for APCs in grants. For reputable journals, this is typically a minimum of $2000-$3000 per paper.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 97. Michael Taffe

**Submit date:** 8/1/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Michael Taffe

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I support Option 2, a $2,000 per paper limit.

While compensating peer reviewers seems fair, I believe this will distort the process of review. People will accept review roles that may be outside of their expertise, just to make some money. This would have a negative impact on the quality of peer review.

Limiting the total amount that can be spent on publication fees limits publishing data which is a huge negative. Funded investigators should be encouraged to publish as much of their work as possible under a NIH award.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Peer review compensation may distort the quality of review by encouraging people to accept assignments outside of their expertise.

**4. Publishing best practices:**

**5. Other Comments:**

## 98. N/A

**Submit date:** 8/1/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I prefer Option 1 or Option 5

**2. Available evidence related to publication costs and proposed options:**
The journals are gouging the research community

**3. Peer review compensation:**
We should NOT pay for peer review

**4. Publishing best practices:**
I don't thin additional $$ are needed

**5. Other Comments:**
I don't thin additional $$ are needed

## 99. N/A

**Submit date:** 8/1/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Options 4 or 5 presented in Notice Number NOT-OD-25-138 are reasonable. Option 1 - 3 are not realistic options for investigators to publish NIH-funded work in reputable, peer-reviewed journals.

**2. Available evidence related to publication costs and proposed options:**
Option 1 - (no publication costs covered) is not realistic since research results must be disseminated to the public and it costs money to do so.

Option 2: The proposed "average" publication cost of $2177 is significantly less than many of the journals in which my team has published our work. Often the publication fees are $5000 or more for high impact journals with rigorous peer review, which is the ideal venue for research to ensure its importance is conveyed and that it gets to the broadest possible audience.e

Option 3:  This is not realistic because peer reviewers are not generally paid for reviewing manuscripts. The peer review process is, simply put, part of our job as scientists. I have reviewed many, many papers and have never once been offered payment for it, and if I were I would doubt the integrity of the journal and review process.

Option 4: Best option. Setting a publication cost cap of 0.8% of the overall grant cost or $20,000 is reasonable and accounts for the range of publication fees.

Option 5: This is less optimal than Option 4, but could work with some modifications. Limiting to $6000 per publication is reasonable for some, but not all journals - especially the top tier ones that generally have much higher publication fees. If publication fees can be pooled for multiple years in order to pay for publishing multi-year projects in truly "top" journals (where costs may be $12,000 - 15,000) this could be ok. But I still favor Option 4.

**3. Peer review compensation:**
Peer reviewers are not generally paid for reviewing manuscripts.

**4. Publishing best practices:**

**5. Other Comments:**

## 100. Ryan Wexler

**Submit date:** 8/1/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Ryan Wexler

**Name of Organization:** National University of Natural Medicine

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Setting a limit on allowable costs per publication would be most reasonable and the easiest to apply across investigators. This would also ensure that superfluous funds aren't requested within NIH grant submissions for publication costs.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Peer review is time consuming a requires a high-level of subject matter expertise. It is ideal that this is a compensated activity

**4. Publishing best practices:**

**5. Other Comments:**

## 101. N/A

**Submit date:** 8/1/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 5 sounds reasonable. Perhaps the most important thing is to work with the publisher to limit their charges, which are sensible for supporting their publishing infrastructure, but it should not be profit-driven. This may help to implement NIH's new policy that there should be no embargo period for all publications.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 102. N/A

**Submit date:** 8/1/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
If any of these options are to be implemented, option 4 and 5 are the only ones that will not seriously impact the ability of most researchers to publish their results. However, any of these options WILL limit the sharing of research product, which is a stated priority of the NIH and one that researchers have spent a lot of time, effort, and money trying to follow. Please do not implement any of these options.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 103. N/A

**Submit date:** 8/1/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option #4 or #5 would be reasonable. Setting a per-publication limit too low would limit the ability to publish in high-impact journals.

**2. Available evidence related to publication costs and proposed options:**
In my experience APCs of $3,000-$4,000 are typical.

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 104. N/A

**Submit date:** 8/1/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I think Option 2 would perhaps limit journals from exorbitant costs for publication if they know that authors are limited in how much they are allowed to spend per publication

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
I don't think journals would institute a process to pay for peer review. It seems like it would be expensive for journals to start instituting a system to track this and then to pay small amounts of money to reviewers.

**4. Publishing best practices:**

**5. Other Comments:**

## 105. Selvakumar Subbian

**Submit date:** 8/1/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Selvakumar Subbian

**Name of Organization:** Rutgers University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I am in favor of Option 4: Set a limit on the total amount of an award that can be spent on publication costs. I recommend the maximum amount of an award that could be spent on publication costs to 1% of the award's direct costs over the length of the award or $25,000.00, whichever is greater, to not disproportionately impact smaller awards.

**2. Available evidence related to publication costs and proposed options:**
In my opinion, scientific publication, particularly through an online platform, is a goldmine and money-making machine. For numerous journals that charge APCs, the reviewers and editors are mostly unpaid volunteers, ranging from undergraduate students to retired professors, who just receive a thank-you note or digital coupons with no monetary value. Therefore, the publishing industries are skimming tons of money in the name of APC from researchers. The APC increases proportionately with the impact factor, going >$6,000 for some journals, which I have a tough time agreeing with. To be fair and nominal, instead of regulating the budget for APCs, I suggest that NIH should form a "Journal Oversight Body" to regularize the publishers' system of setting APCs and to make the publishers accountable and justify the APCs they charge.

**3. Peer review compensation:**
Almost none of the online journals pay or compensate the external peer reviewers and editorial board members (EBMs) for reviewing or managing articles until its published. Some journals have in-house reviewers who are already employed by the journal, and it is unfair to extract money from the submitting party to pay for such reviewers. Actually, the APC should be sufficient or inclusive of the payment to those in-house reviewers and editors. Therefore, if there's peer-review compensation, it should be to external reviewers/EBMs who're not employed by the publishers.

**4. Publishing best practices:**
The easy way is for NIH to start a publication system along with NCBI/Pubmed, such that all the articles emerging from NIH-funded research must be submitted through this platform, which will automatically be incorporated into Pubmed. The NIH can ask funded researchers to serve as reviewers and editors. In fact, NIH can give a small incentive to researchers interested in being reviewers/editors. This incentive can be built at the time of grant budgeting. Why pay $20,000 from an NIH grant to an outside publisher as APC, when the same $$ could be used wisely within the NIH framework to get the article published ?. Plus, as an NIH-funded research output, the articles should have fewer issues with scientific misconduct etc.,

**5. Other Comments:**

The easy way is for NIH to start a publication system along with NCBI/Pubmed, such that all the articles emerging from NIH-funded research must be submitted through this platform, which will automatically be incorporated into Pubmed. The NIH can ask funded researchers to serve as reviewers and editors. In fact, NIH can give a small incentive to researchers interested in being reviewers/editors. This incentive can be built at the time of grant budgeting. Why pay $20,000 from an NIH grant to an outside publisher as APC, when the same $$ could be used wisely within the NIH framework to get the article published ?. Plus, as an NIH-funded research output, the articles should have fewer issues with scientific misconduct etc.,

## 106. N/A

**Submit date:** 8/1/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Publication costs should be disallowed because the transfer of taxpayer money to for-profit (HIGHLY PROFITABLE AT THAT) publishers to first sign over the rights to the scientists' and taxpayers' own work under coercion only to then buy back the rights makes no sense at all.

**2. Available evidence related to publication costs and proposed options:**
For-profit publishers have a monopoly on scientific dissemination and use that monopoly to force scientists and taxpayers to forfeit the rights to their work. The publishers do not have anything to do with the science and the only service they offer is word to PDF with colors. In fact, the money paid to the publishers ironally provides them with resources to strengthen their monopoly and they're also paid by subscription fees which is outrageous. The publishers should pay the government or someone else for the right to publish the articles just like any other original work.

The burden of evidence should be on the publishers to justify charging the creators of the work for the rights and then turning around and charging subscription fees. They have stumbled into a monopoly on journal prestige and that's it.

**3. Peer review compensation:**
$0 per review is inappropriate. A nominal fee is reasonable and NIH should set guidance to standardize the practice.

**4. Publishing best practices:**

**5. Other Comments:**

## 107. Nicholas Wettersten

**Submit date:** 8/1/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Nicholas Wettersten

**Name of Organization:** San Diego Veterans Affairs and University of California San Diego

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I appreciate NIH's taking this on because from a researcher side, publication costs are a frustration. Of the options proposed, I favor option 4 since costs of publications widely vary as do the number of publications resulting from studies (sometimes I expect 2 papers and get 5).

One other potentially radical option to propose is to actually take publication costs out of the grant and instead put it in the control of NIH. That is, set up a system where investigators submit requests for publication costs related to papers from grants. This has multiple potential advantages:

1) Grants really only focus on true research costs when submitting

2) Many times, manuscripts are accepted after a grant has finished. Having funds available to cover the publication after a grant has ended would be a big relief as I myself worry I cannot publish something because I cannot cover the costs now that the grant ended

3) What I am most hopeful of is NIH can use the power of a single large consumer to drive down publication costs in negotiations with journals and mandate open access. If NIH comes to all publishers and says 'this is what we are paying or you cannot have NIH funded research', this may help reduce some of the ridiculous costs.

**2. Available evidence related to publication costs and proposed options:**
I am not sure I have anything specific except that many journals have 'society membership' publication costs. I have signed up for organizations using my own funds simply to lower publication costs.

**3. Peer review compensation:**
I have been a reviewer for over 20 journals and never have I been paid anything for my effort. The closest I get is CME.

I actually think it would be great if reviewers got some compensation as I got asked to do 6 reviews this week and only did 1 from both a time and lack of interest component. But that should be fully on journals if they want to take that route and not paid for from NIH grants.

**4. Publishing best practices:**
Going back to my radical idea of a centralized NIH payment system, this would give NIH oversight of what journals claim to do with publication costs, much like indirect costs for institutions.

**5. Other Comments:**

Going back to my radical idea of a centralized NIH payment system, this would give NIH oversight of what journals claim to do with publication costs, much like indirect costs for institutions.

## 108. Lizhen Chen

**Submit date:** 8/1/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Lizhen Chen

**Name of Organization:** UT Health San Antonio

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 4: Set a limit on the total amount of an award that can be spent on publication costs.

e.g. NIH awardees may not request more than $20,000.00 from their award or 0.8% of the direct costs of the award, whichever is higher, with no limit on the per publication costs, until the maximum allowable amount is reached.

**2. Available evidence related to publication costs and proposed options:**
Publication fees of different journals are different.

**3. Peer review compensation:**
There should not be peer review compensation.

**4. Publishing best practices:**

**5. Other Comments:**

## 109. J Christopher States

**Submit date:** 8/1/2025

**I am responding to this RFI:** On behalf of myself

**Name:** J Christopher States

**Name of Organization:** University of Louisville

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 5 seems most reasonable if a limit must be set.

Does submitting the accepted version of the manuscript to PubMed Central not fulfill the requirement for public access?

The averages cited in the RFI seem low in my experience.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Most peer reviewers receive no compensation. The research publication industry is reliant upon researchers both for uncompensated product and editorial service.

**4. Publishing best practices:**
Fraud / AI detection is a major problem, along with 'paper mills'.

**5. Other Comments:**
Fraud / AI detection is a major problem, along with 'paper mills'.

## 110. Frances Yap

**Submit date:** 8/1/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Frances Yap

**Name of Organization:** Northwestern University Feinbergh School of Medicine

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 4 is my preferred policy, however,  a $20k cap is too low for very productive labs that published >10-15 papers throughout a regular 5-year R01 award. A reputable journal in my field (Microbiology) costs an average of $3800-4500 (w/ open access) per article.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Peer review compensation is a great idea but compensation levels have to be modest because large monetary incentive may promote certain reviewers that are biased on specific topics/fields. There are also concerns that junior faculty may not get invitation to review as much as the senior investigators, further skewing the reviewing pool

**4. Publishing best practices:**
NIH should closely monitor the "evasion" of predatory journals (e.g., MDPI series, and sone Frontiers) and should prohibit  investigators from using NIH fund to publish in those predatory journals.

**5. Other Comments:**
NIH should closely monitor the "evasion" of predatory journals (e.g., MDPI series, and sone Frontiers) and should prohibit  investigators from using NIH fund to publish in those predatory journals.

## 111. N/A

**Submit date:** 8/1/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I think option 4 (cap total amount of award that can be spent on publishing costs, without a limit on any individual publication) is the best in allowing for flexibility in disseminating research results with maximizing funds to support research. The highest impact journals (NEJM, JAMA, Lancet, Nature), have very high publishing costs. Restricting publishing costs based on a per publication basis would discourage scientists from publishing in these journals.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 112. N/A

**Submit date:** 8/1/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Not allowing publication costs whatsoever will have a dramatic impact on public health, but not in a positive manner. I agree that there needs to be a change in publication costs, however, I think setting a limit of money which is allowable for each publication is more acceptable. Making a limit (e.g., $2000/publication) would also motivate journals to reduce their costs to the NIH maximum. If there is a price of 0, the publication industry won't budget and change prices.

**2. Available evidence related to publication costs and proposed options:**
Higher impact factor journals typically charge more for publication. Researchers are motivated to submit to higher impact factor journals because it helps with recognition and promotion. Somehow motivating these journals to reduce costs would be useful.

**3. Peer review compensation:**
In the past 2 years, I have peer-reviewed 50+ manuscripts and I have done this entirely in my own time and without compensation. If the question is regarding grant reviews, I believe higher compensation would motivate people to put more effort into grant reviews.

**4. Publishing best practices:**

**5. Other Comments:**

## 113. russell hovey

**Submit date:** 8/1/2025

**I am responding to this RFI:** On behalf of myself

**Name:** russell hovey

**Name of Organization:** University california Davis

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I fully support capping the cost per publication plus total amount spent (option 5). It is a known fact amongst grant preparers and reviewers that these numbers are impossible to predict and often inflated. The other option would be for NIH to run some sort of reimbursement mechanism - if you publish a paper and cite the grant in your funding source, then NIH will pick up the tab. If you dont publish any papers, then no cost. If you publish 20 papers, then that is great and its a good use of NIH funds (up to a cap of $2K per paper). Also sometimes papers get published after a grant ends (for various reasons) - having the NIH pick up the tab would be healthy to ensure the work gets out even if the grant is finished.

**2. Available evidence related to publication costs and proposed options:**
I would expect there is a very weak association between amount requested for publication costs in a grant and the actual amount spent 5 years later.

**3. Peer review compensation:**
Please dont consider this detail. There are very few good journals that compensate for review and if NIH does consider this detail then it will start encouraging people to stop donating their time for peer review. People will become motivated to only review for compensation "because that is what NIH recognizes". Not a good direction to go.

**4. Publishing best practices:**
The main one is color charges and APC. I have never heard of fraud detection being a factorable cost.

**5. Other Comments:**
The main one is color charges and APC. I have never heard of fraud detection being a factorable cost.

## 114. Ellen T Miller

**Submit date:** 8/1/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Ellen T Miller

**Name of Organization:** Cornell University

**Type of Organization:** Academic Institution

**Role:** Other

**Role – Other:** Research Administrator

**1. Proposed policy options:**
Setting of a per publication limit as well as an overall lifetime of the grant limit makes the most sense. There may be some years where no publications are developed and others where 2-3 are coming out in the same year. This allows the requested budget to be used when needed, but also protects the tax payor from contributing to inflated publication fees.

Option 5: Set a limit on both the per publication cost and the total amount of an award that can be spent on publications. NIH could limit both the total amount of an award that could be spent on publication costs to the greater of 0.8% of the award's direct costs or $20,000.00 over the life of the award, in addition to limiting the amount per publication to $6,000.00.

This option considers the limit in Option 4, as well as NIH applicants' range of estimated per publication costs of $0 to $12,000.00. A per-publication limit of $6,000.00 reflects the mid-point of the range of applicants' estimated per publication costs, and encompasses the majority of reported per-publication costs. By combining an overall percentage of the budget and a generous per publication limit of half of the maximum that NIH applicants estimated, this option allows awardees more flexibility while prohibiting use of taxpayer funds for unreasonably high fees.

Example: NIH awardees may spend up to $6,000.00 per publication up to their per-award spending limit on publication costs. In this example, awardees are explicitly allowed a greater per publication maximum while limiting the total amount.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 115. Carolyn Kroger

**Submit date:** 8/1/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Carolyn Kroger

**Name of Organization:** University of Michigan

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
The most preferable option in NOT-OD-25-138 is Option 4.

This offers the most flexibility to researchers, who may not know the exact number of publications during a grant period. This also allows researchers to submit manuscripts to peer-reviewed journals with varying APCs while requiring researchers to be fiscally-minded about their publication plans. For example, a research group could set forth a plan to publish some papers from an R01 in high-impact journals with higher APCs in addition to pre-prints and journals with lower APCs.

As such, this is the best option in the proposal:

Option 4: Set a limit on the total amount of an award that can be spent on publication costs. NIH could limit the maximum amount of an award that could be spent on publication costs to 0.8% of the award's direct costs over the length of the award or $20,000.00, whichever is greater, in order to not disproportionately impact smaller awards. Limiting the award to 0.8% or $20,000.00 is consistent with recent requested average amounts for publication costs and provides institutions flexibility in publication while containing future cost increases. NIH may consider exemptions to the cap with agency approval for unusual, high-volume publication situations.

Example: NIH awardees may not request more than $20,000.00 from their award or 0.8% of the direct costs of the award, whichever is higher, with no limit on the per publication costs, until the maximum allowable amount is reached.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
As a peer-reviewer, I think it goes without saying that I would be pleased if reviewers were compensated. To date, I have never been compensated for a review. In fact, I have recently accepted a position on the editorial board of a new journal that seeks to innovate on existing publishing models including paying reviewers. https://www.amecera.org/journals/hci/our-articles

Because paid reviewers are not common in many journals/fields, I do not think this should be a consideration for NIH caps at this time. Increasing a per-publication cap based on paid reviewers would not directly encourage journals to pay their reviewers. Actions taken by funding agencies such as NIH should be directed at incentivizing ethical practices rather than punishing researchers for behaviors and decisions made by for-profit companies that perpetuate unethical practices.

**4. Publishing best practices:**
One factor not considered in the summary of NIH publication cost analyses is the scaling of costs with type of article submission. Many journals have tiers of article types and costs, for example, a full-length research report may cost more than a short report. This should be taken into consideration if per-publication caps are implemented.

**5. Other Comments:**
One factor not considered in the summary of NIH publication cost analyses is the scaling of costs with type of article submission. Many journals have tiers of article types and costs, for example, a full-length research report may cost more than a short report. This should be taken into consideration if per-publication caps are implemented.

## 116. A junior PI

**Submit date:** 8/1/2025

**I am responding to this RFI:** On behalf of myself

**Name:** A junior PI

**Name of Organization:** Massachusetts General Hospital

**Type of Organization:** Non-profit Research Organization

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I vote for option 4, which only limits the total amount. Setting a limit on an individual publication will significantly discourage researcher from submitting their work to higher-impact journals.

**2. Available evidence related to publication costs and proposed options:**
I'm working on medical imaging. My own experience of APC is about 3,500-4,500 per publication for journals with a good reputation, such as Medical Image Analysis, Human Brain Mapping, Brain, Annals of Neurology. Some top-tier journals with brand names, like Nature/Science series/PNAS, can go beyond 10,000, but that is rare. So, if we use the average 4,000 per pub for estimation, the limit of 40,000 (500,000 * 0.08) in total will allow 10 papers in total through the award period, meaning 2 papers per year for a five-year R01 grant. I feel this would work well in general. But for a larger team with higher productivity and quality of publications, this might be insufficient.

**3. Peer review compensation:**
I frequently review papers for journals with which I also publish, including those I mentioned in the question above. I have NEVER received any compensation!

**4. Publishing best practices:**

**5. Other Comments:**

## 117. Aimin Liu

**Submit date:** 8/1/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Aimin Liu

**Name of Organization:** The Pennsylvania State University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I support capping the total cost of publication, but not individual ones. This allows grantees to publish high impact papers (Nature, Cell, Science, etc) in journals that may charge more than the proposed $2000 per publication cap. I believe grantees will strategically plan their publication portfolio to avoid low impact, high cost journals to maximize their impacts without going above the cap.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
I wholehearted support NIH's consideration of supporting peer review compensation. I feel that the part of the reason we are facing an epidemics of low quality open access journals is the free review system, so the journals are incentivized to review/accept as many manuscripts as they are willing. Adding the cost of peer reviews likely will eliminate many such predatory journals.

**4. Publishing best practices:**

**5. Other Comments:**

## 118. Cong Liu

**Submit date:** 8/1/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Cong Liu

**Name of Organization:** Boston Childrens Hospital

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I support a combination of a per-publication cost cap and a flexible exception mechanism. A cap of $2,500 per publication is reasonable if the journal provides transparency throughout the publication process such as reviewer recruitment, editorial handling, reviewer compensation, and public availability of peer review comments. However, NIH should take the lead in negotiating publication fees with journals to keep costs under this cap, rather than placing the burden on PIs to secure additional funds to cover any cost gaps. Flexibility should be maintained for cases where researchers publish in high-impact journals (e.g., Nature, Science) that may not agree to NIH's proposed fee structure. In such instances, NIH should allow up to 0.1% of direct costs to be used for publication expenses beyond the cap, with appropriate justification.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Compensating peer reviewers is reasonable only if reviewers are willing to disclose their identities and their reviews are made public. This ensures accountability and aligns incentives. Additionally, reviewers themselves should be reviewed periodically by the community or independent bodies to maintain quality. NIH should consider both transparency and accountability when evaluating compensation models.

**4. Publishing best practices:**

**5. Other Comments:**

## 119. Kevin Haworth

**Submit date:** 8/1/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Kevin Haworth

**Name of Organization:** University of Cincinnati

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I believe that a limit based on the cost per publication is most reasonable. Different fields have different numbers of publications that can come from a grant and therefore it is not as appropriate to have a total cost, independent of the field. The amount listed on a cost per publication, however, should be greater than the current median value because the NIH is now requiring immediate open access. Because of this requirement, the NIH should be prepared to cover the cost of open access publishing at a rate that would include most journals.

**2. Available evidence related to publication costs and proposed options:**
N/A

**3. Peer review compensation:**
N/A

**4. Publishing best practices:**
N/A

**5. Other Comments:**
N/A

## 120. PAMELA christine RONALD

**Submit date:** 8/1/2025

**I am responding to this RFI:** On behalf of myself

**Name:** PAMELA christine RONALD

**Name of Organization:** UC davis

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 3.

Please remember that  publication does cost money. Please support  non-profit journals run by scientific societies

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Peer reviewers are not compensated

It would be nice to be paid $250/ review

**4. Publishing best practices:**

**5. Other Comments:**

## 121. N/A

**Submit date:** 8/1/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Non-profit Research Organization

**Role:** Investigator/Researcher

**1. Proposed policy options:**

**2. Available evidence related to publication costs and proposed options:**
APC's should be calculated on the basis of journals that have a reasonable impact factor and are not predatory. Credible journals from developed nations with impact factors of >3 might be a good target. With lower limits, NIH research will be limited to being published in garbage journals.

**3. Peer review compensation:**
The salary info for peer reviewers is very much off the mark and represents a significant under-estimate. Peer review is done largely by individuals at the assistant professor level or above. Why not use the average salaries of NIH R01 PI's as they are the ones doing the majority of peer reviewing for any credible journal.

**4. Publishing best practices:**

**5. Other Comments:**

## 122. N/A

**Submit date:** 8/1/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Non-profit Research Organization

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I strongly feel that none of the proposed options should be approved. In my field, we often have to pay publication costs and the minimum is typically $3,000. I also considered submitting to a British Medical Journal and they charged closer to $6500 but I didn't have the funds to pay for that. I worry that limited publication costs will just put the cost burden on investigators who typically have limited discretionary resources to pay out of pocket for these costs. For example, my institution would not cover publication fees. It doesn't make sense that NIH budgets would not cover publication costs for results that come out of grants they fund. I would definitely not limit the amount per publication. If you have to put a cap on these costs, researchers will have fewer products from their NIH funded work which is the opposite of using tax payer dollars wisely.

**2. Available evidence related to publication costs and proposed options:**
I had a high impact journal acceptance (JAMA Network Open) that received lots of press and allowed for my research to be more widely seen by the public who indirectly fund our work. It provided useful information to tax payers regarding health behaviors they can change to support their coping with chronic conditions. It had publication fees of $4,000.

**3. Peer review compensation:**
Peer reviewers are not compensated at all in my field. Unpaid peer review is not funded by my institution so I have to do it on my own time. I think it is unfair that peer reviewers work for free yet medical journals charge publication fees. If anything, NIH should bar the journals from charging publication fees in the first place.

**4. Publishing best practices:**
Publishing costs vary widely by journal and by field. In my field, publication costs range from $3,000-6,000.

**5. Other Comments:**
Publishing costs vary widely by journal and by field. In my field, publication costs range from $3,000-6,000.

## 123. John Heintzman

**Submit date:** 8/1/2025

**I am responding to this RFI:** On behalf of myself

**Name:** John Heintzman

**Name of Organization:** Oregon health and science university

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
The crucial issue is that any limitation on funds for publication will directly contradict the new NIH policy on making published research freely available upon acceptance without embargo. To do this, most reputable and non-industry supported journals require open access fees, which can be up to $5000.

So, either NIH should support the robust inclusion of publication fees in NIH grant budgets, or it should allow their funds to publish in journals with subscription options and (limited) embargo. The latter is still widely available to the public through public institutions with libraries in all states.

If his policy contradiction does indeed exist (immediate and free availability and reduced support for publication fees), then industry will produce most published findings in most journals. This is obviously not the wish of the NIH or the HHS.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 124. Emek Demir

**Submit date:** 8/1/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Emek Demir

**Name of Organization:** Oregon Health and Science University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I strongly favor option 5 but also intrigued by option 3.

The primary drawback I see with option 2 and 3 is that it disproportionately favors, from the publisher's standpoint that are short - and although I can not see a clear pathway how might lead to fragmentation of manuscripts that would be best presented as a single large manuscript. For example a publisher might get creative and offers incentives for splitting a manuscript to 3 nanopublications of some type. Although this might sound outlandish, some predatory journals did get fairly creative in the past - so not impossible.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
I do believe that peer review is still a very important part of our collective Q/C process and motivating reviewers to do a better job with a small financial incentive is a good idea. But there are potential pitfalls.

I receive ~10 peer review requests per month. It is impossible for me to respond to all of them given that I actually spend anywhere between 3-10 hours per review. The risk with the incentive is that it might convince reviewers to accept multiple review requests even if they do not have the capacity to do through review.

I have an alternative suggestion : NIH can award supplemental awards for current NIH awardees to cover their time for reviewing NIH funded research up to a certain amount per year. For example assuming a 0.75 day/review and 10 reviews per year, NIH can offer 0.3% salary support per paper reviewed up to 10 publications. Alternatively, this additional fund can be used for publication costs. This system, although comes at some bookkeeping overhead has the advantage of supporting junior researchers, who carry most of the review burden anyway, keeps the funds within NIH ecosystem, incentivizes publishers and researchers to take on NIH funded research while making sure that a few bad actors do not abuse the system by turning in 100s of lax reviews.

**4. Publishing best practices:**

**5. Other Comments:**

## 125. Ze Wang

**Submit date:** 8/1/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Ze Wang

**Name of Organization:** University of Maryland Baltimore

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I consider Option 5 the best but if NIH can send notice to the major publishers to ask for a reduction of publication per paper, that will be great. To me, only federal agency can have this power to negotiate with them. The greediest publisher is Nature Group, and then Elsevier, Frontiers, and Plos. If NIH also push the publisher to reimburse the reviewers for the time (reviewers should get a substantial discount for publishing in these publisher's journals), that will also be great.

**2. Available evidence related to publication costs and proposed options:**
I would propose dispose each paper as a preprint before submitting to a formal journal so the access will be immediate and researchers can have more room to choose journals. For the highly prestigious but extremely expensive journals such as Nature Neuroscience, there are less expensive but similarly competitive ones. It may be worthwhile to add a column in the progress report for how much $$ each paper costs.

**3. Peer review compensation:**
Yes, I totally agree with that reviewers should be compensated either through real dollar or credit to be used for publishing papers in the journals managed by the same publishers.

**4. Publishing best practices:**

**5. Other Comments:**

## 126. Michael Steinman

**Submit date:** 8/1/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Michael Steinman

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 4 is the best of the available options presented, although even this is too limiting in many circumstances. As stated in the RFI, this represents the *average* existing cost per grant, meaning that roughly half of grants would not meet this criteria and have to curtail or otherwise modify their publication practices. Center grants that support infrastructure costs, including supporting publication fees, could also face substantial adverse effects since they typically support large numbers of publications.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**
Recently enacted NIH rules that require no embargo period for NIH-supported publications will likely drive up journal costs, as the decline in Open Access fee revenue will force journals to recoup these costs in other ways. This could well drive no-fee journals to start charging fees, and fee journals to increase their fees.

**5. Other Comments:**
Recently enacted NIH rules that require no embargo period for NIH-supported publications will likely drive up journal costs, as the decline in Open Access fee revenue will force journals to recoup these costs in other ways. This could well drive no-fee journals to start charging fees, and fee journals to increase their fees.

## 127. Charles McManus

**Submit date:** 8/1/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Charles McManus

**Name of Organization:** Carnegie Mellon University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I don't think NIH should cap the total amount investigators can pay from a grant to publish a paper.

Instead, I believe NIH should cap the total amount journals can charge to publish research that is funded in any way by NIH support at $5,000 per publication with annual inflation adjustments tied to the Consumer Price Index.

If NIH limits grant expenses to $2,000, but allows journals to charge higher rates, only very wealthy institutions will be able to publish in top tier journals (e.g. Science = $5,450; Cell = $11,400; Nature = $12690.00; PNAS = $5,300; Molecular Cell = $10,400) because they will have foundation money / endowment money / unrestricted funds, etc to pay for the very high APCs charged by these journals. This will bias future funding and discovery to the benefit of elite institutions and would not be in the public interest.

Publishing in these journals determines future funding and recruitment of research staff. Because of this, a $2,000 per publication cacreates a very bad model. NIH funded researchers without additional support will be less and less competitive for funding and good people - not because they do worse research, but because they can't afford to publish in the top tier of journals.

**2. Available evidence related to publication costs and proposed options:**
NIH cites publication costs from the DOAJ and justifies a cap based on the average and median costs. However, these numbers are skewed by many journals with very low publication costs, many of which may not rigorously review articles or have professional editors who curate articles. Basically, the average costs include predatory journals and papermills. This index also has many journals that are not relevant to biomedical research (e.g. Advances in Civil Engineering) and journals in India with no APC charges at all. This is not very representative of the actual costs of editing and publishing biomedical manuscripts with rigorous expert peer review.

APC charges for "high impact" journals are much higher than the $2,000 median found in the DOAJ (e.g. Science = $5,450; Cell = $11,400; Nature = $12690.00; PNAS = $5,300; Molecular Cell = $10,400).

NIH should evaluate what a reasonable charge should be to publish Open Access (required by NIH) in biomedical journals based on costs to operate a journal, pay professional editors, typesetting, and publication online and use that number as a maximum allowable charge journals can demand when publishing work that had NIH funding. I am guessing that number would be in the $5,000 range, but an actual study would be needed.

Alternatively, NIH should poll researchers supported by different NIH Institutes to establish a list of "reputable journals" and then use those journals APCs to establish a reasonable maximum journal charge for publications relevant to each Institute, perhaps using median +1 standard deviation as a more reasonable limit. Again, it is essential to cap the amount a journal can charge for work that had ANY NIH support, rather than cap the amount that a researcher can pay from an NIH grant.

**3. Peer review compensation:**
Paying for peer review is nice in that it compensates reviewers for their time. However, it can also lead to unethical behaviour. For example:

1) Some reviewers may do "quick and dirty" jobs just to make a quick $300, or use AI to write reviews for them to make easy money.

2) Journal editors will feel more pressure to publish a paper after they paid for reviews, as they've invested money into the manuscript.

3) If reviewers are only paid for accepted manuscripts, they will be more likely to accept the manuscript.

NIH should think very carefully about allowing excess charges to pay for peer review. It may be detrimental overall to scientific integrity.

**4. Publishing best practices:**
NIH should compare society journals and non-profits vs. For-profit journals, they should consider what is a "reasonable" profit margin.

**5. Other Comments:**
NIH should compare society journals and non-profits vs. For-profit journals, they should consider what is a "reasonable" profit margin.

## 128. Aaron DiAntonio

**Submit date:** 8/1/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Aaron DiAntonio

**Name of Organization:** Washington University School of Medicine

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I absolutely agree that publication costs eat up too much of our grants. However, we need to publish, and for our students careers we still need to publish the most impactful work in journals that are highly read and highly cited. These often are the more expensive journals in which to publish. While I agree that some limits make sense, I would urge you not to put a large new regulatory burden on us. There is already a ridiculous amount of money spent dealing with NIH regulations and reporting requirements. If a new regulation is added, please make it as simple as possible with the simplest reporting. My favorite choice is option #4, which is for the largest of $20K or 0.8%. This gives scientists the most flexibility. Instead of having to worry about the rule for every paper we publish, we can choose to "spend more" on a big story and less on others. We just need to report one final number to be sure we followed the rule.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
We are not. I have reviewed hundreds of papers and never gotten compensated. Of course, i also served on NIH study section for 6 years and barely got compensated ($200 for 1-2 weeks worth of work is almost worse than nothing!).

**4. Publishing best practices:**
There are a lot of trash journals. I am not sure the best way to make that list, but I would absolutely support funding only to go for legitimate journals with appropriate editorial practices.

**5. Other Comments:**
There are a lot of trash journals. I am not sure the best way to make that list, but I would absolutely support funding only to go for legitimate journals with appropriate editorial practices.

## 129. Francesco Versace

**Submit date:** 8/1/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Francesco Versace

**Name of Organization:** UT MD Anderson Cancer Center

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
The current problem stems from the NIH mandate requiring open access publication. In practice, this functions as a subsidy to publishers.

A more effective and cost-neutral solution would be to mandate the deposition of preprints, including the final revised version submitted to the journal, in a public repository. This would ensure broad access to research findings without imposing financial burdens on laboratories or the NIH.

Open access publication fees tend to increase with journal impact factor. Consequently, the mandate disproportionately affects smaller laboratories with limited publication budgets, effectively steering them toward lower-impact journals. This creates a structural disadvantage where important findings from underfunded labs may go unnoticed simply because they are published in less visible outlets.

The frequently cited argument that research funded with public money should be freely available to the public does not hold up under scrutiny. Public funds also pay for fighter jets, yet taxpayers are not entitled to fly them.

Finally, the idea that paying for open access publication is essential for dissemination is overstated. Corresponding authors' contact information is publicly available, and article reprints can be requested directly to the corresponding author by anybody. This long-standing mechanism will continue to provide effective access to scientific publications without additional cost.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 130. George R Mangun

**Submit date:** 8/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:** George R Mangun

**Name of Organization:** UC Davis

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I think the option to limit publication costs is a very bad idea.

It goes against NIH goals of public distribution of research findings, and may well negatively affect scientific progress and transparency.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 131. N/A

**Submit date:** 8/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 4 could be considered, while Option 1 should not be considered. For Option 4, $20,000 maximum per total award instead of 0.8% direct cost is more realistic.

**2. Available evidence related to publication costs and proposed options:**
At present, researchers rely heavily on NIH funding to cover publication costs. Current productivity evaluations are largely based on both the number and quality of publications. Without this support, publishing research becomes extremely difficult.

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 132. Nora Engel

**Submit date:** 8/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Nora Engel

**Name of Organization:** Coriell Institute for Medical Research

**Type of Organization:** Non-profit Research Organization

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I believe the best option put forward is:

Option 3: Set a limit on allowable costs per publication and allow a higher amount to be paid when peer reviewers are compensated. NIH could adopt the $2,000.00 limit per publication in Option 1, and allow a higher limit of $3,000.00 per publication when publishing in journals that compensate peer reviewers at a level equivalent to the average hourly wage reported by the U.S. Bureau of Labor Statistics for Medical Scientists and Biochemists/Biophysicists and that publicly provide all reviews resulting from the peer-review process of accepted, NIH-funded manuscripts.

If you just set a maximum percentage or amount of the award allowed for publication costs, you compound the problem of the biggest labs with the most money always getting published in the top, most expensive journals. The journals need to know that they can't keep ripping off the NIH and other funding agencies.

**2. Available evidence related to publication costs and proposed options:**
Most scientific publications have become for-profit organizations and the costs of publication are out of control. For example, Elsevier and Springer-Nature had profit margins that rivaled those of tech companies in 2023 (Source: Yahoo Finance, RELX Investor Presentations, Springer-Nature Annual Reports). This system is unfavorable to labs that aren't well-established yet, that have less funding, or that have new, potentially dissenting, views.

**3. Peer review compensation:**
I don't know of any journal that compensates its reviewers, but that is a wonderful idea. Although it's considered "part of the job", it is unacknowledged in any real way, and paying, even if it's not much, is a good way of rewarding reviewers and getting a wider range of scientists to contribute.

**4. Publishing best practices:**
None of the practices, even the fraud detection capabilities, cost the journals an amount that justifies the outrageous costs. Everything is automated and journals have no need for the extra money - as I mentioned before, it's only going towards shareholder and executive compensations.

**5. Other Comments:**
None of the practices, even the fraud detection capabilities, cost the journals an amount that justifies the outrageous costs. Everything is automated and journals have no need for the extra money - as I mentioned before, it's only going towards shareholder and executive compensations.

## 133. N/A

**Submit date:** 8/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
So long as it is not option 1, the others all seem reasonable. Options 4-5 provide the most flexibility to researchers.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 134. Maria Spletter

**Submit date:** 8/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Maria Spletter

**Name of Organization:** University of Missouri Kansas City

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 3 or Option 4 are the best proposed options. These provide the most flexibility for individual researchers, yet cap the total amount of NIH funds spent on publications.

**2. Available evidence related to publication costs and proposed options:**
Important considerations:

The Impact factor of the journal: for obtaining grants, positions, and advancing in our careers, our productivity is judged based on the quality of our publications and the impact factor of where we publish. The better the journal, typically, the higher the publication cost. I agree that publication costs of publishing companies get out of control and are unreasonably high, but NIH should not penalize researchers and PIs for what the publishing companies are doing. A model with flexibility so the researcher can choose  for example 2 low impact publications or one high impact publication is more equitable for those of us working at institutions that do not have large endowments to cover publication costs for us. Otherwise, I am quite certain that publication costs will not go down, the reliance on high impact factor publications to obtain grants and career advancement will not change, but if we cannot pay out of our NIH funds, we will be forced to pay out of pocket. Many of us PIs already pay all of our transportation and flight costs for conferences, for example, out of pocket because we do not have enough funding from our grants. One has the choice of paying to attend one conference or paying for 3 months of reagents or salary for a student to work on the project. We pay out of our own salary to attend the conference instead, because it is critical we attend and are known in our fields. Options 1 and 2 would force us to pay for publications on top of already paying for our conference travel. I chose to go into teaching and public service instead of earning 2-3x my salary in private industry. I was widowed and am a single parent to two children, so paying so much for professional expenses is really outside my budget. Option 3 or 4 achieve NIH's goals of ensuring a reasonable balance between costs incurred and providing PIs flexibility in how they publish.

**3. Peer review compensation:**
I have never been compensated for peer review for a journal. This actually would lead to a conflict as getting paid requires declaration as a competing interest and may not be allowed by my university.

**4. Publishing best practices:**
The quality and impact factor of the journal should be included in this calculation. Flexibility for the PI to publish as they best see fit should be included in the policy.

In Option 3 or 4, limiting the total allowable publication expenses to 1% or $20k allows researchers to publish where they see fit, but within the allowable expenditure range. I have never published in a journal where my publication cost was below $2000. These journals in my field are often impact factor < 3, that generally are not very well respected. Thus, option 1 or 2 are too restrictive and will negatively impact a PIs ability to obtain new grants or to advance their career.

Use of automated fraud or AI use detection is valuable. PIs should not be using generative AI to write manuscripts for them, but rather as a support tool. A PI needs to interpret their own data, and thus I support use of fraud detection capabilities.

**5. Other Comments:**
The quality and impact factor of the journal should be included in this calculation. Flexibility for the PI to publish as they best see fit should be included in the policy.

In Option 3 or 4, limiting the total allowable publication expenses to 1% or $20k allows researchers to publish where they see fit, but within the allowable expenditure range. I have never published in a journal where my publication cost was below $2000. These journals in my field are often impact factor < 3, that generally are not very well respected. Thus, option 1 or 2 are too restrictive and will negatively impact a PIs ability to obtain new grants or to advance their career.

Use of automated fraud or AI use detection is valuable. PIs should not be using generative AI to write manuscripts for them, but rather as a support tool. A PI needs to interpret their own data, and thus I support use of fraud detection capabilities.

## 135. Alan Schwartz

**Submit date:** 8/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Alan Schwartz

**Name of Organization:** UIC

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Publication is an essential and defining aspect of conducting research and can't really be divorced without changing the meaning of scholarship (cf. Glassick's criteria).

Options 4 and 5 (a per-grant % cap on APCs of 0.8% with or without a per-publication cap of at least $5000) would best balance the goals of open access distribution of federally funded research and ensuring that use of grant funds for these purposes is not disproportionate.

**2. Available evidence related to publication costs and proposed options:**
Nearly all high impact medical journals with APCs charge at least $3000, making proposals that have a per-article cap of $2000 less flexible for investigators and less valuable for the research enterprise.

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 136. Jingjing Yang

**Submit date:** 8/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Jingjing Yang

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 4 will give investigators the most flexibility about publishing their work.

**2. Available evidence related to publication costs and proposed options:**
Some of the top journals are charging $12K per article, which is way too expensive and will not be affordable according to the upcoming NIH policy.

**3. Peer review compensation:**
Most journals do not pay for reviewers. I think reviewers should receive compensation.

**4. Publishing best practices:**

**5. Other Comments:**

## 137. Arshad Desai

**Submit date:** 8/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Arshad Desai

**Name of Organization:** UC San Diego

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Anonymous peer review, revision and publication are the bedrock of our world. I do not believe there is a better system. The key missing element in the options discussed is the impact on trainee careers. Decisions on fellowships, awards and, most importantly, hiring are based on the strength of peer-reviewed publications. This is not just an economic issue - it impacts trainees the most and also the PIs directing the research. NIH should provide investigators flexibility but could consider a cap on the total allowed publication costs. I strongly oppose paying peer reviewers - this will rapidly create a perverse incentive system.

**2. Available evidence related to publication costs and proposed options:**
Publication costs on average for our work in the past 5 years range from $3000-$8,000. The higher end are for Gold Open Access at private publishers. The lower end are at high quality, widely respected non-profit journals (JBC, JCB etc). NIH could use its bully pulpit to force the private publishers to lower their charges. That being said, good editorial work managing and interpreting peer review takes investment. My concern is that the options proposed are all damaging rather than helpful. The directive to post final accepted manuscripts, by contrast, is helpful (as is the general tendency to preprint work at the time of submission). My plea is that any discussions of options not ignore the impacts on trainee careers and evaluation systems. So far, there is no better option than rigorous anonymous peer review that is effectively managed and interpreted by experienced editors (in my experience, the best system is to pair an academic and a professional editor - this really works!).

**3. Peer review compensation:**
Absolutely opposed. Peer review is the bedrock of science and I am in strong favor of anonymous peer review that is conducted as a professional obligation. Peer review also is key to training the next generation. I routinely involve trainees in peer review (most journals allow/encourage this with means to declare who all helped with the review) and this teaches them how to write and present their own work. Paid peer review will rapidly devolve into a small subset of people accepting large numbers of review requests to make money. Honestly, the major problems with peer review relate to lack of editorial oversight. A good editor interprets peer reviews and guides authors. But this is rare as private publishers run a volume business and editors lack expertise or are too green to make thoughtful decisions.

**4. Publishing best practices:**
The key to high quality publications is having good editors who manage and guide the peer review process. This costs money and the NIH should support and promote models where this is done

effectively. I have noted suggestions above on approaches that I believe work best. I do support automated screening for image fraud, plagiarism etc although much of this will be challenged by the new AI world. So a key element is to instill a strong ethical view on trainees from the start - but we will always have some “error rate” and should not impose policies that hurt the majority to catch a few minor bad actors.

**5. Other Comments:**

The key to high quality publications is having good editors who manage and guide the peer review process. This costs money and the NIH should support and promote models where this is done effectively. I have noted suggestions above on approaches that I believe work best. I do support automated screening for image fraud, plagiarism etc although much of this will be challenged by the new AI world. So a key element is to instill a strong ethical view on trainees from the start - but we will always have some “error rate” and should not impose policies that hurt the majority to catch a few minor bad actors.

## 138. Jason Miller

**Submit date:** 8/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Jason Miller

**Name of Organization:** University of Michigan

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Of the presented options, number 3 is best, but it is still not an adequate response. The real problem is the absolute control Cell, Nature, Science and similar journals have over article prestige. And article prestige is one of the key factors, unconsciously, that peer reviewers at the NIH use to judge scoring for submitted grants to study section. The real need here is for there to be explicit rules for study section to de-emphasize the prestige factor for journals. Or set society journals, which generally charge much much less, as a gold standard for publishing. If publishing in Nature increases your chances of getting a grant, it's worth scrounging to find the thousands of dollars it costs to publish in this journal.

None of the proposals tackle the problem at its root, which is to actually DISALLOW NIH-supported research to be published in a journal that charges above X dollars for publishing. Or by creating rules that eliminate past publications in expensive prestige journals as a consideration for determining if a grant will be funded.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Peer review has been a race to the bottom - it is uncompensated time, without any real reward. $50/hr starts to get at the problem, but in reality, especially for physician scientists whose consulting fees are regularly $500/hr or higher, this type of compensation will be inadequate to incentivize peer review. The better way to incentivize peer review is to make it valued... IOVS (society journal for eye research) provides an "exceptional review" moniker from the EIC. It is easy for EIC to see who has done a detailed and thoughtful peer review. Such a peer review that receives such a designation should be part of consideration as a criteria for reviewing grants on study section. Meaning if a candidate submitting a grant to study section has a long history of such exceptional peer review, some extra consideration should be given to such a candidate - equivalent to how ESI status may be given to a candidate. This type of reward for good peer review would instantly improve peer review and incentivize it more than any possible monetary compensation. And it fits squarely within the goals of the NIH - which is to have more rigor and reproducibility, which starts with good peer review.

**4. Publishing best practices:**

**5. Other Comments:**

## 139. Kylie Meyer

**Submit date:** 8/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Kylie Meyer

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I support Option 3. As a taxpayer, I appreciate the NIH's goal to best utilize taxpayer dollars. As the PI of an R01, I value the flexibility of this option that supports some publication expenses, which may be required to publish in journals that support rapid publication of findings. Option 1 (no publication costs allowed) is far too limiting.

**2. Available evidence related to publication costs and proposed options:**
No evidence to provide.

**3. Peer review compensation:**
I appreciate the NIH exploring an option that would encourage peer-review compensation. This approach could really help with a big issue facing the dissemination of research today: the review period is way too long in many journals. Not only is this a disservice to the public at large who could otherwise benefit from scientific findings sooner, it also negatively affects early-career scientists who rely on publications for job evaluations and grant proposals. A reasonable monetary incentive could help reduce delays. Admittedly, this approach could open the door for persons doing a poor job of peer review given the ability to be compensated, the relatively modest amounts proposed likely prevent this. Editors could also choose not to invite back reviewers who do a poor job, as they do now. In short, I appreciate the NIH considering a policy that could encourage journals to adopt this approach.

**4. Publishing best practices:**
As a reviewer and journal associate editor, I am not aware of publishers using these tools in my own direct experience but I support NIH studying these potential costs.

**5. Other Comments:**
As a reviewer and journal associate editor, I am not aware of publishers using these tools in my own direct experience but I support NIH studying these potential costs.

## 140. Megan Rose Curtis

**Submit date:** 8/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Megan Rose Curtis

**Name of Organization:** Washington University School of Medicine

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
To NIH Office of Science Policy,

Thank you for the opportunity to comment on the proposed policy options to limit allowable publishing costs supported by NIH funds. As a physician-scientist committed to transparent, equitable dissemination of research, I write in support of Option 5, which combines a per-publication cap ($6,000) with a total publication spending cap (0.8% of direct costs or $20,000 per award, whichever is greater). I have chosen this for many reasons including:

It allows researchers to publish in reputable open-access journals while avoiding unreasonably high fees.

The total cap (with a minimum floor) protects smaller awards and early-stage investigators from disproportionate burden.

The per-publication cap prevents rare but excessive APCs from depleting research budgets.

I would also add these suggestions for improvement:

Build in a clear pathway for researchers to request exceptions in well-justified cases (e.g., high publication volume, required journals in a given field, global partnerships).

Consider allowing higher proportional thresholds (e.g., up to 1.5% of direct costs) for K awards or R01s held by early-stage investigators.

NIH should track whether the policy inadvertently limits publication options for researchers at under-resourced institutions or those publishing in fields with higher article processing charges.

NIH could incentivize publishing in journals that use transparent peer review, robust fraud detection, and reviewer compensation.

I appreciate NIH's commitment to responsible stewardship of public funds while preserving the dissemination of rigorously conducted science. This proposed policy, with careful implementation, can advance both goals.

Sincerely,

Megan Rose Curtis, MD, MS

Assistant Professor of Medicine

Division of Infectious Diseases

Department of Internal Medicine

Washington University in St. Louis- School of Medicine

**2. Available evidence related to publication costs and proposed options:**
To the NIH Office of Science Policy,

Thank you for the opportunity to comment on the proposed policy to limit allowable publishing costs. I'd like to share evidence and concerns specifically related to the potential impact on early-career investigators (ECIs).

ECIs often rely on a single NIH award with little or no access to institutional discretionary funds. NIH's own data show that grantees typically request only about 0.8% of direct costs for publication expenses, suggesting current spending is modest and not excessive. However, eliminating publication support (Option 1) or capping it at $2,000 per article (Option 2) could disproportionately affect ECIs who face pressure to publish in reputable open-access journals with APCs that commonly exceed this threshold (e.g., AJOG, PLOS Medicine, The Lancet Regional Health).

Further, studies such as Ginther et al. (Science, 2011) have shown that structural barriers in funding disproportionately impact early-career and underrepresented investigators. Restricting publication support risks reinforcing these inequities—particularly for ECIs without access to institutional subsidy or fee waivers.

In contrast, Option 5 provides a more balanced and evidence-informed approach by controlling outlier costs while preserving flexibility. I encourage NIH to consider this option or to include mechanisms that protect early-career investigators from disproportionate burden under any new policy.

Sincerely,

Megan Rose Curtis, MD, MS

Assistant Professor of Medicine

Division of Infectious Diseases

Department of Internal Medicine

Washington University in St. Louis- School of Medicine

**3. Peer review compensation:**
To the NIH Office of Science Policy,

I strongly support compensation for peer reviewers. If NIH considers allowing higher APCs for journals that compensate peer reviewers, I suggest ensuring:

Fair pay based on estimated time and expertise (e.g., ~$300/review).

Transparency, with journals disclosing whether and how reviewers are paid.

Compensating reviewers could improve fairness and quality, but clear standards are essential.

Sincerely,

Megan Rose Curtis, MD, MS

Assistant Professor of Medicine

Division of Infectious Diseases

Department of Internal Medicine

**4. Publishing best practices:**
To the NIH Office of Science Policy,

Beyond peer reviewer compensation, NIH should consider that certain publishing best practices contribute to higher but justified costs. These include:

Automated fraud detection tools to prevent image manipulation, plagiarism, and data fabrication, which safeguard scientific integrity.

Open peer review and transparent editorial processes, which improve trust and reproducibility.

Enhanced data sharing infrastructure that supports linking publications to datasets and code.

Rigorous ethical oversight, including conflict-of-interest checks and patient privacy protections.

Allowing higher per-publication costs for journals that invest in these quality and integrity measures encourages responsible publishing without compromising accountability.

Sincerely,

Megan Rose Curtis, MD, MS

Assistant Professor of Medicine

Division of Infectious Diseases

Department of Internal Medicine

**5. Other Comments:**
To the NIH Office of Science Policy,

Beyond peer reviewer compensation, NIH should consider that certain publishing best practices contribute to higher but justified costs. These include:

Automated fraud detection tools to prevent image manipulation, plagiarism, and data fabrication, which safeguard scientific integrity.

Open peer review and transparent editorial processes, which improve trust and reproducibility.

Enhanced data sharing infrastructure that supports linking publications to datasets and code.

Rigorous ethical oversight, including conflict-of-interest checks and patient privacy protections.

Allowing higher per-publication costs for journals that invest in these quality and integrity measures encourages responsible publishing without compromising accountability.

Sincerely,

Megan Rose Curtis, MD, MS

Assistant Professor of Medicine

Division of Infectious Diseases

Department of Internal Medicine

**Description:** Response to National Institutes of Health (NIH): Request for Information on Maximizing Research Funds by Limiting Allowable Publishing Costs

## 141. J. Philip Miller

**Submit date:** 8/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:** J. Philip Miller

**Name of Organization:** Washington University School of Medicine

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I think that the new policy should not allow for the institution (or other non NIH funds) should be allowed to supplement beyond the upper limit of what NIH woud allow to be charged for an APC fee. The reason is that some institutions appear to be manipulating publication indexes. The best example of this is the Lancet's institutional rankings where 9 of the top 10 institutions are Chinese by virtue of publications in Lancet family publications where APCs are several times larger than average APCs. These institutions are reputed to be ones who will pay the APC for faculty publicatons.

**2. Available evidence related to publication costs and proposed options:**
Have a publication submitted which examines this issue in greater detail, when accepted will add to this submission its content.

**3. Peer review compensation:**
At the very least NIH should allow information about recent peer review activity should be allowed on the Biosketch.

**4. Publishing best practices:**
Perhaps publishers could be financially rewarded by NIH directly for adherence to a set of best practices.

**5. Other Comments:**
Perhaps publishers could be financially rewarded by NIH directly for adherence to a set of best practices.

## 142. Derek Walsh

**Submit date:** 8/3/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Derek Walsh

**Name of Organization:** Northwestern University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Unreviewed pre-prints are not a viable way forward as many are outright wrong, and will create major confusion. As such, we really need to be allowed to budget for and support peer review, which greatly improves the quality of studies and prevents the publication of erroneous science.

While average costs may be around $2,000 per article, this is skewed and many higher quality journals that US scientists often publish in charge more. Simple examples are Nature Communications or Cell Reports, that cost around $5,000. These journals attract higher quality papers and reviewers, making the costs somewhat justifiable. Although I do agree that some Springer Nature costs are needlessly excessive.

We need to be allowed to pay for peer review and publication at a reasonable cost of around $4-5,0000 per article, and budgets should allow this cost set against a reasonable estimate of expected number of publications from a given group as determined by grant reviewers who can assess the applicants output. Averaged numbers shouldn't apply universally as they punish/limit the capacity of the most productive groups.

**2. Available evidence related to publication costs and proposed options:**
See examples above (Cell Reports and Nature Communications) as reasonable costs for quality peer review and reputation.

I would suggest not just averaging all journals but assessing where do US scientists publish most, then examine their costs. Many journals included in the current analysis are likely low quality and therefore cheap, but not where US scientists would publish anyway.

**3. Peer review compensation:**
We never get compensated for reviewing for quality journals.

**4. Publishing best practices:**

**5. Other Comments:**

## 143. Ruogu Ffang

**Submit date:** 8/3/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Ruogu Ffang

**Name of Organization:** University of Florida

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Thank you for the opportunity to provide input on the NIH's proposed policy regarding allowable publication costs. As a researcher in biomedical AI and imaging, an NIH grant recipient, and a long-time reviewer for both NIH and leading journals, I strongly support NIH's effort to ensure responsible use of taxpayer funds while maintaining the integrity and accessibility of research dissemination.

Below I offer my comments on each of the specific questions posed:

Most Effective Option for Balancing Flexibility and Fiscal Responsibility

While a per-publication cap (e.g., $6,000) could curb excesses, I believe a tiered, flexible model—informed by publisher transparency, adherence to open-access standards, and use of best practices—would strike the best balance. Importantly, NIH should negotiate directly with major publishers to reduce APCs for NIH-funded authors, using its collective bargaining power.

Rather than only imposing caps on NIH-funded APCs, I encourage NIH to actively engage in dialogue with major publishers to address the systemic causes of rising publication costs. NIH, as a major funder, has significant leverage to push for more reasonable and transparent APC structures—such as volume-based tiered pricing or institutional agreements that reflect the scale of NIH-supported research.

**2. Available evidence related to publication costs and proposed options:**
From my own experience, APCs have risen steadily without proportional increases in quality or transparency. For example, several journals in medical AI now charge $4,000–$8,000 per article, even when editorial services remain minimal and peer review is volunteer-based. Moreover, open-access journals operated by non-profit societies or universities often publish similar content for a fraction of the cost (e.g., PLOS Digital Health, eLife, and JMIR).

The lack of price regulation and competition is a key contributor to this inflation. NIH's involvement in price negotiations—modeled after initiatives like Plan S in Europe—could lead to more rational pricing aligned with scientific value rather than journal prestige.

**3. Peer review compensation:**
I propose that NIH advocate for a system where reviewers receive publication credits for their service. These credits could be applied toward future APCs when those reviewers publish their own work. Such a system would both incentivize quality peer review and ease the financial burden on authors, particularly early-career and under-resourced researchers. NIH could negotiate with the publishers to allow publication credits for peer reviewers. Reviewers contribute substantially to the publishing process, and

their labor should be recognized in ways that reduce future APC burdens (e.g., by redeeming credits toward their own publications). This would also incentivize high-quality peer review.

**4. Publishing best practices:**
Higher per-publication costs may be justifiable when journals implement and transparently report robust editorial practices, such as:

Automated fraud detection and plagiarism screening

Rigorous data/code availability enforcement

Transparent peer review (e.g., open peer reviews or published reviewer comments)

Equity-based fee waivers for underrepresented or resource-limited authors

Support for reproducibility (e.g., code execution environments or supplementary notebooks)

NIH could develop a checklist or certification standard for journals to qualify for the upper tier of allowable APC reimbursement based on these practices.

**5. Other Comments:**
Higher per-publication costs may be justifiable when journals implement and transparently report robust editorial practices, such as:

Automated fraud detection and plagiarism screening

Rigorous data/code availability enforcement

Transparent peer review (e.g., open peer reviews or published reviewer comments)

Equity-based fee waivers for underrepresented or resource-limited authors

Support for reproducibility (e.g., code execution environments or supplementary notebooks)

NIH could develop a checklist or certification standard for journals to qualify for the upper tier of allowable APC reimbursement based on these practices.

## 144. Judith Fridovich-Keil

**Submit date:** 8/3/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Judith Fridovich-Keil

**Name of Organization:** Emory University School of Medicine

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Publication costs may vary by field and by open access options. Instead of NIH making a universal rule based on limited data, why not let study section reviewers, who are familiar with publication costs in the relevant field, state whether a grant is asking for too much money for publication costs?

**2. Available evidence related to publication costs and proposed options:**
The 2 top journals related to metabolic disease that I am familiar with are Journal of Inherited Metabolic Disease (JIMD) and Molecular Genetics and Metabolism (MGM).

JIMD charges $3,470 USD per article for open access (https://onlinelibrary.wiley.com/page/journal/15732665/homepage/fundedaccess) and MGM charges $3500 per article for open access (https://www.sciencedirect.com/journal/molecular-genetics-and-metabolism).

**3. Peer review compensation:**
I have never seen a reputable journal pay for peer review, at least not in the US. I worry that making peer review a fee-for-service activity will encourage people to accept review assignments they should not, and do a shoddy job, just to get paid.

**4. Publishing best practices:**
Speed of turn-around from submission to 1st decision, and from acceptance to publication. Journals will need to have more paid employees in the loop to keep these processes moving quickly, as they should.

**5. Other Comments:**
Speed of turn-around from submission to 1st decision, and from acceptance to publication. Journals will need to have more paid employees in the loop to keep these processes moving quickly, as they should.

# 145. Joshua Reineke

**Submit date:** 8/3/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Joshua Reineke

**Name of Organization:** South Dakota State University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
As an R01 PI who has struggled to fund publications I am in strong favor of a variation of Option 1 that is not proposed. A factor that I did not see considered in proposal is the size of school research expenditures. For larger institutions with high research expenditures, Option 1 would not impact publications as the larger total indirects and endowments would be able to cover publication costs. This would leave out smaller institutions as they could not cover the extra burden of publication cost if not covered on grants. I think it is important to not allow publication costs as journals will continue to increase charges which negatively impacts the public sharing of scientific discovery. Therefore, I would propose a variation of Option 1 where there is a contingency for institutions with a smaller research expenditure to allow publication costs similar to that allowed in Option 2. In my opinion, this would encourage journals to reduce APCs (as most publications are coming from high research expenditure institutions), address a potential disparity that would emerge if Option 1 were adopted in its current form making more difficult for smaller institutions to publish, and could potentially encourage research collaborations between large and small institutions.

I strongly advise against allowing publication costs for journal if reviewers are compensated (Option 3). I expand on my reasoning in the appropriate question below.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
While I feel it would be good to pay reviewers, there is the potential for poor peer review standards to emerge from reviewers that conduct many reviews for the compensation. I think a system like this could exist and mitigate this concern, but it would require very careful demographic monitoring to ensure that the type of reviewers do not drift from current reviews. For instance the level of training/position of reviewers, the publication record of reviewers, geographic location of reviewers, institution type of reviewers, number of reviews in a period by a reviewer, etc. If this were carefully tracked it would mitigate issues but would create an onerous process of data collection and oversight.

An alternative option to encourage could be for a journal policy that requires authors to review 4 manuscripts within a year of publishing a manuscript in a particular journal or journal collection. This would both incentivize the reviews and keep a high standard of review. Perhaps a review buyout from NIH grants could be used under this system to replace the use of grant funds for APCs.

**4. Publishing best practices:**
I am copying my comment from the above box here as it relates to this question:

An alternative option to encourage could be for a journal policy that requires authors to review 4 manuscripts within a year of publishing a manuscript in a particular journal or journal collection. This would both incentivize the reviews and keep a high standard of review. Perhaps a review buyout from NIH grants could be used under this system to replace the use of grant funds for APCs.

**5. Other Comments:**
I am copying my comment from the above box here as it relates to this question:

An alternative option to encourage could be for a journal policy that requires authors to review 4 manuscripts within a year of publishing a manuscript in a particular journal or journal collection. This would both incentivize the reviews and keep a high standard of review. Perhaps a review buyout from NIH grants could be used under this system to replace the use of grant funds for APCs.

## 146. Julie Johnson

**Submit date:** 8/3/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Julie Johnson

**Name of Organization:** The Ohio State University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
The option of limiting total expenditure from grant (0.8% or $20K) with a max per paper is reasonable - investigators dislike the high costs but sometimes feel the respective journal is the right one for their work. Having a major funding agency, like NIH, put a limit would theoretically create pressure on the journals that have established the exorbitant APCs to bring them back in line - though it is obviously unclear if this would happen - in which case it becomes only harder for the investigator.

**2. Available evidence related to publication costs and proposed options:**
This is a problem created by journals and not by investigators. Indeed there are many situations where the publication costs create significant barriers, in particular for early career, grad students and postdocs to publish in certain journals when there are not funds specifically available for publication at this. Further, when investigators use non-NIH, discretionary resources to pursue a bold idea they also can face challenges relative to high APCs

Ulitimately the NIH is in a position of power to move the needle with publishers, as is obviously with the PMC deposit requirements. It is important that any steps that are taken address behaviors of journals/publishers, and don't simply make everything harder for investigators.

**3. Peer review compensation:**
Peer reviewers are not appropriately compensated because they are not compensated. Having said that, there would need to be a systemwide process created for paying for peer review and it's not clear this is realistic. Also the lack of payment for peer review does not seem to be the major issue. Rather it is the journal charging high prices for APCs for open access, the landscape for which might change dramatically once all federally funded papers have to be open access immediately

**4. Publishing best practices:**

**5. Other Comments:**

## 147. Karyn Frick

**Submit date:** 8/3/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Karyn Frick

**Name of Organization:** University of Wisconsin-Milwaukee

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I get that publication costs for open access are high, and can be outrageously so in top tier journals. But if the limits on fees are too strict, you'll essentially force PIs to publish subscription access, with then restricts the public's access to the research (and defeats the purpose of open access). I would be strongly in favor of a limit per grant (e.g., $20-30k) so to give investigators, whose fields and publishing options may vary considerably, flexibility to make their own publishing decisions.

**2. Available evidence related to publication costs and proposed options:**
I routinely publish my work in long-standing respected journals published by legacy publishers like Elsevier, Wiley, and societies like the Society for Neuroscience. I always opt to publish my NIH-funded work using their open access options so that the public has immediate access to the published work. Open access fees for these journals typically run between $3,000-4,500 per publications, so the proposed $2,000 limit per publication would not allow me to publish open access in any of the respected journals in my field. Instead, I'd have to publish subscription access, thus embargo-ing my papers for 12 months and completely defeating the purpose of open access. This would be a regressive policy that would restrict the public's access to its science unless publishers drastically reduce open access fees.

**3. Peer review compensation:**
Compensation for peer reviews is a poor idea. I know it takes time and that time is precious, but paying people to review will very likely encourage bad behavior by people who only accept reviews to make money and expend little effort.

**4. Publishing best practices:**
This is hard to know without knowing more about how journals set publication costs.

**5. Other Comments:**
This is hard to know without knowing more about how journals set publication costs.

## 148. Huntsman Cancer Institute, University of Utah

**Submit date:** 8/4/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Cornelia Ulrich

**Name of Organization:** Huntsman Cancer Institute, University of Utah

**Type of Organization:** Academic Institution

**Role:** Organizational Official

**1. Proposed policy options:**
Dear NIH Colleagues,

As a Cancer Center Director and investigator with over $130 million in cumulative research funding, I urge you to reconsider implementing a rigid policy in this area. Given the limited overall availability of research dollars, investigators are already highly motivated to allocate funds responsibly and strategically toward scientific advancement. Furthermore, the timeline and venue of publication are often unpredictable, and a one-size-fits-all mandate could inadvertently constrain scientific productivity. Flexibility is essential.

I also want to comment on the recent requirement for immediate deposition of author-accepted manuscripts in PubMed Central. While I support open science and public access, this policy risks undermining the sustainability of many journals whose business models increasingly rely on open access fees—often exceeding $3,000 per article. The unintended consequence is that researchers, particularly those managing limited resources, will publish less frequently. This disproportionately affects trainees—graduate students, postdocs, and interns—for whom first-author publications are a critical part of their career development.

In my own lab, I've published over 500 peer-reviewed papers, the majority led by trainees. I've made it a priority to support interns and junior scientists in developing and publishing their work. With the financial burden of mandated open access, we will be forced to limit the number of publications, combine findings that would otherwise merit individual papers, and reduce opportunities for trainees. This will also lead to less timely publications.

I respectfully urge the NIH to consider these downstream impacts and seek a balanced approach that promotes both accessibility and sustainability in research.

Sincerely,

Cornelia Ulrich, MS, PhD

Chief Scientific Officer and Executive Director of the Comprehensive Cancer Center

**2. Available evidence related to publication costs and proposed options:**
NA

**3. Peer review compensation:**
Please see response above. The current system worked well.

**4. Publishing best practices:**
Please see response above. Maintaining flexibility will work best.

**5. Other Comments:**
Please see response above. Maintaining flexibility will work best.

## 149. Alysson R Muotri

**Submit date:** 8/4/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Alysson R Muotri

**Name of Organization:** UC Sanb Diego

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
NIH should not cover publication costs (option #1). NIH would save a significant amount of funds by creating an open platform for investigators to deposit their manuscripts and allow others to comment/criticize transparently.

There is no reason we still have paid scientific publications, hard copies, more costs for the public to have access to the data, etc, at this stage in science. It is long overdue for a solution that eliminates the middleman (paid journals).

**2. Available evidence related to publication costs and proposed options:**
My lab work with several rare genetic disorders and patients did not have access to the data generated with taxpayers' money due to the monetization of science by private journals.

The creation of an open platform by NIH will mean that all the problems associated with paid journals (biased content, high costs, etc) will go away. It is an easy solution, and it is long overdue.

**3. Peer review compensation:**
Most journals do not pay reviewers; they do this because they find the subject of a manuscript interesting and because most scientists believe in a community-based system. However, this is no longer sustainable.

**4. Publishing best practices:**
NIH should create its own publication platform, independent of private companies. This open-source platform could incorporate AI-driven mechanisms for fraud detection, data duplication, etc.

**5. Other Comments:**
NIH should create its own publication platform, independent of private companies. This open-source platform could incorporate AI-driven mechanisms for fraud detection, data duplication, etc.

## 150. N/A

**Submit date:** 8/4/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 1 goes against the mandate of the NIH to share tax payer data with the community.

Option 4 and 5 will limit the number of publications that can be produced by each grant, which would again go against the mandate of the NIH to share taxpayer data. Many highly successful grants can yield 2-5 publications per year (based on reviews of renewal applications at study section). As such, a higher total limit should be in place if these options are considered ($50,000 over the life of the 5 year grant). I don't think putting a limit on the total number of publications that can come from a grant is in the best interest of communicating the research successes of NIH funding.

Option 2 and 3 are the most reasonable, but cost limits should be higher and need to escalate based on inflation (should include an increase of 3% per year - annual inflation is a thing). Using PLOS as a model (which is a non-profit open access publisher, and one of the pioneers for open access) the current average cost to publish is $2,713 dollars - averaged across 11 different PLOS journals. Many open access society journals (again non-profit publishers) are also within this range. Therefore, a limit of $3,000 with an inflationary increase seems much more reasonable to ensure that the NIH mandate to communicate research with the public is met.

**2. Available evidence related to publication costs and proposed options:**
PLOS and society journals advertise there current open access fees. The NIH has access to data that could be used to determine how publication numbers influence likelihood that grants will be renewed.

**3. Peer review compensation:**
While peer review compensation would be nice, most researchers believe that peer review is important and will do it as a service for non profit journals. For profit publishers that are making huge profits is another issue.

**4. Publishing best practices:**
Non-profit publishers and society journals should be supported. When evaluating real world costs to maintain publishing, costs from these publishers should be considered.

Large datasets may also require large supplemental files that need to be stored on storage space. Therefore, costs to maintain important supplemental files need to also be considered and included.

Inflation also needs to be considered - costs will go up with time.

**5. Other Comments:**

Non-profit publishers and society journals should be supported. When evaluating real world costs to maintain publishing, costs from these publishers should be considered.

Large datasets may also require large supplemental files that need to be stored on storage space. Therefore, costs to maintain important supplemental files need to also be considered and included.

Inflation also needs to be considered - costs will go up with time.

## 151. Paul Joudrey

**Submit date:** 8/4/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Paul Joudrey

**Name of Organization:** University of Pittsburgh

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I strongly favor option 4: Set a limit on the total amount of an award that can be spent on publication costs. This approach is both simple to administer, would be less likely to impact early career researchers and smaller grants, and is clear and easy to plan a project budget around.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 152. N/A

**Submit date:** 8/4/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 4: Set a limit on the total amount of an award that can be spent on publication costs.

This option is seems the fairest and also easiest to implement.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**
I am concerned guidelines such as this put the onus on the researcher in determining whether the journal they're submitting to meets any of these best practices. There are already too many administrative rules for researchers to manage themselves, and this puts researchers at smaller institutions with less resources at even more of a disadvantage, as the PI often has to figure out these things themselves, taking time away from actually doing research.

**5. Other Comments:**
I am concerned guidelines such as this put the onus on the researcher in determining whether the journal they're submitting to meets any of these best practices. There are already too many administrative rules for researchers to manage themselves, and this puts researchers at smaller institutions with less resources at even more of a disadvantage, as the PI often has to figure out these things themselves, taking time away from actually doing research.

## 153. EZEQUIEL MARTIN SALIDO

**Submit date:** 8/4/2025

**I am responding to this RFI:** On behalf of myself

**Name:** EZEQUIEL MARTIN SALIDO

**Name of Organization:** West Virginia University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Reviewing is critical in science and very time-consuming. It needs to be compensated in order to improve the availability of reviewers and the quality.

**4. Publishing best practices:**
ok

**5. Other Comments:**
ok

## 154. Peter Stoilov

**Submit date:** 8/4/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Peter Stoilov

**Name of Organization:** West Virginia University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 1. This option is very problematic for two reasons. It will effectively eliminate peer review and result in decline in the quality of published research. While pre-print servers may appear to be free of publication costs, they do need financial support.

Option 2. This option can produce cost savings in the short term, but is inflexible and incompatible with free markets. It will make publishers with higher personnel costs (e.i. publishers located in US and EU) less competitive and push publishing off-shore. Ultimately it will result in lower publication quality.

Option 3. This option adds an element of fairness to option 2 by requiring reviewers to be compensated. Regardless it suffers the same fatal flow.

Options 4 and 5 are just a variations of option 2 and are similarly unworkable.

Overall the proposed policy options are flawed and unworkable because they all mandate costs. Solve price inflation by mandating costs never works. The outcome of such measures is always deterioration of the regulated market and development of "gray" markets. Furthermore, the proposed solutions do not seem to be based on understanding of how scientific publishing works and how much it costs. I would like to propose an alternative approach of injecting competition and setting standards for publications:

1. Provide grants to academic institutions, non-profits and new for-profit entities to establish and maintain peer-reviewed publications following NIH guidelines on publishing costs, reviewer compensation, peer review standards and mechanisms for retraction and corrections. The publishing costs should be a part of negotiated contract.

2. Create a NIH publisher that would set a standard for research publications in terms of quality and costs. This could be achieved by expanding Pub Med Central.

3. Optionally or as an alternative to #2 Create public non-profit corporation publisher similar in structure to the Corporation for Public Broadcasting.

4. Establish contracts with willing publishers that will specify publishing costs, reviewer compensation, peer review standards and mechanisms for retraction and corrections. This can be negotiated trough the same mechanism overhead costs are negotiated with NIH fund recipients.

Publishing costs from all of the above entities should be accepted by NIH as is. Publications at other entities will be covered at annually updated publishing rates, or not covered at all by NIH funds.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Peer review is an service that for-profit publishers receiving for free while charging both authors for publishing costs and readers for access. This is fundamentally unfair. The proposition for compensating reviewers at standard hourly range for the profession as outlined in Option 2 of the Request for Information is fair and reasonable.

**4. Publishing best practices:**
There needs to be a broad standard for scientific publishing that should cover not only fraud detection, but the peer review mechanism and ethics standards, standard procedures with defined time lines for issuing corrections and retractions. Focus only on fraud detection is wrong as it does not solve the core problem that is caused by how NIH funding is dispersed. This is an issue that is better addressed by changing the funding mechanisms and the receiving institutions promotion and tenure guidelines, so that they do not incentivise fraud.

**5. Other Comments:**
There needs to be a broad standard for scientific publishing that should cover not only fraud detection, but the peer review mechanism and ethics standards, standard procedures with defined time lines for issuing corrections and retractions. Focus only on fraud detection is wrong as it does not solve the core problem that is caused by how NIH funding is dispersed. This is an issue that is better addressed by changing the funding mechanisms and the receiving institutions promotion and tenure guidelines, so that they do not incentivise fraud.

## 155. Sid Tamm

**Submit date:** 8/4/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Sid Tamm

**Name of Organization:** BU

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Reduced or no funding for publishing scientific research ensures that cutting funding for the research itself is redundantly effective in stopping scientific research in the US.

**2. Available evidence related to publication costs and proposed options:**
See above.

**3. Peer review compensation:**
Peer review should be by experts in the field with no ax to grind.

**4. Publishing best practices:**
Fraud, sloppiness, plaigerism, and image manipulation detection should be included.

**5. Other Comments:**
Fraud, sloppiness, plaigerism, and image manipulation detection should be included.

## 156. N/A

**Submit date:** 8/4/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Scholarly Publisher/Journal

**Role:** Organizational Official

**1. Proposed policy options:**

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 157. Charles A Ettensohn

**Submit date:** 8/4/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Charles A Ettensohn

**Name of Organization:** Department of Biological Sciences, Carnegie Mellon University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**

**2. Available evidence related to publication costs and proposed options:**
I think NIH should work hard to reduce the total amount JOURNALS can charge to publish research that is funded in any way by NIH support, rather than restrict the amount that PEOPLE can pay from an NIH grant. Unless NIH forces journals to accept $2,000 per paper, only elite / rich institutions and labs will be able to publish in "top tier" journals (e.g. Science = $5,450; Cell = $11,400; Nature = $12690.00; PNAS = $5,300; Molecular Cell = $10,400) because they will have foundation money / endowment money / unrestricted funds, etc to pay for the exorbitant APCs charged by these journals. Since publishing in these journals can affect future funding and attracting students and postdocs, this creates a very bad model. NIH funded researchers without additional support will be less and less competitive for funding and good people - not because they do worse research, but because they can't afford to publish in certain journals. Rather than simply shunting the exorbitant costs of many journals to PIs, placing the onus on researchers themselves to beg their universities to pump money into these journals or to scrounge for other sources of funding, NIH should take the lead in reducing APCs.

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 158. Nicholas A Wallace

**Submit date:** 8/4/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Nicholas A Wallace

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
It would be huge if you can pull this off. Publishing costs are out of control and none of the money goes to scientists doing or reviewing the work.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
There is no compensation for reviewers.

**4. Publishing best practices:**

**5. Other Comments:**

## 159. N/A

**Submit date:** 8/4/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
NIH is wanting publications and findings to more accessible to the general public, which is laudable. However, to do this, they are requiring that the article is immediately available (i.e., no embargo period). Many journals that require an embargo period will publish immediately but this comes with a steep open access fee that might be more than what open access-only journals charge. If not part of the original review, it would be helpful to know what the average cost is for open access among highly impactful journals that also offer publication with an embargo period. Limiting the amount of grant funds that can be used for publication costs, while also requiring publications to be open access, will result in less articles being published, which seems opposite of what the NIH would want to happen with this new policy.

NIH should work with journals to determine the best way to make open access affordable and within what NIH is willing to allow grants to cover. NIH should allow for at least $6k in each year to support at least one or two publications per year.

**2. Available evidence related to publication costs and proposed options:**
JGIM open access: $5290.00 USD (https://link.springer.com/journal/11606/how-to-publish-with-us#Fees%20and%20funding)

JAMA Open: $4000 (https://jamanetwork.com/journals/jamanetworkopen/pages/instructions-for-authors#SecOpenAccessDepositinginRepositoriesandDiscoverability)

**3. Peer review compensation:**
If NIH is wanting reviewers to be paid a fair hourly rate of review, they should also look at their own compensation for study section review. While there is an honorarium, it does not equate to $50/hr (the amount proposed in the Request for Information for journals to pay), as review of grant applications requires a substantial amount of time and commitment on the part of the reviewer.

**4. Publishing best practices:**

**5. Other Comments:**

## 160. Lefteris Michailidis

**Submit date:** 8/4/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Lefteris Michailidis

**Name of Organization:** Emory University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I think the publication costs are very high in some instances especially when reviewers are not even compensated but authors have to pay to publish and readers to read the papers. However, I think option 4 is the best because it gives flexibility to the researcher to submit in higher impact (higher cost) journals. Sometimes one paper in a high impact would be equally work of multiple lower impact so this could make sense in terms of the cost if someone published one versus 3 papers.

**2. Available evidence related to publication costs and proposed options:**
During the pandemic the biorxiv method helped a lot to get things out when the community needed to see the data as fast as possible. Now, sometimes things get lost in the noise and good peer-review takes more time. I personally accept to review papers almost every month to give back to the community.

**3. Peer review compensation:**
I think compensation for reviewing makes complete sense since journals make a lot of money for publishing and for accessing the papers that scientists review for free. NIH study sections compensate reviewers so why not journals too?

**4. Publishing best practices:**
Reproducibility is a big issue and some metrics related to a publication should change. Just a citation of a paper doesn't mean that it's cited because it's a valid paper but maybe the opposite as an example to avoid. How can we see this in the citations for example?

**5. Other Comments:**
Reproducibility is a big issue and some metrics related to a publication should change. Just a citation of a paper doesn't mean that it's cited because it's a valid paper but maybe the opposite as an example to avoid. How can we see this in the citations for example?

## 161. N/A

**Submit date:** 8/4/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
My preference is option 5 as it provides the most flexibility.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
I have never been compensated for participating in a peer review, and was unaware that some journals compensated reviewers

**4. Publishing best practices:**

**5. Other Comments:**

## 162. Liskin Swint-Kruse

**Submit date:** 8/4/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Liskin Swint-Kruse

**Name of Organization:** The University of Kansas Medical Center

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
As we have learned over the past two decades, it is difficult to anticipate how market forces will drive the APC of scientific publications. My first instinct is that Option 4 - limiting the total amount of grant funds allowed for APC - provides flexibility to researchers, allowing them to balance their own publishing values while reasonably capping direct costs on NIH grants. This is essentially what I already do with the precious and limited direct costs of my NIH grant, and I usually publish in society journals for that reason; however, it is unclear whether this will rein in the overall trajectory of APC pricing. Options 2 and 3 may drive pricing back to reasonable levels, but I worry that any limits could become entrenched and fail to accommodate true cost increases. Option 5 may be the best compromise of Options 2 and 4. I do not support Option 1; pre-prints have their roles, but it is even harder to be motivated to review a pre-print than to serve as a reviewer in the standard process; I expect this would lead to less rigorous publications. The vast majority of my manuscripts have been improved by the current peer review system.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 163. A concerned academic physician-scientist

**Submit date:** 8/4/2025

**I am responding to this RFI:** On behalf of myself

**Name:** A concerned academic physician-scientist

**Name of Organization:**

**Type of Organization:** Not Applicable

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Options 1 and 2 are non-starters.

Options 3 is extremely complicated because few top journals pay for peer review and that list may shift over time, and may shift quickly if this policy goes into effect, so being able to justify the differential cost would be challenging.

Options 4 and 5 are more workable, but still with challenges.

However, before really voting on options, it is necessary to understand not only what the researcher would be alllowed or required to do, but what work has been undertaken with some of the larger publishers to bring the costs down to within negotiated prices. The problem is not how much researchers are spending on NIH budgets for publications, the problem is the cost to publish, especially in top tier journals. For example, in 2025, the cost to publish in Nature portfolio journals was ~$12,000. This means that no researchers without a large amount of discretionary funding or else a very large grant can currently or in the future could publish, not only wasting NIH money, but also making publication in top-tier journals inaccessible for early-career investigators and for those without significant support.

However, under any of the imposed options, with unilateral NIH action without negotiation by top publishers, there is no guarantee that publishers will bring costs down or bring them down uniformly.

One of the best understood similar federal negotiations would be CMS and reimbursement. Medicare/Medicaid pay a certain amount for some medical services, which means that most private insurers pay a bit more, and then health systems charge A LOT more for self-pay. So what would be disastrous to occur would be the creation of a tiered system in which APCs are negotiated (for example) to $1,000 for NIH-funded researchers, $2,000 for research funded by funder Y, and $5,000 for researchers not paying from a grant or foundation. A system like this would completely exclude people not currently funded from starting to get published so they can get grants so they can get more funding so they can publish.... and with the current restrictions on NIH funding that have already severely impacted early-career scientists, something like this could completely kill the pipeline of investigators.

For those of us who are more senior, one of the best ways to train new people and to get additional scientific value from completed grants is to create many secondary analyses and mentor early-career folks in doing and publishing that work. Most of that mentoring is unfunded already, and if then the costs of the publications are not covered by NIH or there is a differential cost that penalizes non-NIH-

funded work, then those small analyses and pilot projects that spin off of a mentor's work will be ever harder to publish.

This investigator strongly suggests helping show the public and research stakeholders what the plan is to negotiate down the cost of journal publications for open access especially before unilaterally limiting what the investigators will pay. We need assurance that the NIH caps would have the intended effect of getting publishers to make the peer-review process more equitable and feasible both to review and publish in.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 164. Ellen Wijsman

**Submit date:** 8/4/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Ellen Wijsman

**Name of Organization:** University of Washington

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I support some limitations on publication fees from grants. These fees have exploded since open-access requirements went into place, and this is despite the fact that many journals no longer even provide a print version, so that some component of publication costs should have dropped. It seems to me that the open-access model has accelerated publication costs simply because there is a good market that has no limit on what journals can ask investigators to pay to publish.

My personal view is that NIH should not be overly prescriptive in exactly how a reduction in publication costs per grant is obtained, which would add administrative burden without, I suspect, having any real effect. The best option to me seems like  a total cap (over the period of the award), with possibly a maximum per paper that is more than the average costs of US publications. If the total is pegged to the direct-cost amount of the award, that would be reasonable, and a rate of 0.8% seems reasonable to me.

I already responded, but I want to add one more comment, since I just noticed a second requirement. If you cap the publication costs, you cannot also require immediate access to publications upon acceptance. The two requirements are incompatible. If you cap publication costs (which I don't have a problem with, in principle), you force authors to use their society journals for more of their papers, because the publication costs are lower. That is fine. Except that these are generally journals with some restriction on the number of months before papers are openly available to the public. Now, if you simply mean that the papers as accepted must be deposited in PubMed (and allow an embargo on making the deposition available to the public), that is fine. But you can't ask for both a reduction in allowable publication costs *and* open publication from the date of acceptance of a paper. That will not work. The alternative is worse: we don't publish a lot of our work at all.

**2. Available evidence related to publication costs and proposed options:**
For most papers that I have been involved in, publication costs (to my grants) range from $0  to  ~$3300. The $0 are for either papers in society publications, when I am a society member, or are in OA journals that are fully subsidized by my institution (e.g., the PLOS journals and a few others). I am irked by one society that has added a fully OA journal, and now routinely bumps papers to that journal (cost: ~$2750 for society members; more for non-members). I think this is a cash-cow for the journal, because neither the main, subscription, or OA journal are in print any more, and those OA fees would probably come down if there were limits to publication costs. I have avoided publishing in the journals with extremely high publication costs (Nature, Cell, Etc.), because I simply cannot see spending that much.

**3. Peer review compensation:**
I don't think that any of the journals I read regularly or publish in pay for peer review. I have done a lot of peer review, and never been paid for it. The only thing that sometimes is offered as a result of doing a review is a reduction or elimination of the publication fee for one future paper in that journal. I view reviewing as part of the responsibility of publishing - other scientists review my papers, so I need to review their papers. I don't think that paying for peer review is necessary.

**4. Publishing best practices:**
We clearly are more-and-more in a situation where fraud or AI-written papers are an issue. I don't, actually, think that is why the costs have shot up so much, but I do think that it is very useful to have some automated fraud detection, as it becomes mroe possible. It is not clear to me that this should add tremendous costs to the publication process. We already have some tools available to us for these purposes. I do think that the main factor(s) that drove the publication costs were the "market appetite" and as a good way to "advertise" publications.

**5. Other Comments:**
We clearly are more-and-more in a situation where fraud or AI-written papers are an issue. I don't, actually, think that is why the costs have shot up so much, but I do think that it is very useful to have some automated fraud detection, as it becomes mroe possible. It is not clear to me that this should add tremendous costs to the publication process. We already have some tools available to us for these purposes. I do think that the main factor(s) that drove the publication costs were the "market appetite" and as a good way to "advertise" publications.

## 165. N/A

**Submit date:** 8/4/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
NIH should negotiate a publication contract with leading publication groups so that all funders who receive NIH grants can get a substantial discount in the publication fee. One possible way is to mandate compulsory reporting of the reviews carried out by researchers funded by NIH and forcing the publication groups to make a payment to NIH for each review that can be used for funding the publication costs.

Also definitive steps needs to be taken to prevent journals taking advantage based on the impact factor.

**2. Available evidence related to publication costs and proposed options:**
Currently various journals are charging very large fees (for eg: nature charges $12690 for gold open access). This large amount is charged based on the impact factor of journal and in no way reflect the actual cost for publication (which might be 5% of this amount). They are asking people like us to review without paying anything and generating profits by charging the huge publication charges.

**3. Peer review compensation:**
As I mentioned in question 1, my suggestion is to make in compulsory to report any review carried out by NIH funded researchers to NIH. NIH should receive a payment for this service from the publication groups (based on the publication charges) and this payment can be used for paying the publication costs.

This way: the researchers are not payed directly and it will benefit all researchers by paying for the publication costs.

As an employer NIH can be the beneficiary for getting this payment from the publication groups, since they are using the time of employees funded by NIH.

A peer review payment system might be another option, but I think it will only benefit certain number of people, while the above system can benefit all researchers holding an NIH grant.

**4. Publishing best practices:**
I think, at present the publication houses are making a huge profit by getting the unpaid reviewers carry the major work in publication.

Also several journals are using the service of academics employed by Universities to run even the administration work for the journals, by providing them with title like Editor and Associate editor. As far I know none of these people get any compensation other than getting a fee waiver for their publication.

So i don't think any further increase in publication costs are justified. The journals should implement any such advanced technique or software by absorbing the costs.

**5. Other Comments:**

I think, at present the publication houses are making a huge profit by getting the unpaid reviewers carry the major work in publication.

Also several journals are using the service of academics employed by Universities to run even the administration work for the journals, by providing them with title like Editor and Associate editor. As far I know none of these people get any compensation other than getting a fee waiver for their publication. So i don't think any further increase in publication costs are justified. The journals should implement any such advanced technique or software by absorbing the costs.

## 166. Jesus G. Galaz-Montoya

**Submit date:** 8/4/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Jesus G. Galaz-Montoya

**Name of Organization:** Stanford University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Among NIH's proposals, Option 2 (a per-publication cap of $2,000) and Option 5 (a combined per-publication cap of $6,000 plus a per-award cap of 0.8% or $20,000) offer the most equitable balance. Option 2 aligns spending with average APCs, while Option 5 preserves flexibility for high-impact venues and economies for authors with multiple publications, without risking disproportionate fund usage.

That said, a Complementary Alternative could be considered: embrace open, "continuously evolving" preprint models.

Rather than treating publication as a fixed, one-time output, NIH could encourage preprints as living documents subject to continuous open peer review. Arcadia Science's Publishing 2.0 model (https://www.arcadiascience.com/) is a vivid example: scientists publish modular, notebook-based "notebook-pubs" on platforms like PubPub, including full data, code, and analysis, and solicit ongoing public feedback from the wider scientific community (research.arcadiascience.com).

This model would remove traditional APCs; instead, scholarly value accrues as community correction, commentary, and reuse builds up—peer review becomes decentralized and crowd-based. Formal journals or funding agencies recognize peer-reviewed preprints such as those facilitated by Review Commons, PREreview, Peer Community In, or Arcadia's own review ecosystem as equivalent to traditional journal publication.

Since peer review is unpaid and voluntarily, there's little to no reason why publication of tax-payer funded research should enable for-profit publishing houses that often act as gatekeepers. Peer review should be open, tracked, and measured (similar to what Publons/Web-of-Science is doing), and should itself be subject to community review and commentary in the age of internet-based social-media-like forums.

Such a framework would encourage faster dissemination, eliminate or greatly reduce cost burdens, and foster transparency.

As an intermediate approach, NIH could incentivize expedient publication by allocating modest bonus research funds to projects that generate outputs shared under evolving open-review models, effectively legitimizing them as formal scholarly products: Imagine arXiv, bioRxiv, medRxiv, OSF, etc., providing infrastructure for a formal-tier, classification, or tag that indicates a preprint has met more structured formatting requirements (complete methods, supplementary data, etc.) and has been peer reviewed by

a minimum number of verified experts. With a resource as such, what value would *anyone* derive from re-publishing a preprint (transformed into a formal article) in Nature, Science, Cell, etc.? For-profit editorial work is lengthy, costly, and simply not worth it.

**2. Available evidence related to publication costs and proposed options:**
Consider the field of Computer Sciences, where it is common practice to submit research results to arXiv and conferences (much cheaper than journals) as terminal products. All fields of science could be encouraged to evolve similar efficiency through the Complementary Alternatives I proposed in my answer to Question 1.

**3. Peer review compensation:**
Peer review is most definitely NOT appropriately compensated. There isn't a comprehensive, nationally or internationally recognized peer-review index or score (the closer I've ever found is Publons, previously Web of Science, which is incomplete because many journals do not report peer review activities to them). There should be one. People have very little incentive to engage in serious and dedicated peer review since it does not earn you grants and it will not help you get a job. Only the minority of scientists who have a sense of duty and actually care about integrity in science seem to engage in frequent, active peer review, at the expense of their leisure time mostly.

Employers may claim that engaging in peer review is "acceptable" while lacking systems that actually recognize it as a valuable activity (e.g., it's not acceptable for a staff scientist, a technician, or a postdoc to tell their PI that an experiment or presentation was delayed because they were actively engaging in multiple peer reviews). Peer review is unfortunately often viewed as a chore and/or a distraction by many, especially senior scientists who are extremely busy managing large research groups and multiple grant and paper deadlines, and the main incentive for many to engage in peer review is to get an early glimpse at what competitors are doing, or to maintain their public image before colleagues that invite them to peer review.

Many predatory journals recruit reviewers who do not actually have the necessary expertise to review the paper at hand and conversely sometimes even dismiss feedback from qualified reviewers, but since the process happens behind closed doors at the discretion of the editors, nobody ever knows or finds out. I have experienced multiple instances of journals not inviting me to a second round of review for a paper I provided comprehensive feedback for because seemingly they were mostly interested in the profit incentive of expeditious publishing and, as such, thorough, critical reviewers who take the job seriously become "inconvenient".

Furthermore, it has also occasionally happened that a journal has gone ahead and published a paper I marked as unsuitable for publication after the authors refused to improve it sufficiently after multiple rounds of review. The scientific community has no need for any of that. We can do better.

Peer review should be 1) open/public; 2) monetarily compensated (authors should pay modest fees for publishing, but the fees should go to the first ~5 qualified peer reviewers to engage a study on Open Science platforms like the aforementioned preprint repositories, instead of paying a publishing house for merely editorial work); 3) *vetted* (there should be a review process for the peer reviews, to ensure they're in good faith, and of good quality, devoid of conflicts of interest, etc.; having forum-like discussions among reviewers would ensure this to some extent, but it's also possible to evaluate easily and automatically evaluate reviews by using AI agents; in fact, AI-driven reviews should be part of the

process alongside expert-driven peer reviews); 4) communal and dynamic (i.e., since peer review would be open and public, reviewers could interact with one another and engage in conversation and debate as they review a paper in a forum-like interface; the Frontiers family of journals has been experimenting with a similar system, but it's still a for-profit publisher with high fees that is considered predatory by some).

NIH has an opportunity to drastically overhaul the peer review process, make sure it works better for both authors and reviewers, thereby reducing publishing costs and timeframes while increasing the quality of feedback provided to authors.

**4. Publishing best practices:**
In addition to compensating peer reviewers, other kinds of publishing best practices, such as use of automated fraud detection capabilities, may contribute to higher publishing costs. NIH is seeking further input on additional factors that it should consider in determining the allowability of a higher per publication cost.

If NIH is truly committed to reducing costs, instead of justifying higher APCs, NIH could 1) mandate best practices (fraud detection, data validation, accessibility, etc.) as *requirement* for journals receiving NIH funded submissions (many of these journals already enjoy high profit margins of ~30%), while setting a hard cap on allowable APCs; 2) provide centralized NIH-supported services (e.g., bulk fraud detection licenses, shared FAIR data validators, etc.) to reduce per journal costs; 3) encourage or *require* preprint first + open peer review platforms (Arcadia Science, Peer Community In, PREreview) that already integrate many best practices with lower overhead. Unfortunately, many scientists, particularly senior PIs, refuse to engage with preprint repositories because they're paranoid about "being scooped", a notion rooted in the obsession with impact factors and the fallacy that "preprints don't count" (in reality, preprints DO establish precedence and SHOULD be recognized as such). 4) Points 1-3 should be temporarily deployed while humanity moves away from for-profit publishing altogether. Non-profit venues like bioRxiv, OSF, Arcadia, etc., should be promoted and *improved* (by integrating open, public, iterative, vetted, compensated peer review, including AI-based review) as models for a better future. Old for-profit models and venues for publishing research articles should be forced to transition/morph into this same type of model (gradually), or face disappearing.

**5. Other Comments:**
In addition to compensating peer reviewers, other kinds of publishing best practices, such as use of automated fraud detection capabilities, may contribute to higher publishing costs. NIH is seeking further input on additional factors that it should consider in determining the allowability of a higher per publication cost.

If NIH is truly committed to reducing costs, instead of justifying higher APCs, NIH could 1) mandate best practices (fraud detection, data validation, accessibility, etc.) as *requirement* for journals receiving NIH funded submissions (many of these journals already enjoy high profit margins of ~30%), while setting a hard cap on allowable APCs; 2) provide centralized NIH-supported services (e.g., bulk fraud detection licenses, shared FAIR data validators, etc.) to reduce per journal costs; 3) encourage or *require* preprint first + open peer review platforms (Arcadia Science, Peer Community In, PREreview) that already integrate many best practices with lower overhead. Unfortunately, many scientists, particularly senior PIs, refuse to engage with preprint repositories because they're paranoid about "being scooped", a notion rooted in the obsession with impact factors and the fallacy that "preprints

don’t count” (in reality, preprints DO establish precedence and SHOULD be recognized as such). 4) Points 1-3 should be temporarily deployed while humanity moves away from for-profit publishing altogether. Non-profit venues like bioRxiv, OSF, Arcadia, etc., should be promoted and *improved* (by integrating open, public, iterative, vetted, compensated peer review, including AI-based review) as models for a better future. Old for-profit models and venues for publishing research articles should be forced to transition/morph into this same type of model (gradually), or face disappearing.

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/a_case_for_independent_research_publications_at_stanford_redacted.pdf

**Description:** E-mail thread with Stanford University administration at the height of the pandemic to determine whether junior scientists could find institutional support for independent publication.

## 167. Kirsten C. Edepli

**Submit date:** 8/5/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Kirsten C. Edepli

**Name of Organization:** NYUAD

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
While the intention behind open access policies is to make publicly funded research freely available, the current model primarily benefits large publishing companies—not the U.S. taxpayer. Shifting the financial burden from subscription fees to article processing charges does not reduce overall costs; it merely changes who pays. If institutions are required to cover these charges, taxpayers may end up subsidizing inflated publishing fees through government-funded research grants or institutional support. This will only benefit commercial publishers, who profit from work produced, reviewed, and edited largely by publicly funded scientists. It is very important to have research be open access, but pressure should be put on the publishers, not the researchers - to address costs as the current model is enriching publishing businesses at the expense of research budgets, public institutions, and ultimately the public good."

**2. Available evidence related to publication costs and proposed options:**
Spending up to 5000 dollars on publication fees, which is to publish research that we paid for, is not reasonable. This could instead be spent on reagents, travel or other costs that are more relevant to the science. Preprint servers have been a fantastic advance for the field and it is great to see so many people using them.

**3. Peer review compensation:**
I do not think this is a good idea. Peer review is part of our work as scientists. However, it is harder and harder to find reviewers. This is a problem is the systemic issue with many scientists being either overwhelmed with other pressing issues or not having a clear vision about the responsibilities of being a scientist.

**4. Publishing best practices:**
Using ways to eliminate AI generated reviews would be good. We should also support those journals that put money back into science, instead of making money for a business.

**5. Other Comments:**
Using ways to eliminate AI generated reviews would be good. We should also support those journals that put money back into science, instead of making money for a business.

## 168. Nathalie Huguet

**Submit date:** 8/5/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Nathalie Huguet

**Name of Organization:** OHSU

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
A policy that would limit allowable publication costs is the complete opposite of NIH requirement to make publications available immediately. The analysis to determine the average cost appears to miss the mark. It seemed that it used journals from all over the world without considering the one most commonly used by NIH funded investigators. A realistic analysis would review the most commonly used journals, likely US based, and create an average from these data. I suspect the average will be closer to $3000.

I have never seen a journal fee <$1000 so it is amazing that NIH finds an average <$1000.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
If NIH wants publications to be publicly available immediately but not pay for it, then they need to negotiate with journals ways to do so, create a white paper website in agreement with journal.

**4. Publishing best practices:**
I am not sure what journals compensate peer reviewers, never heard of such a thing!

**5. Other Comments:**
I am not sure what journals compensate peer reviewers, never heard of such a thing!

## 169. Kevin Hellman

**Submit date:** 8/5/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Kevin Hellman

**Name of Organization:** Endeavor Health

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
None of the options in the Request for Information sounds ideal.

The better journals often have higher open access charges (Science, Nature, PNAS)

**2. Available evidence related to publication costs and proposed options:**
Journal / Title OA Model APC (USD)

Science Delayed OA only None as immediate OA option

Science Advances Gold OA $4,950 → $5,450 (from Jan 1, 2025)

Nature Gold OA ~$12,690

PNAS – Delayed OA Hybrid (6-mo embargo) ~$2,945

PNAS – Immediate OA Hybrid OA ~$5,495 (standard)

PNAS – with UC agreement Hybrid OA discounted ~$3,225

PNAS – Brief Reports Immediate OA ~$2,425 per article

**3. Peer review compensation:**
I have never received a payment for peer reviews, reviewing ~20 papers per year.

**4. Publishing best practices:**
The NIH should consider negotiating discounts with publishing companies--the same way universities are do it now.

**5. Other Comments:**
The NIH should consider negotiating discounts with publishing companies--the same way universities are do it now.

## 170. N/A

**Submit date:** 8/5/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I believe option 2 and option 3 would be the best policies to make. Both these options would put the burden on the publishers to reduce the cost, which has ballooned over time to ridiculous levels. It's particularly egregious the fact that authors receive no compensation for publications, the sponsors provide funding for the research, and the publishers benefit from the wish to communicate scientific content to overcharge both authors and sponsors.

Option 1 would critically endanger scientific publications from most research laboratories. This would primarily affect fields with lower funding opportunities, particularly non-translational work, which is the basis for many translational research.

Option 4 and option 5 would place the burden on the investigator to produce funding for publications. This would gravely impact early-stage investigators who often are encouraged to produce many publications for the tenure process. This may also result in fewer publications from the community, as investigators look to merge papers into single manuscripts to reduce publication costs; reducing the community's scientific output.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
A point of concern in peer review compensation is the US non-immigrant scientists who are restricted in the sources where they can receive pay. For example, H1B visa scientists are only able to receive compensation from their employer, and to receive compensation from another employer, they have to spend hundreds, if not thousands, on legal paperwork. This may place a higher burden on US resident scientists to review more manuscripts.

**4. Publishing best practices:**

**5. Other Comments:**

## 171. N/A

**Submit date:** 8/5/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Organizational Official

**1. Proposed policy options:**

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 172. N/A

**Submit date:** 8/5/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Open access is required and journals charge what they charge. Publishing in "better" (i.e., higher-tier, more visible, more impactful) journals usually costs more. Restricting the amount of money that can be used to pay these fees puts an undue burden on researchers to come up with thousands of dollars from some unrestricted funding source that they may not have. This is especially true of junior faculty and those who do research at public universities or just generally less well funded universities. Imposing this limitation would likely lock away some impactful taxpayer funded research behind a paywall or see it published in a lower tier (i.e., less visible, less cited and less used for continued development of the idea) journal. This policy will not impact faculty at well funded private institutions - these places have extra money available for anyone who needs it. So, the rich will get richer and the great ideas of the people who work hard but aren't lucky enough to be at an elite institutions will be lost to the taxpayers.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Compensating peer review seems like a good idea on the surface but it will likely only incentivize certain individuals to take on copious amounts of reviews and then, inevitably, perform them poorly. Peer review has long been broken - we are all far too busy with too many additional tasks piled on over the decades of this job (and technology) changing, and one-sided anonymity can breed the worst in people. I don't have a solution, but paying reviewers seems like a bad idea. A better idea might be to establish Peer Reviewer as a government-funded job in which experts get paid to perform peer review all day every day, rather than cramming it into their very limited free time. We have a surplus of PhDs and not enough jobs - this could be a great way to soak up some of that highly trained, highly skilled talent. Corruption is always a risk, so strict oversight on neutrality, bribes, etc., would need to be in place.

**4. Publishing best practices:**

**5. Other Comments:**

## 173. Johan Nakuci

**Submit date:** 8/5/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Johan Nakuci

**Name of Organization:** US ARMY DEVCOM Army Research Labs

**Type of Organization:** Other

**Type of Organization - Other:** US Government

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I support Option 4: Set a limit on the total amount of an award that can be spent on publication costs, because this provides the authors the most flexibility in how they want to spend the money. Also, NIH funds should not be used to publish in predatory/scam journals. Create a "We will not pay for this journal " list.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
I think in general this is a great idea! Reviewing is a lot of work. I don't mind doing it for a journal that I know is keeping prices low (MIT Press). However, for publishers like Springer (for-profit), it's difficult to justify that they can't afford to compensate individuals.

**4. Publishing best practices:**
Fraud detection and etc should be an inherent service that is covered/provided by the publisher. If the publisher's can do this, then I don't see what they are good for. Otherwise, I can just submit my paper to Biorxiv and leave it there. In general, some basic image analysis should be"required" for any paper before it is published in the same manner we journals check for plagiarism.

**5. Other Comments:**
Fraud detection and etc should be an inherent service that is covered/provided by the publisher. If the publisher's can do this, then I don't see what they are good for. Otherwise, I can just submit my paper to Biorxiv and leave it there. In general, some basic image analysis should be"required" for any paper before it is published in the same manner we journals check for plagiarism.

## 174.

**Submit date:** 8/5/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:** Hampton University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
This policy of not allowing federal funds to pay for publications will hurt small schools and institutions that don't have budgets to support publishing manuscripts. Hence researchers from this group will have less evidence of scholarly activity. This will the be used against these PIs when they submit a grant. The lack of publication is the most obvious and easiest reason a reviewer can use to rate a grant poorly.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 175. Samuel Bouyain

**Submit date:** 8/5/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Samuel Bouyain

**Name of Organization:** University of Missouri-Kansas City

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
NIH awardees should retain flexibility when deciding where to publish their research. As such, option 4 seems more appropriate because it only establishes an upper limit on funds that can be used for publication. Although less ideal, option 5 provides a good compromise between the maximal cost of each publication and the total funds allowed for publishing.

**2. Available evidence related to publication costs and proposed options:**
I have published my last three manuscripts in the Journal of Biological Chemistry where the cost of publication is $2,300 for society members. Under options 1, 2 or possibly 3, I would not have been able to publish my manuscripts there. Notably, these articles were open access right at publication and so available to the scientific community without any added cost.

**3. Peer review compensation:**
As long as compensating reviewers does not create conflict of interest or bias, it may be compensated. However, it is doubtful that some society journals will be able to compensate reviewers, so mandating that reviewers be compensated is probably not ideal.

**4. Publishing best practices:**
It all depends which tools are used and whether investigators understand how these tools are employed. Perhaps journals that do not employ certain fraud detection tools could be booted out of PubMed.

**5. Other Comments:**
It all depends which tools are used and whether investigators understand how these tools are employed. Perhaps journals that do not employ certain fraud detection tools could be booted out of PubMed.

## 176. Olivia Bermingham-McDonogh

**Submit date:** 8/5/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Olivia Bermingham-McDonogh

**Name of Organization:** University of Washington

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 5

I think that the limit should be linked to the total award direct cost as we can only accomplish as much as the grant will cover in salaries and supplies.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Including a higher limit when reviewers are compensated is not a good idea. In my view reviewers should not be compensated as that could be considered a conflict of interest.

**4. Publishing best practices:**

**5. Other Comments:**

## 177. Kevin Lynch

**Submit date:** 8/5/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Kevin Lynch

**Name of Organization:** University of Virginia

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I favor Option 3, that is, no more than $2,000 of taxpayer's funds (via NIH) should be payable to publishers for any single publication excepting when peer reviewers are paid in which case the allowable limit is $3,000. I would like assurance that the additional $1,000 (of whatever fraction thereof is spent) is paid to 3rd party reviewers.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 178. Joe Verghese

**Submit date:** 8/5/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Joe Verghese

**Name of Organization:** Stony Brook University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Set a limit on allowable costs per publication.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Approve peer review compensation

**4. Publishing best practices:**

**5. Other Comments:**

## 179. Kirstin Matthews

**Submit date:** 8/5/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Kirstin Matthews

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Of the options proposed, I would recommend that NIH set a limit on the maximum of 0.8% of the grant or $20,000 which is higher. A substantial part of these publication fee is a result of ensuring that publications are open access. Those fees are significantly high than other publication fees. If NIH set more limits on what it will reimburse, hopefully that will change journal policies so they reduce these fees. However, it's important to cover these costs through grants. Without these funds, only those investigators from more affluent schools with larger endowment will have access to funds to help with publication costs.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
I've peer-reviewed numerous publications and also serve as an associate editor for a publication. I have never been compensated for this work. It was expected of me as part of academia. I have been compensated for work on grant peer-review. This work is more detailed and would requires more attention therefore should be compensated based on an estimate of how long it should take to read, analyze, write up reviews and participate in any meetings related to the grants.

**4. Publishing best practices:**
Open access peer-review should be required of all peer-reviewed manuscript. Anyone without a subscription should be able to access and view research that was publicly funded.

In addition, publications should also have a 'publicly-accessible' abstract that is a short summary of the goal, findings and impact of the work writing for non-expert audiences. Most abstracts are still written for a specialized audience. Another version of the abstract should be developed without jargon and with explanations of the area and significance of the work.

**5. Other Comments:**
Open access peer-review should be required of all peer-reviewed manuscript. Anyone without a subscription should be able to access and view research that was publicly funded.

In addition, publications should also have a 'publicly-accessible' abstract that is a short summary of the goal, findings and impact of the work writing for non-expert audiences. Most abstracts are still written for a specialized audience. Another version of the abstract should be developed without jargon and with explanations of the area and significance of the work.

## 180. Aaron Hoskins

**Submit date:** 8/5/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Aaron Hoskins

**Name of Organization:** N/A

**Type of Organization:** Not Applicable

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I think limiting costs to a given amount per grant would not be a bad idea (options 4 or 5). However, the 0.8% or $2000 limits are much too low ($20,000 is more workable). While some publishers are charging excessive amounts, many journals are published by scientific societies and costs are carefully balanced--and these journals almost never run a profit. In my experience, these publication costs are usually $2500-5000. These journals are the workhorses of science and need to be maintained.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
I would love to be compensated for the many, many hours that I have spent doing peer review. However, I think many journals (esp. those published by scientific societies rather than Wiley, Elsevier et al) just cannot afford to do this at "real" wage for the people being asked to do this.

**4. Publishing best practices:**
I think if the journal is doing a lot of figure editing/graphic design, doing work in science communication/press for the results, or data management/curation then perhaps higher costs should be allowed.

**5. Other Comments:**
I think if the journal is doing a lot of figure editing/graphic design, doing work in science communication/press for the results, or data management/curation then perhaps higher costs should be allowed.

## 181. Brandt Eichman

**Submit date:** 8/5/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Brandt Eichman

**Name of Organization:** Vanderbilt University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
The only reasonable options are 4 or 5. The worst options that should not be considered are Options 1-3. Communicating results is an essential part of doing research. While publication costs are generally too high, preventing or limiting researchers to pay these costs will erode the peer review process and will put more emphasis on preprints, which are not published content. Also, preventing or limiting researchers to pay publication costs will disadvantage US based researchers as other countries will continue to publish in high impact journals. Publishing in high-impact journals, which tend to be the most expensive, is an important part of the review process; reviewers look at the number and type of publications when assessing progress. If we are limited in publishing, it will erode the foundation of the grant process.

Option 1: Disallow all publication costs.

Option 2: Set a limit on allowable costs per publication

Option 3: Set a limit on allowable costs per publication and allow a higher amount to be paid when peer reviewers are compensated

Option 4: Set a limit on the total amount of an award that can be spent on publication costs

Option 5: Set a limit on both the per publication cost and the total amount of an award that can be spent on publications

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
I have never been provided compensation for peer review. I would welcome compensation.

**4. Publishing best practices:**

**5. Other Comments:**

## 182. N/A

**Submit date:** 8/5/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Non-profit Research Organization

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I would like to propose an additional option: refundable costs for publication are capped to $2000 and can be used only for journals that give a 50% discount to publication fees for each article reviewed by the first or the last author of the paper.

**2. Available evidence related to publication costs and proposed options:**
Serious review of an article takes substantial amount of time and it is a job of responsibility. The hourly cost of an expert is minimum $300 per hour, and it can take up to 10 hours to review an article

**3. Peer review compensation:**

**4. Publishing best practices:**
AI tools will make publishing much easier and less time consuming so publishing costs will decline

**5. Other Comments:**
AI tools will make publishing much easier and less time consuming so publishing costs will decline

## 183. N/A

**Submit date:** 8/5/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 1 is an absolute NO. This option is just utterly ridiculous, given that the point of funding the research is to make it available to the public.

Options 2 and 3 are the most reasonable options, although the ceiling should be higher and should increase each year (or 2-5 years) to account for changes in publication costs.

Options 4 and 5 are not reasonable: what if a monetarily small grant is particularly productive? Capping the overall costs for supporting publication runs the same risks as Option 1 --research that is completed will not be published.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 184. Roger L. Albin, MD

**Submit date:** 8/5/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Roger L. Albin, MD

**Name of Organization:** University of Michigan

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Defray publication costs only for work published in journals and other venues sponsored by non-profit organizations.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
For a journal sponsored by a non-profit organization, yes, for those sponsored by a profit-making publisher, there should be strike until such work is compensated.

**4. Publishing best practices:**
Compensating peer reviewers is unlikely to be a "best practice."

**5. Other Comments:**
Compensating peer reviewers is unlikely to be a "best practice."

## 185. N/A

**Submit date:** 8/5/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Not Applicable

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I agree it is ridiculous that we the scientists and taxpayers, pay for the research, do the research, peer-review the research (most of us do it for free), and then must pay to publish the research and then must pay again to read our research! Meanwhile some for-profit publishers just reap the rewards, for very little labor on their part.

Out of your presented options, I'd vote for Option 5, to limit the amount paid per publication and the total amount that could be spent on publications.

However, I would encourage NIH to take a look at the different publishers to see what their actual costs and profits are. For example, The Company of Biologists charges $0 publication costs. How do they do that? Society journals (such as Society for Neuroscience) charge less than for-profit journals. Elsevier charges thousands for some journals, and makes billions of dollars in profit every year.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Personally I have never been paid for peer review of manuscripts, by either non-profit journals or for-profit journals. Never paid. I am a basic scientist PhD. I have heard that some MDs get paid. How do I get on that gravy train?

I think either everyone should get paid, or no one should get paid.

**4. Publishing best practices:**
You should consider how much profit the publisher made in the previous 5 years. Maybe there should only be non-profit publishers.

**5. Other Comments:**
You should consider how much profit the publisher made in the previous 5 years. Maybe there should only be non-profit publishers.

## 186. N/A

**Submit date:** 8/5/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I think all options put the burden mainly on US scientists rather than on the publishers, but Option 4 or 5 appears to be the most reasonable step to take now. I'm concerned that the proposed options do not address the root problem which is that academic journals are profiting tremendously off of the free labor of scientists and US taxpayer dollars. A possible unintended consequence is that NIH-funded US scientists will simply move to posting manuscripts without peer review, and this would potentially remove a layer of accountability and scientific integrity, lowering the reputation of US scientific programs and research.

I think a better model is one where NIH negotiates with journals for fair pricing of their open access publication costs and reviewer compensation, taking into account the editorial services that the journal provides. NIH-funded researchers should then only have to pay the negotiated APCs for open access, which would be included in their grants.

I would support a policy that disallows NIH-funded researchers from using their NIH funds to publish in predatory journals, and expand the definition of predatory to include journals that charge exorbitant open-access APCs without providing adequately compensated professional services (editors and reviewers) that warrant such charges.

Another thought is that NIH just remove the requirement that publications be open access. While open access is nice, it is expensive, can be burdensome for researchers to comply (particularly when they are not corresponding author) and I have to question whether it's necessary when a person can typically reach out to get a copy of a manuscript by contacting the corresponding author.

**2. Available evidence related to publication costs and proposed options:**
First, looking over the DOAJ list, I think APCs of less reputable journals based in low income countries are driving the numbers lower than the typical open access fees for reputable journals. Many of the journals don't seem to be relevant to NIH-funded research, either. A limit of $2000 seems very low and would incentivize publishing in lower-tier journals and with non-US based publishers. The $6000 limit per article seems more reasonable, but would disallow some mid-tier journals that I feel are run well, or limit open-access publishing options. I think what is being requested for NIH grant budgets is closer to the true cost of publishing in higher tier biomedical journals which US researchers are expected by their institutions to do.

**3. Peer review compensation:**
Many academic publishers are making tremendous profits and it seems wrong that this is largely from free labor of their reviewers and editors, as well as the APCs that must be paid for an article to be "open access". As an associate editor of a journal, it is also very difficult to recruit high-quality reviewers. So I am glad that the NIH is addressing this.

I feel that monetary compensation for peer review is one option, and another is waived publication fees for providing quality reviews and editorial work- this is an ideal option for PIs who may have data they want to publish, but don't have NIH funds available because the grant has ended, etc.

The NIH should also consider its compensation model and whether reviewers are fairly compensated for their efforts reviewing grants for study sections.

**4. Publishing best practices:**
Journals vary in what they offer re: professional editorial services and post-acceptance manuscript preparation for publication. For example, many of the higher-tier Nature journals have professional editors who are paid by the publisher to handle manuscripts, provide copy-editing services, ensure data integrity, etc. and this is a highly involved process that probably warrants a higher APC to cover that cost. Many journals still print their issues, which is also costly. However, other journals do not pay their handling editors, have no copy-editing service, nor do they print their journals and yet they still charge $3,000-7,000 USD APC and so it becomes questionable what the costs even cover.

**5. Other Comments:**
Journals vary in what they offer re: professional editorial services and post-acceptance manuscript preparation for publication. For example, many of the higher-tier Nature journals have professional editors who are paid by the publisher to handle manuscripts, provide copy-editing services, ensure data integrity, etc. and this is a highly involved process that probably warrants a higher APC to cover that cost. Many journals still print their issues, which is also costly. However, other journals do not pay their handling editors, have no copy-editing service, nor do they print their journals and yet they still charge $3,000-7,000 USD APC and so it becomes questionable what the costs even cover.

## 187. N/A

**Submit date:** 8/6/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I support Option #5: Set a limit on both the per publication cost and the total amount of an award that can be spent on publications. NIH could limit both the total amount of an award that could be spent on publication costs to the greater of 0.8% of the award's direct costs or $20,000.00 over the life of the award, in addition to limiting the amount per publication to $6,000.00.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
I have never been compensated for providing peer-reviews of manuscripts or for any other journal-related activities

**4. Publishing best practices:**

**5. Other Comments:**

## 188. Lisa Kilburn

**Submit date:** 8/6/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Lisa Kilburn

**Name of Organization:** Southern Regional AHEC

**Type of Organization:** Academic Institution

**Role:** Institutional Information Sciences Professional/Librarian

**1. Proposed policy options:**

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

# 189. William Stacey

**Submit date:** 8/6/2025

**I am responding to this RFI:** On behalf of myself

**Name:** William Stacey

**Name of Organization:** University of Michigan

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I consider options 2 and 3 to be feasible. It is clear that journals have begun to inflate their charges, led primarily by "for profit" companies. This is inexplicable given that publication costs should be going down (fewer and fewer people read paper now). Paying reviewers would be helpful, but more expensive. I have never seen that offered.

Option 1 is not desirable because without any funding, the entire system of peer review will crumble. Simply posting to preprint archives will not provide peer review, so it will be impossible to know if an article is "vetted". It is not feasible to have to vet every article personally when reviewing large numbers of papers.

Options 4 and 5 are not desirable because it is a bad idea to put a cap on the number of papers. Why would we want to disincentivize productivity?

**2. Available evidence related to publication costs and proposed options:**
I am an editor for the Society for Neuroscience. I know from personal experience that their publication costs are true costs--they are not making money. If they were unable to charge, their journals would cease to exist. Or they would have to start forcing advertisements into articles, which would taint the objectivity.

**3. Peer review compensation:**
I have been an editor for 10 years. It has become increasingly difficult to find reviewers. An incentive would be helpful.

Currently in my fields (neuroscience, clinical medicine, biomedical engineering) there is no compensation at all for peer review. A good review can take 2 hours at least. Compensation is warranted.

**4. Publishing best practices:**
The journals have complained that switching to PDF rather than print format has deprived them of advertising revenue, which seems paradoxical because they no longer have physical publication costs. But it is difficult to know how much of that is true, especially if you are asking a for-profit publisher. One way to get a less biased response about true costs is to ask a society-run journal such as Journal of Neuroscience (Society for Neuroscience) or New England Journal of Medicine (Massachusetts Medical Society). I know that SfN charges ~2000 and this barely keeps the journal afloat--they are not making money from publication fees. Evidence that this is true is that most society journals still try to maintain

paper versions because it makes them more money. Asking Springer or Elsevier for input is pointless--they are clearly trying to increase charges.

On the other hand, there are some journals that manage with zero publication cost, for instance the IOP journals such as Journal of Neural Engineering. I do not know how they manage this. You should ask them.

**5. Other Comments:**

The journals have complained that switching to PDF rather than print format has deprived them of advertising revenue, which seems paradoxical because they no longer have physical publication costs. But it is difficult to know how much of that is true, especially if you are asking a for-profit publisher. One way to get a less biased response about true costs is to ask a society-run journal such as Journal of Neuroscience (Society for Neuroscience) or New England Journal of Medicine (Massachusetts Medical Society). I know that SfN charges ~2000 and this barely keeps the journal afloat--they are not making money from publication fees. Evidence that this is true is that most society journals still try to maintain

paper versions because it makes them more money. Asking Springer or Elsevier for input is pointless--they are clearly trying to increase charges.

On the other hand, there are some journals that manage with zero publication cost, for instance the IOP journals such as Journal of Neural Engineering. I do not know how they manage this. You should ask them.

## 190. Nestoras Mathioudakis

**Submit date:** 8/6/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Nestoras Mathioudakis

**Name of Organization:** Johns Hopkins University School of Medicine

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Of the 5 options offered for addressing publication fees with NIH funds, I prefer Option 5 (limiting to $20,000 per award). However, I think it is important to note that many high-impact research studies could generate more publications with fees than could be covered even with this limit. I also considered Option 3, which does not set an overall limit but limits per publication fee. While this could cover more total publications, it may be difficult to anticipate during the budget planning phase of a research proposal exactly how much would be needed to cover publications using this option. I think Option 5 seems reasonable, gives PI flexibility, and can be enforced.

**2. Available evidence related to publication costs and proposed options:**
I appreciate the NIH taking on this problem. In the past few years, publication fees have continued to skyrocket and have made it very difficult for investigators to see their research through to the end. Most publications are generated in the last few years of a grant award period, and in some cases, there are no remaining funds to cover these open access fees. Open access is important for dissemination of findings, so it is always preferable to publish that way as opposed to subscription publication, which limits readership.

**3. Peer review compensation:**
I wholeheartedly endorse this approach. As an investigator, I receive nearly 20 invitations weekly for peer review, and I am to conduct as many peer reviews per years as the number of articles that I submit for peer review. That being said, this is incredibly time consuming process, with a minimum of 1 hour per review. This work is often done outside of work hours (evenings/weekends), and is currently uncompensated. The main concerns that need to be clearly addressed are conflict of interest and bias. Financial incentives could encourage peer reviews to accept more reviewers to earn money, potentially compromising quality. The editor may need some discretion to ensure that the peer review was thoroughly conduct, with clear standards for assessment.

**4. Publishing best practices:**

**5. Other Comments:**

## 191. William E Kraus

**Submit date:** 8/6/2025

**I am responding to this RFI:** On behalf of myself

**Name:** William E Kraus

**Name of Organization:** Duke University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I favor Option 4, a limit on total expenses over the course of the award.

**2. Available evidence related to publication costs and proposed options:**
Publication costs continue to rise, and there is a perception among investors that this is disportioncate to the costs to the journals. That said, it is important to disseminate information and those journals with the widest readership cost more. It is a matter of weighing the cost benefit, as is so well done in the RFI piece. Option 4 provides the investigator with the most flexibility in time of publication over the course of the awards and choice of high profile journals, which insulating us for awhile from inflation of APC by the journals. 0.8% of the total costs of the average award is very appropriate.

**3. Peer review compensation:**
I personally have never been compensated for peer review of an article. However, it is increasing hard to find reviewers. $50 an hour is more than nothing, but if given the choice to review an article or spend that time writing my own science or grant, it is not a choice; I would do the latter.

**4. Publishing best practices:**
This is a good point. Fraud in publishing is increasingly prevalent. We need to find a way to provide reviewers with information on this. If there is a cost associated with this function, it is well worth the trouble.

**5. Other Comments:**
This is a good point. Fraud in publishing is increasingly prevalent. We need to find a way to provide reviewers with information on this. If there is a cost associated with this function, it is well worth the trouble.

## 192. Sean Patrick David

**Submit date:** 8/6/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Sean Patrick David

**Name of Organization:** Endeavor Health Clinical Operations and the University of Chicago

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Speaking for myself, I support Option 4: Set a limit on the total amount of an award that can be spent on publication costs.

Open access publication is vital to promote open science and to reduce the publication bias that filters out high-quality research from being published in high impact journals.

My experience as a vice chair for research and in general is that many scientists will not submit to such journals unless it is paid for by their grants or other sources (e.g., departmental). In addition, resources to support open-access publishing are an inducement to publish. It is a good public investment to support publication costs.

Option 4, in my view, is the best option to balance with cost reduction because some or most journals seem to have publishing costs of >$3,000 per article. Capping at a lower amount would force scientists to pay out of pocket or seek departmental funds that may not be available.

**2. Available evidence related to publication costs and proposed options:**
I can only speak from professional experience that includes associate editing, general knowledge about the process, and my own team's publishing history.

**3. Peer review compensation:**
It seems reasonable to take into consideration a higher cap for journals that reimburse peer reviewers. However, I don't know how frequently this occurs or how authors would find out if the journal reimbursed peer reviewers. My sense is that even the highest quality journals only reimburse senior editors and statistical reviewers. So, since I don't favor arbitrary caps for individual papers, if such caps are necessary per paper, set a reasonable cap such as $4,000, so that it would be rare to have to pay out of pocket to publish.

**4. Publishing best practices:**
Plagiarism detection should be performed prior to publication -- not afterwards!

**5. Other Comments:**
Plagiarism detection should be performed prior to publication -- not afterwards!

## 193. Amanda Posgai Simmons

**Submit date:** 8/6/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Amanda Posgai Simmons

**Name of Organization:** University of Florida

**Type of Organization:** Academic Institution

**Role:** Other

**Role – Other:** Research Coordinator and Technical Writer

**1. Proposed policy options:**
Of the options outlined in NOT-OD-25-138, Option 4 (Set a limit on the total amount of an award that can be spent on publication costs. Limit the maximum amount of an award that could be spent on publication costs to 0.8% of the award's direct costs over the length of the award or $20,000.00, whichever is greater.) is the only viable option.

According to NOT-OD-25-047, NIH now requires immediate deposition of publications on PMC with no embargo period allowed. This essentially mandates publication in open-access and open-choice journals. If NIH were to recalculate the average APC for open access and open choice journals only, it would find that the allowable direct costs per publication likely need to be well over $5,000 per publication, as high as $12690.0 for Open Access publication in high-impact journals like Nature https://www.nature.com/nature/for-authors/publishing-options (as an example).

The goal is for each grant to result in multiple high-impact publications, so Option 4 provides the necessary flexibility for investigators to publish their work in journals that will maximize readership and citations in their respective fields.

APCs are not necessarily fixed either, so allowing for adjustments of the cap will be necessary to adapt this policy over time.

**2. Available evidence related to publication costs and proposed options:**
Publication costs are higher for open-access and high-impact/high-citation-score journals.

https://pmc.ncbi.nlm.nih.gov/articles/PMC11484459/

**3. Peer review compensation:**
Compensation for peer review certainly would represent an improvement in equity between journals and reviewers, but it is likely that many journals would further increase their APCs to cover this added expense.

**4. Publishing best practices:**
Open-access and high-impact journals have substantially higher APCs than subscription model journals.

**5. Other Comments:**
Open-access and high-impact journals have substantially higher APCs than subscription model journals.

## 194. Tianxiang Hu

**Submit date:** 8/6/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Tianxiang Hu

**Name of Organization:** Augusta University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 4: Set a limit on the total amount of an award that can be spent on publication costs with no limit on the amount per publication, e.g., 0.8% of the award's direct costs or no more than $20,000 over the life of the award, whichever is higher, with no limit on the amount spent per publication.

**2. Available evidence related to publication costs and proposed options:**
Nature Communications is charging an article processing charge (APC) of £5290.00/$6990.00/€5890.00. It makes more sense to set a cap for the total cost for publication over the life of the award, so the awardee will make better use of the taxpayer funds.

**3. Peer review compensation:**
It will be great if peer reviewers are appropriately compensated. If not in the format of payment, credits from the journal publisher to cover the cost for future publication will be great.

**4. Publishing best practices:**
no clue

**5. Other Comments:**
no clue

## 195. N/A

**Submit date:** 8/6/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Given that there is a proposal to reduce indirect rates (which are often used to setup contracts for open source funding) and the new NIH policy that publications have to be made immediately available (no 12 month embargo), all options could significantly limit the number of publications produced by grants. Which seems counter to NIH initiatives.

With that being said, I would vote for option 3. But I also take into account that the amount being proposed ($2000) is lower than article publishing costs for most journals I publish in, which tend to be between $2500-$3000.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
I strongly encourage more money to cover peer review compensation.

**4. Publishing best practices:**

**5. Other Comments:**

## 196. Stephanie Sisley

**Submit date:** 8/6/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Stephanie Sisley

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I would support Option 4 or 5.

**2. Available evidence related to publication costs and proposed options:**
The NIH requires that all articles be published open access if they arise from NIH funds. However, in my experience, APCs for open access articles are at least $3,000 USD.

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

# 197. Vikki Weake

**Submit date:** 8/6/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Vikki Weake

**Name of Organization:** Purdue University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
In my opinion, "Option 2 - limiting allowable costs per publication" provides the best option out of the provided choices. It would be very difficult - almost impossible - for a lab like mine to publish if we were not permitted publication costs on grants (Option 1) because we simply do not have additional funds to cover these costs. I also agree that there are some journals and publishers that have excessive publication costs, but also have high impact - meaning that currently publishing in these journals is considered positively by grant reviewers and by our home institutions. If the NIH would like to see more research published early as a preprint, or in journals that are run by non-profits or societies - then there would need to be some incentives provided to reward such activities.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
I have never been paid for peer reviewing a manuscript, and being paid would not be likely to influence my choice to review or not review a particular manuscript. I think this could raise several problems if used improperly i.e. less experienced researchers reviewing studies they are not qualified to assess because this is paid. Currently, sometimes my very junior graduate students receive requests to review manuscripts for less reputable journals who have discovered their email addresses online. I don't have any issues now explaining to my trainees that this is improper and they should ignore these requests, but if that request came with a financial incentive - I think you might find that some junior trainees would be tempted to review manuscripts that they are not yet qualified to assess.

My opinion is that peer reviewing manuscripts is a service to the research community and is part of the job of all PIs. However, it is not recognized currently by NIH as part of a PI's biosketch or anywhere else. If peer review service could be tracked for PIs, and recognized as part of their required service to the community - then there would be incentives to peer review. Perhaps this would need to be qualified with something that indicates the quality of the review as well. My recommendation (as in section 4 below) is that we should prioritize non-profit and society journals as peer reviewers, in an effort to move towards rigorous and reproducible studies rather than work that has a perceived high impact.

**4. Publishing best practices:**
It may be helpful to distinguish between for-profit publishers and society/non-profit journals in any new policy to encourage researchers to move towards publishing more work in society journals, for example such as those run by ASBMB (eg Journal of Biological Chemistry) or the GSA (Genetics). Society journals

run largely by academic editors are rigorous and publish high quality work, also supporting broader relevant scientific activities such as conferences and fellowships. In my own experience - the best reviews and editorial feedback for my own published studies come from academic editors working for society journals who run their own lab (usually these are PIs at an academic institution) and understand the field of work thoroughly. This can sometimes also be the case with professional editors, but often these editors do not provide substantial scientific input during the review process and tend to focus more on the perceived impact of the work.

**5. Other Comments:**

It may be helpful to distinguish between for-profit publishers and society/non-profit journals in any new policy to encourage researchers to move towards publishing more work in society journals, for example such as those run by ASBMB (eg Journal of Biological Chemistry) or the GSA (Genetics). Society journals run largely by academic editors are rigorous and publish high quality work, also supporting broader relevant scientific activities such as conferences and fellowships. In my own experience - the best reviews and editorial feedback for my own published studies come from academic editors working for society journals who run their own lab (usually these are PIs at an academic institution) and understand the field of work thoroughly. This can sometimes also be the case with professional editors, but often these editors do not provide substantial scientific input during the review process and tend to focus more on the perceived impact of the work.

## 198. N/A

**Submit date:** 8/6/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
The work of reviewers and academic editors should have  compensation by reducing publication costs.

**4. Publishing best practices:**
This can help to trigger further review, but not to final decision.  The author has to given the opportunity to respond and evaluated by a human being

**5. Other Comments:**
This can help to trigger further review, but not to final decision.  The author has to given the opportunity to respond and evaluated by a human being

## 199. Catherine Ishikawa

**Submit date:** 8/6/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Catherine Ishikawa

**Name of Organization:** California State University, Sacramento

**Type of Organization:** Academic Institution

**Role:** Member of the Public

**1. Proposed policy options:**
I do not see anything in the guidelines about open access or the quality of the peer reviewed journal (other than reviewers being compesated). As a consumer of medical information (I do research, but not in health science), I would like to see the government supporting open access to high-quality journals so that the public can access credible research results. Low-quality, predatory journals are open-access but can proliferate questionable science by publishing anything people are willing to pay for. Thus, I would like to see a combination of requiring open-access, rigorous peer review (compensation could help with that, but I really like the idea of making the reviews public), and possibly excluding (1) journals with unrealistically fast publication time and (2) publication of literature review articles (unless that is the focus of the grant).

I have noticed a trend of Generative AI relying on available open-access "journals" that are not necessarily peer-reviewed (in additon to relying on secondary-source articles, which often take research results out of context). This, along with the politicalization of research (i.e., confusing doing "gold standard" science with the use of science for policy-making), could have a profound impact on health decisions that America's people make.

In short, I support spending government money on research publication as long as it is (1) open-access, and (2) in a legitimate peer-reviewed journal, and (3) not subject to the whims of political views of any one administration.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
In my fields of study, peer review is a volunteer activity and the "currency" is being able to put it into retention, tenure, and promotion (RTP) packets as service and/or research activities. It would be nice to compensate reviewers, but I don't know if that ensures good reviews or not...It may actually encourage people who aren't the best choices to start reviewing papers so they get compensated.

**4. Publishing best practices:**

**5. Other Comments:**

## 200. N/A

**Submit date:** 8/6/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
As an investigator, I am opposed to the proposed Option 1 of disallowing all publication costs. Many journals in my field (neuroscience and psychiatry) have converted to only allowing open-access articles, and require an article processing fee. If NIH awards do not include any funding for open-access publications, this will severely restrict the range of journals that investigators can submit to, since they will no longer be able to submit to journals that only publish open-access. I support Options 3 or 4. Option 3 has the advantage in that it may encourage more journals to compensate peer reviewers, which I think could be beneficial to science more broadly, because I believe peer reviewers who are compensated for their time will be more likely to complete their peer reviews on time, and delays in receiving peer reviews is one of the major problems that holds up publishing scientific results. I would also support Option 4, as it would seem to allow some flexibility in how investigators use open access publishing funds. For example, many prominent open-access journals have article processing charges higher than the $2,000 limit proposed in Option 2. Therefore, Option 2 would not allow flexibility for investigators to publish in those more expensive journals. With Option 4, investigators would have some flexibility in determining how their open access publishing funds could be used (submit a small number of articles to journals with higher article processing charges, or submit a higher number of articles to journals with lower article processing charges). I think this added flexibility in Option 4 makes it better than Options 2 or 5.

**2. Available evidence related to publication costs and proposed options:**
I think the average article processing fee for journals depends on the journal discipline. For example, I just submitted an article to a journal that had an article processing charge of $7,030. An article limit of $2,000 for article processing fees could be sufficient for some disciplines, but would not be sufficient for other disciplines.

**3. Peer review compensation:**
I strongly support the idea of putting policies in place that would encourage journals to compensate peer reviewers. As I mentioned in my response to question #1 above, one of the major obstacles to timely publishing of scientific results are delays in receiving peer reviews. I consistently hear from journal editors that many of the scientists they contact for peer reviews decline their requests, that many accept peer review requests but are delayed by months in turning them in, and that some accept peer review requests but then never complete the review. All of these issues can lead to delays of months, or sometimes years, in getting a paper published. I believe if journals compensated peer

reviewers for their reviews, scientists would be more likely to accept peer review requests and to complete peer reviews in a timely manner, and this would be beneficial for science broadly.

**4. Publishing best practices:**

**5. Other Comments:**

## 201. Jeanna Campbell

**Submit date:** 8/6/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Jeanna Campbell

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Publication fees are a challenging problem. I think that having a set amount within a grant that can be used for publication sounds reasonable. However, it is also the case that limiting flexibility in how funds are used for publishing will limit the availability of the research findings. It will restrict how and where researchers can publish, which may reduce the impact of findings internationally. As a consequence, research from the United States may not compete with other nations.

**2. Available evidence related to publication costs and proposed options:**
N/A

**3. Peer review compensation:**
I do not have ideas to share about factors related to paying for peer review. However, I want to note that it is incorrect to say that peer reviewers are paid. Peer reviewers are not compensated.

**4. Publishing best practices:**
I do not have any additional factors to suggest for consideration. However, I want to note that it is inaccurate to say that peer reviewers are compensated. Peer reviewers are not compensated.

**5. Other Comments:**
I do not have any additional factors to suggest for consideration. However, I want to note that it is inaccurate to say that peer reviewers are compensated. Peer reviewers are not compensated.

**Description:** N/A

## 202. Clarissa Kripke

**Submit date:** 8/6/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Clarissa Kripke

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Knowledge is power and research is of little value if people can't access the publication. Quality publishing including rigorous peer review is not free. I support funding as many publications as the researchers produce and at generous levels to ensure the process retains quality. Researchers and editors should decide how many publications, not government policy which doesn't take into account the complexity and importance of one study over another.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 203. Prachee Avasthi

**Submit date:** 8/6/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Prachee Avasthi

**Name of Organization:** Arcadia Science, Astera Institute

**Type of Organization:** Other

**Type of Organization - Other:** Arcadia Science is a for-profit company. Astera institute is a non-profit private foundation

**Role:** Other

**Role – Other:** CSO of Arcadia and Head of Open Science at Astera Institute

**1. Proposed policy options:**
I strongly support capping NIH funding for journal publication costs at zero dollars. In my view, journals obscure the scientific process behind accept-reject decisions, delay the public release of research for months or even years—despite the fact that it could be openly shared at negligible cost to authors—and hinder the sharing of data and findings based on editorial norms and expectations. They also foster a false sense of truth through non-transparent peer review and editorial gatekeeping.

At the Astera Institute, per our open science policy, we do not permit our funds to be used for journal publishing. We also require our scientists at Arcadia Science to share their work openly outside of journals (see research.arcadiascience.com). Additionally, we accept only public feedback on our research—so that readers, not just authors, can benefit from criticism and questions—and we do not gate who may comment, recognizing that highly specialized expertise can exist far beyond traditional reviewer pools.

Our processes are designed to prioritize science above all else—I expect no less when it comes to the use of taxpayer dollars.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
In my view, peer review is essential—but journal-based peer review is typically opaque and fosters a false sense of scientific certainty. Scientific claims cannot be adjudicated at the moment of reading; instead, they must be evaluated over time through orthogonal testing, additional research, and the reuse of data and research artifacts.

The processes journals use for peer review (which should not be conflated with peer review more broadly) are, on balance, a net negative for science and therefore should not be funded with taxpayer dollars. Furthermore, the efforts of peer reviewers are often wasted when their critiques remain hidden and are not shared with other journals that may later publish the same work after rejection. In such a system, paying for peer review with public funds would support not only inefficient practices but also the widespread concealment of valuable evaluations and feedback.

This question could be reconsidered for venues in which peer reviews—for both accepted and rejected papers—are made publicly available, as was the case at eLife during my time on the board and as board chair.

**4. Publishing best practices:**
The highest publishing costs typically go toward personnel and staff. Automating processes such as data availability and integrity checks should ultimately reduce these costs compared to manual processing and screening. The NIH would be better served by supporting the development of automated solutions that can be used by all stakeholders—including authors conducting quality control on their own preprints—rather than subsidizing additional funding for journals to perform quality control checks by independently developing tools that could otherwise be broadly shared.

In general, advancing automated solutions and publishing technology is likely to decrease, rather than increase, publishing costs.

In my view, best practices for publishing involve author-driven dissemination of preprints, data, protocols, and other research artifacts through public repositories. Instead of allocating funds toward per-article publishing costs, the NIH should invest in public infrastructure to support the creation, maintenance, development, and long-term preservation of the scholarly record and its associated outputs.

**5. Other Comments:**
The highest publishing costs typically go toward personnel and staff. Automating processes such as data availability and integrity checks should ultimately reduce these costs compared to manual processing and screening. The NIH would be better served by supporting the development of automated solutions that can be used by all stakeholders—including authors conducting quality control on their own preprints—rather than subsidizing additional funding for journals to perform quality control checks by independently developing tools that could otherwise be broadly shared.

In general, advancing automated solutions and publishing technology is likely to decrease, rather than increase, publishing costs.

In my view, best practices for publishing involve author-driven dissemination of preprints, data, protocols, and other research artifacts through public repositories. Instead of allocating funds toward per-article publishing costs, the NIH should invest in public infrastructure to support the creation, maintenance, development, and long-term preservation of the scholarly record and its associated outputs.

## 204. Stephen Mahler

**Submit date:** 8/6/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Stephen Mahler

**Name of Organization:** University of California, Irvine

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I prefer Option 3: Set a limit on allowable costs per publication and allow a higher amount to be paid when peer reviewers are compensated.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
paying for peer review is likely to increase broad participation in this process by scientists, and may increase the quality of review in some cases.

**4. Publishing best practices:**
automated fraud detection is #1. not likely to be very useful--the worst kinds of misconduct will not be caught by these tools, and #2. should nonetheless be routinely employed by journals, and should not represent a major cost to the journal as many such tools are free or low cost.

Another potential option would be to create a 'bounty' for identifying misconduct in publications, available to those interested in identifying and proving such cases.

**5. Other Comments:**
automated fraud detection is #1. not likely to be very useful--the worst kinds of misconduct will not be caught by these tools, and #2. should nonetheless be routinely employed by journals, and should not represent a major cost to the journal as many such tools are free or low cost.

Another potential option would be to create a 'bounty' for identifying misconduct in publications, available to those interested in identifying and proving such cases.

## 205. Erik Enbody

**Submit date:** 8/6/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Erik Enbody

**Name of Organization:** Cornell University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 3 is the sensible choice. Option 3 is the only option that incentivizes journals to change their policies and thus should be at the front of the list when considering how to address the rising cost of publications.

**2. Available evidence related to publication costs and proposed options:**
In my experience, the greater the impact factor of a journal, the greater the cost to publish in it. This hurts scientific infrastructure as it is difficult for low-budget projects to publish in high-impact journals, which results in a poor return on investment for NIH grants.

**3. Peer review compensation:**
If journals are going to continue to charge such high costs, then reviewers must be compensated for their work.

**4. Publishing best practices:**
Copy editing and formatting for the journal at the time of publication need to be a part of any publishing model. In my experience, neither of these two critical components scales with the cost of publishing in a journal.

**5. Other Comments:**
Copy editing and formatting for the journal at the time of publication need to be a part of any publishing model. In my experience, neither of these two critical components scales with the cost of publishing in a journal.

## 206. N/A

**Submit date:** 8/6/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
-Consider negotiating reduced publication costs for federally funded studies

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
-prior experience with research review

-prior training in research or conduct of research

-expertise in topic area (invited reviewers often have no background or expertise in the topic)

-number of manuscripts reviewed (1 a year vs multiple)

-costs may increase to pay peer reviewers but quality of review and published science may also increase as long as their are criteria

**4. Publishing best practices:**

**5. Other Comments:**

## 207. Leslie Thompson

**Submit date:** 8/6/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Leslie Thompson

**Name of Organization:** UC Irvine

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I think the best option is:

Option 5: Set a limit on both the per publication cost and the total amount of an award that can be spent on publications. NIH could limit both the total amount of an award that could be spent on publication costs to the greater of 0.8% of the award's direct costs or $20,000.00 over the life of the award, in addition to limiting the amount per publication to $6,000.00.

This would still provide a limit per publication (more reasonable than 2K) and allow flexibility.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
NIH pays for peer review but most journals do not

**4. Publishing best practices:**

**5. Other Comments:**

## 208. Shirin Ghods

**Submit date:** 8/6/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Shirin Ghods

**Name of Organization:** University of Louisville

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I support Option 4, which allows up to 0.8% of total award funds or $20,000 total to be used for allowable publication costs. This approach provides Principal Investigators with greater autonomy to allocate resources across multiple publications based on the scope and complexity of their projects.

Unlike flat per-publication caps, Option 4 accommodates diverse research outputs, such as studies with large data sets, collaborative work, or multi-year projects, that may require publishing in multiple venues. This model promotes thoughtful budgeting and responsible planning at the grant proposal stage, which is more aligned with how many investigators manage their projects.

Option 4 also offers a fair solution to investigators who may not publish frequently but require flexibility for a few high-quality or high-cost articles.

**2. Available evidence related to publication costs and proposed options:**
Publication costs vary widely depending on journal, discipline, and format. Evidence from our institution and others indicates:

- Typical APCs range from $2,000 to $3,500 per article for well-regarded biomedical journals.
- Some high-impact journals charge APCs upwards of $4,000–$5,000, especially for open-access options or when enhanced publishing features (e.g., supplementary video/data integration) are involved.
- In practice, one NIH R01 might yield 6–10 publications, meaning that even moderate APCs can exceed $20,000 over the course of a project.

By using a percentage-based cap, Option 4 avoids penalizing labs with higher productivity or greater publishing needs while still encouraging efficient budgeting and use of grant funds.

**3. Peer review compensation:**
I support the idea of promoting publishing models that compensate peer reviewers, and believe that journals following this best practice should be favored in NIH policy decisions.

However, rather than adding additional cost tiers (as in Option 3), Option 4 gives PIs the flexibility to allocate within their capped budget in support of such journals, if they prioritize reviewer compensation, ethical standards, or transparency features. This supports responsible publishing decisions without enforcing narrow limits on how each dollar is spent.

NIH might also consider encouraging the use of such journals by tracking and publishing APC benchmarking data or highlighting best-practice publishers.

**4. Publishing best practices:**
Several publishing practices contribute to increased APCs but also enhance the quality and credibility of scientific literature. NIH should continue to support journals that:

- Use automated fraud detection (e.g., image duplication, plagiarism software).
- Offer transparent peer review, including open reviewer comments and editorial decision histories.
- Require data availability statements or open-source code sharing.
- Promote diversity in editorial boards and equitable access for authors.

Option 4 supports these practices by allowing PIs to strategically prioritize them when selecting journals, instead of limiting choices with a strict per-paper cap.

**5. Other Comments:**
Several publishing practices contribute to increased APCs but also enhance the quality and credibility of scientific literature. NIH should continue to support journals that:

- Use automated fraud detection (e.g., image duplication, plagiarism software).
- Offer transparent peer review, including open reviewer comments and editorial decision histories.
- Require data availability statements or open-source code sharing.
- Promote diversity in editorial boards and equitable access for authors.

Option 4 supports these practices by allowing PIs to strategically prioritize them when selecting journals, instead of limiting choices with a strict per-paper cap.

## 209. Ofer Rog

**Submit date:** 8/6/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Ofer Rog

**Name of Organization:** University of Utah

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I support option 3, Set a limit on allowable costs per publication and allow a higher amount to be paid when peer reviewers are compensated. Given the prominent role of NIH funding, such a move could curb the ever-escalating costs of publishing, especially by for-profit publishers. While reviewers' compensation is not yet common, creating a potential incentives to promote it is desirable.

**2. Available evidence related to publication costs and proposed options:**
N/A

**3. Peer review compensation:**
Peer review is a time-consuming endeavor. In addition, as with many other 'service'-type assignments that don't come with direct symbolic or real capital, its burden tend to be distributed in ways that are not-equitable. Compensation could promote more equitable division of these efforts. It could also eventually lead to quicker peer-review turnaround time, given that reviewer identification and engagement is a major bottleneck in publishing.

**4. Publishing best practices:**
I do not endorse putting the burden of fraud detection on publishers.

**5. Other Comments:**
I do not endorse putting the burden of fraud detection on publishers.

## 210. Carlos M. Rinaldi-Ramos

**Submit date:** 8/6/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Carlos M. Rinaldi-Ramos

**Name of Organization:** University of Florida

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
As a NIH funded PI, I find the following options listed on NOT-OD-25-138 to be acceptable/advisable:

Option 2: Set a limit on allowable costs per publication.

For Option 2 I would recommend a maximum of allowable direct costs of $2,000.00 per publication, including APCs and other fees.

I do not favor Option 1 because there are real costs associated with review, typesetting, and indexing and because eliminating APCs would jeopardize the finances of non-profit professional societies that run high quality journals that uphold the highest standards of peer review while leveraging their members to perform most of the editorial and review work as a service to advance their fields. Moving to a "pre-print" focused model would create a literature that has not been subjected to peer review, a bedrock of science for centuries. If we go this route I expect pre-print services will start to charge more for their service or offer a peer review option at a price. I don't see how this is better than the current system of peer review with a cap on APCs.

I do not support Option 3 - this will not contribute to the problem with current funding models and will create an incentive to further commercialize peer review.

I find the other options to be undesirable as well.

The only reason for which I would agree to a higher APC would be for publishers that have implemented audited programs to prevent fraud in the publication process.

**2. Available evidence related to publication costs and proposed options:**
Due to the sudden change in NIH policy I have an article that was submitted before NIH announced the change in policy and published after July 1. The publisher is Elsevier. They expect me to now pay $3,250 for OA fees and do not allow depositing the author accepted manuscript without an embargo. This is ridiculous. Elsevier has done almost no work related to this manuscript. I see no justification for such a high cost, especially when university subscription costs have not decreased with the increase in OA publications.

I also find it ridiculous that publishers charge lower OA fees to other countries and that other countries and their institutions are able to negotiate OA agreements for lower cost than the US and its institutions. This abusive practice needs to stop.

**3. Peer review compensation:**
I do not think peer reviewers should be compensated. As a scientist I see contributing to peer review as part of my social contract with science and society. I think paying reviewers for performing reviews will further commercialize the science publications enterprise and lead to a class of professional reviewers who do peer review for money and not to ensure the quality of the science being published.

**4. Publishing best practices:**
I think validated and audited fraud prevention and other efforts to prevent scientific fraud are an important goal and deserving of support. But I don't think we can trust individual publishers to develop these methods and standards.

**5. Other Comments:**
I think validated and audited fraud prevention and other efforts to prevent scientific fraud are an important goal and deserving of support. But I don't think we can trust individual publishers to develop these methods and standards.

## 211. sophie caron

**Submit date:** 8/6/2025

**I am responding to this RFI:** On behalf of myself

**Name:** sophie caron

**Name of Organization:** University of Utah

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 5

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
They are not compensated but should be.

**4. Publishing best practices:**

**5. Other Comments:**

## 212. University of Mississippi Medical Center

**Submit date:** 8/6/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Fazlay S. Faruque

**Name of Organization:** University of Mississippi Medical Center

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 3: Set a limit on allowable costs per publication and allow a higher amount to be paid when peer reviewers are compensated. NIH could adopt the $2,000.00 limit per publication in Option 1, and allow a higher limit of $3,000.00 per publication when publishing in journals that compensate peer reviewers at a level equivalent to the average hourly wage reported by the U.S. Bureau of Labor Statistics for Medical Scientists and Biochemists/Biophysicists (approximately $50.00 in 2025) and that publicly provide all reviews resulting from the peer-review process of accepted, NIH-funded manuscripts.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
It is becoming increasingly difficult to find qualified reviewers. Compensating reviewers will help improve this situation, as well as enhance the overall quality of publications. However, I am not sure to what extent reviewers will feel comfortable providing detailed feedback if their reviews are made public.

**4. Publishing best practices:**
If any type of fraud is detected, authors should be held accountable and face appropriate consequences. The practice should focus on both detecting fraud and raising awareness among authors about its serious repercussions.

**5. Other Comments:**
If any type of fraud is detected, authors should be held accountable and face appropriate consequences. The practice should focus on both detecting fraud and raising awareness among authors about its serious repercussions.

## 213. Maria Kalamvokis

**Submit date:** 8/6/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Maria Kalamvokis

**Name of Organization:** University of Kansas Medical Center

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Publications in the current format are essential. This is how knowledge is disseminated and remains well-documented and organized for future generations. Other forms of knowledge dissemination may flood the internet with observations that have not undergone peer review, have never been evaluated, and that could harm science.

APC cost is optional and some journals have already waived it (please see ASM). However, the journals have a processing fee per page. Perhaps a fixed $25,000 in total for publications for the length of the award will give to the investigators the desired flexibility to publish in journals of their interest without counting the pages and experiments they can publish.

Reviewers are important to be compensated. Perhaps, NIH could negotiate new cost per page with publishers, APC waiver, allocate a cost for peer review per publisher and perhaps subsidize publishers to acquire technologies for fraud screening .

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Paying for peer review will:

1. Increase review quality (time dedicated to the review, appropriate expertise, and clear comments and feedback).

2. Increase the possibility of recruiting experts on a specific topic to perform the review.

3. Decrease turnaround time.

Factors to consider for appropriate compensation:

1. Type of a manuscript.

2. Number of figures and length of the manuscript.

3. Journal reputation and impact factor (good reputation and higher impact factor often correlates with lengthier manuscripts with a lot of data).

4. Time required for a thorough review and the written feedback.

**4. Publishing best practices:**
Most journals perform an initial quality control looking mainly the format of the manuscript. I think this is the stage where they need to perform an automated screening to search for figure fraud and plagiarism. Following this step, the manuscript can move to the review process.

**5. Other Comments:**
Most journals perform an initial quality control looking mainly the format of the manuscript. I think this is the stage where they need to perform an automated screening to search for figure fraud and plagiarism. Following this step, the manuscript can move to the review process.

## 214. Jan Lammerding

**Submit date:** 8/6/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Jan Lammerding

**Name of Organization:** Cornell University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I support placing a limit on the costs per publication, but only if the NIH and federal government exert pressure on the publishers to offer open access publication within those limits. The $2000 limited listed in the proposal is well below many of the publication costs for many high quality, well-respected journals. Publishing peer-reviewed articles is crucial to ensure the highest quality of science, and it would be a a pity if work funded by the NIH could not be published because no funds are available to cover the required costs.

I also recommend accepting biorxiv and other preprints as an option to make the final manuscripts available and to satisfy the Open Access requirement. We routinely post our work on biorxiv at the same time we submit it to a journal, ensuring its public access, and then update the biorix version with each revision of the manuscript. However, the NIH currently does not recognize these preprints as satisfying the Open Access policy.

**2. Available evidence related to publication costs and proposed options:**
Our publication fees typically range from around $2000 to over $7000, all for highlight respected journals such as Current Biology, Nature, Science, Nature Communications.

The immediate open access option for many publishers is even higher, and several published prohibit making the accepted version immediately publicly available, putting pressure on the authors to purchase an Open Access option.

The NIH should use their tremendous leverage to push the publishers to alter their policy.

Lastly, i don't think that the estimates for publication costs derived from NIH budgets are accurate, as many budgets low-ball the costs, and the estimates are often provided years before the articles are actually published. A better estimate could come from institutions based on the actually paid article publication costs.

**3. Peer review compensation:**
In my 20+ years as a PI, i have never been compensated as a peer reviewer by a publisher. Compensation is more common for grant reviews, but not for manuscript reviews.

Given the low rates of compensation listed in the call ($50/hour), I am not sure it would provide a substantial incentive for PI's to serve as peer reviewers. Most of us perform peer review as a service to the scientific community.

**4. Publishing best practices:**

**5. Other Comments:**

## 215. Pedro Mendes

**Submit date:** 8/7/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Pedro Mendes

**Name of Organization:** University of Connecticut Health Center

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I think your option 2 (limiting costs per publication) is the only realistic option that could achieve the objectives of curbing the spiraling costs of publications. While I would like that there should be no costs (publication is much cheaper than alleged, particularly if one removes profit and marketing costs), in reality that option would not be effective as all publishers would lobby against it. But putting a cost limit which matches the lower range of current APCs would put a large competitive pressure for publishers to reduce their APCs.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
I do not think that compensating peer review is realistic. Most universities include "service to the community" as a criterion for promotion and tenure. When academics review they are using the time paid by their universities so this would not be a good use of money. In addition, for the payment to be a good incentive for reviewers the cost would have to be fairly high. One reviews because: a) we're interested in the topic of the paper, b) it is good for our career. Paying reviewers will not increase much the number of available reviewers and it will introduce biases in the reviews (which are hard to estimate, actually)

**4. Publishing best practices:**
Fraud detection is important, but it is becoming technically extremely hard and it may become impossible. Image manipulation has been the easiest to detect (but still very hard). Automated text generation is itself almost impossible to detect and the proportion of false positives is so large that it would become a major problem. LLMs are making this task impossible.

**5. Other Comments:**
Fraud detection is important, but it is becoming technically extremely hard and it may become impossible. Image manipulation has been the easiest to detect (but still very hard). Automated text generation is itself almost impossible to detect and the proportion of false positives is so large that it would become a major problem. LLMs are making this task impossible.

## 216. N/A

**Submit date:** 8/7/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 4 is preferred, though it is short sighted to limit the publication of results from research studies. The other options will be quickly out of date or the contingencies they create will be problematic, resulting in limiting the publishing of important results from NIH funded research studies. For examples of problems with the other options: estimating a $50 per hour wage per reviewer may just encourage low quality, less highly trained reviewers to complete reviews--or encourage the outsourcing of reviews to countries where labor rates are lower. Option 2 will just limit the quality of journal in which studies can publish. Option 1 will limit publications, or will create large unwieldy publications that are difficult for U.S. citizens to understand.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
$50 per hour is the salary of a new Assistant Professor and does not result in high quality reviewers. That compensation does not come with benefits as a salary does, so is an under compensation of potential reviewers, and will quickly be out of date.

**4. Publishing best practices:**

**5. Other Comments:**

## 217. Ernest Turro

**Submit date:** 8/7/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Ernest Turro

**Name of Organization:** Icahn School of Medicine at Mount Sinai

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
None of the options on the table, particularly those including a per publication cap, address the underlying problem. That's because the most high quality and prestigious journals charge upwards of $10,000 to publish a paper with open access. The NIH should not be discouraging researchers from publishing in the most well regarded journals, which attract the best submissions, use the best peer reviewers and have the largest readership. The real problem is the proliferation of publications in third rate journals that, cynically, capture the market for low quality work (e.g. MDPI, Frontiers) submitted by people pursuing high publication count over quality. In aggregate, these low quality or "salami slicing" publications must cost the taxpayer a great deal of money for little to no benefit. A per publication cap would have the unintended consequence of encouraging publishing in low quality opportunistic journals. What the NIH should be encouraging is for researchers to publish high quality papers, even if that means publishing more seldomly. If Pubmed were to remove papers from low quality publishers that might be a step in the right direction. Additionally, there may be ways for the NIH to apply pressure on publishers charging exorbitant fees.

**2. Available evidence related to publication costs and proposed options:**
The open access publication fee for a Nature Genetics paper I published a few months ago was $12,690. I agree these fees are exorbitant but until they are reduced I believe they should be eligible for payment using NIH funds. Otherwise, policy will have the perverse effect of discouraging investigators from publishing in the highest quality journals.

**3. Peer review compensation:**
I am not convinced that monetary compensation should be a motivator for peer reviewing.

**4. Publishing best practices:**
I advise that you review the fees charged by the highest quality journals. In my opinion, such costs should be covered, while costs for publishing in low quality journals should not be covered.

**5. Other Comments:**
I advise that you review the fees charged by the highest quality journals. In my opinion, such costs should be covered, while costs for publishing in low quality journals should not be covered.

## 218. N/A

**Submit date:** 8/7/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:** National Institutes of Health

**Type of Organization:** Other

**Type of Organization - Other:** Government Research

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Communication of peer-reviewed research is the bedrock of science and there should be no impediments to that. Indeed the US is a leader in this particular aspect. While I agree that most research costs from taxpayer funded grants should be spent on research and I also agree that there are some journals that are price-gauging the taxpayer by raising their costs of publication (especially for open access publications), the proposed options here does not address the core issue on maximizing research funds. Here are my issues:

1) I favor the option of limiting allowable publishing costs per grant. There has to be some limit on publications allowed per grant.

2) But, by limiting just on the researcher/investigator's side the proposed options are essentially "punishing" the scientist by reducing their ability to publish their research.

3) By limiting allowable publishing costs on NIH grants, the proposed options will cause a wide disparity in who gets to publish - well funded "older" scientists with multiple sources of funds will be able to publish their research more easily than younger, early-stage scientists who often rely on purely NIH grants. The disparity of who gets to publish cutting edge research is already widening and young investigators who do not have many high funded grants are already lagging behind (see Daniels, PNAS, 2015, PMID: 25561560 and Packalen & Bhattachrya PNAS, 2020, PMID: 32430336). Limiting allowable publishing costs per grant or per publication will further widen this disparity of who's research gets disseminated the widest - wealthy older researchers will easily able to afford while early-stage investigators will not be able to. Thus, there should be an exception made for early-stage investigators.

4) Engage and negotiate with the publication groups to drop their prices per publication. There has to be some guidance and rules.

5) Ask publication groups to significantly lower their prices for publication and for open-access studies. If a single open-access publication is $12,000 in the Nature group for example (https://www.nature.com/ni/submission-guidelines/publishing-options#:~:text=GOLD%20OA%20FUND,and%20the%20Nature%20research%20journals.). That is just wildly expensive when NIH has mandated that all publications supported by NIH has to be open access. It has to be lowered by the publication groups.

6) Review articles that are written to provide an overview of the field are often not available for open-access (see: https://www.nature.com/nri/for-authors/preparing-your-submission#publishingmodel). That has to be changed. Again, negotiate and engage with the publication groups, do not punish scientists who just want to communicate their science.

**2. Available evidence related to publication costs and proposed options:**
A single open-access publication is $12,000 in the Nature group for example (https://www.nature.com/ni/submission-guidelines/publishing-options#:~:text=GOLD%20OA%20FUND,and%20the%20Nature%20research%20journals.). That is just wildly expensive when NIH has mandated that all publications supported by NIH has to be open access. It has to be lowered by the publication groups.

Review articles which provide an overview for the field are not available for open-access at many journals and they rely on subscription models (https://www.nature.com/nri/for-authors/preparing-your-submission#publishingmodel). This has to be changed.

**3. Peer review compensation:**
Peer reviewers are not appropriately compensated in the current publishing model by any reputed scientific journal. I completely agree with the policy proposal to raise the limit of allowable costs if that is the route that we are going. However, even there, by limiting allowable costs either per publication or per grant is again punishing researchers without engaging with the core problem - which is to engage and negotiate with scientific journals to lower publication costs especially for open access (as mandated by current NIH policy). Additionally, as stated above this will lead to a vast disparity on who gets to publish as older, established researchers with multiple sources of funding will be able to afford to pay journals that do not compensate peer reviewers while early-stage investigators will be unable to afford it.

**4. Publishing best practices:**
My order of importance for best practices would be:

1) Negotiate with journals to drop their prices and make more articles open access (as mandated by NIH) and drop prices for open-access research articles.

2) Raise the minimum allowing publishing cost per grant higher for early-stage researchers than senior investigators

3) Allow exceptions and for publications that compensate peer-reviewers and use enhanced fraud detection capabilities

4) Finally have a limit on minimum allowing publishing cost per grant -- 0.8% is still very low.

**5. Other Comments:**
My order of importance for best practices would be:

1) Negotiate with journals to drop their prices and make more articles open access (as mandated by NIH) and drop prices for open-access research articles.

2) Raise the minimum allowing publishing cost per grant higher for early-stage researchers than senior investigators

3) Allow exceptions and  for publications that compensate peer-reviewers and use enhanced fraud detection capabilities

4) Finally have a limit on minimum  allowing publishing cost per grant -- 0.8% is still very low.

## 219. Sharon Nachman

**Submit date:** 8/7/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Sharon Nachman

**Name of Organization:** SUNY Stony Brook

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
please do not go for option 1. this will stifle manuscripts adn result in less data being available to the community. option 2 is reasonable and would result in publishers cutting down their costs (perhaps) and allowing researchers to publish manuscripts.

**2. Available evidence related to publication costs and proposed options:**
In general, we have not submitted papers to journals that charge high fees. on average $2-3,000 is what we are seeing. it might be interesting to just look at selected top and middle tier journals for several specialties to understand what the actual cost is, or if some specialty journals do charge significantly more (because those specialists have higher salaries)

**3. Peer review compensation:**
i have not ever been compensated for journal review.  I do review between 6-8 papers per year for top tier journals

**4. Publishing best practices:**
I suspect the cost of looking for plagiarism will come down with better/cheaper tools, so should not significantly impact the cost of submissions or journal costing to the author.

**5. Other Comments:**
I suspect the cost of looking for plagiarism will come down with better/cheaper tools, so should not significantly impact the cost of submissions or journal costing to the author.

## 220. Bernard Fischer

**Submit date:** 8/7/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Bernard Fischer

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Other

**Role – Other:** DUPRI Director of Administration and Research Development

**1. Proposed policy options:**
Option 4: Set a limit on the total amount of an award that can be spent on publication costs. NIH could limit the maximum amount of an award that could be spent on publication costs to 0.8% of the award's direct costs over the length of the award or $20,000.00, whichever is greater, in order to not disproportionately impact smaller awards. Limiting the award to 0.8% or $20,000.00 is consistent with recent requested average amounts for publication costs and provides institutions flexibility in publication while containing future cost increases. NIH may consider exemptions to the cap with agency approval for unusual, high-volume publication situations.

**2. Available evidence related to publication costs and proposed options:**
To publish open access in Frontiers in Immunology in 2023 we spent $3500.

**3. Peer review compensation:**
I have not been compensated for peer review of manuscripts.

**4. Publishing best practices:**
Fraud detection, plagiarism detection, use of AI in writing manuscript detection, image alteration detection.

**5. Other Comments:**
Fraud detection, plagiarism detection, use of AI in writing manuscript detection, image alteration detection.

## 221. James Moody

**Submit date:** 8/7/2025

**I am responding to this RFI:** On behalf of myself

**Name:** James Moody

**Name of Organization:** Duke University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I would recommend a cap on NIH funding per publication, such as the proposed $2000/publication; with the caveat that investigators are allowed to supplement with alternative (non NIH) funds to pay more. I.e. the cap is fine, but we don't want to prohibit people from publishing at more expensive places if they choose and pay for it with non NIH monies.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Peer reviewers should be volunteers and not paid. Review is part of a generalized exchange we all participate in.

**4. Publishing best practices:**
I would recommend a pre-publication veracity review - that journals go through code and such to make sure it matches. This is expensive and time consuming, so would be hard to implement. But NIH should fund trials of this complete-check sort of model.

**5. Other Comments:**
I would recommend a pre-publication veracity review - that journals go through code and such to make sure it matches. This is expensive and time consuming, so would be hard to implement. But NIH should fund trials of this complete-check sort of model.

## 222. Joe Zunt

**Submit date:** 8/7/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Joe Zunt

**Name of Organization:** University of Washington

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I like options #2 and #3. I have never received compensation for my reviews and don't know how many journals provide reviewer compensation. The aspect of both of these options that I support is a limit on cost for publication - I would hope that journals get the message and reverse the gradual climb in costs that has less and less to do with the cost of printing journals as most are on-line.

**2. Available evidence related to publication costs and proposed options:**
I am a big fan of Journal/Author Name Estimator (https://jane.biosemantics.org/) and had contacted the developer of this website to inquire if they could list the cost for publication of each journal; not surprisingly, he said it is very difficult to find publication costs listed on journal websites and would be too much work to include publication costs on their website. Perhaps this move by NIH could be the start of more transparency of publication costs.

**3. Peer review compensation:**
I wonder if compensation would encourage some to seek opportunities to review with the goal of earning money (rather than the altruistic nature of reviewers who currently review without compensation).

**4. Publishing best practices:**

**5. Other Comments:**

# 223. Alison Roxby

**Submit date:** 8/7/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Alison Roxby

**Name of Organization:** University of Washington

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I have been greatly affected by publication costs. I often choose which journal I submit to based on the cost as resources are tight. Publishing companies have increased fees for publishing because there has not been a limit on using grants to pay. I suggest that Option 2 and/or Option 3 are the best approach - allowing researchers to use grant funds for publication but capping the amount to encourage publishers to rein in their own costs.

Given the existence of PMC and of pre-print servers, high cost of publishing is really just a tax by prestigious journals that is being paid by researchers. Just as a Chanel handbag costs more than a Target handbag, publishing in Nature or Science is more expensive due to branding. Taxpayers should not support fancy brands, it should be to make work accessible. Therefore I think the $2000 per article cap will achieve that goal.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
I actively turn down opportunities to peer review papers where my review will be published, because I lack the time to produce a polished, for-publication result. If peer review is open, it should be compensated.

**4. Publishing best practices:**
I think publishing companies are complaining a lot - when you consider that many are online only and use no paper and have no actual printing costs, their costs have actually gone down, so I think they should pay for automated fraud detection and should not pass those costs along to the taxpayer.

I have not seen publishers going bankrupt or shutting down journals so I don't find their arguments persuasive. They have figured out a great way to extract money from us. I started publishing in 2009 and most publishers still use the same exact clumsy user interface - haven't upgraded at all. Given how hard scientists work for their grant money, I don't see the same level of effort from publishers and therefore I resent sharing my hard-earned grant money with them in the form of incredibly high publishing costs.

**5. Other Comments:**
I think publishing companies are complaining a lot - when you consider that many are online only and use no paper and have no actual printing costs, their costs have actually gone down, so I think they should pay for automated fraud detection and should not pass those costs along to the taxpayer.

I have not seen publishers going bankrupt or shutting down journals so I don't find their arguments persuasive. They have figured out a great way to extract money from us. I started publishing in 2009 and most publishers still use the same exact clumsy user interface - haven't upgraded at all. Given how hard scientists work for their grant money, I don't see the same level of effort from publishers and therefore I resent sharing my hard-earned grant money with them in the form of incredibly high publishing costs.

## 224. Susan C Alberts

**Submit date:** 8/7/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Susan C Alberts

**Name of Organization:** Duke University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I would vote for option 2. Set a limit on allowable costs per publication. The dynamics of the peer review and publication system would be severely disrupted by option 1 (Disallow all publication costs) and the unintended consequences could be extreme. Options 3-5 would achieve a similar outcome to option 2 but seem unnecessarily elaborate without a concommitant improvement in outcome.

**2. Available evidence related to publication costs and proposed options:**
One of the concerns about making a drastic change to the system is lack of evidence to understand how these changes (which would be substantial) will affect the publication system. Preprints are not the same as peer-reviewed publications, and never will be.

**3. Peer review compensation:**
I didn't know that peer review is sometimes compensated; this doesn't happen in my fields. I think compensated peer review is a reasonable idea given the great increase in publication volume in the past two decades, but I don't feel I know enough to provide further ideas.

**4. Publishing best practices:**
I think reviews from AI engines is a real risk; I don't know how to avoid this but it seems essential to address.

**5. Other Comments:**
I think reviews from AI engines is a real risk; I don't know how to avoid this but it seems essential to address.

## 225. N/A

**Submit date:** 8/7/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
I think peer reviewers should be paid for their time and the stated numbers in the request for information are appropriate.

**4. Publishing best practices:**
These should not be highly expensive as AI can or will take care of many of them.

**5. Other Comments:**
These should not be highly expensive as AI can or will take care of many of them.

## 226. N/A

**Submit date:** 8/7/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 4 seems the most fair

**2. Available evidence related to publication costs and proposed options:**
Please continue to fund publication costs. I have no other funds to support publication costs.

**3. Peer review compensation:**
I believe peer reviewers should not be compensated, in my opinion. No journal should be paying reviewers or offering vouchers. This is not appropriate. Review is part of service and part of the expectation of maintaining scientific quality. If you publish papers, you should be reviewing at least as many per year to support the ecosystem without pay-to-play.

**4. Publishing best practices:**
ALL journals should be employing uniform fraud detection capabilities. A standard can be set that becomes the expectation across all journals and becomes one of the journal quality metrics. This equalizes the playing field.

**5. Other Comments:**
ALL journals should be employing uniform fraud detection capabilities. A standard can be set that becomes the expectation across all journals and becomes one of the journal quality metrics. This equalizes the playing field.

## 227. Matthew Zipple

**Submit date:** 8/7/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Matthew Zipple

**Name of Organization:** Cornell University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I generally support  option 1, disallowing publication costs, but with a proposed addendum.

I would propose that APCs  in any journal that is exclusively Open Access continue to be allowed, up to some limit ($3000 seems reasonable, in-line with non-profit journal expenses, like eLife).

It seems intuitively clear that subsidizing publishing costs leads to increases in the costs of publication that taxpayers bear. Journals long survived off of subscription costs alone. The ability to charge APCs results from researchers being able to use large pools of money whose depletion has little impact on their daily productivity. The fact that so many journals allow for waivers when authors do not have grants is further evidence that the APC is not strictly necessary for a journal to economically viable.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 228. N/A

**Submit date:** 8/7/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
All options are problematic.

The costs for open-access publications, which NIH now requires, are higher because the journals can no longer acquire revenue for subscriptions to their journals. Thus, the publication cost must cover the entity of the effort necessary to manage submission to the journal, manage the review process, perform the type editing, publish the manuscript (online requires all the associated website management costs), and the archiving fees. This is the reason publications costs have risen and will continue to rise. These are labor-intensive endeavors with almost all the costs now transferred to the scientist at time of publication.

Option 1: Many researchers do not have access to non-NIH funding for their research. These researchers would no longer be able to publish and disseminate their research products, which is a fundamental aspect of scientific discovery and dissemination of knowledge.

Option 2: The proposed limit of $2000 is below the current average, and does not account for inflation, etc. In addition, by setting the limit per publication below the average, assuming the higher than average are for open-access publications, this will limit what can be published. In addition, this low level makes it so that researchers are not selecting the best place to publish their research that will be most publicly available but rather making American scientists published in low tier journals. Importantly, many low-income researchers do not publish their research because of these limitations - Are we now going to be equivalent to a low-income country?

Option 3: Same issues as Option 2.

Option 4: A maximum amount will limit the number of publications. Some studies may generate a large amount of publishable data, ex. 10 papers per year = 50 papers in a 5-year grant. With the inherent variability in research output, limiting publications is limiting the dissemination of knowledge.

Option 5: Combines all the detrimental aspects of all of the previous options, making this the most detrimental for dissemination of scientific knowledge.

Option 4:

**2. Available evidence related to publication costs and proposed options:**
You already cite the most important variables. Publication costs vary dramatically and the number of publications also varies dramatically. The only way to NOT stifle research progress and dissemination of

scientific knowledge is use the maximum (not median) as your baseline. You must assume at least 30 publications at a potential cost of $9000 per publication. In this instance, the limit would be set at $270,000. In reality, each study needs to have the flexibility to publish where and as much as necessary to disseminate their research to maximize public exposure and promote uptake of the research into the scientific enterprise.

**3. Peer review compensation:**
The AVERAGE manuscript takes 6 hours to review. The AVERAGE academic salary for an NIH funded investigator is $200/hr (inclusive of benefits). Thus, even $1000 is unlikely to adequately compensate a reviewer for the effort necessary to review a manuscript. Another important distinction is the time that an academic editor (ie faculty member) takes to manage the review of a manuscript with also AVERAGES 4 hours per manuscript.

Compensation has an academic editor or an reviewer already do not appropriately compensate for the time required. Again, if you were to limit this, it needs to be limited at the maximum level and not the average or you will disrupt the peer review process that is absolutely critical for the rigor of scientific communications.

**4. Publishing best practices:**
This topic suggests that there should be no fraud detection for published research! If anything, with increased potential for AI manipulation of data these types of processes are even more critical and will require more complicated efforts to identify bad players. Limiting the endeavors to verify that published research is real and accurate will decrease the overall quality of scientific research and therefore reduce the public's trust in science.

**5. Other Comments:**
This topic suggests that there should be no fraud detection for published research! If anything, with increased potential for AI manipulation of data these types of processes are even more critical and will require more complicated efforts to identify bad players. Limiting the endeavors to verify that published research is real and accurate will decrease the overall quality of scientific research and therefore reduce the public's trust in science.

## 229. Sam Winemiller

**Submit date:** 8/7/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Sam Winemiller

**Name of Organization:** University of North Carolina Wilmington

**Type of Organization:** Academic Institution

**Role:** Institutional Information Sciences Professional/Librarian

**1. Proposed policy options:**
First, I think this is a worthy pursuit. I would suggest a combination of Option 3 and Option 4 as the best approach to provide both flexibility and support for smaller awards. I think a $20k cap seems reasonable. All that said, encouraging compensation for peer reviewers is also worthwhile, so increasing the cap would make sense in those cases. After reflection, I'm revising my suggestions in a previous response to echo Christopher Steven Marcum's response, which I believe lays out excellent arguments in support of a more sustainable open access/public access system of scholarly communication. I've copied and pasted his response to this question below, which has my full support. "I appreciate the thought that went into the development of the proposed options listed in NOT-OD-25-138. However, none of those options are comprehensive enough to fully achieve NIH's goal of maximizing research funds with its public access policy. The NIH should take the following five steps to do so: - Require all NIH grantees and intramural researchers to deposit preprints of their NIH-funded work in an appropriate publicly accessible repository. Allow for preprints that have undergone transparent peer-review to count towards the NIH public access policy. Fund preprint repository and preprint review services. - Clearly communicate that authors are always able to self-deposit their peer-reviewed author-accepted manuscripts into PubMed Central without cost. NIH needs to directly and publicly counter the misinformation that some publishers are giving to NIH grantees and intramural researchers that they must pay article processing charges in order to comply with the NIH policy. NIH should reward publishers, such as Science/AAAS and AIP, that provide easy paths for authors to comply with NIH public access policies with "green" open access for the federally funded research they publish. - Encourage grantee institutions to provide a percent of NIH award indirect costs to support institutional repositories, community-supported open access journals (i.e., diamond open access), and other shared-resources that institutions can provide to support cost controls. - Enforce NIH's Federal Purpose License to ensure all NIH funded research products including data and publications are accessible to the public. Section 8.2.1 of the NIH grants policy already incorporates the Federal Purpose License into its award contract Terms & Conditions. NIH needs to train its program officers to conduct better oversight and enforcement of that policy. - Modernize public access infrastructure at the National Library of Medicine to lower research burden by: 1) ingesting data from and interoperating with university institutional repositories; 2) creating a discoverable mapping between PMC numbers and any DOIs associated with manuscripts; and 3) improving the submission interface for depositing manuscripts and data (perhaps with AI-based enhancements)."

**2. Available evidence related to publication costs and proposed options:**
https://www.deltathink.com/news-views-open-access-charges-price-increases-back-on-trend After

reflection, I'm revising my suggestions in a previous response to echo Christopher Steven Marcum's response, which I believe lays out excellent arguments in support of a more sustainable open access/public access system of scholarly communication. I've copied and pasted his response to this question below, which has my full support. "I encourage NIH leadership to read the three reports that OSTP submitted to Congress between 2022 and 2024 on the costs of scholarly publishing. Sadly, the publisher lobbyists continue to convince Congressional appropriations staff that these reports do not exist. That's misinformation that the NIH can push back against by citing the latest report in its final policy, which is the most comprehensive compilation of evidence of any source and is available here. The NIH appears to have relied solely on OA journals without considering the costs that hybrid journals also impose in the analysis presented in the RFI. There are a couple of resources that the NIH can draw from for more data on APCs and "gold" open access charges: Springer Nature publishes their costs here, Elsevier publishes their costs here, and Wiley publishes theirs here. Publishers will claim that it is expensive for them to publish an article and that the APCs are justifiable either because of the prestige-value of specific vanity journals or because of their actual expense. Sadly, most for-profit publishers will never share their realized costs per page, per article. Public accounts of surplus revenues (i.e., profits) sometimes in excess of 40% suggest that their APCs contribute to the very price-gouging that NIH wants to curtail. NIH should demand granular transparency to the public from all publishers they do business with at NLM."

**3. Peer review compensation:**
Minimum wage payment is a good start. Publisher verification of peer reviewer status on an ORCID profile would also be valuable to academics. After reflection, I'm revising my suggestions in a previous response to echo Christopher Steven Marcum's response, which I believe lays out excellent arguments in support of a more sustainable open access/public access system of scholarly communication. I've copied and pasted his response to this question below, which has my full support. "I am intrigued by any reform proposal that aims to improve the broken peer-review system. However, the peer-review proposal here has little to do with actually controlling costs and I encourage NIH to abandon this option. There is not yet enough evidence to suggest that compensating reviewers improves quality and avoids gaming. I support policies that require transparent peer-review (non-blinded and shared regardless of final manuscript disposition or editorial decision). See the first bullet in response to this RFI's first question for details on a step that NIH should take here with respect to peer-review."

**4. Publishing best practices:**
After reflection, I'm revising my suggestions in a previous response to echo Christopher Steven Marcum's response, which I believe lays out excellent arguments in support of a more sustainable open access/public access system of scholarly communication. I've copied and pasted his response to this question below, which has my full support. "It is encouraging that some journals are deploying emerging technology to help improve their value. However, the NIH should be cautious against any automated or AI-based fraud detection, peer-review, summarization, et cetera, system as justifiable for higher publication costs. These systems have risks that have not been fully understood and the risks and consequences of their use should lay fully with the publishers. The AI-based fraud detection systems are in an untenable arms-race as LLMs and computer-vision will continue to advance proportionally for nefarious and beneficial uses alike."

**5. Other Comments:**
After reflection, I'm revising my suggestions in a previous response to echo Christopher Steven

Marcum's response, which I believe lays out excellent arguments in support of a more sustainable open access/public access system of scholarly communication. I've copied and pasted his response to this question below, which has my full support. "It is encouraging that some journals are deploying emerging technology to help improve their value. However, the NIH should be cautious against any automated or AI-based fraud detection, peer-review, summarization, et cetera, system as justifiable for higher publication costs. These systems have risks that have not been fully understood and the risks and consequences of their use should lay fully with the publishers. The AI-based fraud detection systems are in an untenable arms-race as LLMs and computer-vision will continue to advance proportionally for nefarious and beneficial uses alike."

## 230. Stephen Staklinski

**Submit date:** 8/7/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Stephen Staklinski

**Name of Organization:** Cold Spring Harbor Laboratory

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Publication in journals is outdated. There is no reason why preprint servers cannot suffice in place of formal peer review, given that those who tend to reach niche articles are familiar with the topic and those who read more popular articles can quickly become aware of discourse about those articles in the community.

**2. Available evidence related to publication costs and proposed options:**
The most beneficial part of the journal costs is the final screening by a typesetter/editor to get the language and formatting proper for the audience. That step is worth the costs. The earlier steps of editor review and peer review are arbitrary and not worth the costs.

**3. Peer review compensation:**
This is an interesting idea, but potentially creates conflicts of interests.

**4. Publishing best practices:**
None, it should be free. NIH would be using money better if it goes to supporting free preprint servers.

**5. Other Comments:**
None, it should be free. NIH would be using money better if it goes to supporting free preprint servers.

## 231. N/A

**Submit date:** 8/7/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Based on my own experience, the typical actual expended funds for publication expenses in any given year on a typical $250k/year NIH award is roughly $5000, which amounts to only 2% of the grant amount. This would appear to be a completely pointless gesture in redirecting more funds towards research. Rather this appears to be a roundabout way of undercutting the US dominant role in scientific research. The peer review process remains absolutely critical in maintaining the level of reliability in the published scientific record. While preprint services like BioRXIV are important in getting new research out quickly, the peer review process results in improvements to published manuscripts in virtually every single case. This is not because the publication authors lack care or are committing scientific fraud, but simply because everyone has different areas of expertise, and review by experts will often uncover issues the original authors didn't consider. If everything were simply published by dumping it into a preprint server, and allowing open comments/discussion to judge the quality of the work, that would mean that every time someone read a manuscript they would also have to fully digest the commentary on the manuscript and have a good understanding of who the commentary was coming from. There are numerous low reliability publications which lack a robust peer review process, and one can readily find that these publications contain a wide range of heavily biased if not outright fraudulent work written by those with a clear conflict of interest. For example, someone who runs a "dietary supplement company" publishing a manuscript purporting to relate the ingredients of their supplement to improved health outcomes, using questionable techniques, and making radically overstated conclusions. The current peer review and publication system is certainly not perfect, but you will find that these highly questionable and biased studies do not generally occur in reasonably respected journals. Indeed, we see the EU moving in the opposite direction from this policy, in paying centrally and directly for publication expenses to make research results publicly available immediately upon publication. The new NIH approach of requiring immediate release of all publications without paying for it appears designed to completely wipe out the scientific publishing industry. While it's clear that internet based dissemination methods may eventually make current publication models obsolete, eliminating the existing system before a reliable replacement exists is a recipe for disaster. At best, publishers will shift the expenses to other places, like libraries or professional organization membership fees, which in most cases the NIH will wind up paying for in other ways. In short, I feel that all of these proposed policies will do nothing but hurt scientific progress and the reliability of scientific results and will achieve only extremely minimal cost savings on the order of 1-2%.

**2. Available evidence related to publication costs and proposed options:**
The provided brief on the policy describes the funds budgeted for publication expenses rather than the

funds actually expended for publication expenses. In my experience, this category, as a small fraction of the whole grant, is generally over budgeted with an optimistic view on how many publications may be achieved each year, and actual expenses are considerably less. Presumably the NIH also has access to information on money actually expended, not just budgeted.

**3. Peer review compensation:**
Peer review is generally considered part of an academic's job, just like going to give talks to the public or other academics and other academic activities. If the goal is to conserve money for research activities, it is unclear why promoting the concept of paid manuscript reviews is on the table?

**4. Publishing best practices:**
There are few types of scientific fraud which could be automatically detected. If a researcher willing to commit intentional scientific fraud becomes aware that an automatic fraud detection system is in place, they will clearly make sure their fraudulent research is not detected in this way. Basic plagiarism detection should, of course, be in place, if only to insure "paper farms" cannot succeed. However, it is already in routine use and has not had a significant impact on publication expenses.

**5. Other Comments:**
There are few types of scientific fraud which could be automatically detected. If a researcher willing to commit intentional scientific fraud becomes aware that an automatic fraud detection system is in place, they will clearly make sure their fraudulent research is not detected in this way. Basic plagiarism detection should, of course, be in place, if only to insure "paper farms" cannot succeed. However, it is already in routine use and has not had a significant impact on publication expenses.

## 232. Jeffrey Withey

**Submit date:** 8/7/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Jeffrey Withey

**Name of Organization:** Wayne State University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
A cap per publication is sensible and $2000 is fair. I am in favor of an additional cap if peer reviewers/editors are paid as well but certainly not more than $3000 max per paper. Having a cap on total publication funds spent on a grant, however, would punish extremely productive labs.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
It should be noted that many editors are also not compensated. Journals charge huge amounts of money for publishing and the majority of the actual work costs them nothing. I am an editor for two journals (one PLoS and one Frontiers journal) and receive zero compensation. I have also reviewed hundreds of manuscripts as a peer reviewer and never received a cent in compensation.

**4. Publishing best practices:**
There are existing fraud detection programs that are not high cost. NIH could also fund fraud detection systems and require their use by journals that publish papers funded by NIH.

**5. Other Comments:**
There are existing fraud detection programs that are not high cost. NIH could also fund fraud detection systems and require their use by journals that publish papers funded by NIH.

## 233. N/A

**Submit date:** 8/8/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Not Applicable

**Role:** Member of the Public

**1. Proposed policy options:**
The limit should clearly be $0. Tax payers like myself should not be subsidizing a parasitic industry of publishers. Grants are intended to advance scientific knowledge, not careers and prestige of individual scientists and not the profitability of the publishing industry.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Peer revue should be a community contribution, not tax money. Replication is the real crisis but that could be addressed with their own grant application, it doesn't apply here.

**4. Publishing best practices:**
That's is the cost of doing business for the journals. If they can't cover it with revenue they shouldn't exist.

**5. Other Comments:**
That's is the cost of doing business for the journals. If they can't cover it with revenue they shouldn't exist.

## 234. Phillip Milner

**Submit date:** 8/8/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Phillip Milner

**Name of Organization:** Cornell University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 1 would severely limit the ability of NIH-funded researchers to publish in leading journals such as Science, Nature, or society journals (e.g., American Chemical Society). It would compromise the ability of NIH-funded researchers to disseminate their findings to the public, as these types of journals have a much wider reach than those that allow for free open access or any kind of archiving service. The only way this could work is if the journals got rid of publication costs for all NIH-supported manuscripts, which seems unlikely.

Option 2 would also limit where manuscripts can be published, because it is unclear what funds the authors could use to cover the rest of the costs.

Since paid peer review is so exceedingly rare, I think Option 3 will not have much of a difference compared to Option 2. Most journals (for example, non-profit society journals like the American Chemical Society) do not have money available for peer review. I would also note that many peer reviewers are located outside of the US, so it is not clear that this policy would really benefit the US.

Option 4 seems like the best to give authors some flexibility in dealing with the APCs for top journals.

Option 5 could be the best course if it provided pressure on journals to provide an option that fulfills NIH requirements and costs less or equal to the maximum amount. In the absence of this pressure, it might provide strain as authors struggle to find a way to cover the remaining costs for each publication.

**2. Available evidence related to publication costs and proposed options:**
For the American Chemical Society, APCs are approximately $3000 for zero-embargo publication in PMC. Open access is approximately $5000.

**3. Peer review compensation:**
While I think this is an admirable goal, compensation for peer review is so exceedingly rare (especially for top journals such as Science, Nature, etc) that I think it cannot be a factor in determining policy related to publication costs.

**4. Publishing best practices:**

**5. Other Comments:**

## 235. Jean Cook

**Submit date:** 8/8/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Jean Cook

**Name of Organization:** University of North Carolina at Chapel Hill

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 4 is my preference. That said, some subfields publish many smaller papers per year whereas my own field tends to publish a smaller number of very comprehensive papers. I suggest looking at the data by subfield to see who will be most negatively impacted - perhaps computational biology? Some clinical research papers are very short case reports, and there may be quite a few of those for some PIs.

Option 2 could work, but where would the difference between the $2000 and the cost from the journal come from? If the institution has to cover that, then pulling it from F&A seems like their first choice which helps the lab, but not the overall ecosystem. Given cost-of-living increases, at least set a policy where the limit increases annually.

Option 3 seems like a good idea, but there are complications: a) there has to be proof that the journal is indeed spending most of that extra $1000 in compensating reviewers. b) expert reviewers are over-burdened for time already, and a few hundred dollars isn't enough to make up for the time. what will keep editors from taking the easy way out and recruiting less-qualified reviewers so they don't have to try so hard? c) as a field, we are trying to give reviewing opportunities and credit to postdocs and senior grad students as co-reviewers. The reviewer of record is usually the faculty supervisor though and the trainees need the funds much more than the supervisor. There needs to be a mechanism to compensate co-reviewers.

Option 1 makes no sense unless the culture of measuring productivity changes. We need the certification of peer review to let us focus our attention on the most meaningful studies to read. Impact factor is a terrible metric, but journal reputation is still an important part of how we evaluate publications for hiring, promotion, and grant reviewing.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
It's not the money, it's the TIME cost to reviewers. One way to help is to reduce the overall administrative burden on PIs and also decrease the amount of time we spend constantly applying for our own funding. I fear that allowing journals to charge more by claiming they compensate for expert review will creative perverse incentives for lower-tier journals and even fake reviewers. I think a lot of the lower journals are inviting reviewers based on lists of keywords in an algorithm without any editorial involvement.

**4. Publishing best practices:**

**5. Other Comments:**

## 236. N/A

**Submit date:** 8/8/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
It is important that the NIH continue to provide funding to pay publishing costs, otherwise it is unclear how scientists will pay for these costs and therefore may limit the public dissemination of NIH-funded research.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
it would be good to provide money for peer reviewers to compensate them for their time, to speed up the turn around time for review and get NIH-funded work published and into the hands of the public faster, and the NIH needs to encourage and financially support this by allowing grant funds to be used for it.

**4. Publishing best practices:**
advancement in technologies for best publishing practices, such as fraud detection, should be covered by the NIH to improve the quality of published science funded by the NIH

**5. Other Comments:**
advancement in technologies for best publishing practices, such as fraud detection, should be covered by the NIH to improve the quality of published science funded by the NIH

## 237. Kiel Neumann

**Submit date:** 8/8/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Kiel Neumann

**Name of Organization:** St. Jude Children's Research Hospital

**Type of Organization:** Non-profit Research Organization

**Role:** Investigator/Researcher

**1. Proposed policy options:**

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
I have never been compensated for peer review from journals of impact factor ranging from low to very high. This doesn't seem like a valuable metric.

**4. Publishing best practices:**

**5. Other Comments:**

## 238. Virginia Gallagher

**Submit date:** 8/8/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Virginia Gallagher

**Name of Organization:** UVA

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 3: Set a limit on allowable costs per publication and allow a higher amount to be paid when peer reviewers are compensated. NIH proposes that higher amount to be set at $3,000 per publication.

**2. Available evidence related to publication costs and proposed options:**
Use preprint servers to satisfy the requirement to publish federally sponsored research.

**3. Peer review compensation:**
Peer-reviewers are NOT appropriately compensated. They should be compensated directly or in exchange for waived fees on future publications.

**4. Publishing best practices:**
Use preprint servers to satisfy the requirement to publish federally sponsored research.

**5. Other Comments:**
Use preprint servers to satisfy the requirement to publish federally sponsored research.

## 239. Suchitra Joshi

**Submit date:** 8/8/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Suchitra Joshi

**Name of Organization:** University of Virginia

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I propose Option 2: Set a limit on allowable costs per publication. NIH proposes setting this limit at $2,000 per publication, including APCs and other fees.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 240. Robin Felder

**Submit date:** 8/8/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Robin Felder

**Name of Organization:** The University of Virginia

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
I've been reviewing original research for over 50 years and have never been compensated. Personally I would use these funds to purchase reagents and instruments for my basic human health research.

**4. Publishing best practices:**

**5. Other Comments:**

## 241. N/A

**Submit date:** 8/8/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Budget limits proposed may be too limited per publication

**2. Available evidence related to publication costs and proposed options:**
publication costs are typically higher than the proposed budget limits. thus, either the per publication cost needs to be higher or the expectation of publication related to grants needs to be realistic. examples of publication costs from my field are attached as a pdf file

**3. Peer review compensation:**
I have never been compensated for peer review of publications. regarding peer review of grants, it is likely lower than market for the skill and time required for the work requested

**4. Publishing best practices:**
fraud detection is a reasonable aspect that should be considered in this. if a journal publishes both paper and digital formats should be as well - although seems like digital only will be standard very soon

**5. Other Comments:**
fraud detection is a reasonable aspect that should be considered in this. if a journal publishes both paper and digital formats should be as well - although seems like digital only will be standard very soon

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/NatureJourals_PubCosts_aug2025.pdf

## 242. N/A

**Submit date:** 8/8/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option A or Option B. (none, or capped at $2000 per article). Publication cost have historically been born by institutions as an indirect cost (through publishing houses earning profit through selling subscriptions to libraries). Publishing houses also were historically not-for-profit operations, with profits from publishing costs born by investigators (through page charges and reprints) benefiting scientific societies and institutional press. The move to online open access in early 2000s has been an absolute disaster for scientific research and has fostered perverse incentives that allowed for-profit publishing to emerge as an insanely profitable business benefiting investors rather than scientists, with many prior not-for-profit journals (such as Nature and Cell) being sold off to for-profit companies who now charge unimaginable fees while expecting scientist to offer their professional services at no charge. These companies have wielded marketing campaigns to convince scientist that publishing in their journals is essential to academic success, making them effectively the gatekeepers of what comprises impactful science rather than the NIH or scientific investigators. All of this change has been heavily funded as direct cost on NIH grants through online article publication fees charged to investigators with NIH effectively fueling growth of the for profit publishing industry. NIH also indirectly pays for the reviewers as NIH pays the salaries through grants of the reviewers who provide reviewing services without a fee.

NIH should dramatically limit or cancel publication fees as an allowable direct cost, but enact as a fully allowable indirect cost (as long as indirect cost can be kept at current rates and not dropped to 15%). Institutions will be forced to again use indirect cost recovery to bear the cost of publishing, as they have done historically. The model emerging for this is "subscribe to open" in which institutions or group of institions enter into publishing agreements that allows their members to publish open access and read articles at no cost to the investigators. By removing NIH direct cost as an income stream, journals will be forced to the table to come to such agreements. Further, journals such as Cell and Nature branded journals will no longer have the benefit of excluding their journals from agreements entered into by their parent companies if they wish to receive papers from the top tier institutions.

Moreover, if Nature and Cell do not come to agreements, institutions will certainly need to rethink their practice of glorifying research in these branded journals over publications in lower cost journals, or introduce procedures to cover the open access cost as an indirect cost.

Any option to instill a $20,000 cap is the worst option in my opinion. it will not remove perverse incentives to publish in high cost journals, but rather exacerbate them. Also, the majority of funds will end up in the pockets of investors. This method will increase competition for publication in branded journals, not reduce it, as investigators preserve data and their limited funds in hopes of gaining prestige

rather than publishing their work in a timely efficient fashion. It will further starve society journals. It will also directly harm graduate students as their advisors may refuse to publish a "lower profile" paper to reserve funds for a future hypothetical publication in Nature or Cell. There will also be no incentive for journals to negotiate subcribe to publish agreements.

Finally, I absolutely disagree with a different rate for journals that pay their reviewers. This will be a direct cost on a grant, to pay for services that should be born by the publishing house of a for-profit journal and by the society members of a society journal through our freely offered service to support our society. NIH and the investigators already pay once for "free" peer review by paying for PI salaries whose time is used for free to increase profits of journals. If I have to pay an extra $1000 from my grant, then I am just effectively paying myself to be a peer reviewer. I would rather spend the money on reagents. If for-profit journals cannot get enough quality reviews to fuel their investor growth strategy, it is not my problem and I should not be asked to pay for it.

**2. Available evidence related to publication costs and proposed options:**
I recently was asked by an editor of a branded for-profit journal to review a paper for 3rd round of revisions (already invested 8-10 hours reviewing 2 prior versions) This last round of revision was almost exclusively text amendments that any editor should have been qualified to assess. I refused to review and received a note from the editor-in-chief that they like the "experts" to sign off on final versions. Thus, they are now using free review to do an editor's text editing job for them. I wrote and said I would no longer review for their suite of journals. I am happy to contribute my services to help science, I am not willing to do the job of someone who is being paid.

**3. Peer review compensation:**
Peer review for society journals should be for free as is an expression of your sense of community. However, the majority of journals are now for profit journals with proceeds going to investors rather than feeding back into the community. They should pay, and NIH should not be picking up the tab. Nature's suggestion that we should use AI to write our reviews so we can take on a greater load was particularly insane.

**4. Publishing best practices:**
The journals should be entering into subscribe to open agreements with institutions rather than peddling high cost via article publication costs directly to investigators. This question is mute. Since all papers for NIH now must go to PMC, if an institution does not agree to a raise in rates for subscribe to open, so be it, it will not impede us from reading the articles on PMC.

**5. Other Comments:**
The journals should be entering into subscribe to open agreements with institutions rather than peddling high cost via article publication costs directly to investigators. This question is mute. Since all papers for NIH now must go to PMC, if an institution does not agree to a raise in rates for subscribe to open, so be it, it will not impede us from reading the articles on PMC.

## 243. Charles Chalfant

**Submit date:** 8/8/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Charles Chalfant

**Name of Organization:** University of Virginia

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Looking at the various proposed options, Option 2 (Set a limit on allowable costs per publication. NIH proposes setting this limit at $2,000 per publication, including APCs and other fees) is somewhat in the "ballpark" of what on average it costs for us to publish in a solid, strong impact factor biomedical journal with a good reputation. A say somewhat in the "ballpark" as this limit is on the low side for good journals. I would recommend raising this limit to to $3,000 to be in line with more of what the average cost is. Option 4 is also a good option, which would give investigators come flexibility as some really high impact, respected journals like JCI can cost >$4000 to publish if you have a lot of figures and pages.

**2. Available evidence related to publication costs and proposed options:**
I am more than happy to share receipts for publications costs over the last few years. In particular:

1. Science Signaling Publication cost $2400-June 29th, 2023: Maus KD, Stephenson DJ, Macknight HP, Vu NT, Hoeferlin LA, Kim M, Diegelmann RF, Xie X, Chalfant CE. Skewing cPLA2α activity toward oxoeicosanoid production promotes neutrophil N2 polarization, wound healing, and the response to sepsis. Sci Signal. 2023 Jul 11;16(793):eadd6527. doi: 10.1126/scisignal.add6527. Epub 2023 Jul 11. PMID: 37433004; PMCID: PMC10565596.

2. Journal of Lipid Research cost $2053.50- May 5th, 2023: Stephenson DJ, MacKnight HP, Hoeferlin LA, Washington SL, Sawyers C, Archer KJ, Strauss JF 3rd, Walsh SW, Chalfant CE. Bioactive lipid mediators in plasma are predictors of preeclampsia irrespective of aspirin therapy. J Lipid Res. 2023 Jun;64(6):100377. doi: 10.1016/j.jlr.2023.100377. Epub 2023 Apr 27. PMID: 37119922; PMCID: PMC10230265.

3. Journal of Lipid Research cost $2000.00 on 02/22/2022: Ceramide kinase regulates acute wound healing by suppressing 5-oxo-ETE biosynthesis and signaling via its receptor OXER1. J Lipid Res. 2022 Apr;63(4):100187. doi: 10.1016/j.jlr.2022.100187. Epub 2022 Feb 24. PMID: 35219746; PMCID: PMC8980959.

4. mBio cost $4,470 on Feb 15, 2024: Read CB, Ali AN, Stephenson DJ, Macknight HP, Maus KD, Cockburn CL, Kim M, Xie X, Carlyon JA, Chalfant CE. Ceramide-1-phosphate is a regulator of Golgi structure and is co-opted by the obligate intracellular bacterial pathogen Anaplasma phagocytophilum. mBio. 2024 Apr 10;15(4):e0029924. doi: 10.1128/mbio.00299-24. Epub 2024 Feb 28. PMID: 38415594; PMCID: PMC11005342.

5. Molecular Therapy-Nucleic Acids cost $3,199.95 on Jan 13, 2025: Xie X, Macknight HP, Lu AL, Chalfant CE. RNA splicing variants of the novel long non-coding RNA, CyKILR, possess divergent biological functions in non-small cell lung cancer. Mol Ther Nucleic Acids. 2024 Dec 5;36(1):102412. doi: 10.1016/j.omtn.2024.102412. PMID: 39807365; PMCID: PMC11728077.

6. Molecular Cancer Research cost $3,705 on 5/13/2022: Vu NT, Kim M, Stephenson DJ, MacKnight HP, Chalfant CE. Ceramide Kinase Inhibition Drives Ferroptosis and Sensitivity to Cisplatin in Mutant KRAS Lung Cancer by Dysregulating VDAC-Mediated Mitochondria Function. Mol Cancer Res. 2022 Sep 2;20(9):1429-1442. doi: 10.1158/1541-7786.MCR-22-0085. PMID: 35560154; PMCID: PMC9444881.

These are either high impact journals (meaning they are respected and read by the public and other scientists) or solid impact journals with excellent reputations allowing for maximum exposure of the results. Average publication cost over the last few years is: $2,971.41. Hence, these data suggest raising the Option 2 cap to $3000 or using Option 4 with the $20,000 total cap for a grant.

**3. Peer review compensation:**
I have never been compensated for reviewing a manuscript. Reviewing manuscripts is a way of measuring your scientific reputation for annual evaluations and tenure review. It is considered "service" to your profession.

**4. Publishing best practices:**
A lot of journals are now using software to detect duplications or issues with scientific figures. This does not necessarily mean fraud versus accidental mistakes. These costs can be high using software programs like Proofig, which may be why some journals are charging higher fees.

**5. Other Comments:**
A lot of journals are now using software to detect duplications or issues with scientific figures. This does not necessarily mean fraud versus accidental mistakes. These costs can be high using software programs like Proofig, which may be why some journals are charging higher fees.

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/Combined-Article-Receipts.pdf

**Description:** Receipts

## 244. Jie Sun

**Submit date:** 8/8/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Jie Sun

**Name of Organization:** University of Virginia

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Set a limit on allowable costs per publication and allow a higher amount to be paid when peer reviewers are compensated.

**2. Available evidence related to publication costs and proposed options:**
Some journals charge too much and do not compensate peer review services. It becomes hard to recruit reviewers for journals. Also, some groups are more productive and so we should not limit total publication fee, but just per publication cost.

**3. Peer review compensation:**
I think a small amount for the service is reasonable. It's tricky here and the compensation should not exceed $100/review.

**4. Publishing best practices:**
Mandate the use of automated fraud or duplication detection before acceptance in each journal.

**5. Other Comments:**
Mandate the use of automated fraud or duplication detection before acceptance in each journal.

## 245. Nicole Russo-Ponsaran

**Submit date:** 8/8/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Nicole Russo-Ponsaran

**Name of Organization:** Rush University Medical Center

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**

**2. Available evidence related to publication costs and proposed options:**
Universities do not want to pay these costs and can range from a few hundred dollars to several thousand to make open access. Funds should be allowed commensurate with the open access rates. In addition, these rates should be standardized across publishers.

**3. Peer review compensation:**
Peer review for articles and grants is routinely inadequate and/or entirely non-existent. Instead, it is often viewed by universities as volunteer activity that may support promotion to higher faculty status (e.g., Associate or full Professor), but even though it is valued, only grant funding truly leads to faculty promotion. Faculty researchers are already, mostly, soft-money positions. They are asked to provide critical input and spend hours/days away from their own work to do this service. The use of funds to compensate accordingly, as you would in any other career, is sorely needed.

**4. Publishing best practices:**

**5. Other Comments:**

## 246. Maggie Stanislawski

**Submit date:** 8/8/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Maggie Stanislawski

**Name of Organization:** University of Colorado School of Medicine

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Most of the options are totally stupid.

Supposedly, our administration wants to get rid of unnecessary regulations, but in the case of NIH and federally funded research, they want to regulate and micromanage every aspect of the process, while also firing all the people who would enforce these inane regulations. Unless there is a really outlandish request for publication costs, it does not need to be even noted. Yes, this is a place where someone might pad the budget a little bit - because we don't know how much it will cost to publish! We don't know where the work will get accepted, and we don't want to rule out top journals that might be more expensive. If we are limited to only the extremely inexpensive journals (e.g., Option 2 - $2,000.00) for publishing, that means we cannot publish in some of the highest impact journals, leaving the rest of the world to step ahead of us in science. Nature open access (and the government suddenly wants us to publish everything open access now) is $12,690.00.

**2. Available evidence related to publication costs and proposed options:**
See above - Nature journals charge $12,690.00.

**3. Peer review compensation:**
There are already options from some journals for compensation. This does not need to be forced upon journals or researchers.

This should not become the standard to be compensated, and the government should BUTT OUT of this issue.

**4. Publishing best practices:**
The government is literally censoring the words we can write in grants and now wants to basically disallow us from publishing in the top journals. Does the government want to force us to go to pharmaceutical companies for grants because they allow us to actually do science and publish it? Supposedly, that goes against the MAHA movement, yet this is going to be the only option.

RUSSIA looks better than the US for academics now.

**5. Other Comments:**
The government is literally censoring the words we can write in grants and now wants to basically disallow us from publishing in the top journals. Does the government want to force us to go to pharmaceutical companies for grants because they allow us to actually do science and publish it? Supposedly, that goes against the MAHA movement, yet this is going to be the only option.

RUSSIA looks better than the US for academics now.

## 247. Karen Edelblum

**Submit date:** 8/8/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Karen Edelblum

**Name of Organization:** Icahn School of Medicine at Mount Sinai

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 4 would be the most reasonable option since new NIH guidelines (July 1, 2025) that require that NIH-funded projects be published as open access with the goal of scientific findings being readily accessible by the public. Since Open Access fees are higher, based on the inability of the journals to embargo publications for subscription only, the cost for publishing each article will be higher than previously reported data or prior budget allocations. If NIH requires Open Access publication and wants to ensure that there are sufficient funds to publish the outcomes of the funded research, then it is most reasonable to cap the percentage of the award that can be used to publish those findings. Capping the amount per publication will disproportionately favor investigators who have more financial resources to publish in journals with a higher publication fee, and disadvantage early career researchers that may largely rely on federal funds but who will have to choose where to publish based on cost as opposed to what will benefit their career. Thus, option 4 (1) provides a more equal allocation of funds for publishing without (2) imposing additional financial burden to the investigator while (3) largely aligning with previous reported data on the average amount requested for publication in federal grants.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**
Many journals have been using fraud detection software for years. Likely the largest factor in higher publication costs is publishers having to change their business models to accommodate open access publishing.

**5. Other Comments:**
Many journals have been using fraud detection software for years. Likely the largest factor in higher publication costs is publishers having to change their business models to accommodate open access publishing.

## 248. N/A

**Submit date:** 8/8/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
The analysis reported in NOT-OD-25-138 "Request for Information on Maximizing Research Funds by Limiting Allowable Publishing Costs" is for all article processing charges (APC) across all types of articles, including open access and subscription-based models. This is not an appropriate comparison because it does not account for the fees journals receive from subscriptions from universities and other institutions.

With the recent implementation of the 2024 NIH Public Access Policy in NOT-OD-25-047, all publications accepted after July 1, 2025, must be fully open access with no embargo from the date of publication.

Therefore, all of the proposed limits on publications are not tenable even for non-profit journals and must be re-calculated.

I would propose an analysis determine the average cost of non-profit open access APC and set the limit per publication to be e.g. 200% of the average of open access APC at non-profit journals. This would be a version of Option 2 but with a reasonable limit to the APC considering the recent requirement for open access publications.

Here are my comments on the options:

Option 1: this makes no sense, how would we disseminate our research findings?

Option 2: A per-publication limit is reasonable but it must be higher to account for the requirement for open access. I propose 200% of the average of non-profit journal open access APC, determined annually.

Option 3: This could be fine with a higher limit per publication due to the requirement for open-access publications.

Option 4: A total limit per grant would discourage publishing papers, which makes no sense. It is also much too low and not in line with the number of publications expected per grant to be competitive for renewal.

Option 5: Has the same issues as Option 4. If there were a per-grant limit, it must be much higher to not discourage people from publishing and to account for the increased costs of open access publishing to researchers since publishers do not receive subscription fees.

**2. Available evidence related to publication costs and proposed options:**
My laboratory has published or has under review 3 open access publications. These were the open access article processing fees:

$3,190 - nonprofit society journal, open access only, with membership discount

$9,350 - for-profit journal, hybrid (subscription and open access), open access fee

$3,043 - nonprofit journal, open access only

**3. Peer review compensation:**
I do not think this should be a mandated government policy. It is standard practice to not pay peer reviewers so the government should not implement a dramatically different policy without any evidence as to the unintended consequences. For example, there may be new perverse incentives for people to review papers outside their qualifications to make extra money. This could degrade the quality of peer review. I would support a pilot program testing paid peer reviewers.

**4. Publishing best practices:**
The main reason the proposed limits to publication fees are not appropriate is they do not factor in the subscription fees paid to publishers that allow them to charge lower APC and contribute to lower overall average APC. The new 2024 NIH Public Access Policy requires all NIH-funded research to be published immediately open access with no embargo. This will not be feasible with a policy to limit APC below even typical open access APC of non profit journals. In addition, I support some journals having professional editors. Academic scientists are already over worked and over burdened and if we remove the ability of publishers to pay for professional editors there will be a degradation in editorial quality and the ability to disseminate our NIH-funded discoveries. Non-profit journals typically have unpaid academic editors. Journals with professional editors will need to be able to charge higher APC.

**5. Other Comments:**
The main reason the proposed limits to publication fees are not appropriate is they do not factor in the subscription fees paid to publishers that allow them to charge lower APC and contribute to lower overall average APC. The new 2024 NIH Public Access Policy requires all NIH-funded research to be published immediately open access with no embargo. This will not be feasible with a policy to limit APC below even typical open access APC of non profit journals. In addition, I support some journals having professional editors. Academic scientists are already over worked and over burdened and if we remove the ability of publishers to pay for professional editors there will be a degradation in editorial quality and the ability to disseminate our NIH-funded discoveries. Non-profit journals typically have unpaid academic editors. Journals with professional editors will need to be able to charge higher APC.

## 249. Matthew Stachler

**Submit date:** 8/8/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Matthew Stachler

**Name of Organization:** University of Califonia, San Francisco

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Some combination of options 3 and 5 seems like a reasonable compromise to both promote good, high-quality reviews and limit needless excess expenses. In my opinion, peer review is an extremely important task to reduce the publication of exaggerated claims and improve the quality of the work. When the reproducibility of scientific work is already not where it should be, it seems that reducing external review would make this worse. I think option 1, with no publication funding, would lead to this. That being said, the publication and review process has gotten out of hand. Reviewing on average 1 manuscript or so a month (many more than I am able to publish myself) is a tremendous, uncompensated time sink. Something like option 3 may help correct this and encourage journals to provide payment to reviewers. I feel this would likely lead to higher-quality reviews. As too many low-quality 'open access' journals have been pushed on researchers, it also makes sense to limit the costs that the NIH will fund towards publication. In my experience, it isn't the high-quality journals that charge the high publication costs.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
I do not feel peer reviewers are appropriately compensated. At least in the fields of basic and translational biology/medicine, most journals (at least those I am aware of) do not compensate reviewers except for some providing CME credit to MDs. Given the amount of requests for review, this process can require a significant amount of time and effort. I think some form of compensation would likely lead to more people accepting reviews and to higher quality reviews.

**4. Publishing best practices:**

**5. Other Comments:**

## 250. Weibin Shi

**Submit date:** 8/8/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Weibin Shi

**Name of Organization:** University of Virginia

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Agree with a cap like $2000.

**2. Available evidence related to publication costs and proposed options:**
Option 2: $2000 per publication

**3. Peer review compensation:**
Yes

**4. Publishing best practices:**
Include the use of automated fraud detection capabilities.

**5. Other Comments:**
Include the use of automated fraud detection capabilities.

## 251. N/A

**Submit date:** 8/8/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Other

**Type of Organization - Other:** independent researcher

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 1: Disallow all publication costs

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 252. Yury Chernoff

**Submit date:** 8/8/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Yury Chernoff

**Name of Organization:** Georgia Institute of Technology

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
None of the options limiting publication costs per publication is viable, unless publishers agree to follow NIH limits for NIH-funded research. If such an agreement is not achieved, NIH-funded researchers will suffer, as they won't be able to publish in high impact journals that frequently charge significantly more than average determined in the policy description. Restricting publications to the journals of lower impact will hurt visibility and competitiveness of NIH-funded researchers. Academic institutions typically don't have (or have very limited) options for covering publication costs from non-grant funds.

Option 5 may work amount-wise if restrictions apply only to the total amount of funds rather than to costs per publications, however may lead to a decrease in the number of NIH funded publications. Also, the downside is that productive researchers exceeding the limits early could be restricted in further publications until the grant period ends. Limitations in paper numbers due to restrictions in total costs could hurt careers of grad students and postdocs involved in the project, and generate unhealthy competition for publication funds within the teams.

Saying this,  publication costs, especially in high impact journals, are currently growing out of control, and measures able to restrict and reverse this trend are highly desirable. However restrictions should be directed towards publishers rather than towards NIH-funded researchers, for whom such restrictions would only increase pressure, unless publishers cooperate.

**2. Available evidence related to publication costs and proposed options:**
Reviewers o grant applications tend to value publications in high impact factor journals much higher than those in other journals. High impact journals charge well above averages indicated in the NIH policy document. Costs in the range between 5K and 9K are typical of high impact journals such as Cell and Nature families of journals.

**3. Peer review compensation:**
Paying for peer review represents only a minor component of publication costs. Many journals (including majority of highly impactful journals) don't pay for reviews, and/or use discounts in publication charges and other benefits, rather than financial compensation to peer reviewers. Low-level financial compensation poorly reflect actual amount of time and effort spent on reviewing, and may even be counterproductive by attracting low-qualified reviewers.

**4. Publishing best practices:**
Fraud detection, maintenance of reviewer and author database, technical arrangements related to peer-reviewing, salaries or compensations for editorial staff, post-acceptance technical editing and

proofreading, compensation of effort spent on submission to public databases, ability to provide waivers to highly respected invited authors, or to authors lacking grant funding at the moment, costs of publicizing the journal in the community all contribute to publications costs. For open access journals, it is unlikely that costs could be decreased below averages (and for many of them, even down to the averages) indicated in the policy document.

Saying this, some high impact journals charge well above actual costs, thus making a profit from their high impact. Attempts to restrict costs should be aimed at publishers rather than grantees. For example, cost limits could be established as a condition of the inclusion into PubMed, a crucial point for the majority of biomedical journals.

**5. Other Comments:**

Fraud detection, maintenance of reviewer and author database, technical arrangements related to peer-reviewing, salaries or compensations for editorial staff, post-acceptance technical editing and proofreading, compensation of effort spent on submission to public databases, ability to provide waivers to highly respected invited authors, or to authors lacking grant funding at the moment, costs of publicizing the journal in the community all contribute to publications costs. For open access journals, it is unlikely that costs could be decreased below averages (and for many of them, even down to the averages) indicated in the policy document.

Saying this, some high impact journals charge well above actual costs, thus making a profit from their high impact. Attempts to restrict costs should be aimed at publishers rather than grantees. For example, cost limits could be established as a condition of the inclusion into PubMed, a crucial point for the majority of biomedical journals.

## 253. Shaun Guttmann

**Submit date:** 8/8/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Shaun Guttmann

**Name of Organization:**

**Type of Organization:** Not Applicable

**Role:** Member of the Public

**1. Proposed policy options:**
Option 3 is the most appropriate.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

# 254. Duke Aging Center

**Submit date:** 8/8/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Heather Whitson

**Name of Organization:** Duke Aging Center

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
The leadership team of our research center unanimously preferred Option #4: Set a limit on the total amount of an award that can be spent on publication costs. We thought this option allows investigators to prioritize high-impact publications that may justify APCs, while maintaining transparency and fiscal responsibility. Our concern with per-publication limits was the potential administrative burden that results when an APC that the team prioritizes exceeds the allowable amount and it is challenging to pay a single invoice with multiple funding sources.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 255. Mohamad Abedi

**Submit date:** 8/8/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Mohamad Abedi

**Name of Organization:** University of Washington, Seattle

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
The publication industry has grown to be predatory in terms of cost and expectations of free service from reviewers given that most are for profit entities. Publication costs paid to these institutions from taxpayer dollars should be 0. Establishing a government organization or a non profit supported by nih funds to handle the review process will help accelerate science, reduce cost and create a more equitable system.

**2. Available evidence related to publication costs and proposed options:**
Reviewers including myself are expected to review papers with no compensation under tight timelines. Many times editors overrule Reviewers due to personal biases or external pressures.

**3. Peer review compensation:**
This is is a must. And publication organizations should not be for profit.

**4. Publishing best practices:**
Automation reduces costs. NIH should take the lead in the publication process.

**5. Other Comments:**
Automation reduces costs. NIH should take the lead in the publication process.

## 256. Gordon W. Laurie

**Submit date:** 8/9/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Gordon W. Laurie

**Name of Organization:** University of Virginia

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I agree with Option 3 at a $4,000 per publication level

'Set a limit on allowable costs per publication and allow a higher amount to be paid when peer reviewers are compensated. NIH proposes that higher amount to be set at $3,000 per publication.'

or Option 4 proposal:

'Set a limit on the total amount of an award that can be spent on publication costs, such as 0.8% of the award's direct costs over the length of the award or $20,000, whichever is greater.'

Both approximate actual costs for JBC 'level' journals. The problem is that so-called 'higher level' journals are much more expensive. We should not polarize PI's by available lab resources such that those with more can publish in 'higher level' journals and not those with less.

**2. Available evidence related to publication costs and proposed options:**
My most recent JBC article cost $3,430 (although reduced to $2,817.40 with member discount). However, Nature Communications is apparently $6,790 and Nature $12,290.

**3. Peer review compensation:**
Adequate compensation for quality peer review is long overdue. Peer review has become much more challenging in recent years per my experience as an Executive Editor. Standards would need to be established for review quality. Publishers such as Elsevier seem very unresponsive to improving the efficiency of peer review or make clumsy changes that worsen the problem.

**4. Publishing best practices:**
Automated fraud and AI detection should not be allowed to significantly increase publication costs.

**5. Other Comments:**
Automated fraud and AI detection should not be allowed to significantly increase publication costs.

## 257. Heng Li

**Submit date:** 8/9/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Heng Li

**Name of Organization:** Dana-Farber Cancer Institute & Harvard Medical School

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Ideally I would prefer a variation of Option 3 (see my response to point 3 below), but in practice, it might be difficult to implement. Option 2 (set a limit on allowable costs per publication) might be more practical.

**2. Available evidence related to publication costs and proposed options:**
N/A

**3. Peer review compensation:**
I publish and review papers. I think reviewers should be compensated, but not by cash. If journals start to pay reviewers by cash, I predict we will see a surge of empty but politely phrased reviews. Many of these reviews could be generated with AI by someone who knows nothing about biology but makes a living by gaming the system. "Paper mill" is bad enough; "review mill" will be worse if that is directly tied to money.

The right way to compensate reviewers, in my opinion, is to give reviewers credits for future papers they publish with the publishers. For example, a researcher gets $200 credit for each paper he/she has reviewed for a journal under the publisher. When the researcher publish a paper as a co-first/co-corresponding author, he/she gets a discount up to $1000 per paper. Importantly, the credits should not be journal-specific as we don't often publish papers in journals we review for. The devil is in the details, though. How to implement such a system depends on many factors (e.g. journal-publisher relationship) I am not familiar with.

**4. Publishing best practices:**
It is the best interest for journals to avoid fraud. They should not charge authors for that.

**5. Other Comments:**
It is the best interest for journals to avoid fraud. They should not charge authors for that.

## 258. Nikolay Dokholyan

**Submit date:** 8/9/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Nikolay Dokholyan

**Name of Organization:** University of Virginia

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 1: Disallow all publication costs.

I believe that since the journals require a subscription, they should not charge for the content they are selling. Open access support should be offered through the institution and the funds can come from the overhead. However, those payments should be limited to no more than $2000.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Payments for peer review may not change the quality.

**4. Publishing best practices:**

**5. Other Comments:**

## 259. N/A

**Submit date:** 8/9/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Institutional Information Sciences Professional/Librarian

**1. Proposed policy options:**
My preferences of options from most to least preferred are: 5>4 >>> 3>2>1

I favor a generous publication cost allowance to cover the times when good results can be published in very high impact journals. A limit on funding per publication puts the researcher's ability to publish in jeopardy as our institutions are unwilling to subvent research activities, especially in current challenging fiscal times.

**2. Available evidence related to publication costs and proposed options:**
The NIH report is thorough and reflects my own experience, with publication costs ranging from $400 to $4,500 per article.

**3. Peer review compensation:**
Rather than focusing on reimbursing reviewers, I suggest placing greater emphasis on the financial viability of journals. I would also encourage NIH to consider the broader economic impact on journals, given that all NIH-funded studies must be deposited in PMC immediately upon publication. Ensuring open access while also maintaining the financial stability of reputable journals is an important balance to strike. The matter of public reviews is complex and subject to many confounding factors.

**4. Publishing best practices:**
As above, higher publication costs may be justified for immediate open access publication of all NIH funded studies.

**5. Other Comments:**
As above, higher publication costs may be justified for immediate open access publication of all NIH funded studies.

## 260. N/A

**Submit date:** 8/10/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Healthcare Industry (Biotech/Device/ Pharmaceutical Company)

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Everybody involved in this harebrained scheme to gut the United States scientific enterprise, as well as their family and associates, should be prosecuted and permanently banned from holding any government positions for the rest of their lives.

**2. Available evidence related to publication costs and proposed options:**
Everybody involved in this harebrained scheme to gut the United States scientific enterprise, as well as their family and associates, should be prosecuted and permanently banned from holding any government positions for the rest of their lives.

**3. Peer review compensation:**
Everybody involved in this harebrained scheme to gut the United States scientific enterprise, as well as their family and associates, should be prosecuted and permanently banned from holding any government positions for the rest of their lives.

**4. Publishing best practices:**
Everybody involved in this harebrained scheme to gut the United States scientific enterprise, as well as their family and associates, should be prosecuted and permanently banned from holding any government positions for the rest of their lives.

**5. Other Comments:**
Everybody involved in this harebrained scheme to gut the United States scientific enterprise, as well as their family and associates, should be prosecuted and permanently banned from holding any government positions for the rest of their lives.

## 261. Mohammad Fallahi-Sichani

**Submit date:** 8/10/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Mohammad Fallahi-Sichani

**Name of Organization:** University of Virginia

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Here is my input on the proposed options:

Option 1 – Disallowing all publication costs:

This is not a good option, even though the rationale is understandable. The preprint system currently does not provide a platform for peer review, and the academic system still heavily relies on journal-based peer review. For example, NIH study section reviewers must scrutinize preprints more closely than peer-reviewed publications when evaluating data supporting a grant application. Eliminating funds for peer-reviewed journal publications would push greater reliance on preprints, thereby increasing study section reviewers' workload and reducing their ability to perform high-quality reviews within time constraints.

Option 2 – Setting a limit on allowable costs per publication:

A $2,000 per-publication cap without limiting the number of publications is reasonable in principle, but still problematic. It treats all journals the same, despite wide variations in publishing models and costs. In the modern era, there is little justification for funding hard-copy printing through NIH grants. Funds should support open, peer-reviewed online publications that maximize accessibility and dissemination of knowledge, not printed pages of limited utility.

Moreover, this option fails to address the core issue: peer review. The main value journals add beyond preprints is the peer-review process, yet journals often struggle to find quality reviewers because the work is time-consuming, unrecognized, and uncompensated. Journals charge authors thousands of dollars while relying entirely on unpaid peer reviewers—who are the true drivers of publication quality. The publishing system needs reform to create a platform "by scientists, for scientists," possibly leveraging modern technology and AI to reduce costs and improve efficiency.

Option 3 – Setting a limit on allowable costs per publication with a higher allowance when peer reviewers are compensated:

This is a good option because it addresses the concerns noted above. Linking higher allowable costs to reviewer compensation both recognizes the core work that makes publications credible and incentivizes journals to reform their business models. I support the proposed $1,000 allocation for journals to compensate peer reviewers and would even support mandating this for journal publications, as it would likely enhance review quality. However, I have concerns about setting the $2,000 per-publication limit solely on the cited averages—namely, the global average APC ($1,235.51), the average budget request

($2,600–3,100), and the U.S. journals' average APC ($2,177). These figures are not necessarily reliable indicators of reasonable costs. For instance, some journals have lower APCs because they are affiliated with societies that charge membership fees, while others have higher costs due to employing full-time paid editors. Additionally, annual budget requests in grant applications may reflect an estimate of fewer than one publication per year, skewing the apparent per-publication cost. Given these considerations, the cap should instead be informed by a realistic assessment of the actual costs for fully open-access electronic distribution and editorial management, using modern tools and technologies. A negotiated rate—similar to how indirect costs are set between NIH and universities—could be established in collaboration with representative journals. This would clarify which expenses should be covered by authors (via NIH funding) and which should be offset by journals through other revenue sources such as advertising or charging for-profit organizations for access to publications.

Option 4 – Setting a limit on the total amount of an award that can be spent on publication costs:

This is not a good option. It would constrain investigators' ability to publish if costs exceed the cap, without applying any pressure on journals to reform the peer-review or cost structures.

Option 5 – Setting a limit on both the per-publication cost and the total award amount spent on publications:

Also not a good option, as it limits investigators while doing nothing to drive systemic change in journal publishing.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
I support the proposed $1,000 allocation for journals to compensate peer reviewers and would even support mandating this for any journal publication for which NIH funds are requested, as it would likely enhance review quality.

In determining whether peer reviewers are appropriately compensated, NIH should consider both the direct and indirect factors that influence review quality and the credibility of the resulting publications. Compensation mechanisms should be standardized, transparent, and linked to clear quality expectations for the review process. As one approach, NIH could maintain a running list of approved journals eligible for NIH-funded publication costs. Inclusion on this list should be contingent upon:

1) Peer-review compensation – Journals must compensate reviewers at a fair, standardized rate.

2) Establishing credibility and value beyond preprints – Journals must demonstrate that their review process provides substantial added value compared to preprint dissemination. This includes transparency in reviewer selection, publishing reviewers' comments and how the authors have addressed them, and disclosing clearly how reviewers were chosen for any specific publication (e.g., highlighting their specific research area/expertise).

**4. Publishing best practices:**
Reasonable costs (using modern technology) that provide automated fraud detection capabilities should be considered in the allowable cost. This is in alignment with the idea that journals should demonstrate credibility and value beyond preprints.

**5. Other Comments:**

Reasonable costs (using modern technology) that provide automated fraud detection capabilities should be considered in the allowable cost. This is in alignment with the idea that journals should demonstrate credibility and value beyond preprints.

## 262. Charles Shuster

**Submit date:** 8/10/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Charles Shuster

**Name of Organization:** New Mexico State University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option #4 or 5 seems to offer the most flexibility.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
I am not in favor of compensating manuscript review. It seems like that will only compound the problem of increasing publication costs.

**4. Publishing best practices:**

**5. Other Comments:**

## 263. Hrishikesh Kulkarni

**Submit date:** 8/11/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Hrishikesh Kulkarni

**Name of Organization:** UCLA

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 5 seems the best option because this allows multiple publications that may have a wider range, but allows costs up to $6000. Ultimately investigators are caught between institutions and funding agencies. You do not want the investigator to have to pay out of pocket to disseminate findings based on NIH results. The other option (Option 6) is NIH also starts a peer review journal where there are no publishing costs. This could be an online only journal. In this way, researchers can still disseminate their findings but are not at the mercy of APCs.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
This is an excellent idea -- and I think journals should be incentivized based on this.

**4. Publishing best practices:**

**5. Other Comments:**

## 264. Hernando Lopez-Bertoni

**Submit date:** 8/11/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Hernando Lopez-Bertoni

**Name of Organization:** Johns Hopkins School of Medicine

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
We support Option 5 as the most balanced approach to controlling publication costs while preserving investigator flexibility. The dual constraints of a per-publication cap and an overall award-level limit would help prevent excessive expenditures on individual articles and cumulative spending, encouraging cost-conscious dissemination planning. However, to safeguard the visibility and perceived impact of NIH-supported research, it is critical to build in a flexible, criteria-based exception process. Some top-tier journals of high strategic value to the biomedical community (e.g., Cancer Cell, Nature Medicine) have article processing charges that significantly exceed common cap levels. Without an exception pathway, U.S.-funded research risks being underrepresented in the highest-impact venues, with potential downstream effects on global visibility, competitiveness, and the career trajectories of early-stage investigators. We recommend NIH establish a transparent, administratively streamlined mechanism allowing investigators to request a limited number of justified exceptions per award period tied to factors such as journal impact, public health relevance, and unique scientific contribution while preserving the overall principle of cost containment.

**2. Available evidence related to publication costs and proposed options:**
Publicly available datasets support the feasibility and fairness of NIH's proposed Option 5. NIH analysis of R01 proposals shows average per-publication costs between $2,565 and $3,104, and OpenAPC institutional data indicates a median APC equivalent of ~$2,040. Nevertheless, in specialized fields, such as oncology, the median APC is $2,957, with 10% of journals exceeding $4,000. We therefore support a combined cap model anchored near $3,000, paired with a transparent, criteria-based exception mechanism to accommodate high-impact publications that exceed this threshold.

**3. Peer review compensation:**
We support the concept of compensating qualified peer reviewers as a means to recognize the significant time and expertise required for rigorous manuscript and grant review. However, to preserve review quality and avoid unintended incentives, NIH should establish transparent eligibility criteria for paid review assignments. These could include: (1) demonstrated subject-matter expertise evidenced by recent, relevant publications; (2) prior peer review experience or equivalent editorial service; and (3) completion of a brief ethics and best-practices training module. Purely quantitative thresholds (e.g., h-index) could be considered in combination with these qualitative measures, but should not serve as the sole determinant of eligibility. To further ensure quality and equitable distribution of opportunities, we recommend placing a reasonable cap on the number of compensated reviews per reviewer per year (e.g. 10). This would discourage excessive volume for financial gain, encourage reviewers to accept

assignments in their areas of strongest expertise, and broaden participation across the scientific community.

**4. Publishing best practices:**
We agree that higher per-publication costs may be warranted when directly tied to demonstrable publishing best practices that enhance research integrity, reproducibility, and public trust. In addition to compensating peer reviewers, NIH should consider allowing higher caps for journals that implement robust, verifiable quality-control measures such as: (1) automated plagiarism and image manipulation detection; (2) statistical review by qualified biostatisticians for applicable studies; (3) mandatory data and code verification to ensure reproducibility of reported results; (4) adherence to rigorous reporting guidelines (e.g., CONSORT, ARRIVE, STROBE) with documented compliance checks; (5) open peer review, with publication of reviewer comments and editorial decisions; and (6) integration of persistent identifiers (e.g., ORCID, ROR, DataCite) for authors, institutions, and datasets. NIH should require transparency in both the implementation and cost breakdown of these practices before approving higher APC caps. This will ensure that additional expenditures are justified by measurable improvements in the quality and accessibility of the scientific record, rather than by discretionary publisher pricing.

**5. Other Comments:**
We agree that higher per-publication costs may be warranted when directly tied to demonstrable publishing best practices that enhance research integrity, reproducibility, and public trust. In addition to compensating peer reviewers, NIH should consider allowing higher caps for journals that implement robust, verifiable quality-control measures such as: (1) automated plagiarism and image manipulation detection; (2) statistical review by qualified biostatisticians for applicable studies; (3) mandatory data and code verification to ensure reproducibility of reported results; (4) adherence to rigorous reporting guidelines (e.g., CONSORT, ARRIVE, STROBE) with documented compliance checks; (5) open peer review, with publication of reviewer comments and editorial decisions; and (6) integration of persistent identifiers (e.g., ORCID, ROR, DataCite) for authors, institutions, and datasets. NIH should require transparency in both the implementation and cost breakdown of these practices before approving higher APC caps. This will ensure that additional expenditures are justified by measurable improvements in the quality and accessibility of the scientific record, rather than by discretionary publisher pricing.

## 265. Jean Fan

**Submit date:** 8/11/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Jean Fan

**Name of Organization:** Johns Hopkins University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I'm writing to express concern that "Option 1: Disallow all publication costs" would simply mean those with access to non-NIH, discretionary funds will continue to publish in exclusive venues. Even post-publication peer-review venues like eLife charge for editorial handling. It takes time and effort to recruit peer reviewers and editors should be compensated for their work. Unless the NIH is willing to provide such editorial support, the system cannot rely solely on volunteer labor.

I am also concerned that "Option 3: Set a limit on allowable costs per publication and allow a higher amount to be paid when peer reviewers are compensated" will encourage more paid peer-reviewers and lead to "peer-review mills" where AI/LLMs are used to auto-generate reviews for the sake of collecting the peer-review compensation.

In general, considering the amount of tax-payer dollars that have gone into research, it is counter-productive to put the final product behind a paywall inaccessible to the tax-payers who funded the work, all over 0.8% of funding amount. It should therefore be more clearly emphasized to the public and policy-makers how little of the funding amount is going towards publishing costs, though it can always be lower.

**2. Available evidence related to publication costs and proposed options:**
This is a quote from a publication from 2023. Numbers should be adjusted for inflation:

"The Fair Open Access Alliance (FOAA), an organization that evaluates sustainable OA publishing, analyzed the cost to publish OA and demonstrated that much lower APCs of no more than $50 per page are feasible to sustain an OA journal. FOAA advocates for transparency in APC prices and recommends that author fees should not exceed $1,000 per article (FOAA, n.d.). Factoring in differences between journals' rejection rates, staffing, editorial services, and publishing volume, Grossmann and Brembs (2021) similarly estimated that fees between $200 and $1,000 per article are sufficient to sustain a gold OA journal. They calculate that an APC of $500 could still accommodate a 10% profit margin (Grossmann & Brembs, 2021). Rodrigues et al. (2020) found that 59% of gold journals indexed in DOAJ charge APCs less than $1,000, demonstrating the possibility of this average price point when generating profit is not the main purpose."

- https://direct.mit.edu/qss/article/4/4/778/118070/The-oligopoly-s-shift-to-open-access-How-the-big

Notably, this paper considers publications spanning all fields and not just the life-sciences. Based on my experience as a volunteer Section Editor at the journal PLoS Computational Biology, desk rejection rates

at life-sciences journals may be considerably higher such that these minimal APC estimates may be higher for life-sciences than for other fields. The APC charges for different PLoS journals (all non-profit) range from $1,046 to $6,460. A similar study limited to life-sciences journals may be needed for more appropriate limits on APC charges.

**3. Peer review compensation:**

**4. Publishing best practices:**
The exclusivity of a journal venue should associate with higher per publication cost because it means editors have to do more work per paper accepted. In other words, the more papers an editor has to handle (desk reject or find peer reviewers) in order to find one that is eventually published, the higher the per publication cost.

**5. Other Comments:**
The exclusivity of a journal venue should associate with higher per publication cost because it means editors have to do more work per paper accepted. In other words, the more papers an editor has to handle (desk reject or find peer reviewers) in order to find one that is eventually published, the higher the per publication cost.

## 266. Jennifer Morgan

**Submit date:** 8/11/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Jennifer Morgan

**Name of Organization:** Marine Biological Laboratory

**Type of Organization:** Non-profit Research Organization

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I'm a senior scientist at a research institution (non-profit), who has been publishing my research results for 30 years. I also recently served as a member of an NIH study section (2018-2024) and frequently as an ad hoc panel member (2012-present). In all the NIH budgets I've constructed or seen, the publication costs are a small fraction of the total budget, typically less than 1% as indicated in Options 4 and 5 proposed in Notice NOT-OD-25-138. The typical cost to publish my research articles these days is between $1500-$5000.

I believe that reporting and dissemination of NIH-funded research is essential and is our obligation to U.S. taxpayers. The research findings must be made public as soon as possible. Hence, I don't think there should be a strict limit on the amount of NIH funds used for publications. If anything, the publishers are the ones that should be limited from charging those publication costs!

I don't think that manuscript repositories like BioRxiv are a suitable alternative to publishing, because they are not peer-reviewed. The peer-review process is essential to making sure the research reported is as accurate and reliable as possible upon publication.

**2. Available evidence related to publication costs and proposed options:**
For the type of work I do, Options 4 or 5 match my current situation. I've never had to pay more than $6000 per publication, nor exceeded $20K in a grant period. Nonetheless, I would not recommend placing restrictions on publication costs (see below).

**3. Peer review compensation:**
As scientists, we take on the role of peer reviewer as a service to the scientific community. Hence, we do not expect to get paid for these services. While time consuming, it is an opportunity to ensure that scientific results are reported accurately; to learn about a new field; and to stay on top of newest findings. Reviewing a manuscript takes 2-4 hours of time in total.

On the other hand, the compensation for reviewing grants for the NIH is inadequate. To serve on an NIH study section, you receive 8-10 grants (each 60-120 pages long). It takes at least 1-2 full weeks of time to review the grants properly in advance of the meeting, 2 days for the meeting itself, plus travel time for in-person study sections. The compensation is $400-800 at most. I point this out as another example of where scientists "donate" a lot of their time in service of the review process because this is an honor and privilege to serve in this way. We do not expect more compensation, although it would be nice of course.

**4. Publishing best practices:**
I think the publishers are the ones to blame here, and the scientists doing the work should not suffer. Scientists should be allowed to publish their research findings without restrictions on costs or journal. If NIH puts pressure on the publishers to limit publication costs, perhaps this would be more effective. It is the publishers who are driving up the costs, as noted.

**5. Other Comments:**
I think the publishers are the ones to blame here, and the scientists doing the work should not suffer. Scientists should be allowed to publish their research findings without restrictions on costs or journal. If NIH puts pressure on the publishers to limit publication costs, perhaps this would be more effective. It is the publishers who are driving up the costs, as noted.

## 267. Brittany Sara Hollerbach

**Submit date:** 8/11/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Brittany Sara Hollerbach

**Name of Organization:** NDRI-USA, Inc.

**Type of Organization:** Non-profit Research Organization

**Role:** Investigator/Researcher

**1. Proposed policy options:**
While setting a cap on allowable publication costs may help control spending, the most effective solution will be a coordinated strategy that addresses the root cause—high article processing charges (APCs) set by publishers. NIH could explore tiered caps or exceptions for journals that meet clear cost-transparency and quality benchmarks, ensuring that researchers maintain the flexibility to publish in reputable outlets while protecting taxpayer funds.

To maximize research impact without overspending:

- Pair cost caps with publisher accountability measures, such as transparent APC pricing and justification of fees.

- Create allowances for high-quality journals that meet rigorous standards for peer review, ethical publishing, and open-access dissemination.

- Increase the allowable publication fee threshold for journals that compensate peer reviewers fairly and transparently, as this practice supports quality assurance and values the expertise of the research community.

- Work in coordination with other major funding agencies, universities, and research consortia to encourage publishers to adopt fair and sustainable pricing models.

This combined approach preserves researcher choice, promotes equitable access to reputable publication venues, and ensures that more grant funds are available for core research activities rather than inflated publication costs.

**2. Available evidence related to publication costs and proposed options:**
From my experience budgeting for federally funded research, article processing charges (APCs) for reputable journals frequently range from $1,500 to $5,000 per article. These costs have increased significantly over the past decade—often outpacing inflation—despite advances in digital publishing that should lower production costs.

Publicly available data also supports this trend. For example, a 2023 study by the Scholarly Publishing and Academic Resources Coalition (SPARC) found that average APCs for high-impact open-access journals now exceed $5,000 in many disciplines, with some exceeding $10,000. Analysis of major publishers shows APC growth rates of 4–8% per year, well above typical inflation rates, suggesting pricing practices are influenced by market control rather than operational necessity.

These patterns indicate that high publication costs are not solely tied to actual service costs but reflect systemic pricing structures in the scholarly publishing industry. This underscores the need for NIH's policy to address not only cost limits but also publisher accountability and transparency.

**3. Peer review compensation:**
Peer review is a cornerstone of research integrity, yet it is traditionally unpaid labor, even though it requires significant time, expertise, and professional judgment. If journals choose to compensate peer reviewers, NIH should consider whether payment policies are transparent, whether compensation reflects fair market value for the time and expertise required, and whether payments are tied to high-quality, timely, and constructive reviews that meet disciplinary standards. Safeguards must also be in place to ensure that compensation does not compromise impartiality or incentivize rushed reviews. In addition, NIH should consider whether compensation is equitable across reviewers, including early-career researchers and those from underrepresented institutions. Journals that meet these criteria for appropriate and transparent peer reviewer compensation could be eligible for higher allowable publication cost thresholds, which would incentivize publishers to value and fairly compensate the essential contributions of the scientific community.

**4. Publishing best practices:**
In determining whether higher per publication costs are allowable, NIH should consider whether a journal employs robust and transparent publishing best practices that directly enhance research quality, integrity, and accessibility. These may include the use of automated fraud detection tools to identify image manipulation, plagiarism, and data fabrication; rigorous data availability and reproducibility requirements; and clear conflict-of-interest disclosures for authors, reviewers, and editors. Journals should also demonstrate strong editorial oversight, transparent peer review processes, and policies that protect against predatory publishing practices. Additionally, NIH should evaluate whether journals provide open access without restrictive embargo periods, support author rights retention, and make cost structures publicly available. When journals meet these high standards, a higher allowable publication cost may be justified because these practices require additional investment and directly benefit the scientific community and public trust in research.

**5. Other Comments:**
In determining whether higher per publication costs are allowable, NIH should consider whether a journal employs robust and transparent publishing best practices that directly enhance research quality, integrity, and accessibility. These may include the use of automated fraud detection tools to identify image manipulation, plagiarism, and data fabrication; rigorous data availability and reproducibility requirements; and clear conflict-of-interest disclosures for authors, reviewers, and editors. Journals should also demonstrate strong editorial oversight, transparent peer review processes, and policies that protect against predatory publishing practices. Additionally, NIH should evaluate whether journals provide open access without restrictive embargo periods, support author rights retention, and make cost structures publicly available. When journals meet these high standards, a higher allowable publication cost may be justified because these practices require additional investment and directly benefit the scientific community and public trust in research.

## 268. Laura Bellows

**Submit date:** 8/11/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Laura Bellows

**Name of Organization:** Cornell University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
To stay competitive with researchers from other countries, it is imperative that authors have flexibility in publishing. That said, I also see that publishers continue to charge high fees. I prefer option 4 with capping the amount but leaving flexibility to individual paper's fee. My second option would be #5.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
In my opinion, paying for peer review will have its own host of concerns. Namely, that we will have professional reviewers who do it solely for compensation. This will saturate the reviewer pool with junior/younger reviewers. I don't believe the problem is compensation as much as it is that we have too many journals and the asks have gotten too great to keep up.

**4. Publishing best practices:**

**5. Other Comments:**

## 269. Tamara Fitzgerald

**Submit date:** 8/11/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Tamara Fitzgerald

**Name of Organization:** Duke University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Of the proposed policy options, I would support option #4: Set a limit on the total amount of an award that can be spent on publication costs.

Not all journals have publication costs, but some do have them. As a researcher, I try to publish in journals that do not charge fees. However, I cannot always avoid this. When I do need to publish in journals that require fees, then where is this money going to come from? Particularly in the current climate where the NIH has already decreased the money given for overhead expenses. My institution does not have the money to pay these fees, and I don't think that I should be paying to publish papers personally out-of-pocket.

I there was a limit set on the total amount of the award, then it would allow investigators more flexibility in managing their own budget and having some autonomy to do what is best.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
I have reviewed papers for > 25 different journals. I have never been compensated for peer review.

**4. Publishing best practices:**

**5. Other Comments:**

## 270. N/A

**Submit date:** 8/11/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Other

**Type of Organization - Other:** Government

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Disseminating research results in high quality peer-reviewed journals is critical to ensuring that the research has been conducted appropriately and that the results are shared. This policy will limit dissemination of research results and incentivize dissemination through non-peer reviewed avenues, compromising the quality of the research and ensuring that it was conducted both ethically and effectively. Dissemination is a key part of the research process and limiting the ability of researchers to use funds to disseminate results will result in less dissemination == meaning that taxpayer funded research will not have its intended and desired impact. This policy will destroy rather than maximize use of taxpayer funds to support high quality research.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Peer reviewers volunteer their time as subject matter experts and are not compensated for review. While this can impede timely review, it also keeps reviews objective. Paying for peer review would introduce conflicts of interest and incentivize positive or negative reviews based on factors other than the quality of research. I strongly oppose compensation for peer review.

**4. Publishing best practices:**
I have significant concerns about the use of AI in the publishing process. NIH should consider explicitly prohibiting the use of AI in preparing research publications supported by NIH funding, both in terms of publication fees and coverage of investigator effort to prepare papers. Writing is a key technical skill required to be a successful researcher, both for obtaining grants and disseminating results. AI should not be used in the process and compromises quality.

**5. Other Comments:**
I have significant concerns about the use of AI in the publishing process. NIH should consider explicitly prohibiting the use of AI in preparing research publications supported by NIH funding, both in terms of publication fees and coverage of investigator effort to prepare papers. Writing is a key technical skill required to be a successful researcher, both for obtaining grants and disseminating results. AI should not be used in the process and compromises quality.

## 271. Julianne O'Daniel

**Submit date:** 8/11/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Julianne O'Daniel

**Name of Organization:** UNC Chapel Hill, School of Medicine, Department of Medicine

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 2 seems most fair and reasonable.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
I am a peer reviewer for ~ 10-12 manuscripts each year. I have never been compensated. Makes me wonder which journals do?

**4. Publishing best practices:**
I think with all things publication costs are bound to increase, especially if all publications of NIH funded research must be open access. The amount per pub or total amount per grant should reflect an anticipated increase from start to end of budget.

**5. Other Comments:**
I think with all things publication costs are bound to increase, especially if all publications of NIH funded research must be open access. The amount per pub or total amount per grant should reflect an anticipated increase from start to end of budget.

## 272. Aaron Lazorwitz

**Submit date:** 8/11/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Aaron Lazorwitz

**Name of Organization:** Yale University School of Medicine

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
From the presented options, Option 3 seems the most feasible to implement without negatively affecting grant recipients. Given the current requirements for publications from NIH-funded studies to be published as open-access, it is almost impossible to find journals that offer open access publication without a publication fee. For this reason, Option 1 is currently not feasible and would result in grant recipients being caught in a no-win situation of having to publish findings from NIH-funded projects as open-access with no funding actually provided to accomplish this goal. This could result in significant data being lost or never published if grant recipients lack other funding avenues to publish their work, while also causing grant recipients to fail to meet the requirements set forth by the NIH. Option 3 is the ideal balance of limiting the cost per publication, while also incentivizing journals to pay reviewers. If all NIH-grant recipients could only pay $2000 per publication, this would incentivize journals to reduce their publication costs so that they can receive high value NIH-funded results. Those journals who refuse to reduce their publication prices would find their manuscript submissions start to fall and would lose out on high value publications. Thus, this cap has the benefit of forcing journals to control their publishing costs, which will have benefits across the scientific field. Further, it incentivized journals to pay their reviewers, as they can qualify for a higher amount ($3000) of payment if they meet that requirement. Overall, Option 3 is the best option that deals with the growing issue of exorbitant publishing fees while allowing NIH grant recipients to still publish their findings in the required open-access format that is both required and overall beneficial for the scientific community at large.

**2. Available evidence related to publication costs and proposed options:**
As a published researcher, I frequently get requests from International scientists or members of the lay public for copies of my published manuscripts, which I am always more than happy to share with them. With open access publication, I find that I receive fewer of these requests, thus demonstrating that open access leads to true increased access of scientific research to the lay public and international community. Thus, there is a scientific benefit for open access publication. However, we know that open access publication is very rarely free, and so completely getting rid of publication funding would significantly reduce our ability to publish our research with open access capability.

**3. Peer review compensation:**
As a peer reviewer for many journals, I have never been directly compensated for my time spent reviewing manuscripts. I agree with the NIH that this is an out-dated practice that should change so that the time spent by reviewers is adequately compensated. I believe that Option 3 is the right type of incentive to make journals update their reviewer compensation policies by keeping additional

publication funds limited to only journals that demonstrate appropriate reviewer compensation. The $50 per hour rate as described by the NIH is a bit low for clinician scientists. For grant reviews, compensation is often $100 per hour for clinical scientists and this should be the benchmark for the review of clinical research. Journals could also consider incentivization programs for more experienced reviewers to mentor junior scientists in manuscript review by offering junior reviewers a portion of the compensation.

**4. Publishing best practices:**
If the NIH were to consider a higher per publication cost than $2000, I would want the journals to provide actual data on their per manuscript publication cost broken down by the cost of any additional tools used, such as a fraud detection tool. The NIH should be privy to how much these kinds of tools cost to ensure that journals are not exaggerating their publication costs. There should be transparency for publication costs and journals should have to provide a breakdown of the individuals costs associated with publication to justify why $2000 would not be enough.

**5. Other Comments:**
If the NIH were to consider a higher per publication cost than $2000, I would want the journals to provide actual data on their per manuscript publication cost broken down by the cost of any additional tools used, such as a fraud detection tool. The NIH should be privy to how much these kinds of tools cost to ensure that journals are not exaggerating their publication costs. There should be transparency for publication costs and journals should have to provide a breakdown of the individuals costs associated with publication to justify why $2000 would not be enough.

## 273. N/A

**Submit date:** 8/11/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Disallowing publication costs seems untenable. The publishers have legitimate costs, and not allowing researchers to cover those costs from grant funds would undermine productivity, particularly among researchers from institutions with fewer other sources of income (e.g., philanthropy).

Limiting costs to $2,000 per publication seems reasonable, given the current landscape, but it also seems unnecessary -- that's essentially what is already happening.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 274. Zeribe Nwosu

**Submit date:** 8/11/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Zeribe Nwosu

**Name of Organization:** Cornell University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 4: Set a limit on the total amount of an award that can be spent on publication costs. NIH could limit the maximum amount of an award that could be spent on publication costs to 0.8% of the award's direct costs over the length of the award or $20,000.00, whichever is greater, in order to not disproportionately impact smaller awards. Limiting the award to 0.8% or $20,000.00 is consistent with recent requested average amounts for publication costs and provides institutions flexibility in publication while containing future cost increases. NIH may consider exemptions to the cap with agency approval for unusual, high-volume publication situations.

**2. Available evidence related to publication costs and proposed options:**
The publication cost charged by top-tier journals is nowadays beyond imagination. It is now easy to see anywhere $5,000 to $10,000+ publication fee. The NIH should either allow a certain amount of fund to be allocated to publications ($20,000 is considerate) or have a mechanism for making journals to charge less (which I imagine is hard to enforce for any journal operating outside the US).

**3. Peer review compensation:**
Peer reviewers should be compensated on per review basis rather than on hourly basis as the latter is also hard to quantify or implement fairly.

**4. Publishing best practices:**
-

**5. Other Comments:**
-

## 275. New Frontier Labs

**Submit date:** 8/11/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Rob Streeper

**Name of Organization:** New Frontier Labs

**Type of Organization:** Healthcare Industry (Biotech/Device/ Pharmaceutical Company)

**Role:** Organizational Official

**1. Proposed policy options:**
I feel that publication fees are a perverse incentive that ultimately is an inducement to put profit over quality of science. I feel that all Federally funded research must be openly available to all. APC's for government funded research should be capped at $0. The current system has created a large number of trash journals that promulgate trash work.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
If the journal gets paid the reviewers should be paid.

**4. Publishing best practices:**
Make publishers become non-profit institutions. Give grants to journals to support staff and operational costs.

**5. Other Comments:**
Make publishers become non-profit institutions. Give grants to journals to support staff and operational costs.

## 276. Crystal Rogers

**Submit date:** 8/11/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Crystal Rogers

**Name of Organization:** UC Davis

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I think that Option 4 is almost reasonable. Set a limit on the total amount of an award that can be spent on publication costs, up to $20,000. This option would be more reasonable at 1-2% of total direct cost based on current costs for publication -for example, $250,000 direct cost grant = $2,500-$5,000 per year for publications up to $20,000. I do not think any journal should charge more than $5,000 for open-access fees. However, this budget should be flexible. Some years, labs publish a lot and other years they do not. Funds should be able to be rolled over.

**2. Available evidence related to publication costs and proposed options:**
If the NIH and reviewers would like the research to be published and accessible to the pubic- the money to publish the papers will need to come from somewhere. Journals are not free to run. However, I agree that some journals like Nature- have ridiculous and wasteful open access fees of more than $10,000 and that could pay for open-access publication for 3 peer-reviewed publications in several other journals.

**3. Peer review compensation:**
I do not think NIH should be involved in this question. Very few journals use this model anyway.

**4. Publishing best practices:**
I think there are plenty of journals that use fraud detection and have open access charges for peer-reviewed articles of less than $5,000. Journals do not need to charge more than that in my opinion.

**5. Other Comments:**
I think there are plenty of journals that use fraud detection and have open access charges for peer-reviewed articles of less than $5,000. Journals do not need to charge more than that in my opinion.

**Description:** Thoughts on publication charges

## 277. Lance Davidson

**Submit date:** 8/11/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Lance Davidson

**Name of Organization:** University of Pittsburgh

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I would propose all publication costs be moved to "indirect" costs. Clearly, publishing is a requirement for advancing science and not unlike the requirement that we have lab spaces, heating, administrators. My University negotiates subscription and APC together with certain publishers. These two aspects of publishing are like two sides of the same coin. "If you want my subscription, you should also want my manuscripts."

Unfortunately, some journals have exceptionally high APCs. These charges by journals, especially Nature Publishing Group and various Cell journals, make publishing in them impossible but for a few institutions that can afford the combined subscription/APC. I myself am loath to spend $12000 for publication in such a place. This is a large fraction of a graduate student's pay or a year of operating costs for our animal facility.

Lastly, I would suggest guidelines on the use of faculty researchers as "free labor" in reviewing manuscripts for these same journals that would take funds away from research. If I were to charge $300/hour for reviews I would consider "donating" those charges to a pool of APC funds that could be used to publish from my Lab.

**2. Available evidence related to publication costs and proposed options:**
These options are ridiculous. America is a capitalist country and these options would seek to control publisher charges as if we were communists. Publishers can and should make money but the way to do it is to move the charges to the indirect category.

**3. Peer review compensation:**
Peer reviewing has never been compensated. If I am carrying out reviews gratis I should not be charged to publish in that journal. For instance, once I referee 3 articles I should be given a coupon for free APC.

**4. Publishing best practices:**
Best publishing practices should include a tracking number for a paper that would allow anyone to see where a manuscript has been submitted, where it has been sent out for review, and where it has been rejected/published. This is simple transparency. This would cost nothing. Automated fraud detection has been useful but will only contribute to higher costs.

Fundamentally, it is unclear why publication costs have skyrocketed in recent years even as publications have moved to fully digital.

**5. Other Comments:**

Best publishing practices should include a tracking number for a paper that would allow anyone to see where a manuscript has been submitted, where it has been sent out for review, and where it has been rejected/published. This is simple transparency. This would cost nothing. Automated fraud detection has been useful but will only contribute to higher costs.

Fundamentally, it is unclear why publication costs have skyrocketed in recent years even as publications have moved to fully digital.

## 278. N/A

**Submit date:** 8/11/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:** University of Missouri-Kansas City

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
The average cost to publish an open access research article (which NIH prefers, and desirable given the research is supported by taxpayer funds) is $2300-2500 in my field. This is for an average, mid level journal. If data/results are particularly significant then it might be pertinent to publish in a high profile journal, where the costs can be 2-4 time more expensive for open access. Also, it is common the published more than one paper per year and/or have manuscripts completed and submitted one or more years after the final year of the award. I feel 1% of grant costs for publications in year 1 is reasonable (for many types of research) but increasing to 2% in subsequent years as the research ramps up.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Most researchers take on a huge burden reviewing articles for 'for-profit' publishers without any compensation because 'it's the way it has always been done to support the profession'. But in contrast to decades ago, many publishers are now making billions in profits off the back of researchers and still expecting free work. They should be forced to compensate reviewers - every other profession gets compensated when they are called upon. This however should not be made up with higher publication costs.

**4. Publishing best practices:**
Only a few publishers have full editorial duties these days. Many push this back on the scientists to do the formatting to reduce their costs and increase profit margins further. Cost should be limited when using publishers that push more to the scientists and more allowed for those publishers that still have proper editorial staff (not just administrative staff).

**5. Other Comments:**
Only a few publishers have full editorial duties these days. Many push this back on the scientists to do the formatting to reduce their costs and increase profit margins further. Cost should be limited when using publishers that push more to the scientists and more allowed for those publishers that still have proper editorial staff (not just administrative staff).

## 279. N/A

**Submit date:** 8/11/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I am a newly tenured professor at a large state school in an INBRE state that is on the low end of R1 institutions. We transitioned from an R2 school ~15 years ago, but still have many policies and mindsets of the R2 system. As we are a smaller R1 and INBRE, the research infrastructure--including institution-supported funds for research--are more limited.

I could see a viable path forward with all options but number 1, disallowing all publication cost. Should publication costs be disallowed, there are not viable pots of money available at the institution to support our publication costs. I'm basing this on my experience with the lack of bridge funding, lack of fund to support any research-related travel unless it is for undergraduate students, and minimal options for new/repair equipment funds. While there are limited grants available to pay up to half of an open access publication, these are limited in number, limited in total cost (often capped around $1000), and often spent only partway through the year. Realistically, I would likely end up paying publication costs out of my own pocket.

My concern with limiting costs per publication (e.g. parts of options 2, 3, and 5) is if the publishing industry adapts to this. For example, big name/premier journal cost well over the proposed limits: a search as I'm filling this out shows Cell at $11400, Science at $5450, Nature $12690, and PNAS at $5995 for base open access articles. I can envision a path forward where journals, as a for-profit entity, continue to charge higher rates and institutions with extra funds and the additional pressures/expectations to publish in such journals become the only ones that can afford to pay these fees through a combination of NIH and internal funds. Ultimately, this could lead to a system where there is inequity and bias of who has the access to publish in certain journals. At this point, it seems a major overhaul of the publishing system would be needed to bring publication costs in line with the proposed per article limits, or a system that pays reviewers. Perhaps I am being pessimistic, but I don't see any incentive for for-profit journals to change their system to work with the proposed guidelines when they can currently charge such high publishing costs and not compensate reviewers (as it's "professional service")

My worry about these policies is that they are tailored to work at large R1s, but will have major challenges at any other type of institution. It could cause a backstep in initiatives to include more work from smaller R1s, R2s, PUIs, HSIs, or HBCUs. Such institutions are more likely to be facing other challenges in funding that would limit availability of funds to supplement NIH-provided funds.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 280. N/A

**Submit date:** 8/11/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I am a strong proponent of Option 1 - disallow all publication costs. The cost of these publications, particularly in high impact journals, have skyrocketed. These increasing rates are disproportionate with both the falling costs of actually running a journal (where the majority of the labor is done for free by volunteers and the electronic distribution costs continue to fall precipitously). This has created an anti-meritocratic situation, where richer institutions and well funded scientists publish more frequently in high impact journals, exacerbating the inequities in what is already a highly corrupt and inside-dealing ecosystems of high impact journals. Of course, merely banning the use of NIH funds for publication costs will not remedy this situation, and in fact may only exacerbate existing inequities. To that end, the NIH should go further and ban the publication of NIH funded research in for-profit journals and those that charge a publication fee to the scientists. Scientific publication should never be pay-to-play.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Paying for peer review is a dangerous slippery slope, particularly because of the advent of chat bots and LLMs and the potential for them to be used by lazy reviewers. Money is simply too strong of an incentive for such bad actors. Other incentives, such as public recognition that can help in tenure evaluation and immigration processes, are a better option for encouraging participation in peer review.

**4. Publishing best practices:**
To my mind, the single most corrupting force in academic publishing today, at least in high impact journals, is the rampant inside dealing within journals that occurs at the Associate Editor review level, i.e. before papers ever get to peer review. I have personally experienced, and have had many other colleagues experience, unreasonable rejection of papers from high impact journals before consideration by neutral reviewers. Time and time again, we see this, only to subsequently see similar papers published by competing scientists in the same journal. The common thread is always a relationship between the AE and the competing scientist. The NIH has the ultimate trump card here - ban the publication of NIH funded research in journals that use an AE screening round - all submissions (that meet some basic criteria) must go to peer review. Notably, many of the journals plagued by these issues are the same journals that charge outrageous publication fees.

**5. Other Comments:**
To my mind, the single most corrupting force in academic publishing today, at least in high impact

journals, is the rampant inside dealing within journals that occurs at the Associate Editor review level, i.e. before papers ever get to peer review. I have personally experienced, and have had many other colleagues experience, unreasonable rejection of papers from high impact journals before consideration by neutral reviewers. Time and time again, we see this, only to subsequently see similar papers published by competing scientists in the same journal. The common thread is always a relationship between the AE and the competing scientist. The NIH has the ultimate trump card here - ban the publication of NIH funded research in journals that use an AE screening round - all submissions (that meet some basic criteria) must go to peer review. Notably, many of the journals plagued by these issues are the same journals that charge outrageous publication fees.

## 281. N/A

**Submit date:** 8/11/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Not Applicable

**Role:** Investigator/Researcher

**1. Proposed policy options:**
With the current costs of publication, the only option that comes close is Option 5. As NIH grant recipient for basic research, currently the only way we can show we are contributing to the field and meeting the goals of the project funded--requirements for future funding, is through publication. We do not control these costs. If NIH requires we publish our work with peer review, then they need to put pressure on publishers or have a different mechanism to evaluate and share results from research.

**2. Available evidence related to publication costs and proposed options:**
Publication costs for the different peer reviewed journals is on each website for that journal.

**3. Peer review compensation:**
Interesting discussion. In the past, this has been part of our job that is not specifically compensated--along the lines of NIH study section reviews that are only minimally compensated. It is important that it does not become 'the job'.

**4. Publishing best practices:**

**5. Other Comments:**

## 282. Mark Peifer

**Submit date:** 8/11/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Mark Peifer

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Of the options offered

Option 1: Disallow all publication costs.

Option 2: Set a $2,000 limit on allowable costs per publication.

Option 3: Set a $2,000 limit on allowable costs per publication and allow up to $3,000 when peer reviewers are compensated.

Option 4: Set an 0.8% limit on the total amount of an award that can be spent on publication costs, up to $20,000. For example, $250,000 direct cost grant = $2,000 per year for publications.

Option 5: Set a $6,000 limit on both the per publication cost and the total amount of an award (0.8% up to $20k) that can be spent on publications.

Only option five would prevent the large for-profit publishers from destroying non-profit journals run by scientific societies and universities. Option 1 is simply untenable--maintainng a journal does cost money and researchers can't pay out of pocket. Most of us publish 2 or more papers per so options 2-4 will be very problematic

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 283. Elisa Zhang

**Submit date:** 8/11/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Elisa Zhang

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 3: Set a $2,000 limit on allowable costs per publication and allow up to $3,000 when peer reviewers are compensated.

The above would be my favored option of all 5 options presented.

That said, I do have questions as to feasibility. If this is less than what it costs for a journal to truly provide a published product, will this negatively impact the publication industry? If so, would that negatively impact academia? What if these costs now simply can't be covered by investigators? How will they publish their work? Or will journals simply close, making it even more difficult for researchers for options of where to publish? Will this disincentivize open access? I think we need to think carefully about how a proposed policy change could have unintended and undesired consequences.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**
Automated fraud detection, when coupled with human review to ensure no false hits are pulled up, should be used. Reproducibility and reliability of results are a cornerstone of scientific research as well as public trust of research.

**5. Other Comments:**
Automated fraud detection, when coupled with human review to ensure no false hits are pulled up, should be used. Reproducibility and reliability of results are a cornerstone of scientific research as well as public trust of research.

## 284. N/A

**Submit date:** 8/11/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Of the proposed options, option 4 seems least crippling to the grant holders given current expectations and systemic structures.

Alternative considerations might include: Changing how publication record is scored in regards to evaluating the investigator biosketch to limit bias towards institutions with the ability to pay high APCs for the authors. Encourage increased use of pre-print services such as bioRxiv to level out disparities in access to publishing. Work with publishers on reducing open access fees or "preferred" rates for NIH/NSF funded work. Consider a mechanism where journals could apply for "open access funding" from the federal government to subsidize that service, thus reducing publication fees while ensuring greater access of the public to that taxpayer generated information. Fully fund PubMed to continue providing open access versions of manuscripts after embargoes, and work with publishers to shorten embargoes. Advertise to the public about PubMed and how they can access their taxpayer supported research for free.

**2. Available evidence related to publication costs and proposed options:**
With funding, there is an expectation to publish your findings as well as they can be published. I have worked in top tier labs for most of my career (approx 22 years), and I do not think you can publish a medium to high impact paper in my field for less than $3500. This cost is increased if you elect open access (We spent >$6k on one of my articles 10 years ago so it would be open access). Also, the general expectation is that you should publish around 1 paper per year of funding (e.g. 4-5 for a 5 year grant). However, it is also accepted that those may cluster in the back half of the award period, as that is when the data and analysis are finalized. Thus, tying it to a max of $2000/year, for example, would be problematic unless the model shifts to funding completed rather than proposed work. The only way to publish a paper in the first 12-18 months of an award is typically for the work to have already been mostly completed at the award start.

If the cost was more limited, e.g. $2000 per publication, then the impact and access of the publication would also be limited, or investigators at resource limited or emerging institutions would be penalized. Institutions with larger operating budgets could presumably create mechanisms to pay the balance due for investigators to publish. However, this would adversely affect someone like me who holds one of only a few NIH grants at my institution, and the institution does not have funds to support publication fees. This would effectively prohibit me from publishing in high impact journals even when my work IS high impact. This would also negatively reflect on future applications because my work was published

poorly, or because I had fewer publications because I could not afford to publish. I believe if I can accomplish my funded research goals AND publish within the awarded funds I should be able to do that.

**3. Peer review compensation:**
I have been reviewing articles for nearly 20 years. I have never been offered any compensation for this work beyond a "thank you" by any American or UK journals. I have been awarded vouchers toward reducing future potential publication costs with one publisher (MDPI), but these also have expiration dates and/or are restricted to one journal and so, in the end, may have no actual value for my time spent. I would be shocked to learn if there are publishers that compensate peer reviewers with pay per article.

**4. Publishing best practices:**
One consideration may be with -omic and other large datasets. Journals assert that their need to maintain and archive that data is a considerable expense, and truthfully, if they do maintain it indefinitely then it is an expense that needs to be paid.

**5. Other Comments:**
One consideration may be with -omic and other large datasets. Journals assert that their need to maintain and archive that data is a considerable expense, and truthfully, if they do maintain it indefinitely then it is an expense that needs to be paid.

## 285. N/A

**Submit date:** 8/11/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Grants should have an upper limit for covering publication costs in commercial outlets.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
I am concerned about creating a monetary incentive for reviewing scientific manuscripts other than interest in the topic of the manuscript and community service.

**4. Publishing best practices:**

**5. Other Comments:**

## 286. Amy Shaub Maddox

**Submit date:** 8/11/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Amy Shaub Maddox

**Name of Organization:** University of North Carolina at Chapel Hill

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
All of the options are undesirable and problematic. As a mentor, I need to be able to prioritize my trainees' career trajectory, and not just cost, when choosing what journal to send our work.

Review Commons is becoming an increasingly attractive option - this removes from authors' control what journal will end up with our manuscript.

**2. Available evidence related to publication costs and proposed options:**
Publications can cost over $6000, even with black-and-white images (Biophysical Journal).

**3. Peer review compensation:**
It would take a culture shift to normalize paying referees. Such a shift should be piloted and studied. It should be explored whether referees are more likely to accept a refereeing job for which they are ill-equipped or for which they have a conflict of interest, for the money.

**4. Publishing best practices:**
The scientific enterprise, including peer review of manuscripts and funding proposals, is incredibly robust and rigorous as it is. There is no, or minimal, "waste, fraud, and abuse." Public funds are stewarded carefully and appreciatively, due to 1) the intrinsic goodness of scientists and science staffers, 2) the checks and balances of the system, 3) the fact that science itself cannot build upon falsehoods, and 4) the cultural standards to be good stewards and to adhere to regulations.

**5. Other Comments:**
The scientific enterprise, including peer review of manuscripts and funding proposals, is incredibly robust and rigorous as it is. There is no, or minimal, "waste, fraud, and abuse." Public funds are stewarded carefully and appreciatively, due to 1) the intrinsic goodness of scientists and science staffers, 2) the checks and balances of the system, 3) the fact that science itself cannot build upon falsehoods, and 4) the cultural standards to be good stewards and to adhere to regulations.

## 287. Jan Christian

**Submit date:** 8/11/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Jan Christian

**Name of Organization:** University of Utah

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 5: Set a $6,000 limit on both the per publication cost and the total amount of an award (0.8% up to $20k) that can be spent on publications.

**2. Available evidence related to publication costs and proposed options:**
Solid peer reviewed journals in my field (cell and developmental biology, biochemistry) generally charge $2000-$4000 per publication, with additional charges in some cases for printing color figures or over length articles. Many of the spin offs of higher profile journals (Cell Reports, Nature Communication) charge much more to enable authors to get their name in flashy lights but the science is generally not better than what is published in solid main stream journals. These journals don't increase public access, they just cost more. .

**3. Peer review compensation:**
Peer review for grants and papers in my field has always been voluntary and I believe it should stay so. Paying for peer review introduces the possiblity of bias, and in general compensation is not a meaningful amount relative to time spent.

**4. Publishing best practices:**
Mainstream journals in my field alaready use fraud detection software and I don't know how much this contributes to cost.

**5. Other Comments:**
Mainstream journals in my field alaready use fraud detection software and I don't know how much this contributes to cost.

## 288. Claude Desplan

**Submit date:** 8/11/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Claude Desplan

**Name of Organization:** NYU

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Although the intend of this rule is to force publishers to lower their cost, they might not do it and this will result in scientists struggling to find ways to pay for publications fees.

Scientists will publish a paper in the highest possible journal and will only later figure out a way to pay for it. If the cost of a Nature paper is $7,000, the scientists will still choose this journal as the impact of the paper on their future will be might higher. They might end up paying from their own pocket, which would not be fair.

**2. Available evidence related to publication costs and proposed options:**
Scientists will publish a paper in the highest possible journal and will only later figure out a way to pay for it. If the cost of a Nature paper is $7,000, the scientists will still choose this journal as the impact of the paper on their future will be might higher. They might end up paying from their own pocket, which would not be fair.

**3. Peer review compensation:**
There is no example that I know of when reviewers are compensated. eLife was going to do it, but then relinquished. So, it is not an issue. and if publications fees are being lowered, of course journals will never remunerate their reviewers...

**4. Publishing best practices:**
Fraud detection is a simple software and will not cost significant money. Therefore, this is a non-issue

**5. Other Comments:**
Fraud detection is a simple software and will not cost significant money. Therefore, this is a non-issue

## 289. N/A

**Submit date:** 8/11/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
#1. Proposed policy options

I support Option 5. Set a per-award cap at the greater of 0.8% of direct costs or $20,000 over the life of the award, plus a per-article ceiling of $6,000 for all direct publication charges.

Principles: keep it simple, PI-friendly, and automatic.

- Author choice preserved. Labs may still publish anywhere; amounts above the ceiling can be covered by institutional agreements or non-federal funds.
- Publisher-facing administration. Publishers should auto-deposit to PubMed Central on the publication date and send a standard invoice to the institution, not the PI. No new PI forms or portals.
- Fair allocation with low friction. Allow proportional allocation across multiple NIH awards when more than one award materially supported the work. Use a simple attestation; no extra documentation layers.
- No penalty for library deals. If a read-and-publish agreement covers the cost, do not count it against any project's cap. Handle tracking centrally at the institution.
- Count only what hits the award. If no charge is posted to the grant, nothing counts toward the cap. Keep invoice rules between publisher and institution, not the PI.

**2. Available evidence related to publication costs and proposed options:**
Five-year snapshot of my lab (10 papers):

- Premium placements (3/10): Cell (2021), Nature Microbiology (2023), Cell Host & Microbe (2020).
- Selective society/OA or moderate-fee venues (7/10): mBio (×2, 2023), EMBO Reports (2023), Journal of Virology (2022), PLoS Genetics (2021), PNAS (2021), Frontiers in Pharmacology (2022).

What a $6,000 per-article ceiling plus a ≥0.8% or $20,000 per-award cap would have meant:

- The majority (7/10) would likely fit under the $6,000 ceiling or be compliant through accepted-manuscript deposit without high APCs.
- The few premium papers (3/10) would need institutional coverage or non-federal top-up. That is acceptable given their rarity and impact.
- The per-award cap would not constrain a typical year's output for my lab. It would prevent publication costs from crowding out experiments without forcing venue changes.

This pattern supports Option 5 as balanced and workable in day-to-day practice.

**3. Peer review compensation:**
I have never been paid for peer review. If NIH allows a higher per-article limit when reviews are paid, keep it publisher-managed so there is no PI burden:

- Journals post reviews on acceptance and certify that reviewers were paid a transparent benchmarked rate.
- Payments come from publisher revenue, not line items billed to the author or award.
- No PI attestations or uploads. No new steps for authors.

**4. Publishing best practices:**
Recognize practices that add value, but keep them automatic and off the PI's plate:

- Automatic PMC deposit on publication date by the publisher.
- Integrity checks (images, plagiarism, fraud-screening) performed by the publisher with behind-the-scenes documentation.
- Price transparency with a single, standard invoice to the institution; no "junk fees."
- Open data/code verification at acceptance handled by editorial staff, not by PIs uploading extra forms.

If NIH ties any premium to best practices, verify publisher-side only. Do not add author tasks.

**5. Other Comments:**
Recognize practices that add value, but keep them automatic and off the PI's plate:

- Automatic PMC deposit on publication date by the publisher.
- Integrity checks (images, plagiarism, fraud-screening) performed by the publisher with behind-the-scenes documentation.
- Price transparency with a single, standard invoice to the institution; no "junk fees."
- Open data/code verification at acceptance handled by editorial staff, not by PIs uploading extra forms.

If NIH ties any premium to best practices, verify publisher-side only. Do not add author tasks.

## 290. Irma Sanchez

**Submit date:** 8/11/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Irma Sanchez

**Name of Organization:** NYU School of Medicine

**Type of Organization:** Non-profit Research Organization

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I propose that the NIH ask institutions to use the indirect funds from NIH funded research awards to cover publication costs .

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 291. Jeff Bourgeois

**Submit date:** 8/11/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Jeff Bourgeois

**Name of Organization:** Worcester Polytechnic Institute

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I have been an outspoken critic of the publication charges at for profit journals since entering academic science about a decade ago. However, the option that bans all page charges is dangerous as it would essentially end journals as we know them with no substitute—free (or "free" as they're backed by tax payer money or donations) servers cannot adequately filter paper mill papers or subjugate papers to peer review, and the established journals that can require some funding to succeed. I personally like capping publication charges at ~$2000 per article, in line with many of the non-profit journal page charges.

**2. Available evidence related to publication costs and proposed options:**
The page charges at ASM journals, the society of infectious diseases, and numerous other society journals would be covered by a $2000 cap. Journals like Nature or Cell which have had a parasitic relationship with science for generations would hurt with this change in policy, likely to the public's benefit.

**3. Peer review compensation:**
I think a small honorarium could help incentivize more contributions to peer review, but it would need safeguards to ensure journals weren't just paying reviewers for speedy acceptances (or rejections) without actually reviewing the papers

**4. Publishing best practices:**
I cannot comment on this

**5. Other Comments:**
I cannot comment on this

## 292. N/A

**Submit date:** 8/11/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 5: Set a $6,000 limit on both the per publication cost and the total amount of an award (0.8% up to $20k) that can be spent on publications.

**2. Available evidence related to publication costs and proposed options:**
Our average publication cost per publication has been between $4K to $5K over the last 15 years. Limiting the publication cost to $2K would impact which labs are able to submit their work to the higher impact journals. This would exacerbate the already widening gap between academic labs in this country.

**3. Peer review compensation:**
A thorough and high-quality peer review requires hours of our time. This should be compensated fairly in order to encourage peer review participation and to encourage high-quality peer review. Unless some form of compensation is instituted, I fear the that quality of peer review will continue to decline.

**4. Publishing best practices:**

**5. Other Comments:**

## 293. N/A

**Submit date:** 8/12/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
2

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
This is a quandary, because offering money will probably increase the supply of reviewers, but it will also increase the number of unqualified reviewers, so there would need to be clear and specific criteria for selecting the best team.

**4. Publishing best practices:**
Fraud detection is critical. So is choosing the best match in subfield and knowledge between author and reviewers

**5. Other Comments:**
Fraud detection is critical. So is choosing the best match in subfield and knowledge between author and reviewers

## 294. N/A

**Submit date:** 8/12/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Non-profit Research Organization

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I favor option 4 (limit total amount of the award that can be spent on publication costs).

**2. Available evidence related to publication costs and proposed options:**
The number of papers published by a lab per year can vary. Option 4 provides the best compromise to deal with this variation and to get research results published in a timely fashion.

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 295. M.R.F.

**Submit date:** 8/12/2025

**I am responding to this RFI:** On behalf of myself

**Name:** M.R.F.

**Name of Organization:**

**Type of Organization:** Non-profit Research Organization

**Role:** Investigator/Researcher

**1. Proposed policy options:**
None of the proposed options will work within the context of the recently implemented mandate for open access publishing of NIH-funded studies. Doing a proper job of vetting papers, formatting/copyediting them, hosting them online and publicizing them, plus all the ancillary tasks such as ethics screening, is not cheap if done correctly. Thus any reputable journal has substantial operational costs for activity required to maintain quality. To be frank, the rising costs for publishing articles are largely due to the open access mandate; in the past, operational costs of publishing were paid by subscription and ad revenue, but this is not possible in the current milieu where all readers around the globe can expect to read NIH-funded articles for free immediately on publication.

I am actually in favor of open access publishing; I also have no love for big for-profit publishers and would be delighted to see them squeezed out of the field. However, even non-profit organizations that exist only to disseminate excellent science will be unable to pay their bills with any of these options when taken together with the open access mandate. No journal, even one run by a non-profit scientific society, can continue to publish articles if they take a net loss on every paper.

The end result of such a policy will be the very opposite of the administration's stated goals in that only researchers at elite, well-endowed institutions (who will have robust sources of non-federal funds to pay publishing costs) will be able to publish in reputable journals.

**2. Available evidence related to publication costs and proposed options:**
Presumably the actual costs of publishing an article are known by non-profit societies that have journals. I recommend asking them.

**3. Peer review compensation:**
Peer reviewers are already aequately compensated by in-kind avenues (other investigators reviewing their submissions). Direct monetary compensation for peer review is impractical and would dramatically increase the administrative costs at journals (which would then be reflected by higher publishing fees).

**4. Publishing best practices:**
Detection of fraudulent papers is essential and should be incorporated into any allowable costs. Part of the challenge here is that this is not a "per publication" cost, since by definition it will be used to weed out submisisons which are not published due to misconduct.

**5. Other Comments:**
Detection of fraudulent papers is essential and should be incorporated into any allowable costs. Part of

the challenge here is that this is not a "per publication" cost, since by definition it will be used to weed out submisisons which are not published due to misconduct.

## 296. Manfred Weiss

**Submit date:** 8/12/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Manfred Weiss

**Name of Organization:** Helmholtz-Zentrum Berlin

**Type of Organization:** Non-profit Research Organization

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I would advocate "Option 2" limiting the costs for a single publication. However, I would set the limit on 2500.- US-$. The reason is that publishing houses need to pay rent, pay their staff, maintain and develop their software and hardware infrastructure for manuscript processing and archiving.

**2. Available evidence related to publication costs and proposed options:**
I used to work as co-editor and editor for Acta Crystallographica Sections D and from 2002 to 2017. These journals are published by a learned society, the International Union of Crystallography (IUCr). Although I have no direct numbers to share, I am sure that the IUCr office in Chester would be willing to provide some estimates for how much a publication costs. One thing that also needs to be considered is the rejection rate. Processing the rejected manuscript adds to the price for each accepted one. In my opinion, publishers should ask for 50% of the APC upon submission. If the paper is rejected these costs are not refunded. This would force authors to think about the most opportune place to publish their work.

**3. Peer review compensation:**
As a scientist, I am always happy to review other papers. I see this as part of my work. Hence, I am not sure if the system can be improved if reviewers are refunded. It would be more important to publish the reviews along with the manuscript and the responses of the authors. I have often encountered reviews which are less than helpful. Compensation will not improve this.

**4. Publishing best practices:**
Automated fraud detection is just a computer program, which will add little to the costs. It would be more important that fraudulent papers are can be identified and marked as such. Journal editors are often not as helpful as they could be because they want to protect their journal. It should be possible for any researcher to write some comments on any paper in the literature in a way that pubpeer allows them to. In my opinion, the publising houses themselves should allow this feature. Of course comments need to be written with the clear name of the commenter spelled out in order to prevent misuse of the feature.

**5. Other Comments:**
Automated fraud detection is just a computer program, which will add little to the costs. It would be more important that fraudulent papers are can be identified and marked as such. Journal editors are often not as helpful as they could be because they want to protect their journal. It should be possible for any researcher to write some comments on any paper in the literature in a way that pubpeer allows

them to. In my opinion, the publising houses themselves should allow this feature. Of course comments need to be written with the clear name of the commenter spelled out in order to prevent misuse of the feature.

## 297. N/A

**Submit date:** 8/12/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 4, where there is a budget set for allowable publication costs, is the least bad option. The best options would be for (1) NIH to allow preprints to satisfy public access and (2) for the US government to negotiate lower Open Access publication costs with major publishing houses like Springer Nature, Elsevier, Wiley, to limit charges to principal investigators.

**2. Available evidence related to publication costs and proposed options:**
We publish 10-15 papers per year, so we would need $50,000-75,000 per year budgeted if we were required to pay all Open Access. This is more like 25-33% of our budget, far more than the 0.8% proposed cap.

**3. Peer review compensation:**
Peer reviewers should get credits for journal publishing fees based on the number and quality of reviews.

**4. Publishing best practices:**

**5. Other Comments:**

## 298. Emily Dykhuizen

**Submit date:** 8/12/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Emily Dykhuizen

**Name of Organization:** Purdue

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I think there should be a cap on publication costs to curb vanity for-profit journals. They tend to select papers based on perceived trendiness of topic and fame of authors to boost impact factor. They take advantage of scientists desperate to increase their visibility and status. This shouldn't be supported by the NIH.

I think both a per publication limit and a total budget limit is appropriate.

**2. Available evidence related to publication costs and proposed options:**
From my experience $3000-4000 would be sufficient to cover most well-regarded society journals. There should also be a limit on publications. More than 10 corresponding author publications from a single R01 indicates to me that the researchers should be publishing larger, more complete stories and not so many "minimal publishable units".

**3. Peer review compensation:**
I don't think peer reviewers need to be compensated for reviewing for society and non-profit journals.

**4. Publishing best practices:**
An unintended consequence of lowering publications costs too much is that journals will need to accept and publish more of the submitted manuscripts. We need fewer and better publications and we don't want to punish journals for being selective. Some good models are Nucleic Acids Research and Cancer Research. They are very rigorous and high impact, and publication costs range 3000-4000.

**5. Other Comments:**
An unintended consequence of lowering publications costs too much is that journals will need to accept and publish more of the submitted manuscripts. We need fewer and better publications and we don't want to punish journals for being selective. Some good models are Nucleic Acids Research and Cancer Research. They are very rigorous and high impact, and publication costs range 3000-4000.

## 299. N/A

**Submit date:** 8/12/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Keep it simple - if a cap is to be enforced, it should be per publication and uniformly applied

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Bad idea - this is likely to 1) introduce bias or 2) attract the wrong folks to become reviewers. I review papers for many high-quality journals - compensation would *not* lead me to accept more review invitations.

**4. Publishing best practices:**
In my view, compensating reviewers is not a best practice

**5. Other Comments:**
In my view, compensating reviewers is not a best practice

## 300. Center for Endometriosis Care

**Submit date:** 8/12/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Heather C. Guidone, BCPA

**Name of Organization:** Center for Endometriosis Care

**Type of Organization:** Other

**Type of Organization - Other:** Principal Investigator Site/Private Practice

**Role:** Organizational Official

**1. Proposed policy options:**
Please see attached

**2. Available evidence related to publication costs and proposed options:**
Please see attached

**3. Peer review compensation:**
Please see attached

**4. Publishing best practices:**
Please see attached

**5. Other Comments:**
Please see attached

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/response-to-NIH-funding-cap.pdf

**Description:** Center for Endometriosis Care Response Submission

## 301. Professor

**Submit date:** 8/12/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Professor

**Name of Organization:** A large research university

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Under any policy option, it is essential that 50% of the allowable publishing costs be covered by indirect cost returns (IDC) for that NIH grant to the institution. Otherwise, these policies will drain resources from direct research. For NIH-funded PIs, research success depends on direct laboratory costs.

Publications in high-impact, i.e., expensive, journals build the brand of the institution as they are part of broadly used metrics of excellence. Hence, it is in the interest of the institution to subsidize publications, and it can be considered part of the infrastructure for research.

If publication costs are not linked to a specific grant and its IDC, then nepotism will run wild. Institutions with large private endowments will be the only ones to afford high-impact publications, skewing the playing field among NIH grant recipients even more. The same rationale applies within an institution: well-connected, senior professors have easier access to institutional resources and favors. Junior, non-tenured faculty will be disadvantaged.

**2. Available evidence related to publication costs and proposed options:**
The current price tag for high-impact publications exceeds the limits set by all options.

The absolute number of high-impact publications, as well as the fraction of high-impact to total publications, is an explicit metric to evaluate NIH-designated comprehensive Cancer Centers. Placing limits on allowable publication costs will have an unfair and unequal impact on smaller cancer centers and those at public institutions, especially in IDeA states.

**3. Peer review compensation:**

NIH should begin by appropriately compensating the peer reviewers it employs. Right now, NIH peer review is reimbursed at an hourly rate below minimum wage. Now compensating peer review for NIH grants or journals introduces inequality and degrades review quality.

**4. Publishing best practices:**
If the per article publishing costs are reduced, this will increase subscription prices for individuals and institutions. It will increase the appeal of preditory publishers or publishing costs.

**5. Other Comments:**
If the per article publishing costs are reduced, this will increase subscription prices for individuals and institutions. It will increase the appeal of preditory publishers or publishing costs.

## 302. N/A

**Submit date:** 8/12/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**

**2. Available evidence related to publication costs and proposed options:**
Capping allowable expenses for APC will disproportionally impact less well funded labs, further segregating publication culture where only labs from top universities with deep discresionary funding will be able to afford publishing in the most prestigious, high visibility journals (which tend to have the highest APC). The solution is not to cap NIH expenditures by funded labs, but to restructure the scientific publishing culture/business.

**3. Peer review compensation:**
Peer review in publishing is nearly non-existent. This should change, and the cost of critical expert review should be borne by the journal. However, a system needs to be put in place to protect peer review process from biases that may arise. For example, what is to prevent an individual from agreeing to review an untenable number of manuscripts only to get a payout, while submitting cursory or insufficient reviews simply as a cash grab irrespective of scientific quality?

**4. Publishing best practices:**

**5. Other Comments:**

## 303. David R. McClay

**Submit date:** 8/12/2025

**I am responding to this RFI:** On behalf of myself

**Name:** David R. McClay

**Name of Organization:** Duke University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I prefer option 4 - 0.8% of award.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
I've never been compensated in 54 years for a large number of reviews. I consider it part of my academic responsibilities.

**4. Publishing best practices:**

**5. Other Comments:**

## 304. Nicolai van Oers

**Submit date:** 8/12/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Nicolai van Oers

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
A researcher needs to pay for publication fees. Capping this limits the opportunity for fundamentally important research to be published as many investigators do not have alternate resources for these payments.

**2. Available evidence related to publication costs and proposed options:**
Most journals charge a minimum of $3000 per article. If our goal is to publish 2 manuscripts a year, our costs are $6,000. The publication fees can be much higher should open access be required, which is mandated by the NIH.

An NIH grant budget provides funds to pay for charges from suppliers and vendors for research needs. I would consider a publishing company to be part of this process. Why is it different?

Proposed options would be to eliminate payments for predatory journals, if the NIH has such a list. Other possibilities including the elimination of payments for journals that are not part of a standard peer review process. Making all journals who are receiving NIH provide the names of reviewers after a publication is accepted would introduce a control mechanism to ensure integrity and ethical standards are met.

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 305. N/A

**Submit date:** 8/12/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
My lab publishes multiple papers a year and in well-respected top journals. Doing so enables us to grow and attract talent and increases the impact of our science in the US and globally. The only option that approaches feasibility in my mind is 6, 2K a year is unreasonably low for a lab like mine. More broadly, option 1-4 would harm US scientific publishing and reduced international competitiveness and innovation in US science. That said, Option 6 lacks flexibility and would negatively impact my labs ability to publish. NIH should recognize that additional funds my be necessary to fully mandate instant open access.

**2. Available evidence related to publication costs and proposed options:**
It costs money for a publisher to run a journal, maintain a journal website, communicate metrics to scientific organizers, and employee people to maintain journal standards. If the journal has a physical copy, the cost of maintaining journals are higher. That said the push for open access, which I support, has often resulted in journals pushing those costs on to PIs. NIH should negotiate with journals to cap such costs per paper.

**3. Peer review compensation:**
This is an issue that needs to involve journals, as does publishing rates. I would love to get compensated for my time reviewing articles, but not at the cost of making publishing my papers prohibitively expensive. NIH could include a bonus in their funds to researchers who review, and mandate journals provide a list of them acknowledging that they have reviewed for that journal (without disclosing what they reviewed to maintain anonymity). Most reputable journals publish lists of reviewers at the end of the year.

**4. Publishing best practices:**
Many journals are implementing this already. I am on the editorial board and we have a small team of staff at the journal (2 people) who use AI and automated systems to screen for a variety of potentially fraudulent things in manuscripts. Most top tier and respected journals do, and that is why they are valued by scientists. Ones that dont are not.

**5. Other Comments:**
Many journals are implementing this already. I am on the editorial board and we have a small team of staff at the journal (2 people) who use AI and automated systems to screen for a variety of potentially fraudulent things in manuscripts. Most top tier and respected journals do, and that is why they are valued by scientists. Ones that dont are not.

## 306. N/A

**Submit date:** 8/12/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:** Yale University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
$5,000 per article if journals start paying reviewers.

**2. Available evidence related to publication costs and proposed options:**
NA

**3. Peer review compensation:**
Absolutely. Considering that it takes at least a whole work day to review an article, compensation at $400-800 per article is appropriate.

**4. Publishing best practices:**
Fraud detection can only detect lazy frauds, which I do not find particularly damaging.

**5. Other Comments:**
Fraud detection can only detect lazy frauds, which I do not find particularly damaging.

# 307. Jason Meyers

**Submit date:** 8/12/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Jason Meyers

**Name of Organization:** Colgate University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Publishing the work is one of the critical aspects of the work. It needs to come out so that people have access to the data and conclusions (and ideally it needs to be open access so that any tax payer has access to the work their money funded without needing a journal subscription). That said, we do not need to support the continued proliferation of garbage coming out in next to meaningless stories, so should not incentivize lots of tiny publications with unclear conclusions but rather should support comprehensive papers (which may therefore have more costs associated in terms of length, data storage, etc.).

**2. Available evidence related to publication costs and proposed options:**
Part of the move to open access is to provide better access to research paid for by federal funds. Capping costs will promote keeping research behind publishers paywalls and limiting access.

**3. Peer review compensation:**
Hard to have a conversation about this without consideration of the level of peer review. Some reviewers do a surface level review that leads to poor science getting published. Some reviewers are super detailed and clearly have put a ton into it. I wouldn't want to promote speed and number of reviews done (with a compensation incentive) to reduce quality of peer review.

**4. Publishing best practices:**

**5. Other Comments:**

## 308. N/A

**Submit date:** 8/12/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
If all publication costs are disallowed by NIH, how will researchers be expected to pay to publish their work? There will be a bias in the type of work that gets published, influenced by what sources are willing to pay for publication costs.

Faculty are asked and expected to serve as peer-reviewers yet get no compensation for this work currently.

Setting a maximum publication cost of $2,000 or $3,000 per publication (or a set dollar amount/percentage per grant) goes against capitalism. Publishers are companies operating in the free market.

What if research conducted on a grant leads to 7 publications and there is only enough funding for 4 publications? What would happen to the tax payer generated findings? Should the NIH create a publication system to side-step publishing companies that have gotten to greedy?

**2. Available evidence related to publication costs and proposed options:**
So called "high impact" journals often charge ~$10,000 per publication, while so called "low impact" journals often charge ~$3,000 per publication. Therefore, the potential perceived impact of a publication is in part influenced by the budget of the lab and not simply due to the quality of the work.

**3. Peer review compensation:**
Would payments for peer review need to be disclosed to Universities? to NIH?

Would there be limits on the amount of peer-review for pay that an individual could perform? This could be ripe for abuse by individuals becoming professional peer-reviewers.

**4. Publishing best practices:**
Use of AI and or use of AI detection tools may contribute to higher publishing costs.

**5. Other Comments:**
Use of AI and or use of AI detection tools may contribute to higher publishing costs.

## 309. Tami Lieberman

**Submit date:** 8/12/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Tami Lieberman

**Name of Organization:** Massachusetts Institute of Technology

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I believe that at least $3,000 is required for publication costs, as it takes time and expertise to handle, edit, and format a manuscript. While I have had paid lower fees in the future, the manuscripts at those journals have more often had errors introduced during typesetting or issues with image quality.

**2. Available evidence related to publication costs and proposed options:**
While I have had paid lower fees in the future, the manuscripts at those journals have more often had errors introduced during typesetting or issues with image quality.

**3. Peer review compensation:**
The single biggest issue with peer review today is that accomplished scientists do not contribute. I have seen that many of my colleagues think it is a waste of time.

A small compensation will not be sufficient to incentivize these individuals to review, but may incentivize those with insufficient expertise to over-contribute.

I strongly suggest that policies are implemented that require authors to peer review at least X number of manuscripts per year or per manuscript submitted in order to get reimbursed for publication costs.

**4. Publishing best practices:**
The single biggest issue with peer review today is that accomplished scientists do not contribute. I have seen that many of my colleagues think it is a waste of time. Journals could require that authors submit at least 2 'peer review credits' (evidence of recent review in ORCID or other system) to be able to submit a paper. The NIH could have a higher publication cost for journals that require and record these peer review credits.

**5. Other Comments:**
The single biggest issue with peer review today is that accomplished scientists do not contribute. I have seen that many of my colleagues think it is a waste of time. Journals could require that authors submit at least 2 'peer review credits' (evidence of recent review in ORCID or other system) to be able to submit a paper. The NIH could have a higher publication cost for journals that require and record these peer review credits.

## 310. Lauren Moo

**Submit date:** 8/12/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Lauren Moo

**Name of Organization:** Massachusetts General Hospital

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Perhaps the federal government should negotiate a federally funded research publication fee rate with all the major publishers. Given the high publication fees across many publishers, limiting the amount will dramatically limit the sharing of research results otherwise. Publication fees are particularly high for Open Access publications, but publishing via Open Access increases the readership and allows members of the public/those not affiliated with wealthy academic institutions to read the science.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Peer reviewers are generally not compensated at all. Scientists are expected to peer review grants and publications for free. In no other industry would people be expected to donate their time and expertise without compensation. Compensation for peer-review linked to timeliness would benefit everyone: it would increase willingness to review and also get high quality results published more quickly, thereby benefiting the whole scientific community and general public.

**4. Publishing best practices:**
Having a per-publication cap on publication fees may be reasonable if it aligns with common publication fees. But there should not be a limit on total publication funds for projects. We want to encourage peer-reviewed publication of results and if that means five publications per year by a given project, that is great.

**5. Other Comments:**
Having a per-publication cap on publication fees may be reasonable if it aligns with common publication fees. But there should not be a limit on total publication funds for projects. We want to encourage peer-reviewed publication of results and if that means five publications per year by a given project, that is great.

# 311. Jennifer Mason

**Submit date:** 8/12/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Jennifer Mason

**Name of Organization:** Clemson University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Limiting the amount of money that one can spend on publications will do nothing to curb publication costs for the investigator but will instead put the cost on the investigator through other funds. As an investigator at a state-funded institution, we do not have access to large pots of additional funds to spend on publication costs. This will make many journals (open access charges for smaller reputable journals are still often 3000 and above) unavailable to many investigators at state-funded institutions. Unfortunately, where we publish is often considered as a measure of prestige and scientific impact so limiting publication costs without simultaneously addressing the use of journal prestige as a metric for scientific metric will put us at a huge disadvantage with regards to obtaining scientific funding.

I do agree that publication costs for some journals are way too high (10K for a single publication is absurd). I would say 6-10K per year of an award would not be unreasonable, but 2000 or 6000 for an entire award will hurt those of us with smaller labs the most.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
We do not get compensated for peer review. One potential way is to try to get all journals to offer discounts to investigators who review. This can be done on a tier system. For instance, if you review for a journal once, you can receive 10% off publication fees, a few times gives you 50% off and if you review a lot (>5) for journal in one year, they waive the APC charge. You can even put a limit on when it has to be used (>5 in 12 month period, discount good for 2 years for instance)

This will give an incentive to authors to review (esp for respected journals) but not lead to the increase cost driving up publication cost. The journal would only have to pay out if the reviewers publish a paper at that journal.

**4. Publishing best practices:**

**5. Other Comments:**

## 312. Ken Irvine

**Submit date:** 8/12/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Ken Irvine

**Name of Organization:** Rutgers

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I think that option 2 or option 5 could be workable, although I worry that the numbers are too low.. The other proposed options seem unreasonable to me.

-It costs money to conduct peer review and publish articles. So there needs to be some kind of payment for publication under the open access model (the old model, where publication costs were covered by journal subscriptions, was much better for researchers, as funding agencies have not increased grants to account for the increased cost of publishing).

- Limiting publication costs by the overall size of the award seems very unfair to me -it disadvantages or advantages research for publication based on the size of the grant, which is a ridiculous criteria for publication.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
All the peer review I have done in my career (many 100s of papers) has been without any financial compensation. It's always been viewed as part of the responsibilities of being a scientist. I don't believe that paying peer reviewers would increase the quality of review, and it might decrease it, by encouraging less qualified people to review papers just for the money.

**4. Publishing best practices:**
One has to pay for the people and the infrastructure that enable peer review and publication. It costs money. I suspect $2000 is not enough, but one would have to audit the publishers to really assess this.

**5. Other Comments:**
One has to pay for the people and the infrastructure that enable peer review and publication. It costs money. I suspect $2000 is not enough, but one would have to audit the publishers to really assess this.

## 313. Ryan Kerney

**Submit date:** 8/12/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Ryan Kerney

**Name of Organization:** Gettysburg College

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I advocate for option #1. I don't see a material benefit from for profit publishers, and there are far too many life science journals in circulation. Publishing peer reviewed research should be free to the PI, and to the reader. Period.

**2. Available evidence related to publication costs and proposed options:**
I can't afford to publish! We are working on two manuscripts right now and in both cases I need to collaborate with R1 colleagues just to cover the APCs.

**3. Peer review compensation:**
I review 6-10 papers a year and have never been compensated.

**4. Publishing best practices:**
This needs to be determined by professional societies. We don't have as much fraud in basic research, because there isn't as much of a profit motive.

**5. Other Comments:**
This needs to be determined by professional societies. We don't have as much fraud in basic research, because there isn't as much of a profit motive.

## 314. Kacy L Gordon

**Submit date:** 8/12/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Kacy L Gordon

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I think it would be reasonable to cap publication costs PER PAPER allowable on federal grants, Option 2 or Option 3.

I think capping the TOTAL that can be spent would penalize highly productive workers who use their grant dollars efficiently to produce more papers per grant year. Ideally, you want more research product per grant, so penalizing the outputs is counterproductive. I disfavor Option 4 or Option 5. People still need to stay within their budgets, but they know best how to allocate those resources.

One consideration is that research that produces many papers relatively quickly tends to be theoretical/computational and have fewer expenses in terms of consumables/research materials, while research on cells or animals is slower and takes more time and lab resources to produce each paper. I think it's likely that a productive population geneticist might spend on publication costs what a productive molecular geneticist spends on fly food, for example, so the allocations will all work out and make sense given the norms of each field.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
I have never been compensated as a peer reviewer.

While of course I would appreciate my time being acknowledged with some extra money, I worry that such a scheme will incentivize high numbers of reviews from questionably qualified people who are seeking opportunities to review for income.

I would much rather "credits" at a journal to reduce page charges. For example, if three timely and high quality peer reviews for Journal X allows me to waive publication fees at that journal for my next accepted manuscript with Journal X.

**4. Publishing best practices:**
The automated processes for detecting image manipulation are already part of the quality check at most journals. I would not believe journals who say they are offering a better/more rigorous software and thus need to charge more money.

**5. Other Comments:**
The automated processes for detecting image manipulation are already part of the quality check at most

journals. I would not believe journals who say they are offering a better/more rigorous software and thus need to charge more money.

## 315. N/A

**Submit date:** 8/12/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
It is important that the public has timely access to the latest research findings funded by the NIH. However, the journal costs for immediate open access right now are prohibitive, especially if NIH does not permit this cost to be charged to grants. Therefore, the proposed Options 4-5 would be best to support timely dissemination of research as researchers would have the highest level of flexibility to use funds for publication. Options 2 and 3 are also fine, except $2,000 is usually not enough to cover immediate open access costs.

**2. Available evidence related to publication costs and proposed options:**
The costs for immediate open access is often higher than a faculty member's annual discretionary funds. Thus, this would limit the number of publications, and where the authors choose to submit the results (depend on price).

**3. Peer review compensation:**
Peer reviewers for grants and papers are woefully under-compensated. Not compensated at all in most cases and this should change in order for scientists to obtain high quality feedback from peers, and for the public to trust the results.

**4. Publishing best practices:**

**5. Other Comments:**

## 316. Lindsey Barske

**Submit date:** 8/12/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Lindsey Barske

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I am generally in favor of this endeavor to limit allowable publication costs - some journal's costs are ridiculously high and can dissuade a less-well-funded researcher from pursuing publication there. However, there are some points left out of the Notice that require consideration.

First, this new policy proposal is at odds with the other new NIH policy that requires immediate open access for all new publications. Publishing an article as immediate open access generally costs the author quite a bit more than the standard subscription/6-month embargo (which is often entirely free), and may easily exceed the proposed $2000 cap. Even if an institution has an agreement with a publisher to allow a certain number of articles to be published open-access per year for free, once that number is exceeded, the author is on the hook for the full cost. Adhering to both policies at once seems likely to cost the researcher more in the end.

Second, though I am a researcher rather than a publisher, I can see how these policies put the publishers in a bind as well: if no NIH-funded research can be published under the subscription/6-month embargo (generally free to the author) model, then fewer institutions will pay for that access. In order to meet costs, or remain profitable (depending on their business model), they will instead have to charge authors higher fees for open access publication. So these two policies will collectively push costs to the individual authors/NIH, rather than the academic institutions.

Third, regarding option 3, I have never been offered compensation as a peer reviewer; I am not sure how common this is across disciplines.

Fourth, regarding options 4 and 5: Limiting the percentage of the award that can be spent on publication is at odds with the professed goal of making NIH-funded data accessible to the public as soon as possible. If an author has already met this threshold (perhaps quickly due to higher open-access fees), they may be precluded from publishing work produced in the later years of the grant until additional funding can be acquired.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
I have never been offered compensation as a peer reviewer; I am not sure how common this is across disciplines.

**4. Publishing best practices:**

**5. Other Comments:**

## 317. Jarred M Whitlock

**Submit date:** 8/12/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Jarred M Whitlock

**Name of Organization:** University of Virginia School of Medicine

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
As a faculty member responsible for paying publication fees, I think the spirit of this effort is a positive change in what appears to be a run away, for-profit publishing landscape. Personally, I believe some metric for regular cost increases to be built in to the policy. Unfortunately, it takes a great deal of effort to change such policies, and there is the danger of setting a dollar amount that makes sense now that will be wholly inadequate for publishers in 10 years.

Personally, I strongly support setting a fixed publication fee limit with an increase of ~50% for publishers that compensate peer reviewers.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Compensation for Peer Review is long overdo. However, I would like to suggest that it should not be direct compensation for the peer reviewer, but instead, compensation should come in the form of tokens that can be redeemed for small non-taxed grants to support the reviewer's lab in ways that are currently not allowed on NIH grants.

An example: I review 25 manuscripts in 2026 and earn 25 review tokens. These manuscripts were reviewed for 12 different journals, but it makes no difference because the funds are all a universal digital currency that can be redeemed at an central NIH website. The journals are not compensated for this, instead their incentive comes from more easily identifying willing peer reviewers compared with their competitors that do not participate in the program. I redeem my 25 tokens for a $5,000 grant awarded to my institution (with no overhead provided) that I am allowed to use to buy 3 laptops for my graduate students.

**4. Publishing best practices:**
You all negotiate F&A rates with each university. Perhaps something like this should happen with each publisher.

**5. Other Comments:**
You all negotiate F&A rates with each university. Perhaps something like this should happen with each publisher.

## 318. Andrew Ewald

**Submit date:** 8/12/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Andrew Ewald

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I do favor restrictions on publication charges. The major journals are for-profit and already charge large APCs and open access fees. Researchers in China and elsewhere will continue to be willing to pay those fees to publish in journals such as Nature and Cell. Most US researchers do not have significant sources of funds for publications costs beyond their research grants. Banning or greatly limiting the ability to charge publication costs to grants will weaken US science relative to international competitors.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Peer review at journals is not standard and would unnecessarily increase the cost of publishing.

**4. Publishing best practices:**
For better or worse, the international publishing business is a market and the major players explicitly price their APCs based on the perceived value of publishing in a specific title (e.g. Nature vs. Scientific Reports). They have no incentive to reduce APCs for US researchers when other countries will pay full price.

**5. Other Comments:**
For better or worse, the international publishing business is a market and the major players explicitly price their APCs based on the perceived value of publishing in a specific title (e.g. Nature vs. Scientific Reports). They have no incentive to reduce APCs for US researchers when other countries will pay full price.

## 319. Brock Grill

**Submit date:** 8/12/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Brock Grill

**Name of Organization:** Seattle Children's Research Institute and the University of Washington

**Type of Organization:** Non-profit Research Organization

**Role:** Investigator/Researcher

**1. Proposed policy options:**
The cost of publication should be capped at $2000 per paper with $3000 being allowed if peer reviewers are compensated.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Peer reviewers should be compensated by for profit publishers.

**4. Publishing best practices:**

**5. Other Comments:**

## 320. N/A

**Submit date:** 8/12/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Of the 5 options proposed, my preference is "Option 4: Set a limit on the total amount of an award that can be spent on publication costs", as this provides the most flexibility for researchers and caters to different numbers of publications in different tiers of journals, which may have very different costs.

**2. Available evidence related to publication costs and proposed options:**
One of the top journals in my field (Nature Genetics) currently has publication charges of $12,690, which must be paid in order to deposit manuscripts immediately into PubMed central, per NIH policy. All 5 of the proposed policy options make covering fees in such a high impact journals extremely difficult and a maximum of one such paper could be covered in the course of a standard R01.

**3. Peer review compensation:**
I am not familiar with peer review compensation and I have never been compensated for reviewing.

**4. Publishing best practices:**
I think the impact factor and reach of the journal should be taken into consideration in allowing higher per publication costs. I am concerned that the proposed policies will cause NIH-funded research to result in fewer publications and publications in lower impact journals.

**5. Other Comments:**
I think the impact factor and reach of the journal should be taken into consideration in allowing higher per publication costs. I am concerned that the proposed policies will cause NIH-funded research to result in fewer publications and publications in lower impact journals.

## 321. Chris T. Amemiya

**Submit date:** 8/12/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Chris T. Amemiya

**Name of Organization:** Univ. California, Merced

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Options 3 and 5 are the best from the PI's standpoint. Publications in high end journals are costly and if you have to pay out of pocket for these, it is not tenable.

**2. Available evidence related to publication costs and proposed options:**
When I was at a private research institute with funds that were unrestricted I had no problems covering my publication costs. Since moving to a public university, I have had to cover the costs out of pocket. The pandemic wiped out my startup and I've had to scrimp and scrape to get by. I am a senior PI with over 30,000 citations and H-index of 68. Two of my NIH grant proposals have been reviewed favorably but are in limbo at the time. I believe a lot of investigators at my level are facing similar circumstances... some are contemplating retirement.

**3. Peer review compensation:**
I have never peer reviewed for compensation except for Study Section service and external scientific review boards. I suppose that reviews would be of higher quality.

**4. Publishing best practices:**
I can see where AI can be a problem. I have little experience here except for the software we use to detect plagiarism and possible AI-generated papers in the courses I teach. They do work. But I try not to be penal and ask the students for rewrites. I suppose the use of such software to check manuscripts and grant proposals is inevitable.

**5. Other Comments:**
I can see where AI can be a problem. I have little experience here except for the software we use to detect plagiarism and possible AI-generated papers in the courses I teach. They do work. But I try not to be penal and ask the students for rewrites. I suppose the use of such software to check manuscripts and grant proposals is inevitable.

## 322. Christy McKinney

**Submit date:** 8/12/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Christy McKinney

**Name of Organization:** University of Washington

**Type of Organization:** Academic Institution

**Role:** Other

**Role – Other:** PI of multiple training grants

**1. Proposed policy options:**

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Peer reviewers, publications and grants, should be reasonably compensated based on number of hours. Whatever compensation is determined it should increases annually tied to some benchmark (like salary cap). A lower pre-doc rate while they learn could be considered.

**4. Publishing best practices:**

**5. Other Comments:**

**Description:** Consideration for Trainees/Training Budgets is Needed

## 323. N/A

**Submit date:** 8/12/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Member of the Public

**1. Proposed policy options:**

**2. Available evidence related to publication costs and proposed options:**
Investigators often include the cost of poster printing in their publication fees section, and for training/education awards they will often pay for dozens of trainees to print posters as well, so this should be considered in any cap that is put into place. Some investigators also budget for professionally-created handouts/press releases/brochures/websites to desseminate study data to the general public (rather than solely peer-review journal publications), and budget for graphic/web designers as well as printing/hosting costs, so that should be considered too. Sometimes social media is utilized to dessminate important findings to specific targeted populations, and there are costs associated with that as well. If these items should be budgeted in a different section of the budget, this should be clarified in the RFA/guidance, as most are including these expenses under "publication costs."

**3. Peer review compensation:**

**4. Publishing best practices:**
With AI advancing as quickly as it is, we must anticipate that there are unkowns that should be allowed for. If, for example, additional oversight is required to determine whether or not AI was misused in the creation of a publication, and that oversight is not free, investigators need to be allowed to budget for this.

**5. Other Comments:**
With AI advancing as quickly as it is, we must anticipate that there are unkowns that should be allowed for. If, for example, additional oversight is required to determine whether or not AI was misused in the creation of a publication, and that oversight is not free, investigators need to be allowed to budget for this.

## 324. N/A

**Submit date:** 8/12/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
These options will limit where and how many publications will be generated from an award. Crucially, these options will limit the numbers and journal impact form US based science and will make US research less competitive in the world.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**
The addition of automated fraud detection has significantly improved the quality and standards for publications in the past decade. These expenses are therefore necessary to maintain high quality research expectations.

**5. Other Comments:**
The addition of automated fraud detection has significantly improved the quality and standards for publications in the past decade. These expenses are therefore necessary to maintain high quality research expectations.

## 325. Ellen Fitzsimmons-Craft

**Submit date:** 8/12/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Ellen Fitzsimmons-Craft

**Name of Organization:** Washington University in St. Louis

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I agree there is a balance here, however, an important issue that must be considered in light of this is the new policy related to immediate open access requirement for federally funded research. To comply with this, Wiley, for example, is now requiring U.S. based investigators to pay for open access and we are not allowed to submit to PubMed Central prior to their embargo period. It seems the U.S. government needs to enter into serious negotiations with all of the major academic publishers to solve this problem as the current situation is not tenable (we cannot both limit costs to publish and require investigators to pay publication fees to meet U.S. government mandates).

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Peer reviewers need to be compensated. On average, I receive at least 1-2 requests for peer review every work day--this is between 20-40 requests every month. I spend much time responding to these requests and that does not even account for the time I spend on the papers I actually peer review. To do this well requires a very high level of attention and thoughtful work and it is clear to me that peer review standards (for both papers and grants ) have slipped in recent years, I believe due to the increasing demands, both for peer review and other administrative burdens put on investigators. This work should be compensated.

**4. Publishing best practices:**

**5. Other Comments:**

## 326. Debra Kaysen

**Submit date:** 8/12/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Debra Kaysen

**Name of Organization:** Stanford University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
By allowing for publication charges, it allows us as researchers to better target journals that are open access or pay for open access to allow for quicker and larger access to results of NIH research. Currently, publishers can wait up to 12 mos before releasing papers open access, which delays dissemination efforts.

**2. Available evidence related to publication costs and proposed options:**
Given that more and more journals are moving toward open access options that require publication charges, being able to include this as part of grant funding has become increasingly important, especially for investigators working in less resourced academic settings. Most journals in my field charge between $3000-$4000 per publication. My ability to pay for those charges is particularly critical in supporting trainee publications and those of early career scientists who do not have other sources of funding and who are working on my studies.

**3. Peer review compensation:**

**4. Publishing best practices:**
It has become increasingly difficult to even find peer reviewers. For a top tier journal in my field I am an Associate Editor (uncompensated). It is taking me reaching out to up to 10-15 reviewers to get 2 reviews completed (uncompensated), as scientists have more and more on their plates. I also do think that automated fraud detection and detection of use of AI would be very helpful.

**5. Other Comments:**
It has become increasingly difficult to even find peer reviewers. For a top tier journal in my field I am an Associate Editor (uncompensated). It is taking me reaching out to up to 10-15 reviewers to get 2 reviews completed (uncompensated), as scientists have more and more on their plates. I also do think that automated fraud detection and detection of use of AI would be very helpful.

## 327. Laura Ridge

**Submit date:** 8/12/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Laura Ridge

**Name of Organization:** University of Cincinnati College of Nursing

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I am unsure which of these is best, but I believe Option 1 would slow the dissemination of research significantly. I believe Option 4 allows for unnecessarily high costs.

**2. Available evidence related to publication costs and proposed options:**
If I am understanding your math, $20,000 should be enough for about 10 manuscripts, but the average R01 only plans on 5-7.

**3. Peer review compensation:**
I would ask that you consider what compensation, of any, volunteer editors should receive. I do think the amount of $1000 is perhaps a little low, since it comes from the $300 estimate, and many colleagues of mine try to complete about four per year. Also, if this amount to cover is a multiyear award, shouldn't the math be $300 x 4/year x number of years? Or did I misunderstand and peer reviewers yet $1000 per year?

**4. Publishing best practices:**

**5. Other Comments:**

## 328. Jennifer Jao

**Submit date:** 8/12/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Jennifer Jao

**Name of Organization:** Ann & Robert H. Lurie Children's Hospital of Chicago

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 4 is best

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**
It is important to note that many stipulations are in place now to make publications publicly accessible, including through using Open Access journals or Open Access mechanisms. Using Open Access mechanisms requires a much higher publication fee. Therefore, it is particularly important for grants to cover this expense.

**5. Other Comments:**
It is important to note that many stipulations are in place now to make publications publicly accessible, including through using Open Access journals or Open Access mechanisms. Using Open Access mechanisms requires a much higher publication fee. Therefore, it is particularly important for grants to cover this expense.

## 329. Jonah Meyerhoff

**Submit date:** 8/12/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Jonah Meyerhoff

**Name of Organization:**

**Type of Organization:** Not Applicable

**Role:** Investigator/Researcher

**1. Proposed policy options:**
NIH should allow researchers to determine how much of their awarded budget to allocate toward publication costs rather than imposing fixed caps. Dissemination is a core requirement of the research process and the costs of meeting NIH's own public access requirements vary widely across disciplines, journals, and article types. Capping allowable publication costs will create inequities, hinder compliance with immediate public access mandates, and reduce the visibility and impact of taxpayer-funded science. Giving PIs discretion to balance publication expenses with other research costs within their total budget is the most effective way to maximize both flexibility and the value of NIH investments.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
If NIH intends to incorporate peer reviewer compensation into its publication cost policy, it must first recognize that successful implementation will require direct negotiation with publishers rather than placing burden on individual researchers. Without publisher participation, a mandate for compensated peer review will be impractical. Appropriate compensation should be transparent. Journals must disclose whether reviewers are paid, at what rate, and under what conditions, and ensure payments go directly to reviewers instead of inflating APCs. Moreover, rates must be fair, reflecting the time and expertise required for high-quality review, and applied equitably so that all reviewers on a manuscript are compensated equally. NIH must work with publishers to develop cost models that are sustainable and do not drive excessive APC inflation or shift costs onto researchers in ways that exacerbate inequities.

**4. Publishing best practices:**

**5. Other Comments:**

## 330. Margaret Crane

**Submit date:** 8/12/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Margaret Crane

**Name of Organization:** Brown University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Options option 4 or 5 would be the most tenable. My area of research is implementation science and many of the top journals are open access. If I don't receive funds for open access fees, I can't publish in these journals. Open access is incredibly valuable for dissemination of information.

Some sample open access fees in the top journals in my field are: Implementation Science = $3390; Implementation Science Communications = $2290; Implementation Research and Practice = $1,500. As a postdoctoral fellow, I  publish at least 2 open access articles per year, with more senior researchers likely publishing more.

Perhaps the NIH could work directly with publishers to have a contracted rate for NIH funded research rather than having a restrictive policy that passes costs along to the PI.

**2. Available evidence related to publication costs and proposed options:**
https://implementationscience.biomedcentral.com/submission-guidelines/fees-and-funding

https://implementationsciencecomms.biomedcentral.com/submission-guidelines/fees-and-funding#:~:text=Article%20processing%20charges%20(APC),discounts%20policy%20for%20further%20information).

https://us.sagepub.com/en-us/nam/implementation-research-and-practice/journal203691

**3. Peer review compensation:**
This is a journal issue. I'd love to be compensated for peer review as an academic!

**4. Publishing best practices:**

**5. Other Comments:**

## 331. Steven Bedrick

**Submit date:** 8/12/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Steven Bedrick

**Name of Organization:** Oregon Health & Science University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I agree that publication costs are kind of out of control; however, it is incredibly important that research be made available without paywalls, and more and more journals are defaulting to an open-but-with-publication-fee scenario. I suspect that as the ramifications of the public access policy become more apparent, more journals will get on this bandwagon. So disallowing publication costs altogether feels like a real non-starter to me, and will just result in us having fewer publication venues in which to publish (as we are required to pay for publication costs out of our grants; our institution does not have additional sources of funds that are available to us for this purpose).

So, of the options described in the RFI, I would vote for "Option 3: Set a limit on allowable costs per publication and allow a higher amount to be paid when peer reviewers are compensated", as long as the limit was reasonable (2k sounds fine to me, _assuming_ that journals play ball).

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
I would love it if we could find ways for peer reviewers to be compensated; it is a major issue facing the entire scientific world and has been for ages. I have little hope that publishers would get on board, but who knows?

**4. Publishing best practices:**
Some journals do actually provide significant copy-editing and production assistance- help with figures, tables, etc. That is specialized and valuable labor, and doesn't come for free, so I 100% support publishers that provide such services covering those costs via publication fees. Many journals, however, do not actually provide meaningful editorial or production support. I'd be in favor of mechanisms that encouraged more of this!

**5. Other Comments:**
Some journals do actually provide significant copy-editing and production assistance- help with figures, tables, etc. That is specialized and valuable labor, and doesn't come for free, so I 100% support publishers that provide such services covering those costs via publication fees. Many journals, however, do not actually provide meaningful editorial or production support. I'd be in favor of mechanisms that encouraged more of this!

## 332. Michael Deans

**Submit date:** 8/12/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Michael Deans

**Name of Organization:** Emory University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Any regulations or policies created should restrict the dollar amount that a journal may charge for publication rather restrict the researchers by interfering with where and when scientific research is published and disseminated.

**2. Available evidence related to publication costs and proposed options:**
Publication costs due more than consume research dollars, they also have an adverse impact on the manuscript review process. If a journal will receive a hefty publication fee for publishing papers, they will publish as many articles as possible irrespective of quality because there is no longer an incentive to maintain a rigorous review process. Based upon my experience reviewing papers over the past twenty-five years (starting before the creation of online journals) I have seen the recent emergence of papers that should have been rejected - because I wrote a negative review and rejected them - that are being published. Coincidentally the journals that I review for who are doing this also have hefty publication fees.

**3. Peer review compensation:**
I have never been compensated for reviewing manuscripts for journals. It is simply not done which is extraordinarily inappropriate considering the hefty publication fees that are being requested. In addition, the compensation received by experts reviewing NIH grants is also insufficient and does not adequately reflect the time and effort that reviewers commit to that effort.

**4. Publishing best practices:**
I think that these publishing companies are feeding you a line, and are creating expenses to justify the fees that are being charged.

**5. Other Comments:**
I think that these publishing companies are feeding you a line, and are creating expenses to justify the fees that are being charged.

## 333. Russell B.

**Submit date:** 8/12/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Russell B.

**Name of Organization:**

**Type of Organization:** Non-profit Research Organization

**Role:** Investigator/Researcher

**1. Proposed policy options:**
If you really want to reduce the cost of publications, the NIH should support open access journals that are free to NIH supported researchers.

**2. Available evidence related to publication costs and proposed options:**
Typical costs are $0 - $3,000 but more typically around $1,000. Some journals have charged for submission too.

**3. Peer review compensation:**
Most peer reviewers are not compensated (similar to CSR which minimally compensates reviewers).

**4. Publishing best practices:**
Fraud detection should be applied to apply NIH-supported published research (for all journals) and should be a service run though the government or central service just before publication (to save money).

**5. Other Comments:**
Fraud detection should be applied to apply NIH-supported published research (for all journals) and should be a service run though the government or central service just before publication (to save money).

## 334. Philip Jordan

**Submit date:** 8/13/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Philip Jordan

**Name of Organization:** Uniformed Services University of the Health Sciences

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I think it is a very good move to reduce the allowable payment to journals. For far too long, journals have charged extortionate amounts of money for the "privilege" to publish with them. Taking advantage of the "impact factor" and knowing that scientists' careers, tenure, job security, etc., rely on this somewhat fabricated grandeur. It is about time journals gave institutes the opportunity for cut-rate prices for their journals. Furthermore, these journals provide zero payment to their expert reviewers, whom they desperately rely on. Finally, the initial decision on whether or not a manuscript will be reviewed or not at some of these journals is opaque and often not founded on the true science/impact of the work. A single "closed door" opinion of an editor with a "specialist investigator" consultation is flawed, to say the least.

**2. Available evidence related to publication costs and proposed options:**
Nature Springer - $6,890 USD

Wiley - between $3,000 and $5,000 USD

PLoS (Public Library of Science) - between $2,500 to $5,3000

The Company of Biologists - between 3,600 to $6,000

EMBO - between $4,500 and $7,990

ASCB Journals (American Society for Cell Biology) - between $3,200 to $4,500

MDPI journals - $1,350 to $3,250

Cell Press - between $5,200 to $9,900

Science (AAAS) - between $5,500 to $6,500

**3. Peer review compensation:**
Peer review is a task that is important for the community. The journal publication prices continue to rise. Available journals to publish in expand. However, none of these journals pay for review. They should either lower the prices or compensate reviewers. I prefer lowering the prices of publication. This will ensure tax payer dollars are saved. It would be beneficial to have a mechanism between journals and institutes to pay a certain amount/% each year based on how much research funding they receive. This would ensure equitable access across all research institutes and make the cost come from the "indirect" costs that seem to be a bit of a "black box" in many institutes regarding what this money gets used for.

**4. Publishing best practices:**
Honestly, I don't think there is a sufficient excuse for these journals to charge so much. Make the system easier for all.

**5. Other Comments:**
Honestly, I don't think there is a sufficient excuse for these journals to charge so much. Make the system easier for all.

## 335. N/A

**Submit date:** 8/13/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Publication costs are a necessary component of disseminating research to the public. The central role that journals provide to the public is the high quality vetting of research. This costs money -- to employ talented and passionate individuals and to create the infrastructure necessary to vet research studies. The NIH proposed limits on publication costs and requiring that research is published immediately as open access are both detrimental to the publication process and run the risks of alternately infusing the literature with even more poor quality studies (limits of pub costs) or costing more to the researcher (requiring immediate open access). The bioRxiv server run by CSHL is totally open access. How about the NIH require that all publications be posted in an open access server prior to or contemporaneous with peer review? And leave the publication model alone -- high quality work requires funds, and the funds are presently being well spent at high quality journals.

**2. Available evidence related to publication costs and proposed options:**
Please consider the bioRxiv as a requirement for NIH-funded research, rather than imposing restrictions on the current market model without simultaneously providing researchers with viable solutions to the restrictions.

**3. Peer review compensation:**
peer review does not need to be compensated, IMO. If you did compensate peer review, then you could expect a huge increase in cost to support publication, which seems at odds with the goal of this survey.

**4. Publishing best practices:**
journals should require researchers to divulge more raw data

**5. Other Comments:**
journals should require researchers to divulge more raw data

## 336. N/A

**Submit date:** 8/13/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Options 2 and 3 in the RFI are very good.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
If NIH compensates for peer review, that would certainly expand this practice. I think it is a very good move to increase fairness and accountability in the peer review process.

**4. Publishing best practices:**
I believe that with the expansion of AI support to the peer review process, these additional costs can be reduced.

**5. Other Comments:**
I believe that with the expansion of AI support to the peer review process, these additional costs can be reduced.

## 337. Travis Bailey

**Submit date:** 8/13/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Travis Bailey

**Name of Organization:** SUNY Geneseo

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Set a $2,000 limit on allowable costs per publication in 2025 dollars and adjust for inflation for years thereafter based on a reliable standard similar to the consumer price index.

**2. Available evidence related to publication costs and proposed options:**
Publications of my work funded by the federal government must be made freely available after an embargo time. Without a federal grant I must find private funding sources to help me pay for those publication costs.

**3. Peer review compensation:**
Being an uncompensated reviewer of a minimum number of manuscripts should be part of the responsibility that NIH grantees hold during the time of each of their awards. Those with more federal grants should be responsible to review a greater number of manuscripts than those with fewer. This service could be documented when reapplying for grants as part of a researcher's biosketch or ORCID.

An honorarium of a set amount should be considered, say $250 2025 adjusted for inflation for each manuscript or grant reviewed by those persons without grant funding.

**4. Publishing best practices:**
Honorariums for reviewers would increase publication costs.

Digital maintenance of large data set archives will increase costs.

Inflation will increase costs.

Transmission of digital files may become more expensive as electricity prices increase.

**5. Other Comments:**
Honorariums for reviewers would increase publication costs.

Digital maintenance of large data set archives will increase costs.

Inflation will increase costs.

Transmission of digital files may become more expensive as electricity prices increase.

## 338. N/A

**Submit date:** 8/13/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I agree with limiting the costs on publication according to option 4 or 5 of the NOT-OD-25-138. I agree that some publishers have extremely high costs and taxpayer funds should be considered when choosing a publisher. That being said, limiting the costs and allowing other funds (not related to the grand) to complement the costs could also be an option. Even though our publishing system has flaws, reputable journals are still the best way to disseminate our work. Preprints are valuable, but not near as much as a formal peer reviewed publication.

**2. Available evidence related to publication costs and proposed options:**
Several universities have agreements with publishers for reduced costs of publication. Perhaps, if NIH negotiates costs with the biggest publishers, that would drastically reduce publication costs. In fact, if one good agreement is achieved, very likely all other publishers will follow it. As I mentioned, several universities have achieved that.

**3. Peer review compensation:**
That's a delicate point that needs to be addressed. Paying is one option. Another option could be a credit system for the lab or institution (for ex. if a person revises a manuscript for journal X, it will get a 20% discount on the next publication - that discount could go to the investigator or his/her institution). As of today, peer review work demands time and no compensation at all.

**4. Publishing best practices:**
Indeed this is an issue. It should become mandatory to publish all raw data with the manuscript. Several journals don't request it yet. So it could be mandatory that only journals that request that could be used in NIH-funded publications. This should not increase the costs of publication.

**5. Other Comments:**
Indeed this is an issue. It should become mandatory to publish all raw data with the manuscript. Several journals don't request it yet. So it could be mandatory that only journals that request that could be used in NIH-funded publications. This should not increase the costs of publication.

## 339. N/A

**Submit date:** 8/13/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 3: Set a limit on allowable costs per publication and allow a higher amount to be paid when peer reviewers are compensated.

In my experience, publication in good journals could be achived for 2000-3000 USD

Above 3000 is a burden on research fundings

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Peer reviewers are ot apporpriately compensated considering the publication fees in certain high impact journals (5000 - 10000 usd).

However, if publication fees are around 2000 usd (such as it is the case currently for society journals), then the reviewers should continue without compensation as it is the case currently.

If reviewers are financially compensated, then it would be important to check that they do not review only for the compensation (limiting the number of reviewed papers per month? asking to editors for rating of their review quality?)

**4. Publishing best practices:**

**5. Other Comments:**

## 340. Xuebing Wu

**Submit date:** 8/13/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Xuebing Wu

**Name of Organization:** Columbia University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
option 3 with compensation for peer reviewers

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
strongly agree to pay peer reviewers

**4. Publishing best practices:**

**5. Other Comments:**

## 341. N/A

**Submit date:** 8/13/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I like Option 5. But any of the options are better than none.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
I believe that all reviewers should be compensated. I have reviewed at least 1,000 papers in my career (ca. 6,000 hours of work) and have never been compensated. At $50 an hour, this is $300,000 of uncompensated work!

**4. Publishing best practices:**
AI detection is a must

**5. Other Comments:**
AI detection is a must

## 342. Brent Small

**Submit date:** 8/13/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Brent Small

**Name of Organization:** University of North Carolina at Chapel Hill

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**

**2. Available evidence related to publication costs and proposed options:**
The proposed guidelines seem in conflict with expectations that research be widely available to the public. Investigators are stuck in the middle, between Federal guidelines and journal publishers.

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 343. Nils Walter

**Submit date:** 8/13/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Nils Walter

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
The proposed options appear to stem from a misunderstanding of how the scientific enterprise functions. Peer-reviewed publications are the lifeblood of U.S. science, essential for maintaining our international leadership in science, technology, and trade. Calculating an "average" article processing charge (APC) from journals worldwide is not meaningful, as the primary outlets for high-impact research from U.S.-based scientists are based largely in the U.S. and Europe—not in countries where operating costs are substantially lower.

These leading journals maintain higher APCs because of their more rigorous peer review, editorial oversight, and high production standards, all of which require significant labor and operational costs. Capping allowable APCs at an artificially low level would force these journals either to reduce the quality and sophistication of their editorial processes or to close entirely. Both outcomes would be deeply counterproductive: they would cost skilled jobs, weaken the dissemination of top-tier research, and diminish the visibility and recognition that have helped position the U.S. at the forefront of global innovation.

At a time when other nations—most notably China—are making large-scale strategic investments in science and technology and rapidly closing the gap with the U.S., we cannot afford to undermine the very publishing infrastructure that has been central to our success. Instead, we should be working collectively to sustain and strengthen it to ensure that the U.S. remains the global leader in scientific discovery.

**2. Available evidence related to publication costs and proposed options:**
Typical publication costs for the high-impact journals in which I publish—most of which are included in the Nature Index list of top research journals (https://www.nature.com/nature-index/faq#journals)—range from approximately $3,700 to $7,000 per article. For many of these journals, adding an open-access option to maximize the visibility and societal impact of federally funded research can easily double that cost, bringing the total to $7,500–$14,000 per article.

These costs reflect the rigorous peer review, high editorial standards, professional copyediting, and long-term digital archiving that ensure the credibility, reproducibility, and discoverability of scientific work. Arbitrarily capping allowable APCs at a much lower level would inevitably push many U.S. researchers toward lower-cost, lower-quality publication venues, which would harm both the perception and the actual rigor of U.S. science.

If, as an alternative, federally funded research were disseminated only through preprint servers, the result would be a flood of non–peer-reviewed manuscripts into the public sphere. While preprints are valuable for rapid sharing within the scientific community, they lack the quality control mechanisms of formal peer review. This would directly undermine the current administration's stated goal of restoring Gold Standard Science in America (https://www.whitehouse.gov/fact-sheets/2025/05/fact-sheet-president-donald-j-trump-is-restoring-gold-standard-science-in-america), which depends on the rigorous validation processes that high-quality journals provide.

In short, peer-reviewed journal publications are not a luxury—they are an essential component of the scientific enterprise, ensuring that the research funded by U.S. taxpayers is disseminated with the credibility and impact needed to maintain U.S. leadership in science and technology.

**3. Peer review compensation:**
Most journals do not compensate peer reviewers, and this is not merely due to tradition—it is also to avoid introducing potential conflicts of interest. Direct payment for reviews could create real or perceived pressure for reviewers to produce feedback aligned with editorial preferences, rather than offering an independent, candid assessment. Maintaining the integrity and impartiality of the peer review process is paramount to ensuring that published research meets the highest scientific standards.

The "compensation" that reviewers currently receive is largely professional and reputational. Serving as a peer reviewer signals expertise and standing within a field, often enhancing one's visibility to editors, funding agencies, and peers. Reviewers also benefit intellectually from early access to emerging findings—especially in fast-moving, highly competitive research areas—allowing them to stay at the forefront of their discipline. These non-monetary incentives are widely viewed as valuable professional currency within the scientific community.

That said, NIH could consider indirect forms of recognition or support that avoid conflicts of interest while still acknowledging the significant time and expertise required for high-quality reviews. Examples might include:

- Providing formal certificates or recognition letters that reviewers can include in promotion or tenure dossiers.

- Offering modest, non-cash incentives such as discounts on open-access fees or conference registrations.

- Public acknowledgment (with reviewer consent) in NIH annual reports or reviewer honor rolls.

- Counting reviewing activity toward service contributions in NIH biosketches or grant reporting.

In evaluating whether and how to compensate peer reviewers, NIH should weigh the need to preserve objectivity against the reality that peer review is an increasingly time-intensive service. Creative, non-monetary recognition systems may provide a balanced approach—ensuring reviewers feel valued without compromising the impartiality on which the credibility of the peer review process depends.

**4. Publishing best practices:**
Sustaining the high impact and global leadership that U.S. science has long enjoyed requires ongoing investment in the infrastructure that supports both innovation and the effective dissemination of knowledge. Core publishing practices—such as robust peer review, rigorous editorial oversight, and the

deployment of advanced tools for detecting image manipulation, plagiarism, and data fraud—are not optional luxuries; they are essential safeguards for the integrity of the scientific record.

Attempting to reduce costs by cutting these critical components would run directly counter to the Administration's stated aim of achieving Gold Standard Science in America. Instead, funding policies should encourage and support journals in adopting and expanding best practices, including:

- Automated fraud detection systems that flag potential issues before publication.

- AI-assisted pre-peer review tools that help maintain quality while reducing reviewer burden.

- Enhanced data transparency infrastructure, such as integrated data repositories and standardized reporting tools.

These measures inevitably increase per-publication costs, but they also mitigate the long-term economic and reputational costs of retractions, scientific misconduct, and erosion of public trust.

In today's competitive global landscape—particularly given the rapidly growing R&D investment by China—the U.S. cannot afford to cede leadership in research quality or credibility. The marginal increase in publication costs associated with these best practices is, in reality, an investment in maintaining the nation's scientific authority and its ability to translate research into societal and economic benefits.

**5. Other Comments:**

Sustaining the high impact and global leadership that U.S. science has long enjoyed requires ongoing investment in the infrastructure that supports both innovation and the effective dissemination of knowledge. Core publishing practices—such as robust peer review, rigorous editorial oversight, and the deployment of advanced tools for detecting image manipulation, plagiarism, and data fraud—are not optional luxuries; they are essential safeguards for the integrity of the scientific record.

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- AI-assisted pre-peer review tools that help maintain quality while reducing reviewer burden.

- Enhanced data transparency infrastructure, such as integrated data repositories and standardized reporting tools.

These measures inevitably increase per-publication costs, but they also mitigate the long-term economic and reputational costs of retractions, scientific misconduct, and erosion of public trust.

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# 344. Molly Gale Hammell

**Submit date:** 8/13/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Molly Gale Hammell

**Name of Organization:** NYU Langone Health

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I have been running an academic research laboratory for over 15 years, where my goal has been to understand the basic biological changes that underlie human neurodegenerative disease. I have also served on the editorial board of a non-profit scientific journal that publishes in this area. I have also contributed as a peer reviewer for over 50 scientific articles. I have been a contributing author to over 50 scientific articles. This enables me to speak from experience on all aspects of scientific publishing (editing, reviewing, and submitting).

The scientific publishing infrastructure enables two important modes for communicating scientific results -- pre-print servers (like BioRxiv, which are free and open-access) and peer-reviewed publications that charge for publications. Pre-print servers enable the rapid communication of scientific results to the public and the entire scientific community, but these results can include misleading statements and misinterpretations of data. I speak from experience when I say that many pre-printed manuscripts I review contain statements that are not supported by the underlying data. Peer review enables experts to point out these flaws and allows the manuscript authors to improve their articles prior to publication. Peer review for publications is crucial to ensuring that the scientific literature is accurate.

If a specific cap on publication costs is inevitable, I would strongly urge the NIH to adopt option 4 (limiting the total spent to $20,000). This would enable researchers the flexibility to put all of their data into 1-2 large publications in prestige journals that charge ~$10,000 for open-access publication. Alternately, researchers would have the flexibility to publish several smaller articles in journals that charge $3,000-$6,000 per article. I would hope that the NIH strongly believes in the freedom to choose the best venue for communicating results, while also ensuring that all NIH-funded research is released to the public.

**2. Available evidence related to publication costs and proposed options:**
Publication of research results is the major mechanism by which universities and research institutes judge productivity -- and is also the mechanism the NIH uses to measure productivity of NIH-funded researchers. There are multiple well-respected journals that charge publication fees in the range of $3,000-$7,000. The smaller journals that charge $2,000 per article are typically less well-respected, less likely to be read by other scientists, and less likely to make those articles publicly available. Those smaller fees are most often charged by journals that also charge for access to read the articles. The stated average publication costs must be updated to stratify by whether those charges are used for open-access publications or for (more commonly) embargoed/paywalled journals.

**3. Peer review compensation:**
Peer review compensation should only be considered for commercial for-profit publishers (Elsevier, Nature/Springer) that have paid editorial staff. This requirement for paid peer-review would have a very negative impact on smaller community-run journals that are non-profits, or not-for-profits, and are mostly staffed by volunteer scientists.

I would prefer a model where peer-reviewers can accumulate tokens or discounts for their own publication costs. This would enable compensation for peer-review without damaging the entire scientific publication process.

**4. Publishing best practices:**
I worry about the implementation of automated fraud detection software while that software is still in its infancy. Text-based software often makes mistakes in recognizing boilerplate text from methods sections and author lists. It often mistakenly flags articles that are available as pre-prints. Unsupervised application of this software could have negative consequences. Furthermore, there does not yet exist validated mature software for automated detection of fraud in scientific images (where much of the fraudulent results are currently detected). This software is not yet mature enough to be used as a gold-standard.

**5. Other Comments:**
I worry about the implementation of automated fraud detection software while that software is still in its infancy. Text-based software often makes mistakes in recognizing boilerplate text from methods sections and author lists. It often mistakenly flags articles that are available as pre-prints. Unsupervised application of this software could have negative consequences. Furthermore, there does not yet exist validated mature software for automated detection of fraud in scientific images (where much of the fraudulent results are currently detected). This software is not yet mature enough to be used as a gold-standard.

## 345. N/A

**Submit date:** 8/13/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 1 is not viable. Without allowable funding to publish results, results will simply not get published. This directly contradicts the entire goal of transparency (e.g., making peer reviewed data available) in the use of taxpayer funds to support research. Option 2 is both reasonable and viable. It does not pose an arbitrary restriction on the number of publications that can be supported from an award while simultaneously reducing the amount of taxpayer dollars that support journals charging very high article processing fees.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 346. Gal Haimovich

**Submit date:** 8/13/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Gal Haimovich

**Name of Organization:** Weizmann institute of Science

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I think option 3 is the best, since compensating reviewers should be an additional goal.

**2. Available evidence related to publication costs and proposed options:**
Cotton et al Critical Care Medicine 53(6):p e1181-e1189, 2025

https://journals.lww.com/ccmjournal/fulltext/2025/06000/effect_of_monetary_incentives_on_peer_review.3.aspx

DOI: 10.1097/CCM.0000000000006637

Gorelik & Clark, bioRxiv 2025

https://www.biorxiv.org/content/10.1101/2025.03.18.644032v1

DOI: 10.1101/2025.03.18.644032

**3. Peer review compensation:**
The current situation in which we pay 1000's of $ to the journal and the review cycle takes months, and even more than a year is ridiculus and impedes science. Compensating reviewers will increase the rate of reviewers accepting the work, and incentive to review faster - but without compromising the quality. see evidence above.

However, any type of compensation should take into account that often it's not only the PI but also grad students & postdocs help review the paper.

**4. Publishing best practices:**

**5. Other Comments:**

## 347. Anon

**Submit date:** 8/13/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Anon

**Name of Organization:** University of Florida

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 3 or option 4 seem best. I like the idea of facilitating pay for reviewers, but I also think a % cap gives more flexibility to researchers who then could potentially use that budget to publish in an expensive journal (most high impact journals are often on the higher side).

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
While I support exploring compensation as such, this is s difficult subject because it may decrease the quality of peer reviews by making people kore willing to review papers that are not in their field. I think that the editors would need to reserve the right to not pay for low quality reviews.

**4. Publishing best practices:**

**5. Other Comments:**

## 348. ROBERT R Anholt

**Submit date:** 8/13/2025

**I am responding to this RFI:** On behalf of myself

**Name:** ROBERT R Anholt

**Name of Organization:** Clemson University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I prefer option 4.

**2. Available evidence related to publication costs and proposed options:**
I usually request $5000 per year for publication costs in my NIH grants. This usually covers open access fees for one publication, ranging from $4000-$6000. This does not cover all publication costs and I need to use other sources to cover the shortfall.

**3. Peer review compensation:**
Yes, reviewers should definitely be compensated for their services, like any professional consultant.

**4. Publishing best practices:**

**5. Other Comments:**

## 349. N/A

**Submit date:** 8/13/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I think the publication fees should be limited to $2,500 per publication with yearly increases allowed for inflation. There should be no limit on total costs of publication per year so that we maximize public access to research data through publication. Capping total costs would have the negative effect of labs not publishing data. This would greatly impede scientific progress.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
I think peer reviewers should be compensated for their time by publishers. $100 per hour is appropriate.

**4. Publishing best practices:**

**5. Other Comments:**

## 350. N/A

**Submit date:** 8/13/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
The recent requirement for research results to be published in open access journals has actually increased the costs per publication, since open access journals charge more to publish. Thus, the data used to generate the numbers quoted is probably incorrect. I would imagine that the average cost per publication is now much higher. There are really no other funds available with which to pay for publication costs. It is not clear where the NIH leadership thinks investigators will get the money to be able to pay for publications if not from their grants. I do not think the current policy should be changed at all. Leave it alone.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Peer review is a professional courtesy and expectation of being a scientist. We do this to keep science as fair and unbiased as possible. We are not looking to earn extra money. Someone has to review my grants and papers and I review other people's grants and papers. We are compensated by the knowledge that other people are taking the time and effort to review our submission as we are taking the time and effort to review others' submissions.

**4. Publishing best practices:**
There are definitely more text search tools and image manipulation tools that need to be used by journal publishers today. In addition, since print journals have decreased and most people access journal articles online, the ad revenue that journals used to get to help support publication costs has greatly declined. These and other factors have driven up the cost of publishing.

**5. Other Comments:**
There are definitely more text search tools and image manipulation tools that need to be used by journal publishers today. In addition, since print journals have decreased and most people access journal articles online, the ad revenue that journals used to get to help support publication costs has greatly declined. These and other factors have driven up the cost of publishing.

## 351. Chase Weidmann

**Submit date:** 8/13/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Chase Weidmann

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I am not sure that limiting the amount of money allotted in NIH grants for publications will address any real issue. The real problem is the value placed on "elite publications", which are abusing open access policies to charge ridiculous sums to researchers for spots in their journal. Unless you can limit what all journals can charge for services, the problem and inequities that exist now will not change.

Would instead recommend requiring that NIH funded research is exclusively published through nonprofit publishing outfits, who run on tight budgets, charge APCs that are in line with this proposal, are under specific legal scrutiny, and are wholly mission-driven.

Let universities and research institutes chasing prestige foot the bill for their faculty who want to publish in beauty-prize journals.

**2. Available evidence related to publication costs and proposed options:**
Just do a comparison on what something like Cold Spring Harbor Press (nonprofit) charges versus Nature publishing group or Cell Press charges (for-profit) for open access.

**3. Peer review compensation:**
I do not think compensation for peer review would alter the landscape in any meaningful way (other than drive up publishing costs).

**4. Publishing best practices:**
I actually have no idea where most publishing costs come from, as I have rarely seen added value provided to my manuscripts beyond typesetting and formatting. My guess is that most costs are associated with advertising and expansion of reach to increase subscriptions.

**5. Other Comments:**
I actually have no idea where most publishing costs come from, as I have rarely seen added value provided to my manuscripts beyond typesetting and formatting. My guess is that most costs are associated with advertising and expansion of reach to increase subscriptions.

## 352. Bob Renden

**Submit date:** 8/13/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Bob Renden

**Name of Organization:** University of Nevada, Reno

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 4: total allowable publication cost limit per award.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 353. Amy Ralston

**Submit date:** 8/13/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Amy Ralston

**Name of Organization:** Michigan State University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
NIH should not enable journals to profit from the end-product of NIH-supported projects. NIH should establish and oversee its own publication process.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
It is wrong for journals to profit from NIH-supported research, when it relies on voluntary peer review to support its business model. Voluntary, unpaid peer-review could be expected as a condition of NIH funding, were the publication process centralized within NIH.

**4. Publishing best practices:**
Publishing is highly biased and non-transparent currently. This is not in line with the values of NIH.

**5. Other Comments:**
Publishing is highly biased and non-transparent currently. This is not in line with the values of NIH.

## 354. Lee Ann Garrett-Sinha

**Submit date:** 8/13/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Lee Ann Garrett-Sinha

**Name of Organization:** State University of New York at Buffalo

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I think what should be done is to discourage journals from charging excessive fees for publication, while at the same time allowing researchers funds to publish research as needed. In my opinion, the best way to do so is to implement Option 3 (Set a limit on allowable costs per publication and allow a higher amount to be paid when peer reviewers are compensated).

**2. Available evidence related to publication costs and proposed options:**
This article is a few years out of date, but it sought to estimate the costs incurred by publishers for articles - https://pmc.ncbi.nlm.nih.gov/articles/PMC8276192/. I feel like the maximum amount allowed per article should be the cost of publication plus a reasonable fee for profit of the publisher. That might be around $2,000 per article and should be indexed to inflation.

**3. Peer review compensation:**
No suggestions

**4. Publishing best practices:**
I think fraud detection is important as well as the costs of maintaining databases of articles for long-term storage

**5. Other Comments:**
I think fraud detection is important as well as the costs of maintaining databases of articles for long-term storage

## 355. N/A

**Submit date:** 8/13/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Well, of course, as expected from the imcompetence and lack of critical and analytical thinking typical of the Trump administration and it's appointees, nothing is mentioned as to where the funds for publication costs will come form. Does the NIH expect individual researchers to pay for these expenses out of their own pockets; or does the NIH expect publication costs to be paid by the researcehr's institution, from indirect costs?

I am astonshed and dismayed I have to point this out to the NIH, but publishing research results is integral to research, and essential to research support. It's clear that this policy is designed to "punish" journals (just because it will hurt their bottom line because Trump enjoys making institutions and individuals who are successful suffer). Don't insult our intelligence and trry to gaslight us about some bullshit about "maximizing the use of taxpayer funds to support research. If you really want to maximize the use of taxpayer funds to support research, stop cutting funding for essential and valuable research aimed at improving the health of US taxpayers and actually increase fundung for NIH-supported research.

None of the 5 Options presented about implementing a cap on allowable publication costs are reasonable or acceptable. The only acceptable Option is to not change the policy, or Option 4 is the least disagreeable.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Publication costs from NIH grants should not be used to compensate peer reviewers.

**4. Publishing best practices:**
The use of automated fraud detection capabilities should beconsidered in determining the allowability of a higher per publication cost because this will instill confidence to congress and the public that taxpayer funds used to support research is not being used for fraudulent and deceptive data placement into journals.

**5. Other Comments:**
The use of automated fraud detection capabilities should beconsidered in determining the allowability of a higher per publication cost because this will instill confidence to congress and the public that

taxpayer funds used to support research is not being used for fraudulent and deceptive data placement into journals.

## 356. Ondine Cleaver

**Submit date:** 8/13/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Ondine Cleaver

**Name of Organization:** UT Southwestern Medical Center in Dallas Texas

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I am a professor who teaches and also does basic research. To keep my lab running, I must write grants. These grants pay for all my reagents, the salaries of all trainees (graduate students, postdoctoral fellows, research assistants, technicians and bioinformaticians). It also helps pay for 50% of my salary.

Generally, I can keep my lab open with about 2-4 grants. One grant, if around about 200K, can pay for part of my salary, another person or two, and all my costs (supplies, reagents, chemicals, equipment upkeep and use, core facilities, travel to conferences, enzymes, animal costs, etc).

I used to only publish in journals that were "free". And "free" means that they pay for their business (organizing, reviewing, printing scientific articles) by subscriptions bought by universities. However, with the rise of open access (which is great in theory), I have increasingly been encouraged to pay for open access. However, my funds for this are very limited.

With the shift by NIH to making everybody that uses NIH funds pay for publishing, I now face a very real cliff. I do not have the money to do this, as of now. If I had to pick an option, I guess I would pick options 4 or 5. Simply because this helps pay for more published articles.

The real problem here is that we MUST publish to survive in academic science. "Publish or perish". NIH itself expects about 4-8 papers per grant that is awarded. Given that minimum open access costs about 3K per article, that would mean 12K-24K minimum needed.

Sure if the publishers reduce their costs, that's fine. But presumably they cannot, or their own business will fail. Hence, we are really caught between a rock and a hard place here. NIH says we MUST publish a lot. We MUST publish open access. And yet is proposing to cut funds allowable to publish.

How can we survive this?

**2. Available evidence related to publication costs and proposed options:**
The way things are going, I am starting to look for other jobs. My work as an academic professor, doing basic science, is becoming unsustainable. I have been in science for 30 years, 20 of which running my lab, publishing, securing grants from NIH and other sources. However, I will not be able to keep a lab open with the cuts we are facing on all sides.

If the NIH wants to cut costs, they need to limit how universities spend the money they receive from NIH. The indirect funds are meant to help the actual research that researchers do. It is mean to buy researchers computers, and chairs, keep the buildings from falling down, buy lightbulbs and toilet paper.

However, we know that these overhead funds are also used to employ and increasing clique of administrators that are in charge of the purse strings. They use this money to get themselves their own administrators, and keep bloating the administration. NIH could have a huge impact if they limited use of indirect funds to be used for specific things that help researchers. Not for the high salaries of Deans and their ever expanding offices.

**3. Peer review compensation:**
Of course peer review compensation would be fantastic. I peer review all the time. I do it for free, and it eats up my precious time. I do it to serve the community, and also because it allows me to see what others in the field are doing. The only problem with peer review compensation is that companies that publish are reluctant to do this, because it eats into their profits. The only company I know that did this for a while was Company of Biologists, which is a non-profit.

We will lose publishing companies and choices if the NIH decides to limit how much researchers can pay for each paper. As they will seek to make profits elsewhere.

**4. Publishing best practices:**
Yes, automated fraud detection has added to higher publishing costs. But all journals should go online only. No more paper (or at least minimal). This would help reduce costs tremendously.

**5. Other Comments:**
Yes, automated fraud detection has added to higher publishing costs. But all journals should go online only. No more paper (or at least minimal). This would help reduce costs tremendously.

## 357. Burk Braun

**Submit date:** 8/13/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Burk Braun

**Name of Organization:**

**Type of Organization:** Not Applicable

**Role:** Other

**1. Proposed policy options:**
This is in response to NOT-OD-25-138, notice to limit grant money used for publication costs.

The statement by the NIH director that is associated with this notice appears to be disingenuous. Someone has to bear the costs for publication. Either they are charged to readers, or to writers. The open access movement has moved the costs to writers, so that their work can be available openly to all in perpetuity. This is a critical goal to be maintained and extended.

If the NIH wants to set up its own journal to take the place of private publishers, that would be an excellent solution. But otherwise, grants have to cover reasonable publication costs, up to the more prestigious journals who charge higher fees. None of the listed options in this notice satisfy these goals, so the entire notice and policy needs to be rethought, fundamentally.

But we all know that the current administration listens to no reason and no person, so one wonders why one even bothers to write in response to such a transparently vacuous solicitation.

Sincerely, Burk Braun, PhD, QIAGEN

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

# 358. David Corey

**Submit date:** 8/13/2025

**I am responding to this RFI:** On behalf of myself

**Name:** David Corey

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 1. Relying on free pre-prints is silly. Robust, timely, mentoring, and fair peer review is essential.

Option 2. Global average includes garbage journals publishing low impact/low quality science. Maybe consider not funding articles in predatory journals? If you do set a standard, look at the basket of well respected journals.

Option 3. Reviewing manuscripts is part of our jobs as scientists. Introducing the complexity of payments is a bad idea that will be a distraction. Do you really want reviews from people who insist on being paid? Do you want papers in journals that need to pay people for review? Horrible concept.

Option 4. What if some is productive and publishes a bunch of papers in a year? This policy would penalize them.

Option 5. I am an editor for a journal that has an open access fee of $3900. The journal is edited entirely by practicing scientists. We pride ourselves on being innovative and responsive. We have high standards. We know how to find effective reviewers. We are open to appeals. We commission and publish Perspectives that are published at no cost for the benefit of the community. We have a Junior Editorial Board. You cannot treat all journals the same (see Option 2).

**2. Available evidence related to publication costs and proposed options:**
Again, all journals are not the same. It would be better to have a discussion on "best practices" of journals that publish transparent, robust, reproducible science. For example, do you want to consider journals edited by scientists who are actively practicing science in their own laboratories differently from publishers that use professional editors that do not run their own labs and are dependent on the journals revenue for their jobs?

**3. Peer review compensation:**
As described above, reviewing manuscripts is part of the job description. Paying for reviews introduces an unnecessary complexity into the system. I edit ~200 manuscripts a year. I find that the community is incredibly generous - it is a constant inspiration to see how reviewers donate their time and how many see their role as providing constructive advice. I almost never see the stereotype of unfair or ungenerous feedback. I doubt that other top journals have problems finding reviewers. If a journal does have a problem finding reviewers, perhaps you need to look deeper.

**4. Publishing best practices:**
The ultimate fraud detection is having good editors who can detect the biggest source of fraud -

contrived papers that cherry pick results. To answer your question, you want publishing costs to support a committed pool of editors who are dedicated to serving authors, reviewers, and the wider community. In my experience, my colleagues are lightening fast in their evaluations and communication. Such people do not grow on trees. Our compensation is modest (probably around the $50 an hour you quote). Our job is made easier by having effective back office and administrative staff so that we can focus on science. Another expense is dealing with the inevitable research misconduct that falls into our laps a few times a year.

**5. Other Comments:**

The ultimate fraud detection is having good editors who can detect the biggest source of fraud - contrived papers that cherry pick results. To answer your question, you want publishing costs to support a committed pool of editors who are dedicated to serving authors, reviewers, and the wider community. In my experience, my colleagues are lightening fast in their evaluations and communication. Such people do not grow on trees. Our compensation is modest (probably around the $50 an hour you quote). Our job is made easier by having effective back office and administrative staff so that we can focus on science. Another expense is dealing with the inevitable research misconduct that falls into our laps a few times a year.

## 359. Marina Carlson

**Submit date:** 8/13/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Marina Carlson

**Name of Organization:** Yale University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 3 in the NOT-OD-25-138 is the most reasonable, because it addresses the need to limit grant funds available to cover publication and it addresses the need for compensation for reviewers who participate in the peer-review process.

**2. Available evidence related to publication costs and proposed options:**
I have heard that PIs have to pay even larger publication fees to make their articles Open Access through the journal. I think this factor should be considered as well in cost estimates.

**3. Peer review compensation:**
Most peer-reviewers have advanced degrees, so the cost per/hour might go by degree held rather than reported profession. Further, many researchers are physician-scientists or hold multiple roles. Professional editing services charge approximately 150$/hour of effort even for consultation.

**4. Publishing best practices:**

**5. Other Comments:**

## 360. Weifeng Gu

**Submit date:** 8/13/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Weifeng Gu

**Name of Organization:** UC Riverside

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Agree with compensation. This will help improve the journal quality.

**4. Publishing best practices:**

**5. Other Comments:**

## 361. Kristen Lynch

**Submit date:** 8/13/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Kristen Lynch

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
As Department Chair, I am deeply concerned about equity and equal opportunity for all faculty. Publication in well-respected journals is required for both NIH grant renewals and tenure and promotion. Limiting funds for publication from NIH dollars means that only faculty with institutional funds (starting assistant professors with "start up funds" or senior Professors with endowed Chairs) will be able to publish in "top tier" journals. This will set up a cycle of the rich getting richer, but those who are mid-career with only NIH funding to support them will not be able to publish, thus not renew their grants or get promoted to full Professor, and need to quit research. This will cause great inequity

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 362. Adam Norris

**Submit date:** 8/13/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Adam Norris

**Name of Organization:** University of California, Riverside

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Options 1-3 seem likely to be crippling to "regular scientists" lacking substantial endowment funds to cover the costs of publishing in prestigious (and high-cost) journals. This would likely decrease the proportion of U.S. science being published in these journals.

Options 4-5 seem a reasonable balance. One important factor to add would be a yearly inflation adjustment. This lack of inflation adjustment in other aspects of NIH caps (e.g. modular budgets) causes significant issues over time.

**2. Available evidence related to publication costs and proposed options:**
The proposed caps in options 1-3 would have precluded me from publishing 8 of my lab's 10 most recent manuscripts.

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 363. N/A

**Submit date:** 8/14/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Restricting the use of funds for publication puts pressure in the wrong place. If journals are charging too much money for publications, pressure should be put on the journals to lower prices. Cutting off funds for researchers to publish their work will punish the researchers, resulting in fewer manuscripts submitted. This is especially problematic for trainees and early career researchers who need to establish a publication record.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 364. N/A

**Submit date:** 8/14/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Organizational Official

**1. Proposed policy options:**
Option 3: Set a limit on allowable costs per publication and allow a higher amount to be paid when peer reviewers are compensated.

This allows researchers to still select their desired publication and provide a fair amount. This does not limit the number of publications that a research may ask for funds to cover.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 365. Jun Liu

**Submit date:** 8/14/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Jun Liu

**Name of Organization:** Cornell University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I think none of the proposed options are good. I think the most reasonable way is to work with different journals and require that they cap their charge per publication. Most researchers do not have any other funding to pay for publication cost, the only way is from their NIH grant. Setting a limit on the number of publications or amount of fees that a researcher can charge the grant is absolutely not reasonable. It also punishes people who are highly productive on a limited sized grant. While considering compensating reviewers is a good one, it could significantly compromise scientific integrity--at present, the paper reviewing system is not the same as the NIH study section grant review system.

**2. Available evidence related to publication costs and proposed options:**
The only option that can be considered a viable option is to set the limit. However, $2000 is too low--unless the journals that charge more than that would lower their publication fee.

**3. Peer review compensation:**
I oppose this because of the potential of compromising research integrity and the possibility of certain people who are well connected with the editors to benefit from this practice.

**4. Publishing best practices:**
I don't think there should be a cap for publication cost.

**5. Other Comments:**
I don't think there should be a cap for publication cost.

## 366. N/A

**Submit date:** 8/14/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Organizational Official

**1. Proposed policy options:**
My question is how much money would it save by eliminating support for the publication cost? Eliminating the support for publication cost would result in more waste of taxpayer money if the research results can't be published and made widely available.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
I have never received any payment for conducting peer reviews for journals. I am ok with it because I know my peers are paying me back by volunteering their time to review my manuscripts

**4. Publishing best practices:**

**5. Other Comments:**

## 367. Brian Ackley

**Submit date:** 8/14/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Brian Ackley

**Name of Organization:** The University of Kansas

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I would propose a specific pool of money, separate from the award itself, that is maintained by the NIH for publications by funded investigators. The APC costs could have limits that were set by the institution, and they investigators would need to provide non-sponsored funds to go over said costs. Upon publication, the authors could request the funds paid directly by the NIH to the publisher, if they were below the APC cap. I think the benefit is that sponsored projects no longer need to estimate costs as part of the total budget, it becomes more direct to link publications to sponsored projects, and encourages PIs to identify places to publish research that fits the NIH budget for publications. A time limit on publications from awards would be important, for example, submitted within 1 year of the end of the award, etc., to encourage submissions in timely manner.

I do think that taxpayer funds supporting research includes making the results of that work public, and available to the taxpayer, so it is an important part of the NIH mission.

**2. Available evidence related to publication costs and proposed options:**
There are places to put work that is somewhat publicly available, FigShare, YouTube, etc., but we have little control over those repositories and therefore, it does not seem like a viable long term plan.

**3. Peer review compensation:**
While a good idea in principle, I think financial compensation for peer reviewers has a number of structural problems. Is there a quality of review component? Would editors be able to decide whether to pay or not? I could imagine people accepting review invitations and then just sending back "Accept" or "Reject" without much work. Do reviewers need to have it in on time? I just think the model gets very confusing and difficult to agree on standard practices.

**4. Publishing best practices:**
This is a broader concern than just publication costs, but can definitely lead to such increases. I do think that as generative AI and LLM tools become more accessible, tools to detect their use need to be prioritized. In terms of fraud and/or scientific misconduct, those are very serious issues, and I would encourage the NIH to work with the community to develop rubrics by which we will evaluate and, if necessary, retract papers that demonstrate specific types of concerns. At present, there is a significant population of people doing this work pro bono, but also without clear guidance.

**5. Other Comments:**
This is a broader concern than just publication costs, but can definitely lead to such increases. I do think that as generative AI and LLM tools become more accessible, tools to detect their use need to be

prioritized. In terms of fraud and/or scientific misconduct, those are very serious issues, and I would encourage the NIH to work with the community to develop rubrics by which we will evaluate and, if necessary, retract papers that demonstrate specific types of concerns. At present, there is a significant population of people doing this work pro bono, but also without clear guidance.

## 368. N/A

**Submit date:** 8/14/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 369. Paul Babitzke

**Submit date:** 8/14/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Paul Babitzke

**Name of Organization:** Penn State University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I favor a modified option 2.

Perhaps $2,000 per paper is a bit too low. In my experience, most journal publication costs are closer to $2,500-$3,000 and I can assume that is near the real cost of producing the paper from submitted documents. The fact that some of the prestigious journals charge $5,000-$13,000 for open access is absurd (e.g. Nature journals).

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
I have never been compensated for reviewing any of the over 500 manuscripts in my 31 year career as a university professor. I don't think we should be paid for this service because others review my submitted manuscripts.

**4. Publishing best practices:**

**5. Other Comments:**

## 370. Christopher Vann

**Submit date:** 8/14/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Christopher Vann

**Name of Organization:** Duke University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Of the listed options, option five seems to be the most logical approach. This option provides a balance of providing funding to disseminate our research as it relates to NIH funded grants while also not penalizing smaller awards in a disproportionate manner. While the research we conduct with federal tax dollars is among the most critical aspects of our work, it is also imperative that the work gets disseminated, and this is almost equally as important. Looking at this from a different vantage point, if researchers do not have adequate means to publish findings from the work being done, it is increasingly more likely that tax dollars will be allocated to research designs that are already being executed - in some cases producing null or negative results while also potentially affecting innovative research designs.

**2. Available evidence related to publication costs and proposed options:**
As a researcher on the academic side, our careers are tied to many metrics, including publications - with manuscripts in higher impact journals being weighed heavier for promotion. It is also important to recognize that publications from a grant funded by tax dollars are a metric of success for the grant and publications are also evaluated in the application stage. Of interest, top journals in my field - which include Nature and its family of journals, Cell and its family of journals, and others like JAMA and NEJM - all have higher impact factors which seemingly coincide with the upper range of APC costs (range $7,000-$12,000+).

**3. Peer review compensation:**
Compensation for peer review is an interesting idea that I am admittedly on the fence about. Having served as a reviewer for numerous journals across multiple publishers, I have had mixed experiences. In my opinion, reviewing manuscripts prior to publication is part of service to the academic and research community which is often built into an academic's FTE in some capacity. I do think that if reviewers ultimately start to get financial compensation, the cost to publish will increase in an effort to cover these additional expenses. I also believe that if this model were implemented, there would have to be metrics which dictate the amount of compensation which could be related to time spent, thoroughness of the review, as well as other factors. Additionally, this does not account for the reviews that ultimately end up in rejection where APC fees are not paid.

**4. Publishing best practices:**
While more a journal/publisher specific comment, many journals expect ad-hoc reviewers to be able to provide a critique on statistical analyses performed for an investigation. Most people who serve as reviewers have at least had basic statistics but are also often not on a solid foundation to provide

meaningful insight into the statistical analysis of a particular study - especially as the biomedical field in particular continues to shift toward more robust modeling. If publishers/journals could implement independent statistical review, this may be a helpful tool moving forward.

**5. Other Comments:**

While more a journal/publisher specific comment, many journals expect ad-hoc reviewers to be able to provide a critique on statistical analyses performed for an investigation. Most people who serve as reviewers have at least had basic statistics but are also often not on a solid foundation to provide meaningful insight into the statistical analysis of a particular study - especially as the biomedical field in particular continues to shift toward more robust modeling. If publishers/journals could implement independent statistical review, this may be a helpful tool moving forward.

## 371. Abdullah Ozer

**Submit date:** 8/14/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Abdullah Ozer

**Name of Organization:** Cornell University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I support "Option 3: Set a $2,000 limit on allowable costs per publication and allow up to $3,000 when peer reviewers are compensated." for now. However in time, NIH should switch to a centralized publication venue (see my comments for Q4 below).

**2. Available evidence related to publication costs and proposed options:**
.

**3. Peer review compensation:**
I support the idea of Reviewer Compensation.

**4. Publishing best practices:**
I suggest all NIH funded work should be published in only in a centralized and publicly available database/journal such as PMC Central. This will put every paper in equal footing and the best performed work will get citations, not simply because they are published in a flashy journal.

Also, I think there is value in publishing/documenting some of the critical negative results. Often many labs try an idea that has been tried many times by others. This leads to huge expense. If one can see, what has been tried and failed, finding a solution can be achieved more economically if one were to bypass initial failures and directly test novel ideas.

**5. Other Comments:**
I suggest all NIH funded work should be published in only in a centralized and publicly available database/journal such as PMC Central. This will put every paper in equal footing and the best performed work will get citations, not simply because they are published in a flashy journal.

Also, I think there is value in publishing/documenting some of the critical negative results. Often many labs try an idea that has been tried many times by others. This leads to huge expense. If one can see, what has been tried and failed, finding a solution can be achieved more economically if one were to bypass initial failures and directly test novel ideas.

# 372. Randy Schekman

**Submit date:** 8/14/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Randy Schekman

**Name of Organization:** Howard Hughes Medical Institue and University of California, Berkeley

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I favor a funding cap on open access fees as well as a mandate for open access publication for all research supported by federal funds. The problem with the options that have been proposed is that many investigators will simply cover the difference with discretionary funds or private grants from agencies that have no cap or open access mandate. Furthermore, any specific $ number will cause those journals which have lower open access fees to raise their fee to that level. The problem is with the commercial journals that charge exorbitant open access fees. The fee structure for these commercial journals can not be justified by any reasonable standard of profit. Indeed, the publishers Springer Nature and Elsevier have among the highest profit margins of any business entity in the World.

I suggest another way to deal with the gross imbalance in open access fees is for the Federal government to negotiate a fair price structure with the publishers, just as HHS is now able to negotiate drug pricing with the pharmaceutical industry. Without the power of the Federal government to mandate a cost limit, many publishers will continue to extract excess fees from authors who have multiple sources of support.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
I do not favor monetary compensation for peer reviewing. Non-commercial journals such as those run by many scientific societies have poor profit margins and can ill-afford any additional expense in providing service to their members. In place of monetary compensation, I suggest a greater incentive placed on credit for providing valuable peer review reports. Such reports should be compiled by each investigator to present as evidence of scholarly accomplishment and list on grant proposals and promotion reviews.

**4. Publishing best practices:**
Journals must take greater responsibility in assessing cases of errors or willful compromises of scientific integrity as in plagiarism, falsification or fabrication of data. Many of the most selective journals are quite reluctant to allow corrections or retractions for fear of loss of credibility and prestige. The government could have a role in the evaluation of journals and publishers with sanctions issued on those publishers that have the poorest track record.

**5. Other Comments:**
Journals must take greater responsibility in assessing cases of errors or willful compromises of scientific

integrity as in plagiarism, falsification or fabrication of data. Many of the most selective journals are quite reluctant to allow corrections or retractions for fear of loss of credibility and prestige. The government could have a role in the evaluation of journals and publishers with sanctions issued on those publishers that have the poorest track record.

## 373. Moriah Beck

**Submit date:** 8/14/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Moriah Beck

**Name of Organization:** Wichita State Unviersity

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I support Option 5 as the most effective approach for balancing the dual goals of maintaining flexibility for investigators while ensuring responsible stewardship of taxpayer funds. By placing limits on both per-publication APC costs and the overall annual APC expenditures charged to a grant, this approach provides a clear framework that aligns with NIH's intent to maximize the impact of research funding.

This dual-limit structure allows investigators to make strategic choices about where and how to publish, ensuring that high-quality open access dissemination remains possible while discouraging disproportionately high publication costs. The flexibility to select venues within these parameters is particularly important given differences across disciplines in publication costs and norms.

I also support Option 5 because it scales more equitably with the size of the grant and the number of publications produced. Smaller awards often operate with tighter budgets and fewer publications per year, while larger grants may generate many outputs. A combined cap system helps ensure that publication costs remain proportional to the overall scope and funding level of the project, avoiding situations where an excessive share of a grant's budget is directed toward APCs rather than research activities.

**2. Available evidence related to publication costs and proposed options:**
See attached document.

**3. Peer review compensation:**
My concern is that paid peer review currently is an incentive for bad practices. Paid or incentivized peer review systems can create perverse incentives. If reviewers are financially compensated per manuscript, there is potential for "tit-for-tat" behaviors—for example, agreeing to favorable reviews in expectation of reciprocal treatment, or rushing reviews for payment rather than rigor. This can undermine the integrity of the scholarly record, increase the risk of biased or cursory evaluations, and ultimately reduce trust in publications supported by taxpayer funds.

In the context of APC policies, NIH could consider additional safeguards to ensure that APC-funded publications maintain robust, unbiased peer review and avoid incentives that could compromise ethical standards.

**4. Publishing best practices:**

**5. Other Comments:**

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/NIH_APC_feedback.docx

## 374. Phillip D. Zamore, PhD

**Submit date:** 8/14/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Phillip D. Zamore, PhD

**Name of Organization:** University of Massachusetts Chan Medical School

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
All five policy options appear to be intended to reduce the role of peer-review and to discourage open-access publication in the biomedical sciences. The return on investment in NIH funded research more than pays for the amount spent funding it. What is the evidence the current system doesn't maximize the efficiency use of taxpayer funds? Moreover, the calculations in the proposal were clearly not peer reviewed. They exemplify the worst type of manipulating data to support a pre-determined outcome. Allow me to explain.

The calculation for the average global APC ($1,235.51) assumes that every archival journal is relevant to every field of NIH science. This is, of course, false. For any given NIH awardee, there will be (1) a set of "high-prestige," often expensive, journals shared by all fields; (2) invariably expensive, prestigious journals with greater specialization; (3) and set of perhaps ten archival journals generally read by a specific sub-field. Accordingly, for each individual grant recipient's direct cost budge, Category 3 should have no more than a weight of ~50%. Instead, the OSP has taken Category 1 and diluted it with all the thousands of journals in Categories 2 and 3, giving disproportionate weight to journals that are irrelevant to most awardees.

In theory, an NIH grant recipient might use some other source of unrestricted funds to pay publication costs. In practice, the current efforts to impoverish universities and medical schools will eliminate all such funds. The effect of any of these poorly thought out policies will be to reduce the reach and quality of US science. I am confident that my Chinese colleagues will have no problem pay publication charges from their grants, no matter how expensive. If this is part of the overall strategy to allow Chinese science to overtake the US, it will be highly effective.

**2. Available evidence related to publication costs and proposed options:**
My laboratory typically publishes 3–5 papers per year; the publication costs for these average ~$7,000 per paper.

**3. Peer review compensation:**
Peer review should never be compensated. For a tenure-track or tenured professor, peer review is a requirement for the job. Scientists are already compensated for peer-review. Paid peer-review is called consulting. Consulting does not count towards academic promotion.

**4. Publishing best practices:**
High quality editing by journal editors is typical at the top journals. The NIH should promote high quality editing at less prestigious journals to ensure clear writing and clear thinking. Open-access publishing is

the number one driver of publication costs. Open-access in Nature costs $10,690. The NIH should negotiate directly with the journal publishers to pay them directly for all publication costs, leaving no costs to be paid by research grants.

**5. Other Comments:**

High quality editing by journal editors is typical at the top journals. The NIH should promote high quality editing at less prestigious journals to ensure clear writing and clear thinking. Open-access publishing is the number one driver of publication costs. Open-access in Nature costs $10,690. The NIH should negotiate directly with the journal publishers to pay them directly for all publication costs, leaving no costs to be paid by research grants.

## 375. Marina Krykbaeva

**Submit date:** 8/14/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Marina Krykbaeva

**Name of Organization:** University of Massachusetts Chan Medical School

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Limiting the amount of grant funding researchers can spend on publication is a terrible idea. In many fields, publication costs are extremely high. For example, the top tier journals in biology require fees in the range $2,000 - $5,000 to publish for subscribers only and around $10,000 to publish open-access. This will ensure that fewer studies are published without a paywall and the taxpayers that fund this research will only be able to read the results after paying a fee. Furthermore, it will slow down the rate of publications as researchers will try to spread their funds across multiple years to prevent exceeding the limit of spending on publication. The better option is to address the journals themselves and negotiate lower publication costs.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 376. Brianna Bramato

**Submit date:** 8/14/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Brianna Bramato

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Publications should not be limited. Our society grows with every new piece of knowledge we acquire and all a monetary-publication limit would do is hinder new information getting to the public and thereby hinder scientific discoveries and medical advancements. Publications are necessary to both the tax paying public and the inventor/ researcher responsible for finding the data. If the number of publications were limited, the data would not be put out for free, it would be held onto until proper credit and compensation could be afforded to the researcher and their organization.

**2. Available evidence related to publication costs and proposed options:**
These are the costs to publish in the associated journals.

eLife

$3,000

RNA

$1,000

Cell Reports

$5,620

Nature Communications

$6,990

Nature

no charge for subscriber access only, $10,690 for open access

Science

$650 for the first color figure and $450 for each additional color figure, not sure if there is an OA fee, so ≥$2,000

Structure

no charge for subscriber access only, but $550 for the first color figure and $275 for each additional color figure, so ≥$1,375

Molecular Cell

no charge for subscriber access only, $10,40 for open access

NSMB

no charge for subscriber access only, $10,690 for open access

NAR

$4,192

Cell

no charge for subscriber access only, $11,400 for open access

PLoS ONE

$2,382

PLoS Biology

$5,500

PLoS Genetics

$3,043

Science Advances

$4,500

**3. Peer review compensation:**
I think a small monetary compensation could be appropriate, that would incentivize reviewers to take time out of their schedule to do the review and fairly compensates for the time it takes to properly review. A different type of compensation could be a "publication credit" of some sort. I envision a govt. voucher provided for each review to use towards publishing in any journal of the reviewer's choosing.

**4. Publishing best practices:**
Artificial intelligence is moving into the scientific publications very fast. I absolutely see the need to use automated fraud detection capabilities however, I believe the increased per publication cost should be put onto those who submit a fraud article, not put onto the general community trying to publish real data.

**5. Other Comments:**
Artificial intelligence is moving into the scientific publications very fast. I absolutely see the need to use automated fraud detection capabilities however, I believe the increased per publication cost should be put onto those who submit a fraud article, not put onto the general community trying to publish real data.

## 377. Sarah Certel

**Submit date:** 8/14/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Sarah Certel

**Name of Organization:** University of Montana

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Neither of the options achieves the goal of maximizing taxpayer funds as without publication of a grant's findings, the knowledge is not available.

However, the least onerous of the five options is, #4 Set a limit on the total amount of an award that can be spent on publication costs.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
NIH should determine that  a journal that pays peer reviewers has set clear guidelines to avoid conflicts of interest and maintain quality standards.

**4. Publishing best practices:**
The cost of digital infrastructure and long-term preservation of articles should be considered.

**5. Other Comments:**
The cost of digital infrastructure and long-term preservation of articles should be considered.

## 378. Jonathan Watts

**Submit date:** 8/14/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Jonathan Watts

**Name of Organization:** UMass Chan Medical School

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
It would be more effective to work with publishers to push their costs down rather than putting the burden on us academics -- this proposed policy effectively disallows us from publishing our work open access in good journals - or at least prevents us from doing it very often. That works against the goal of disseminating our NIH-funded research to the broadest audience possible.

**2. Available evidence related to publication costs and proposed options:**
The cost to publish in high quality journals is much higher than the costs proposed here. This policy will end up being a penalty on schools or institutions with fewer of their own resources to pay the publication fees using separate funding.

For example, Nature family journals often cost between $5K and $10K to publish open access. Even Nucleic Acids Research, a more traditional open access journal in my field, costs $3600.

The numbers are unrealistic because they are based on an average over all journals, while most cheap journals are terrible quality (to the point that they are considered predatory in some cases).

**3. Peer review compensation:**
The problem is that the time required for good peer review is too substantial to be worth a bit of money (ie. for most good peer reviewers, their 'hourly value' is high enough that they still wouldn't do peer review for the sake of the money). Paying peer reviewers might tempt people to accept many peer review requests for the sake of the money, while rushing through the work. So it would need to be accompanied by a careful assessment of the peer reviewers' quality. Right now, at least people are typically doing it for the right reasons - i.e. because they care about quality in the scientific enterprise.

**4. Publishing best practices:**

**5. Other Comments:**

## 379. J Christopher States

**Submit date:** 8/14/2025

**I am responding to this RFI:** On behalf of myself

**Name:** J Christopher States

**Name of Organization:** University of Louisville

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
A limit on per publication costs and on total publication costs allowable on grants may be workable. A caveat: those with additional resources may be able to supplement and publish in more expensive journals. That could set up a two tier system.

**2. Available evidence related to publication costs and proposed options:**
There is wide variation in open access fees. Personally, I find fees of $4,000 and higher to be off-putting, especially with limited grant resources.

**3. Peer review compensation:**
Peer reviewer compensation is a complicated issue. On the one hand, we have been providing uncompensated service for a very long time. On the other hand, there are those who would spend more (if not all) of their time reviewing for compensation. I am not sure that would incentivize quality, knowledgeable review. Then again, editors are finding it extremely difficult to get timely reviews.

**4. Publishing best practices:**
Fraud detection is at best in its infancy. AI detection is fraught with false positives and the situation will get worse as more manuscripts & grant applications are submitted for screening. A feedback loop will develop.

**5. Other Comments:**
Fraud detection is at best in its infancy. AI detection is fraught with false positives and the situation will get worse as more manuscripts & grant applications are submitted for screening. A feedback loop will develop.

# 380. Brandon Stell

**Submit date:** 8/14/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Brandon Stell

**Name of Organization:** The PubPeer Foundation

**Type of Organization:** Other

**Type of Organization - Other:** California 501(c)3 nonprofit

**Role:** Investigator/Researcher

**1. Proposed policy options:**
As President of The PubPeer Foundation and Founder of the website PubPeer, I have observed that the scientific community is bound to the current publishing paradigm not because it is the most effective way to share research, but because career evaluation systems have been built around it. Evaluators, pressed for time, rely on shortcuts like bibliometrics (impact factors, h-index, journal prestige) to assess researchers and their work. This has entrenched a system where journal title often outweighs the actual quality and content of the science.

The way to free science from this bind is to separate evaluation from publication. We can do this by building a secondary evaluation layer alongside the scientific record, where scientists provide open, expert assessments of published articles—whether in journals or on preprint servers. This approach would:

Replace metrics with expert judgment while requiring no sudden overhaul of current publishing norms.

Allow the evaluation layer to grow organically until it reaches a critical mass, at which point it will become more informative than bibliometric measures.

Once established, enable scientists to publish in any format they choose—including free and open platforms—without harming career prospects.

When the focus shifts to the content of articles instead of publication counts and journal titles, the incentive to push papers into prestige journals will fade. The scientific record will be strengthened by ongoing expert evaluation rather than a one-time pre-publication review.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
At PubPeer, we have direct evidence that financial incentives dramatically improve participation and quality in post-publication review. In 2024, we introduced a $1000 monthly award for the best review that added something genuinely new to an article. This is a nearly life-changing sum for a PhD student or postdoc :-), and the impact was immediate: the number and quality of in-depth, evidence-based reviews increased sharply. These types of reviews can now be found on the PubPeer front page, serving as both recognition and a model for others.

If scientists saw that NIH or other funding bodies were offering similar rewards for high-quality public reviews, participation would accelerate dramatically—in effect, turbocharging the growth of an expert evaluation layer.

Such incentives could be combined with:

Prestige-based recognition (formal awards or credentials for CVs).

Integration into funding and hiring evaluations so that reviewing counts as meaningful scientific output.

**4. Publishing best practices:**

**5. Other Comments:**

# 381. Carolyn Klinge

**Submit date:** 8/14/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Carolyn Klinge

**Name of Organization:** University of Louisville School of Medicine

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I understand the desire to cap publication costs. Will NIH be able to negotiate or mandate that publishers abide by a cap of $2k/publication AND that this is open access publication?

**2. Available evidence related to publication costs and proposed options:**
I recently paid $4090.00 for an open access publication in Functional and Integrative Genomics (Springer). I think the cap of $2k is too low.

**3. Peer review compensation:**
I have never received compensation for manuscript reviews. I wonder if this would incentive people- economically the answer is yes. I am an editor of a peer-reviewed journal which doesn't provide compensation to reviewers and think that people would say yes to review if they were appropriately compensated. However, I think people with more time (less likely to be PIs on grants) would be more likely to review than PIs.

**4. Publishing best practices:**
As an editor for a peer-reviewed journal in the Elsevier publishing empire, every submitted manuscript comes to me already evaluated for 'overlap' with published papers and a percent of overlap. This is done line-by-line and has references, so I carefully look at that to determine if I will reject the paper or send it out for reviwe. I use an online tool called Proofig to evaluate images within that manuscript. As an editor, I really need a tool to compare images in that submitted paper with all the published literature from that author and institution to be sure people are not reusing published images/data- especially if they are re-labeling these images to (falsely) indicate that they are different proteins or treatments. I don't see a journal using these tools should affect the cost I pay the publisher to publish a manuscript. The cost should be borne by the publisher. I think that NIH has the power to mandate costs to these profit-making scientific publishers.

**5. Other Comments:**
As an editor for a peer-reviewed journal in the Elsevier publishing empire, every submitted manuscript comes to me already evaluated for 'overlap' with published papers and a percent of overlap. This is done line-by-line and has references, so I carefully look at that to determine if I will reject the paper or send it out for reviwe. I use an online tool called Proofig to evaluate images within that manuscript. As an editor, I really need a tool to compare images in that submitted paper with all the published literature from that author and institution to be sure people are not reusing published images/data- especially if they are re-labeling these images to (falsely) indicate that they are different proteins or

treatments.  I don't see a journal using these tools should affect the cost I pay the publisher to publish a manuscript.  The cost should be borne by the publisher.  I think that NIH has the power to mandate costs to these profit-making scientific publishers.

## 382. N/A

**Submit date:** 8/14/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Other

**Role – Other:** Research Administration

**1. Proposed policy options:**
Out of the options suggested by the NIH, I think either Option 3 or Option 4 seem to have the best balance of providing agency and fairness to researchers as well as ensuring that grant funds related to publication costs are spent with thought and discretion. I also commend the NIH for their commitment towards best research practices by having options available that account for making sure reviewers are paid fairly for their time and effort. Unpaid reviewership has never seemed a sustainable (and perhaps even ethical) practice to me, and I think it's important that we move research forward in a manner that doesn't rely on the goodwill of investigators without fair compensation.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 383. Hilaire Thompson

**Submit date:** 8/14/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Hilaire Thompson

**Name of Organization:**

**Type of Organization:** Not Applicable

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Prefer option 2 followed by option 4.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
I feel like having peer reviewers compensated (beyond continuing education credits) could undermine the rigor of the process. Folx would be incentivized to complete a quantity of reviews over quality of review.

**4. Publishing best practices:**

**5. Other Comments:**

## 384. Ron Gregg

**Submit date:** 8/15/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Ron Gregg

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 2 would be the best ($2000/publication). This should not depend on peer reviewer compensation. Reviewing  is one responsibility PIs should do to support science, it should be provided free of fees.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
PIs should not be compensated for reviewing. This is one of our duties as faculty and scientists

**4. Publishing best practices:**
Reviewed by statisticians as a separate part of the review process. Most journals do not do this, but they should.

**5. Other Comments:**
Reviewed by statisticians as a separate part of the review process. Most journals do not do this, but they should.

## 385. N/A

**Submit date:** 8/15/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
The following option I believe is the most flexible "Option 4: Set a limit on the total amount of an award that can be spent on publication costs." Journal publication fees range above and below the $2000 proposed amount; if a journal cost is >$2000, that would create budgetary headaches and disincentives to publish in these journals, some of which are highly regarded journals. Additionally, Option 4 potentially allows for multiple publications to be covered. With this knowledge, a researcher can better strategize how many publications can be covered by the award.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 386. N/A

**Submit date:** 8/15/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 4: Set a limit on the total amount of an award that can be spent on publication costs.

If NIH is seeking to limit overall costs, this is the only option that allows flexibility to researchers/institutions. NIH requires open access publications. But high quality open access journals are expensive. Researchers should be able to decide whether they want 1-2 high impact, 'expensive' publications or whether they want several lower impact, 'cheaper' publications according to project and professional determinations.

**2. Available evidence related to publication costs and proposed options:**
Respected quality publishers charge much more than $2000 for open access publication on average. These costs are even higher for specialty journals where researchers want to publish their work. Cheaper open access fees are usually in low impact, low quality (often predatory) journals.

For example, a few well-regarded, non-predatory publishers have the following open access fees:

The PLOS fees for a 'regular' research article start at $2382, and goes up for specialty PLOS journals https://plos.org/fees/

Oxford University Press open access fees average $5080 https://academic.oup.com/pages/open-research/open-access/charges-licences-and-self-archiving

Wiley Open Access fees average $2348 for full open access journals and $3781 for hybrid journals https://authorservices.wiley.com/author-resources/Journal-Authors/open-access/index.html

Proceedings of the National Academy of Science open access fees start at $2520 and go to $5495 https://www.pnas.org/author-center/publication-charges

**3. Peer review compensation:**
I have previously received credits towards an open access publication for reviewing for a journal, rather than direct payment. This to me was a fair compensation model as it simultaneously incentivized peer review and facilitated open access publishing.

**4. Publishing best practices:**
Journals and publishing houses who employ editors (managing, associate, academic, copy editors, etc.) rather than relying on volunteer service for these activities can at least partly justify higher costs. Some journals have tried to skim on these costs by consolidating or eliminating functions (such as copy editors, or reducing the size of the paid editorial board), leading to worse publication experiences, or

use volunteer (or very low paid) labor for associate and academic editors to handle most of the editorial process.

**5. Other Comments:**
Journals and publishing houses who employ editors (managing, associate, academic, copy editors, etc.) rather than relying on volunteer service for these activities can at least partly justify higher costs. Some journals have tried to skim on these costs by consolidating or eliminating functions (such as copy editors, or reducing the size of the paid editorial board), leading to worse publication experiences, or use volunteer (or very low paid) labor for associate and academic editors to handle most of the editorial process.

## 387. N/A

**Submit date:** 8/15/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
The stated goal is important, but doesn't account for the current environment regarding publication of research results. The results of research must be publicized in order for taxpayers to get the maximal benefit of the research, as publication ensures that the results are widely read and cross-checked for validity, both by peer-reviewers and by other researchers in related fields. As such, grant funding for publication costs is essential, as it directly contributes to the goal of providing research benefits to taxpayers. As such, Option 1 is not tenable. Another note is the importance of open-access publishing. Many for-profit journals hold articles behind paywalls, limiting access to the information and all but excluding the public from being able to see the research results brought about by taxpayer funds. These journals require fees occasionally in addition to general publication fees in order to make an article open access.

Additionally, in order to maximize the impact of research results, investigators try to publish in widely read journals, which leverage their prestige to increase publication costs. Unfortunately, some of the most widely read journals have publication costs that almost always exceed $2000, which would make Options 2 and 3 challenging for many researchers.

As such, Options 4 and 5 are more reasonable, but still penalize investigators that are more productive when it comes to research results. If investigators hope to publish more than one paper in a year related to a particular grant award, they will not have the funds to do so with most of the proposed options. I believe that, of the proposed options, Option 4 is the best in terms of still enabling investigators to publish on a semi-regular basis, albeit in journals that are not as widely read. However, it would be better to not restrict the amount of grant funds that can be used to cover publication costs in order to ensure that research results are adequately publicized so that their public benefit may be maximized.

**2. Available evidence related to publication costs and proposed options:**
In order to maximize the benefit of research results, they should be as accessible as possible, ideally published in an Open Access journal so that the public can read the results without a paywall. However, the costs of many journals for publishing articles open access exceed the limits suggested in the options.

https://www.cell.com/open-access

https://elifesciences.org/about/submit-your-research

https://www.nature.com/nature/for-authors/publishing-options

https://www.pnas.org/author-center/publication-charges

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 388. Eric Alani

**Submit date:** 8/15/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Eric Alani

**Name of Organization:** Cornell University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
In my opinion Option 3 would likely encourage researchers to publish in society journals which are non-profit and are run by academics. Of the five options this seems like the best in terms of recognizing that most researchers have very few options available to cover publication costs besides grant funding. The reality is that publication costs are part of the research enterprise; while peer reviewers are not compensated there are significant costs associated with reviewing editing and formatting papers for publication. Importantly there must be a robust mechanism to cover them because disseminating research findings is the most important (and visible) way to show that work was performed on a funded research project .

**2. Available evidence related to publication costs and proposed options:**
My publications costs have ranged from 2K to 5K per paper.

**3. Peer review compensation:**
As mentioned above, I feel that Option 3 is the most reasonable one because it recognizes that reviewers do not receive compensation when reviewing for journals that make a profit. I am not as concerned about having reviewer compensation when publishing in non-profit /society journals.

**4. Publishing best practices:**

**5. Other Comments:**

## 389. Melissa Rethlefsen

**Submit date:** 8/15/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Melissa Rethlefsen

**Name of Organization:** University of New Mexico Health Sciences Center

**Type of Organization:** Academic Institution

**Role:** Institutional Information Sciences Professional/Librarian

**1. Proposed policy options:**
I appreciate the NIH's interest in seeking to reduce the double costs to institutions (subscriptions plus APCs) and to reduce spending on APCs. Creating new paths for publication that are just as trustworthy, yet are more economically sustainable, are essential for research long term. However, we have seen slower uptake of these initiatives, such as models like eLife or Open Research Europe or Octopus. The proposed options, however, may not promote the outcomes NIH is seeking. The basis of options 2 and 3 is also a deceptive cost analysis for biomedicine; looking at all of the journals in DOAJ when the majority of journals are not journals that NIH-funded researchers would either choose to publish in or could publish in, based on subject matter, does not show a realistic picture of current APCs. Journals with expensive APC costs very often have higher production costs, including illustration creation, statistical review, high-level editing and formatting services, and more. Because of the care taken by many of these journals, they are often the top choices for publishing.

Option 1: Since the current NIH policies require immediate availability of manuscripts associated with NIH research funding in PubMed Central, this may impact researchers' ability to publish in a journal of their choice, since not all journals will allow immediate publication in PubMed Central.

Option 2: Having a maximum cost may artificially drive up costs for some journals, which would now charge the NIH rate instead of their cheaper rates.

Option 3: Though a noble desire and one that many scientists would like to see happen due to economic realities of publishing, many academic institutions would not allow their researchers to receive compensation for peer review, much in the same way that many have to turn down honoraria and speakers' fees. There are significant barriers to paying peer reviewers, including whether or not they would be allowed to receive payment. This could distort the pool of peer reviewers.

Option 4: Of the five options, this seems the best path. This will enable researchers to continue to exercise their choice on where to publish, but still force researchers to think strategically about their dissemination venues. I would recommend, however, varying the amount based on the number of years of the grant term and considering multiple cut points for percentages of funding based on analysis of prior grant expenditures and not budgets.

Option 5: This option is directed at publishers with strong reputations and heavy editorial arms that go beyond what can be done by smaller journals. This seems to be directed at impacting the market, but it is unlikely it will do so, but will instead contribute to better funded labs and non-federally funded labs dominating the major dissemination venues instead of allowing for a more even playing field.

**2. Available evidence related to publication costs and proposed options:**
The United States should learn from the lessons of Plan S and cOAlition S in the European Union. These programs are achieving real change. National support of science publication and universal access to information is costly, but impactful.

**3. Peer review compensation:**
This should be determined by researchers and not NIH.

**4. Publishing best practices:**
1. Paid statistical reviewers

2. Paid editorial staff and editors, for whom this work is a profession and not a side gig

3. Illustrators

4. Researchers on publication ethics, publication practices, peer review, etc.

5. Ability to conduct research within a journal to determine impacts on rigor, transparency, etc

6. Graphic designers

7. News arms that bring substantive value to researchers

8. Paper mill detection, plagiarism detection, research ethics officers, etc; all are costs for major publications and publishing houses

**5. Other Comments:**
1. Paid statistical reviewers

2. Paid editorial staff and editors, for whom this work is a profession and not a side gig

3. Illustrators

4. Researchers on publication ethics, publication practices, peer review, etc.

5. Ability to conduct research within a journal to determine impacts on rigor, transparency, etc

6. Graphic designers

7. News arms that bring substantive value to researchers

8. Paper mill detection, plagiarism detection, research ethics officers, etc; all are costs for major publications and publishing houses

## 390. Jochen Zimmer

**Submit date:** 8/15/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Jochen Zimmer

**Name of Organization:** University of Virginia

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I believe the NIH should not impose any limitations on the budget that can be spent on publications. As the number of publications, and the associated costs, can vary substantially from year-to-year, imposing limits on publication costs could harm the future career options of our trainees. This is because some investigators may not be able to afford publishing their results or are forced to publish in less visible journals, which could affect the competitiveness of our students and postdoctoral researchers on the job market.

Instead, I would advocate for imposing immediate open access on all NIH-sponsored publications. While this comes at a higher publication cost (which should be addressed separately), I believe federally-sponsored research should be made accessible immediately to the taxpayers and the general public at no additional cost. At a minimum, the NIH could request deposition of the final (author-accepted) manuscript in publicly accessible repositories.

**2. Available evidence related to publication costs and proposed options:**
NA

**3. Peer review compensation:**
I believe peer review compensation is not a good idea. It may encourage individuals to 'review for compensation', rather than scientific curiosity and service to the community.

**4. Publishing best practices:**
Fraud detection capabilities are very important. If not already provided by departments or employers, licenses may have to be purchased, which increases publication costs.

**5. Other Comments:**
Fraud detection capabilities are very important. If not already provided by departments or employers, licenses may have to be purchased, which increases publication costs.

## 391. N/A

**Submit date:** 8/15/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
The cost to publish has shifted from libraries onto the researchers themselves. Often. grant budgets barely cover the costs of the project. The fact that grant sizes have not increased in line with inflation further supports the fact that there just isn't enough room in grant budgets to cover publishing as well as the science work itself. Increasingly, journals offer no option except paid open access. Whether this is in the spirit of open science or simply due to economic expediency, it's become the reality. Several years ago, NIH enacted a policy that journals are required to deposit manuscripts in PubMed Central with a 1-year embargo. This allows for open access of publicly-funded science. Still, when journals do not offer an option to publish at no cost to the researcher, it effectively still creates a barrier. It would be great if there were a policy such that the federal government would negotiate a contract with publishers that would cover the cost of at least a basic tier of open access publication if no free/embargoed option is available.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
It is hard to justify providing free editorial services to for-profit journals, especially these days when workloads are higher than ever. Yet, this leads to a situation where good reviewers are too busy to review and the peer review process is held up by mostly mediocre reviewers. With no incentives to review, priorities are elsewhere. Perhaps financial compensation would help, though I suggest that this won't be financially viable. An alternative would be something of real value, such as substantial discounts on publishing fees. Honestly, the real problem is the workload, and the real source of the stress is increased administrative and other demands on time, with decreased research funding. Increased access to funds to support research support staff in my own research program would free up lots of bandwidth for activities like mentoring and reviewing articles. Yet, these days, all staff must be 100% soft money, which is not a viable way to run a lab with any sort of capacity.

**4. Publishing best practices:**

**5. Other Comments:**

## 392. Kevin Wang

**Submit date:** 8/16/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Kevin Wang

**Name of Organization:** University of Pikeville

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 5: Set a limit on both the per publication cost and the total amount of an award that can be spent on publications. NIH could limit both the total amount of an award that could be spent on publication costs to the greater of 0.8% of the award's direct costs or $20,000.00 over the life of the award, in addition to limiting the amount per publication to $6,000.00.

This option considers the limit in Option 4, as well as NIH applicants' range of estimated per publication costs of $0 to $12,000.00. A per-publication limit of $6,000.00 reflects the mid-point of the range of applicants' estimated per publication costs, and encompasses the majority of reported per-publication costs. By combining an overall percentage of the budget and a generous per publication limit of half of the maximum that NIH applicants estimated, this option allows awardees more flexibility while prohibiting use of taxpayer funds for unreasonably high fees

**2. Available evidence related to publication costs and proposed options:**
Option 5: Set a limit on both the per publication cost and the total amount of an award that can be spent on publications. NIH could limit both the total amount of an award that could be spent on publication costs to the greater of 0.8% of the award's direct costs or $20,000.00 over the life of the award, in addition to limiting the amount per publication to $6,000.00.

This option considers the limit in Option 4, as well as NIH applicants' range of estimated per publication costs of $0 to $12,000.00. A per-publication limit of $6,000.00 reflects the mid-point of the range of applicants' estimated per publication costs, and encompasses the majority of reported per-publication costs. By combining an overall percentage of the budget and a generous per publication limit of half of the maximum that NIH applicants estimated, this option allows awardees more flexibility while prohibiting use of taxpayer funds for unreasonably high fees

**3. Peer review compensation:**
NO Peer review compensation

**4. Publishing best practices:**
N/A

**5. Other Comments:**
N/A

## 393. Clifford B. Saper

**Submit date:** 8/16/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Clifford B. Saper

**Name of Organization:** Harvard Medical School

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
The demand by the NIH that publications be available via PubMed immediately upon publication has devastated the budgets of many labs, which cannot afford the very high APCs for publishing in top tier journals, which do not permit material to be posted earlier than six months or one year after publication. The NIH cannot have it both ways: demanding that papers be posted upon publication, and exposing labs to egregious publication fees, which destroy our budgets. The demand for immediate posting will destroy the subscription model of publication, making it impossible for NIH sponsored labs to publish in top tier journals.

**2. Available evidence related to publication costs and proposed options:**
We recently had a paper published in Nature, with a requirement of paying an APC of $11,000, or publishing by the subscription model. We had to choose the latter. But now our paper is locked up from PubMed for a year.

**3. Peer review compensation:**
It will be impossible to compensate grant reviewers fairly. I was on study section this last June, and was paid $200 per day (total $400) for about 30 hours of preparation and 20 hours of time at the study section and afterward. The salary for a professor earning at the NIH maximum ($222,000) would be approx $100 per hour. The fair cost of that time would be $5,000, or more than ten times what the NIH actually pays. My study section had over 20 members, so instead of a cost of $8,000 for honoraria, the fair payment cost would be over $100,000. This would eat into the number of grants that could be funded.

I do this because I value the service that others have put in to review my own grants, and because of the opportunities to learn about the field and meet colleagues.

So, I think that asking reviewers to "give back" by serving for an honorarium that is only a small fraction of the cost of their time is not unreasonable.

**4. Publishing best practices:**
The largest components of publication cost are the production costs and profits for the publisher. Perhaps the NIH could develop an automated publication pipeline (as it does for taking manuscripts uploaded to PubMed and making them into PDFs), that could be available to journals to reduce their publication costs. This would also make the PubMed version of the paper closer to the final version.

**5. Other Comments:**

The largest components of publication cost are the production costs and profits for the publisher. Perhaps the NIH could develop an automated publication pipeline (as it does for taking manuscripts uploaded to PubMed and making them into PDFs), that could be available to journals to reduce their publication costs. This would also make the PubMed version of the paper closer to the final version.

## 394. Douglas Brash

**Submit date:** 8/16/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Douglas Brash

**Name of Organization:** Yale School of Medicine

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Thanks for addressing the APC issue and for asking our opinion!

These options could remedy more than one weakness in the current system:

• Publisher greed.

• Authors buying citations (because Open Access articles get more citations).

• Authors buying prestige (because some publishers charge higher APC for journals that are harder to publish in; the Studio 54 strategy).

• Study Section members counting papers as a measure of progress.

Specific comments on the options:

1. Disallow all APC and focus on preprints.

a) As a ms reviewer, I've seen enough flaws and overstated claims on the initial submission that I don't trust preprints.

b) There are no other sources for APC costs. Universities and departments don't have the funds and will soon have less.

2. Limit APC per publication.

This (and other options below) will restrain greedy journals.

3. Limit APC + allow higher APC if reviewers are compensated for review time at a faculty hourly rate.

A welcome idea. If an attorney were asked to spend 30 hours per week pro bono, the requester would be laughed out of the office.

However, the same logic applies to NIH grant reviewing, a far larger drain on faculty time. I have thoughts on this, too, but that would be a digression here.

Requiring the publisher to also post the reviews has little value; I barely have time to read the paper, much less wade through reviewer comments.

4. Limit total on award.

A great idea !! In addition to costs, this would also limit:

a) The amount of slicing of a study into several papers.

b) The conversion of PhD thesis Background chapters into minor-journal reviews.

c) Study Sections' use of publication count, rather than publication quality, as a criterion.

Anecdote: I once had a grant terminated because "all the investigator has to show for the previous year is 1/2 of a Nature paper". Well, the other half was also from my lab (I naively submitted two complementary papers at the same time) and it has currently been cited 1900 times.

5. Limit per publication and per award.

Probably need to do #4 this way, else journals will decide "the authors can spend all their publication costs on one paper in our journal at $8000".

Other Comments and Suggestions:

1. APC are not the only publication costs. There is also the cost of preparing drawings, e.g. medical illustration. I strongly suspect that pretty papers are favored over Excel graphs, especially in papers involving bioinformatics.

2. With regard to whether authors are buying citations by paying exhorbitant APCs, it might be instructive to plot:

Journal's APC vs Journal's Impact Factor.

Actually, two graphs, one for Open Source journals and one for "regular" journals.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Compensation would be welcome. But in soft-money research institutions, such as most medical schools, the bigger issue is that even compensated reviewing time does not contribute to covering the required 70-100% of the faculty member's salary on grants. Indeed, it subtracts from grant writing time. This is a very substantial issue for reviewing grants on a Study Section.

**4. Publishing best practices:**
I have gotten papers to review that were surely written by AI; that was two years ago when it was easy to spot. As AI becomes scarily good at organizing thoughts and writing them out, fraud detection will be essential. A bigger problem is whether, in 5 years, the fraud will be undetectable.

**5. Other Comments:**
I have gotten papers to review that were surely written by AI; that was two years ago when it was easy to spot. As AI becomes scarily good at organizing thoughts and writing them out, fraud detection will be essential. A bigger problem is whether, in 5 years, the fraud will be undetectable.

## 395. Wendy  OMeara

**Submit date:** 8/17/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Wendy  OMeara

**Name of Organization:** Duke University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Overall, the model of publishing scientific research is broken and disproportionately favors groups with more funding, marginalizing good research and good ideas which have limited external funding. However, the changes proposed here won't fix the model, will only make it trickier to publish results in a way that maximize their impact for public good.  NIH's mandate to publish results in Open Access journals has good intentions, but drives up the cost of publication for researchers. On the other hand, if project-specific funds can't be used to pay for publication, then research may not be published. This means important information that could improve health will not reach the light of day.  That completely undermines the goal of funding science.

In the short term, NIH should continue funding publication costs, with maximum flexibility given to researchers to choose which journal is best suited to their work. Therefore I favor the option of a portion of the budget being used to guide publication costs per project (Option 4).

Capping the payment at 2000 dollars excludes most decent public health journals at this time.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
I don't think peer reviewers should be paid. This creates too many conflicts of interest and is likely to lead to a reviewer pool that is biased. Everyone who publishes should also offer their time to review.

However, NIH reviewers should be fairly compensated for the days and days they spend reviewing science.

**4. Publishing best practices:**

**5. Other Comments:**

## 396. N/A

**Submit date:** 8/17/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Maximizing taxpayer investment in research by limiting allowable publication costs is a crucial policy step to ensure more funding directly supports scientific discovery rather than fueling massive publisher profits from high fees charged by top journals like Nature, Science, and Cell.

However, it's important to understand some of the challenges this change might create.

Currently, many scientists review research papers for free, helping journals maintain quality and speed up publication. If publication fees are capped, some journals may have fewer resources to manage peer review efficiently, potentially causing delays in getting new discoveries published. (due to shift in submissions to journals without publication fres)

Early-career researchers (those just starting their scientific careers) often rely on publishing in prestigious journals to advance jobs and funding. Lowering allowable fees might limit their ability to publish in these outlets, potentially affecting their careers, without government pressure on publishers and tenure review committees.

Universities also pay for subscriptions to journals so their researchers can access articles. If publishers respond by increasing subscription fees to offset lost publication revenue, institutions might face higher costs, which could trickle down to researchers (using IDCs) and taxpayers.

These are complex issues with ripple effects throughout the research ecosystem.

**2. Available evidence related to publication costs and proposed options:**
In July 2019, UC faculty escalated pressure by threatening to step away from Elsevier journal editorial boards unless negotiations resumed, highlighting the academic community's leverage over publishers.

Elsevier signed smaller OA agreements with other institutions during this period, indicating responsiveness to global pressure for OA, but UC's scale made its stance particularly influential.

Resolution: Transformative OA Agreement (March 2021):In June 2020, Elsevier returned to negotiations with a new offer responsive to UC's goals. By March 2021, UC and Elsevier signed a landmark four-year transformative OA agreement, the largest of its kind in North America at the time.

Key Terms:All UC-authored articles in Elsevier journals became immediately open access by default, aligning with UC's mission to make publicly funded research freely accessible.

UC secured a 15% discount on APCs for most journals (10% for prestige titles), reducing publishing costs.

Total expenditure (subscriptions plus APCs) was reduced by 7% compared to the 2018 model, saving UC over 7% by avoiding annual price escalations. The total cost in 2021 was approximately $13 million, comparable to 2018 levels despite expanded OA.

Reading access to Elsevier journals was restored and provided for free, with costs covered by OA publishing payments under the transformative model.

The agreement was part of UC's broader strategy, as it was their ninth OA publishing agreement in two years, covering over 30% of UC-authored articles by 2021. UC aimed to expand such agreements to cover 75% of its articles in the following years.

Broader Impact:The UC-Elsevier agreement set a precedent for other institutions, inspiring global interest in transformative OA models. UC shared its negotiation strategies through workshops, toolkits, and a global conference in May 2021, influencing universities and consortia worldwide.

Media coverage highlighted the deal as a victory for OA, with outlets like Inside Higher Ed, The Los Angeles Times, and The Atlantic noting its significance in challenging publisher profiteering and promoting equitable access.

(https://osc.universityofcalifornia.edu/uc-publisher-relationships/press-room/historical-information-regarding-ucs-negotiations-with-elsevier/)

The UC case illustrates the power of collective action (e.g., systemwide coordination, faculty support) to challenge publisher models, which NIH could replicate by rallying research institutions and funding agencies.

The global influence of UC's agreement (e.g., inspiring other universities and consortia) suggests that NIH policies could catalyze a broader shift toward cost-effective OA, reducing the risk of unintended consequences like journal quality degradation or inequitable access.

**3. Peer review compensation:**
Factors NIH Should Consider for Peer Reviewer CompensationFair Compensation Rates:Factor: Establish a standardized hourly rate or flat fee for peer review that reflects the expertise and time commitment of reviewers, ensuring fairness across disciplines and career stages.

Rationale: The NIH's proposed $50/hour rate (based on BLS medical scientist wages) assumes approximately 6 hours per review, yielding $300 per reviewer for three reviewers per article, plus administrative costs, totaling the $1,000 additional cap. However, review times vary widely (e.g., 2–10 hours depending on manuscript complexity, as noted in studies like Publons 2018 Global Reviewer Survey, which reported an average of 6.8 hours per review). Compensation should account for:Discipline-Specific Workloads: Reviews in fields like biomedicine (e.g., clinical trials) may require more time than in others due to data complexity.

Experience Level: Early-career researchers (ECRs) may spend longer on reviews due to less experience, while senior researchers may command higher rates for their expertise.

Task Scope: Compensation should cover not only manuscript review but also additional tasks like re-reviews or responding to author rebuttals.

Evidence: The UC-Elsevier negotiations (2018–2021) showed faculty leverage through editorial board resignations, suggesting reviewers have significant bargaining power. However, no widespread data exists on journals currently compensating reviewers, indicating a need for NIH to set clear benchmarks (e.g., $300–$500 per review based on 6–10 hours at $50/hour).

Recommendation: NIH should define a range of acceptable compensation (e.g., $200–$500 per review) based on estimated hours and discipline, verified through journal reporting of reviewer payments.

Verification of Compensation:Factor: Develop mechanisms to confirm that journals are compensating reviewers as claimed, preventing misuse of the $3,000 cap to inflate APCs without actual payments.

Rationale: Publishers may claim to compensate reviewers to qualify for the higher cap without distributing funds appropriately. Transparency is critical to ensure taxpayer funds are used effectively.Verification Methods: Require journals to submit annual reports detailing reviewer payments, including number of reviewers, payment amounts, and proof (e.g., payment receipts or contracts). Alternatively, NIH could establish a centralized peer-review platform to manage and verify payments.

Evidence: The NIH's RFI notes that few journals currently compensate reviewers, highlighting the risk of non-compliance. The Plan S initiative in Europe requires transparency in OA journal costs, which could serve as a model for verifying reviewer payments.

Recommendation: Mandate journals to publish compensation policies and provide audited financial statements to NIH as a condition for the $3,000 cap eligibility.

Impact on Peer Review Quality and Speed:Factor: Assess whether compensation improves the quality, timeliness, and diversity of peer reviews, ensuring that payments enhance the research ecosystem rather than creating perverse incentives.

Rationale: Uncompensated peer review relies on volunteerism, which can lead to delays or inconsistent quality, especially if journal resources are strained by APC caps. Compensation could incentivize thorough and timely reviews but risks attracting reviewers motivated by payment rather than expertise.Quality Metrics: Evaluate review quality through metrics like thoroughness (e.g., length and detail of reports), consistency (e.g., agreement among reviewers), and author satisfaction.

Timeliness: Track review turnaround times (e.g., median time to first review, typically 2–4 weeks per Publons data) to ensure compensation reduces delays.

Diversity: Ensure compensation encourages participation from underrepresented groups (e.g., ECRs, researchers from low-resource institutions) to broaden the reviewer pool.

Evidence: A 2019 study in Research Integrity and Peer Review found that reviewer fatigue contributes to delays, suggesting compensation could alleviate this. However, no direct evidence links compensation to quality improvements, necessitating pilot studies.

Recommendation: Fund pilot programs to test compensation models (e.g., $300 per review) and measure impacts on quality, speed, and reviewer diversity, using results to refine compensation policies.

Equity and Accessibility for Reviewers:Factor: Ensure compensation policies promote equitable participation in peer review, particularly for ECRs, researchers from underfunded institutions, and those in low- and middle-income countries (LMICs).

Rationale: Peer review is often an unpaid burden, disproportionately affecting ECRs and researchers with limited resources who rely on prestige journals for career advancement. Compensation could level the playing field but must avoid favoring established researchers or high-resource institutions.ECR Support: Compensation could offset time costs for ECRs, who often spend longer on reviews (per Publons data, ECRs average 8 hours vs. 6 for senior researchers).

Global Equity: Researchers in LMICs may face currency barriers or lack institutional support, so compensation should be accessible (e.g., paid in stable currencies or adjusted for local economies).

Evidence: The UC-Elsevier case showed faculty advocacy for fair publishing practices, suggesting that compensating reviewers could align with broader equity goals. The Plan S Principles emphasize equitable OA, which extends to reviewer participation.

Recommendation: Prioritize compensation for underrepresented reviewers (e.g., ECRs, LMIC researchers) and explore non-monetary incentives (e.g., professional credits, publication fee waivers) to enhance accessibility.

Sustainability of Funding Compensation:Factor: Identify sustainable funding sources for reviewer compensation to avoid increasing taxpayer burden or shifting costs to researchers or institutions.

Rationale: The NIH's $1,000 additional cap per publication assumes three reviewers at $300 each, but widespread adoption could strain journal budgets or lead to higher APCs or subscriptions, negating cost-saving goals.Funding Sources: Options include reallocating a small percentage of NIH grant budgets (e.g., 0.1% of direct costs), institutional contributions, or publisher cost reductions (e.g., from profits, as Elsevier reported $500 million in profits annually).

Cost Control: Ensure compensation does not inflate overall publication costs beyond the $3,000 cap, requiring journals to absorb costs or streamline operations.

Evidence: The NIH's R01 budget analysis shows publication costs average 0.8% of direct costs ($2,565–$3,104 per article), suggesting room to fund reviewer compensation within existing budgets. The UC-Elsevier agreement's 7% cost reduction demonstrates that publishers can absorb cost pressures without increasing fees.

Recommendation: Cap total compensation costs within the $3,000 APC limit and explore public-private partnerships (e.g., with universities or consortia like Big Ten Academic Alliance) to fund compensation sustainably.

Transparency and Public Availability of Reviews:Factor: Link compensation to the requirement that journals make peer reviews publicly available, ensuring transparency and accountability in the review process.

Rationale: Option 3 requires public reviews to qualify for the $3,000 cap, aligning with open science principles. Transparent reviews enhance trust, allow scrutiny of reviewer quality, and justify compensation by demonstrating value to the scientific community.Implementation: Journals should

publish anonymized review reports alongside articles (e.g., as practiced by eLife or PeerJ), with compensation tied to compliance.

Evidence: Open review models (e.g., F1000Research) show that public reviews improve accountability without compromising quality, but adoption is limited. NIH's RFI notes that public reviews are a condition for the higher cap, suggesting a need for clear guidelines.

Recommendation: Require journals to publish review reports and verify compliance through audits, ensuring compensation supports open science goals.

Impact on Journal Ecosystem:Factor: Evaluate how compensation affects journal operations, particularly for small, society-run, or low-cost journals that may struggle to afford payments.

Rationale: High-cost journals (e.g., Nature, Elsevier) can absorb compensation costs, but smaller journals (e.g., DOAJ-listed journals with median APCs of $950 globally) may face financial strain, potentially reducing publishing options or quality.Differential Impact: Larger publishers may exploit the $3,000 cap to maintain high APCs, while smaller journals may opt out, limiting researcher choices.

Evidence: The DOAJ analysis shows that 50% of global journals charge less than $950, indicating that many cannot afford reviewer compensation without external support. The UC-Elsevier case suggests that large publishers can adapt to cost pressures, but smaller journals may need assistance.

Recommendation: Offer subsidies or grants to small journals to implement compensation, and explore centralized peer-review platforms to reduce costs for all journals.

Additional ConsiderationsPilot Programs: NIH should fund pilot programs to test compensation models (e.g., $300 per review, flat fees vs. hourly rates) across disciplines, measuring impacts on review quality, speed, and equity. This could build on initiatives like eLife's review model, which emphasizes transparency and efficiency.

Stakeholder Input: Engage researchers, publishers, and institutions through the RFI to refine compensation rates and verification methods, ensuring buy-in and feasibility.

Global Context: Align with international efforts like Plan S, which emphasizes transparent publishing costs, to create a cohesive global framework for compensated peer review.

ConclusionTo determine appropriate peer reviewer compensation, NIH should consider fair and discipline-specific rates, robust verification mechanisms, impacts on review quality and speed, equity for underrepresented reviewers, sustainable funding, transparency through public reviews, and effects on the journal ecosystem. Evidence from the NIH's DOAJ and R01 analyses, the UC-Elsevier agreement, and global OA initiatives supports the feasibility of compensation within a $3,000 cap but highlights the need for careful implementation to avoid unintended consequences like cost-shifting or reduced journal options.

**4. Publishing best practices:**
Factors NIH Should Consider for Allowing Higher Per-Publication CostsUse of Automated Fraud Detection Capabilities:Factor: Journals should implement robust automated tools to detect research misconduct, such as plagiarism, data fabrication, image manipulation, and citation fraud, to justify higher costs.

Rationale: Automated fraud detection enhances research integrity, ensuring taxpayer-funded research is reliable. Tools like iThenticate, Proofig, or AI-based systems for statistical anomalies require investment, increasing costs. However, error concerns include:False Positives/Negatives: AI may misflag legitimate content or miss sophisticated fraud (e.g., AI-generated paraphrasing), per a 2021 Learned Publishing study (1–3% false positive rate) and 2023 Retraction Watch data (10–15% missed fraud).

Algorithmic Bias: Tools may unfairly flag non-English-speaking authors' work, per a 2022 Scientometrics study (5% higher error rates for translated texts).

Cost-Benefit: High costs ($10,000–$100,000 annually) may not be justified if errors persist, especially for small journals with low APCs ($950 median, DOAJ 2025).

Implementation: Journals should use validated tools and combine AI with human oversight to minimize errors.

Verification: Require annual reports detailing tool usage, error rates (e.g., false positives), and misconduct outcomes.

Recommendation: Allow a $3,000 cap for journals using audited fraud detection tools, ensuring transparency in error mitigation.

Transparent Editorial and Peer-Review Processes:Factor: Journals should publish peer-review reports, editorial decision letters, and conflict-of-interest disclosures to justify higher costs.

Rationale: Transparency builds trust and ensures accountability, aligning with open science principles. Open peer review (e.g., eLife, F1000Research) requires infrastructure, increasing costs. AI tools for managing reviews must avoid over-reliance, which risks missing nuanced issues (2023 Journal of Scholarly Publishing).

Implementation: Publish anonymized review reports alongside articles, as required in Option 3.

Verification: Require links to published reviews and audited editorial policies.

Evidence: Plan S emphasizes transparent review, and UC-Elsevier's 2021 agreement supports OA principles, showing feasibility.

Recommendation: Include transparency as a condition for the $3,000 cap, verified through compliance audits.

Data Availability and Reproducibility Standards:Factor: Journals should mandate public deposition of raw data and analysis code in repositories (e.g., Dryad, Zenodo) to justify higher costs.

Rationale: Data sharing enhances reproducibility and public access, but verification requires resources. AI tools for data validation must address privacy risks (e.g., 2024 Science report on breaches) and false negatives in detecting fabricated data.

Implementation: Require authors to deposit data in NIH-approved repositories.

Verification: Report compliance rates and dataset links.

Evidence: NIH's 2024 Public Access Policy mandates manuscript deposition, and a 2021 Nature study found only 20% of articles share data fully, highlighting enforcement needs.

Recommendation: Allow higher caps for journals enforcing data sharing, verified through compliance metrics.

Equitable Access and Participation in Publishing:Factor: Journals should reduce publication barriers for early-career researchers (ECRs), researchers from low- and middle-income countries (LMICs), and those with limited resources to justify higher costs.

Rationale: Broadening participation ensures taxpayer-funded research benefits a wide range of scientists. Initiatives like APC waivers or reviewer mentorship require funding, increasing costs. AI tools must avoid biases against non-English-speaking or under-resourced authors (2022 Scientometrics).

Implementation: Offer tiered APCs or waivers, as practiced by PLOS for LMIC authors.

Verification: Report metrics on waivers granted and reviewer participation from under-resourced groups.

Evidence: UC-Elsevier's 2021 agreement reduced APCs by 15%, supporting broader access. A 2020 Nature study noted underrepresentation of LMIC authors in high-impact journals.

Recommendation: Include policies promoting equitable access as a best practice, verified through participation metrics.

Sustainable Open Access Models:Factor: Journals should adopt sustainable OA models, such as transformative agreements, to justify higher costs while ensuring broad access.

Rationale: Sustainable OA eliminates paywalls, maximizing taxpayer value. Transformative models (e.g., UC-Elsevier) involve transitional costs. AI tools for managing OA workflows must ensure data security (2024 Science).

Implementation: Transition to models like SCOAP³ or Knowledge Unlatched.

Verification: Disclose OA funding models and confirm no double-dipping.

Evidence: UC-Elsevier's 7% cost reduction and DOAJ's $950 median APCs show sustainable OA is feasible.

Recommendation: Allow higher caps for sustainable OA models, verified through financial transparency.

Efficient Editorial and Production Processes:Factor: Journals should streamline workflows to minimize delays and costs, justifying higher caps only with demonstrated efficiency.

Rationale: Inefficiencies inflate costs without benefiting researchers. AI-driven platforms (e.g., Scholastica) can reduce delays but risk over-automation (2023 Journal of Scholarly Publishing). Efficiency ensures higher costs deliver value.

Implementation: Adopt automated manuscript tracking and standardized formats.

Verification: Report metrics like time to publication.

Evidence: NIH RFI notes delay concerns, and eLife's rapid review model shows efficiency is achievable.

Recommendation: Tie higher caps to efficiency, verified through publication speed metrics.

Additional ConsiderationsVerification: Require journals to submit audited reports on best practices (e.g., fraud detection error rates, waiver metrics), using third-party certification (e.g., COPE, DOAJ).

Pilot Programs: Fund pilots to test AI-driven practices, measuring error rates and impacts on quality and access.

Cost-Benefit Balance: Prioritize practices with clear taxpayer benefits (e.g., fraud detection, data sharing) over less impactful ones.

Global Alignment: Align with Plan S and COPE for consistent standards.

Evidence Supporting Best PracticesDOAJ Analysis (2025): Median APCs ($950 globally) suggest cost-effective journals can adopt best practices.

UC-Elsevier (2021): 7% cost reduction and universal OA show transformative models work.

Retraction Data (2023): Over 10,000 annual retractions justify fraud detection investment.

Open Review: F1000Research shows transparent review is feasible but resource-intensive.

ConclusionNIH should consider best practices like automated fraud detection (with error mitigation), transparent review, data sharing, equitable participation, sustainable OA, and efficient workflows when allowing higher costs ($3,000 cap). Addressing AI error concerns (false positives/negatives, bias, privacy) through verification and pilots ensures taxpayer value.

**5. Other Comments:**
Factors NIH Should Consider for Allowing Higher Per-Publication CostsUse of Automated Fraud Detection Capabilities:Factor: Journals should implement robust automated tools to detect research misconduct, such as plagiarism, data fabrication, image manipulation, and citation fraud, to justify higher costs.

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Implementation: Offer tiered APCs or waivers, as practiced by PLOS for LMIC authors.

Verification: Report metrics on waivers granted and reviewer participation from under-resourced groups.

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Evidence Supporting Best PracticesDOAJ Analysis (2025): Median APCs ($950 globally) suggest cost-effective journals can adopt best practices.

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## 397. N/A

**Submit date:** 8/18/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 4 seems most flexible with option 5 being also appropriately flexible while also effectively stewarding funds.

While it is my hope that a policy like this works to limit charges for publication by publishers, I am also acutely aware of some of the challenges faced by journals run by professional organizations and societies. Limiting costs too much ( options 1-3) may limit the ability of researchers to publish articles in higher profile journals, which brings more awareness to important research, and force some investigators into "cheaper" options that may provide less ROI. I also fear that some journals may accept NIH limits while pushing higher costs onto non-NIH funded research further reducing the ability of investigators to get data published that serves as a foundation for a future proposal.

**2. Available evidence related to publication costs and proposed options:**
I recently had an article under review with a relatively high profile international journal, after a few editors of cheaper society driven journals steered us to something that would accept work that was more interdisciplinary in scope, but the publication charges were close to $5000. The work was outside the scope of my current grant and I did not qualify for a fee waiver. I needed to find additional funding institutionally. Since the work was all completed by students, that was supported, but that funding would have still impacted tax dollars or tuition-paying students in some way indirectly when deemed part of the costs of doing science. Considering the limited options for publication, the impact on the students' careers, and the benefits for the institution to have research published at that level and the recognition it provided. I think that the NIH needs to be careful in considering the all of the direct and indirect impacts such a policy change would have on the system. While there may be some desired outcomes, those may be possible, but not probable outcomes.

**3. Peer review compensation:**
I am not opposed to compensation for peer reviewers, however contributing to my profession has always been part of my job description. Reviewing work gives me an opportunity to think critically about experimental design and help train scientists in their practice. It is part of what keeps me current in my understanding of current scholarly works in my discipline. It has always counted toward part of my job time (teaching/research/service) and I am particular in how much I review, reserving my time as appropriate. I have never reviewed for what I deem as predatory journals (high costs for publication). Compensating me for that work would take it outside the scope of my appointment and make it more of a burden on my time management. Should my institution no longer include recognition of that work as

part of my job, then compensation would be necessary. That said, early in my career, when I was drastically underpaid for the work I contributed, any compensation would have been much appreciated.

**4. Publishing best practices:**
I have always been asked to review articles, until recently I just started getting assigned articles with no option to decline. This is terrible practice and I think leads to waste, haste, and increased costs. The use of AI to produce written work that may or may not be accurate and is then subject to review is concerning. We saw the network of fraudulent reviewers a few years ago. People have more sophisticated tools to circumvent the system and trying to stay on top of things while also maintaining reasonable review and publication periods (I recently had an article accepted that sat in the cue for publication for over a year) is leading to rising costs in many places. Certainly some are taking advantage of that to raise costs higher than what is needed, but capping costs below what is necessary for smaller journals to survive will only force more mergers and companies that streamline for profits to further monopolize the system. If you really care about gold standard science and maintaining integrity in the system, then why don't you cap costs for any journal using a for-profit publisher and let the professional societies and non-profits find a model forward that is affordable for them?

**5. Other Comments:**
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## 398. N/A

**Submit date:** 8/18/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Healthcare Industry (Biotech/Device/ Pharmaceutical Company)

**Role:** Member of the Public

**1. Proposed policy options:**
Tax payer funds are not being used in a way determined by tax payers. They are being distributed by politicians that have no understanding of science or research. Removing those constraints and the ability for politicians and political parties to determine funding are what need to be done.

**2. Available evidence related to publication costs and proposed options:**
Why are my opinions being asked to be proven when the authors are not? This change to the process of peer review,publication, and access and are all highly likely to erode the system, construct further barriers by changing the current system, and all without giving any proofs as to why this is necessary.

**3. Peer review compensation:**
Paying for peer review invites the standard of implied bias that whomever is paying should be given due consideration regarding their findings and is contradictory to the nature of research although all research is not above it inviting all research review to be paid will provide a pathway for such.

**4. Publishing best practices:**

**5. Other Comments:**

## 399. N/A

**Submit date:** 8/18/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
None of the approaches seem to address the root cause of the problem that journals are overcharging to publish. The proposed measures may reduce cost to taxpayers but it moves the burden to scientists which is a distraction to what we should be focusing on - generating and analyzing data and making our results known to the scientific community.

Option 4 - "NIH could set a limit on the total amount of an award that can be spent on publication costs (0.8% of award's direct costs or $20,000 – whichever is greater)" is the "best" model in my opinion but I still think this is not addressing the root cause of the issue and could still lead to significant barriers for researchers publishing data.

In other countries governments negotiate with publishers to have an rate for particular funding bodies. This this not included as an option but should be considered at least for the larger publishing groups. It seems to better address the root cause of the problem.  at the minimum this should be pursued in addition to some of the proposed options.

Journals who are not transparent in how publishing costs are decided and used could be blacklisted from publishing NIH-supported work. NIH has the negotiating power - scientists and individual universities do not.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Paying reviewers may undermine the peer review process and could lead to a lessen quality of review over time. If the currency is providing funding for universities to offset cost of publications, this could work but the success would depend on how this is structured.

**4. Publishing best practices:**

**5. Other Comments:**

# 400. Marc Mendillo

**Submit date:** 8/18/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Marc Mendillo

**Name of Organization:** Northwestern University Feinberg School of Medicine

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Of the proposed options, Option 2—setting a reasonable cap on allowable costs per publication—is the most practical and least disruptive.

Peer review compensation (Option 3) risks driving costs higher, while eliminating or severely restricting publication support (Options 1, 4, or 5) would damage the dissemination ecosystem. Publication is not a peripheral expense—it is the mechanism through which the value of NIH-funded research is realized, both for producers and consumers of science.

The scientific literature is effectively infinite. No one can read everything, and without some structure, only work from the most famous laboratories will reliably be noticed. Journals play a critical curatorial role—much like a sommelier guiding someone through an overwhelming cellar. They help highlight the most important or innovative findings within subfields such as cell and molecular biology, ensuring visibility for strong science beyond reputational networks.

The current system has flaws—fees of $10,000 or more per article are unreasonable—but dismantling it would have serious unintended consequences. A firm but reasonable cap, e.g. $5,000 per publication, would incentivize journals to control costs while maintaining their essential role in filtering, vetting, and disseminating new science.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
I don't think compensating peer reviewers makes sense. The best system is when scientists review for journals they also publish in—the benefit is maintaining a relationship with the journal, which helps ensure your own papers can be fairly and knowledgeably reviewed. While getting paid would be nice in principle, introducing compensation would distort the incentive structure. People might review for journals they don't intend to publish in, or even outside their expertise, just to get paid. That would reduce quality and create conflicts of interest.

**4. Publishing best practices:**
The strength of the current publishing system is that journals are already highly incentivized to detect and prevent fraud in order to protect their reputation. Fraud detection practices are continually being integrated into editorial workflows, and while they help, those determined to commit fraud will inevitably adapt. NIH involvement in dictating or subsidizing these practices does not make sense. The

more appropriate role for NIH is to ensure that when fraud is uncovered, it is met with strict and enforceable penalties.

In addition, the review process should more clearly distinguish between high-quality, peer-reviewed publications and those in low-impact or predatory journals that lack meaningful quality control. Publications in such outlets should be weighed less favorably in review, while work published in rigorous, reputable journals should receive stronger recognition.

**5. Other Comments:**

The strength of the current publishing system is that journals are already highly incentivized to detect and prevent fraud in order to protect their reputation. Fraud detection practices are continually being integrated into editorial workflows, and while they help, those determined to commit fraud will inevitably adapt. NIH involvement in dictating or subsidizing these practices does not make sense. The more appropriate role for NIH is to ensure that when fraud is uncovered, it is met with strict and enforceable penalties.

In addition, the review process should more clearly distinguish between high-quality, peer-reviewed publications and those in low-impact or predatory journals that lack meaningful quality control. Publications in such outlets should be weighed less favorably in review, while work published in rigorous, reputable journals should receive stronger recognition.

## 401. N/A

**Submit date:** 8/18/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:** University of North Carolina

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
NIH could limit allowable costs to $2,000 per publication and allow a higher cost of $3,000 for journals that compensate peer reviewers

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Peer reviewers are not appropriately compensated and that should change immediately. Compensating peer reviewers is not only fair—it's essential for sustaining the integrity and quality of the scientific enterprise. Peer review is a time-intensive, intellectually demanding process that requires deep expertise, critical thinking, and a commitment to advancing science. Yet, it remains one of the few professional activities in academia that is routinely unpaid, despite its central role in determining the fate of research funding and publication. Providing compensation acknowledges the value of reviewers' labor, incentivizes timely and thorough reviews, and helps diversify the reviewer pool by enabling participation from early-career researchers and those from under-resourced institutions. As NIH seeks to uphold excellence and equity in research, compensating reviewers is a concrete step toward recognizing their indispensable contributions and ensuring a more inclusive and sustainable peer review system.

**4. Publishing best practices:**

**5. Other Comments:**

## 402. Supriya Mehta

**Submit date:** 8/18/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Supriya Mehta

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 1, disallow all publication costs, is attractive because publication costs from R01s are steep, and increasing. As noted in the Request for Information, R01 awards typically generate 5-7 publications, some generating 10+ publications. Although the median APC is $2,000, this is variable by specialty, and many researchers encounter APCs typically in the $3,000-4,000 range. This exacts a significant toll on science: $30,000 in publication fees can amount to a graduate research assistant's job for a year, half a post doc, additional specimen processing. This is real resources taken away from the conduct of science, keenly felt when the direct cost limit has not increased in more than 20 years – against rising salary, fringe, and other direct costs. At the same time, many universities do not provide APC support for publications stemming from NIH-sponsored grants. There are few journals that publish OA without a fee, and often the time to publication is longer and the reach is smaller. This negatively impacts the value of the science and hence the taxpayer investment is stymied.

If there is a limit to how much grant support can be allocated to APCs, then the requirement for open access publishing must be relaxed. However, this wouldn't solve the issue of timely and broad dissemination.

Other Options (not mutually exclusive):

- Is there an option for NIH to work with publishers towards substantially reduced rates, as some institutions have done?

- Could pre-print posting address the requirement for public access?

- If there is a cap on publication fees that are allowed to be included in grants, could there be a separate fund at NIH to pay for APC when fees go beyond this?

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
There will be much greater participation in Peer Review with compensation. This will hasten the time to review.

If there is payment, obviously COIs and reviewer identities will need to be disclosed.

**4. Publishing best practices:**
The APCs are only ever increasing - nothing is decreasing. Not evening with the maddening "AI quality checks" that journals implement. Also, the AIs make mistakes that take days if not weeks to resolve.

**5. Other Comments:**
The APCs are only ever increasing - nothing is decreasing. Not evening with the maddening "AI quality checks" that journals implement. Also, the AIs make mistakes that take days if not weeks to resolve.

## 403. N/A

**Submit date:** 8/18/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
The proposal that NIH awardees may not use NIH funds to cover any publication expenses is not fair. How then are we supposed to publish, using which funds? An important metric to demonstrate progress is publication. If we cannot afford to publish, we cannot openly release our findings and help the scientific community.

A limit per year that is some percentage of the direct costs to the institution seems like a good compromise. This would account for differences in the amount given to each contract/subcontract as well as the differences in the amount of the actual award (R01 versus R21, for example).

**2. Available evidence related to publication costs and proposed options:**
We are mandated to publish in open access journals. Any policy that caps total spending would make it difficult to publish at all.

**3. Peer review compensation:**
Peer reviewers should be compensated more for their time and effort. This applies to publication reviewers as well as grant reviewers. Both require a lot of time and effort that would otherwise be spent on germinal aspects of their own research enterprise.

**4. Publishing best practices:**
Publication costs are already exorbitant, especially when you need to make a publication open access. We cannot afford for them to be any higher.

**5. Other Comments:**
Publication costs are already exorbitant, especially when you need to make a publication open access. We cannot afford for them to be any higher.

## 404. Folami Ideraabdullah

**Submit date:** 8/18/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Folami Ideraabdullah

**Name of Organization:** University of North Carolina at Chapel Hill

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I'm most in favor of

Option 4:  NIH awardees may not request more than $20,000.00 from their award or 0.8% of the direct costs of the award, whichever is higher, with no limit on the per publication costs, until the maximum allowable amount is reached.

Publication costs are unavoidable, especially with the new open access requirement from NIH. This will also allow faculty to negotiate with journals for better compensation for peer review and editorial board service.This option gives faculty who rely primarily on NIH funding the most flexibility in publication.

In addition, payment of APC via NIH funds should be tied to a itemized invoice of compliance requirements that the journal used maintains gold standards of peer review including: external review of at least 3 peer reviewers that provide expertise in the science, statistics, and disease/mechanism/structure under study; fair compensation for peer reviewers and editors/guest editors;  thorough copy editing of the article including text, figures, and supplementary data prior to publication; thorough checks for inappropriate data/figure manipulation; confirmation that all supporting data and information required to reproduce the study are provided; and overarching supervision an the assigned editor that verifies these steps are met.

**2. Available evidence related to publication costs and proposed options:**
Journal publication costs (particularly open access costs) have increased substantially since 2020 and PI's have very little leverage to counter/check.  Journal publication charges are likely damaging the scientific integrity of studies by creating a conflict of interest for editors to accept more publications of lower quality to maximize costs. Instead of creating a compilation of studies of high quality that the scientific community must find value in to pay for to subscribe to access (the previous magazine model), journals are collecting payment up front through open access charges and what happens downstream is less consequential than it used to be.

Journals are rapidly reducing their efforts at copy editing and maintaining the data repositories (eg, supplementary data) and papers are either being published with very poor copy editing and many mistakes/errors that are harmful to the rigor and reproducibility tenent of good science.

**3. Peer review compensation:**
For a variety of reasons, PIs are spending more of their effort/time than ever before applying for and managing funds.  That means less time is available for thinking about science and innovation (problems

to address and interpreting findings of their work and the broader field), less time for teaching the next generation of students, and less time in service to the community. One of those services that scientists have historically performed completely free of charge is the peer review process. The justification is that we are serving the community we are a part of and helping ensure that the science reported in our own field of expertise is of high quality (rigorously performed) and of value to the field.

The amount of uncompensated time spent on a thorough peer review and on other editorial services (guest editors & associate editors) should be collected across different fields to accurately determine how much time is being spent and thus how much should be compensated.It is typical to spend 8-20 hrs on peer review of a single publication - most of this is performed in consecutive hours since scientific review requires highly focused time.

Being compensated fairly for this peer review service (either through payment or journal discounts or merit based recognition) may engage better scientists to put the work required into the job. With more time spent applying for funding and following compliance guidelines to maintain funding, scientists have less time to spend on careful review of the publications when we are asked to serve as a peer reviewer. The result is either lack of adequate review by experts in the field or very poor peer review (by nonexperts or students) and publications that lack adequate peer review being released to the public.

**4. Publishing best practices:**
Gold standards of peer review include: external review of at least 3 peer reviewers that provide expertise in the science, statistics, and disease/mechanism/structure under study;  thorough copy editing of the article including text, figures, and supplementary data prior to publication; thorough checks for inappropriate data/figure manipulation; confirmation that all supporting data and information required to reproduce the study are provided; and overarching supervision an the assigned editor that verifies these steps are met.

**5. Other Comments:**
Gold standards of peer review include: external review of at least 3 peer reviewers that provide expertise in the science, statistics, and disease/mechanism/structure under study;  thorough copy editing of the article including text, figures, and supplementary data prior to publication; thorough checks for inappropriate data/figure manipulation; confirmation that all supporting data and information required to reproduce the study are provided; and overarching supervision an the assigned editor that verifies these steps are met.

## 405. Georgia Papavasiliou

**Submit date:** 8/18/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Georgia Papavasiliou

**Name of Organization:** Illinois Institute of Technology

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 406. Alan Grodzinsky

**Submit date:** 8/18/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Alan Grodzinsky

**Name of Organization:** MIT

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Ban all publication costs

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
If you mean paying for peer reviews of NIH applications that are reviewed by study sections, then I'd suggest maintaining the current approach. If you mean peer reviews of articles submitted to journals for publication, reviewers are bot compensated for the most part at present. I'd leave this as is.I would not submit

**4. Publishing best practices:**
I would not submit papers for publication to journals that charge excessively beyond a few hundred dollars.

**5. Other Comments:**
I would not submit papers for publication to journals that charge excessively beyond a few hundred dollars.

## 407. Carl Johnson

**Submit date:** 8/18/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Carl Johnson

**Name of Organization:** Vanderbilt University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
To maximize visibility of research funded by NIH, publication in the highest visibility journals is desirable. Unfortunately, publishing in high-visibility journals is often expensive. Therefore, budgeting publication costs into budgets of research grants is necessary.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
I have been an active researcher for 40 years, and I have regularly reviewed manuscripts and grant proposals without compensation. It is one of the responsibilities/obligations of our profession.

**4. Publishing best practices:**

**5. Other Comments:**

## 408. N/A

**Submit date:** 8/18/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 1

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 409. Tanvir Faisal

**Submit date:** 8/18/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Tanvir Faisal

**Name of Organization:** University of Louisiana at Lafayette

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 4: Cap costs at 0.8% of the award (up to $20,000 total).

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Peer reviewers are not compensated for reviewing.

**4. Publishing best practices:**

**5. Other Comments:**

## 410. Ramkumar Tiruvannamalai Annamalai

**Submit date:** 8/18/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Ramkumar Tiruvannamalai Annamalai

**Name of Organization:** University at Buffalo

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 3: Cap at $2,000 per paper or $3,000 if peer reviewers are compensated.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 411. N/A

**Submit date:** 8/18/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I support Option 3: Cap at $2,000 per paper or $3,000 if peer reviewers are compensated.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Most journals do not pay for peer review. I am in favor of compensation for appropriate peer review, this is hard to manage and evaluate. It would be ideal if all journals had to make NIH funded research publicly available without having to pay to submit or for review.

**4. Publishing best practices:**
If there is a screening for plagiarism and use of AI in writing that are substantive and helpful it would be good to include those fees in what can be included in the cost.

**5. Other Comments:**
If there is a screening for plagiarism and use of AI in writing that are substantive and helpful it would be good to include those fees in what can be included in the cost.

## 412. N/A

**Submit date:** 8/18/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
There should be a limit on which journals the NIH will support with funding. Foreign-based, pay to publish journals should not be supported by NIH dollars. However, submission and publication fees to reputable journals with rigorous review that are appropriate to the field of study should be supported.

Option 3, with limits on acceptable journals seems most reasonable for efficiency of funds expenditures.

**2. Available evidence related to publication costs and proposed options:**
There is a $250 dollar article submission fee to the Journal of Bone and Joint Surgery, which is the premier research journal for the community of orthopedic surgeons. Lack of funding to support this process will limit the ability to get relevant research to healthcare providers to inform practice.

**3. Peer review compensation:**
When paying reviewers, it would seem to be important that the review is done on time and using great detail in the critique. Reviewers that do not receive payment put in less effort, resulting in more superficial reviews and more questionable science being published as findings.

**4. Publishing best practices:**

**5. Other Comments:**

# 413. Nancy Crego

**Submit date:** 8/18/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Nancy Crego

**Name of Organization:** Duke University School of Nursing

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 3: Set a limit on allowable costs per publication and allow a higher amount to be paid when peer reviewers are compensated. NIH could adopt the $2,000.00 limit per publication in Option 1, and allow a higher limit of $3,000.00 per publication when publishing in journals that compensate peer reviewers at a level equivalent to the average hourly wage reported by the U.S. Bureau of Labor Statistics for Medical Scientists and Biochemists/Biophysicists (approximately $50.00 in 2025) and that publicly provide all reviews resulting from the peer-review process of accepted, NIH-funded manuscripts. This option considers the limit in Option 2, with an additional $1,000.00 to allow journals to compensate peer reviewers. Given surveyed reports that reviewers spend 6 hours per review,1 three peer reviewers can be compensated at $50.00 per hour for 6 hours per peer review ($300.00 for each reviewer), while rounding up to $1000.00 to account for additional costs of organizing peer review and accompanying payments. There may be other situations where a higher rate may be justified (e.g., use of automated fraud protection capabilities).

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Traditionally peer reviewers have not been compensated because the primary use in the past has been to be a content expert (topical, methodological for example) but not some of the other details that are now needed to assure that our assumptions that things like referencing are accurate. Now I do far more than just identify the reference but often open and read parts to know if the reference actually does support what is being reported.

**4. Publishing best practices:**
The increase in the use of Artificial Intelligence and the lack of reliable automated methods of detecting when there are factual inaccuracies (for example references that don't actually exist or are inaccurate) increases the reliance on peer reviewers to be more in-depth. The amount of time for reviewing manuscripts will likely increase and may mean changing how reviews are conducted (maybe requiring more people to complete them)  and it may become harder to get reviewers willing to conduct these or additional training by reviewers to conduct the manuscript reviews.

**5. Other Comments:**
The increase in the use of Artificial Intelligence and the lack of reliable automated methods of detecting when there are factual inaccuracies (for example references that don't actually exist or are inaccurate)

increases the reliance on peer reviewers to be more in-depth. The amount of time for reviewing manuscripts will likely increase and may mean changing how reviews are conducted (maybe requiring more people to complete them)  and it may become harder to get reviewers willing to conduct these or additional training by reviewers to conduct the manuscript reviews.

## 414. Jessica Woo, PhD

**Submit date:** 8/18/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Jessica Woo, PhD

**Name of Organization:** Cincinnati Children's Hospital Medical Center

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
The options proposed in this RFI sound like a solution in search of a problem. In fact, reduction in allowable publication costs will fly in the face of other NIH directives that require publication in open access journals that do not have embargo requirements. The analysis provided in the proposal likely captures a minority of papers currently being published in this format, given the extremely high costs of open access publishing. If anything, the costs for publishing will be increased on a per-paper from what is currently the case, making research MORE expensive overall. Given the extremely LOW percentage of total grant budgets typically allocated toward publishing (by your own analysis, <1%), and the importance placed on productivity in peer-review of grant renewals, dedicating NIH's precious time and effort into this initiative seems inefficient and not a good use of taxpayer dollars.

**2. Available evidence related to publication costs and proposed options:**
Given the directive to publish only in open access/non-embargo format, the NIH should ONLY consider the costs for publishing by US investigators (e.g., please ignore publishing discounts for low and middle income countries) in open access journals or open access options for traditional journals. Print costs will not factor into this price structure going forward. For example, just today I looked up the open access option for the journal Maturitas, for which we are preparing an NIH-funded publication. The open access publishing cost is $4170, while under the subscription model, there is no APC (but an embargo of 12 months). Under normal circumstances, I would gladly choose the subscription model to conserve NIH dollars for research, submitting the article to PUBMED Central with an embargo.

**3. Peer review compensation:**
In my experience as a peer reviewer for many journals over the past 20 years, I have never been offered compensation for such reviews, across a broad array of medical journals. This cost, in terms of time and effort, is typically supported by institutions as part of general support for investigators, whether acknowledged as such or not. Peer review compensation for grants at the NIH is quite low, given the enormous amount of time that goes into doing a thorough review of several grants, and I sat on study section for several years. Most of us sit on study section because it's an important scientific and civic duty to do so, not because it pays appropriately.

**4. Publishing best practices:**
Fraud detection and other protections against AI-based publishing should indeed by strengthened. While AI may be useful for some things, its tendency to make up key details and references is a danger to public trust in reproducible research. With increasing pressures to publish, the temptation to have AI as a significant writing partner will be enormous, and will be a growing threat to solid scientific research.

Journals (and the NIH) will need to be increasingly vigilant about this, and techniques and technologies to identify increasingly sophisticated methods for generating content will increase costs over time as well.

**5. Other Comments:**

Fraud detection and other protections against AI-based publishing should indeed by strengthened. While AI may be useful for some things, its tendency to make up key details and references is a danger to public trust in reproducible research. With increasing pressures to publish, the temptation to have AI as a significant writing partner will be enormous, and will be a growing threat to solid scientific research. Journals (and the NIH) will need to be increasingly vigilant about this, and techniques and technologies to identify increasingly sophisticated methods for generating content will increase costs over time as well.

## 415. Chelsea Bahney

**Submit date:** 8/18/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Chelsea Bahney

**Name of Organization:** UCSF

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**

**2. Available evidence related to publication costs and proposed options:**
The average publication cost for me is between $3.5-5k. I have had publications cost up to $8k (although it was probably 8 years ago and subsequently refused to go back to them because of that cost).

**3. Peer review compensation:**
I think this is the ONLY way to fix the peer review process. I currently serve as an associate editor for a tissue engineering journal and have a terrible time finding decent reviewers. I often send out 15 to 20 invitations to get 2 solid reviews. We need to pay professional reviewers for fast and good quality reviews. As a community we also need to have mandatory training for reviewers before they can do a review and this should no longer be a service activity - it is much more serious and should move towards a paid professional activity. Either journals could hire a set of their own reviewers, or it could be become a paid profession.

Further as a Professor being asked to review article this is just not something I have time for and make sure to never commit to doing more than 3 a year and only review for the highest impact journals.

We also need to remove "editorial" reviews from scientific review. All articles should be put through some sort of AI or editorial review PRIOR to going to scientific integrity review. The could decrease the burden on the scientific review trying to get through poorly written papers.

**4. Publishing best practices:**
This is really important! Editors and reviewers cannot be in charge of identifying the fraudulent papers/paper mills.

The journal tools for helping to find reviewers are TERRIBLE.

**5. Other Comments:**
This is really important! Editors and reviewers cannot be in charge of identifying the fraudulent papers/paper mills.

The journal tools for helping to find reviewers are TERRIBLE.

## 416. Scott Tashman

**Submit date:** 8/18/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Scott Tashman

**Name of Organization:**

**Type of Organization:** Non-profit Research Organization

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Regarding limits on how federal grant funds can be used for APCs, I support Option 2: Cap at $2,000 per paper.

Publication of results is critical, and there are many respected pay-to-publish open-access journals that provide a great avenue for disseminating research results to a broad community, wtih fees at or less than $2000/paper. However, allowing reimbursement for excessively large publishing fees would encourage abuse by publishing companies that would seek the maximum allowed.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
For journal manuscript reviews: Knowing how hard it is to find good reviewers, some compensation could be warranted. However, I have concerns about compensation to reviewers for "pay-to-publish" journals. These journals have a profit motive to publish as many papers as possible, which could create a bias towards reviewers who review less critically, resulting in more accepted, lower-quality papers. Given the growing issues with paper mills, AI-generated fake research, and concerns regarding research integrity, it is more important than ever to ensure scientific reporting is high-quality and free of bias. Those of us dedicated to high-quality science who rely upon our colleagues to review our papers fairly should be willing to do the same for them without significant compensation - that is the best way to minimize bias and maintain the integrity of the peer review system. Any compensation offered should be at a low level appropriate for recognition/thanks, but not as salary.

Payment for NIH reviewers is a different situation. I have participated in 44 NIH study sections over more than 20 years - each of these required many times the effort of a journal paper review. The compensation has stayed flat over that time, effectively dropping dramatically when considering inflation. For a 1-day meeting, I typically review around 8 grants, spending on average about 4 hours per grant, plus the 8-hour meeting time. The $200 payment for a 1-day remote review, therefore, works out to $5/hour for high-level expertise. I consider peer review to be an obligation for everyone who receives NIH funding, as should be clear by the number of times I have volunteered, so I do not expect to get compensated at the level of my salary. But, I believe the compensation model should be increased to at least a slightly more attractive level, and perhaps changed to a fixed amount per grant reviewed (currently, reviewers get paid the same whether they review 3 grants or 10). The NIH has also removed

or tightened the rules for other perks that made peer review more attractive, such as late submission privileges for regular reviewers - this was, in my opinion, a move in the wrong direction.

**4. Publishing best practices:**

While I believe these tools are useful, they must be used with caution, and not without careful human oversight, since we all know they make mistakes. Publishers should provide reviewers with access to resources for plagiarism checking (or share the results with reviewers) since the reviewers are best qualified to determine whether any text that appears elsewhere is actually problematic. Including the cost of these tools in publication costs is reasonable if accounted for properly; e.g., if the tool costs $10,000/year and the journal publishes 500 papers/year, then the added cost should not be significantly higher than $50/paper (plus perhaps some amount for the personnel managing the process).

**5. Other Comments:**

While I believe these tools are useful, they must be used with caution, and not without careful human oversight, since we all know they make mistakes. Publishers should provide reviewers with access to resources for plagiarism checking (or share the results with reviewers) since the reviewers are best qualified to determine whether any text that appears elsewhere is actually problematic. Including the cost of these tools in publication costs is reasonable if accounted for properly; e.g., if the tool costs $10,000/year and the journal publishes 500 papers/year, then the added cost should not be significantly higher than $50/paper (plus perhaps some amount for the personnel managing the process).

## 417. Cathy Carlson

**Submit date:** 8/18/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Cathy Carlson

**Name of Organization:** University of Minnesota

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 4: Cap costs at 0.8% of the award (up to $20,000 total);

**2. Available evidence related to publication costs and proposed options:**
Covering publication costs at some level is required in order to properly disseminate the information. The data are worthless if they are not shared in publications.

**3. Peer review compensation:**
The compensation is extremely low, but reviewers are willing to participate because of learning opportunities and prestige considerations. If it is no longer prestigious to do these reviews, the costs will skyrocket. I calculated the compensation at about $5/hour when considering reading the grants, writing reviews, attending the review meeting, and revising the reviews.

**4. Publishing best practices:**
I am not aware of any journal that pays individuals to review publications. It seems like these questions are mixing apples and oranges--peer review of publications (not normally compensated as they usually are anonymous) and grant reviews (compensated at a very low rate.

**5. Other Comments:**
I am not aware of any journal that pays individuals to review publications. It seems like these questions are mixing apples and oranges--peer review of publications (not normally compensated as they usually are anonymous) and grant reviews (compensated at a very low rate.

## 418. Andreas Patsalos

**Submit date:** 8/18/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Andreas Patsalos

**Name of Organization:** Johns Hopkins University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I am in favor of Option 3, which would allow for a higher publication cost limit for journals that compensate their peer reviewers. This option strikes an effective balance between fiscal stewardship and promoting a more sustainable and equitable scholarly publishing ecosystem. By creating a direct financial incentive, the NIH can play a pivotal role in encouraging journals to formally recognize and value the critical, expert labor that peer reviewers provide labor which underpins the integrity of the entire scientific enterprise.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Compensation should formally acknowledge that peer review is a form of expert consultation requiring significant time and specialized knowledge. Fair compensation can also lead to more thorough, higher-quality, and timely reviews, which strengthens the science that NIH funds and accelerates the dissemination of important findings. Furthermore, the current model of uncompensated review disproportionately burdens researchers from less-resourced institutions and those in early-career stages. Providing payment helps democratize participation in the peer review process and promotes greater equity.

**4. Publishing best practices:**
In addition to compensating peer reviewers, the NIH should consider incentivizing other best practices that contribute to publishing integrity. A higher per-publication cost could be justifiable for journals that demonstrate investment in rigorous fraud detection through advanced tools, adherence to robust policies for data sharing and transparency, and a commitment to long-term digital preservation of the scholarly record. By linking allowable costs to these practices, the NIH can use its influence to foster a publishing environment that prioritizes quality and integrity alongside cost-effectiveness.

**5. Other Comments:**
In addition to compensating peer reviewers, the NIH should consider incentivizing other best practices that contribute to publishing integrity. A higher per-publication cost could be justifiable for journals that demonstrate investment in rigorous fraud detection through advanced tools, adherence to robust policies for data sharing and transparency, and a commitment to long-term digital preservation of the scholarly record. By linking allowable costs to these practices, the NIH can use its influence to foster a publishing environment that prioritizes quality and integrity alongside cost-effectiveness.

## 419. Katherine Hinderer, PhD, RN

**Submit date:** 8/18/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Katherine Hinderer, PhD, RN

**Name of Organization:**

**Type of Organization:** Non-profit Research Organization

**Role:** Investigator/Researcher

**1. Proposed policy options:**
As an employee in a non-profit pediatric healthcare organization, we cannot afford to pay open-access publication fees; however, open-access research allows important information about US research to be shared openly and publicly with the scientific and healthcare community. Most scientific researchers who work for non-profits do not have the money to pay these fees out of pocket. The more reputable and higher-impact the journal, the higher the publication fees. Open-access articles are read more often, cited more often, and generally have better metrics, which is historically a measure of the scientific impact of a study. I am a PhD-prepared Pediatric Nurse Scientist. Having funding support for open-access fees is critical, especially in the science of children and families. Open access also allows the public and people who work in institutions that have limited library resources, like many of the rural and critical access hospitals around the country, to have the ability to access this critical information.

Limiting funding to $20,000 seems low, given that each publication may cost $5K or more, therefore a study would not be able to publish more than 4 open-access papers - if it was a large and highly successful study, this may simply not be enough.

I do not support limiting the fees in the proposed option, the amounts seem way too low, especially if you are going to limit to 0.8% and $6K per paper. Of all of the options, I do not understand why you are only looking at mid-point - you should be looking at the quality of the journal, aiming to have federally funded research published in high-tier journals - and then look at those costs, not the mid $$$ of everything (e.g., Nature = $12600; JAMA = $6-8K; Lancet = $8680; .

**2. Available evidence related to publication costs and proposed options:**
In the field of nursing, open-access fees for reputable, peer-reviewed scientific nursing journals typically range from $2,500 to $6,000 per article. Some medical journals are higher (5000 - 13000) and would benefit from publishing nursing science or interprofessional science. Open access is important, and having grant funds pay these fees is critical. The NIH needs to continue supporting rigorous American research in an open-access format to better share important scientific breakthroughs and information. Taking this away would significantly limit our ability as American Scientists to stay at the forefront of global research.

**3. Peer review compensation:**
No, peer reviewers are not compensated appropriately; most journals do not provide any compensation for this activity. Some offer waivers of open access fees, but these are not usually high-quality journals. This is a big problem for the scientific community.

**4. Publishing best practices:**
I do think the integration of technology into the review process is costly. Honestly, I don't understand the magic formula; top-tier journals seem to be able to charge more. I already commented above: I do not support limiting the fees in the proposed option, the amounts seem way too low, especially if you are going to limit to 0.8% and $6K per paper. Of all of the options, I do not understand why you are only looking at mid-point - you should be looking at the quality of the journal, aiming to have federally funded research published in high-tier journals - and then look at those costs, not the mid $$$ of everything (e.g., Nature = $12600; JAMA = $6-8K; Lancet = $8680). Maybe reach out to the big publishing firms and ask them why and how they set their fees (Elsevier, Lippincott, Wiley).

**5. Other Comments:**
I do think the integration of technology into the review process is costly. Honestly, I don't understand the magic formula; top-tier journals seem to be able to charge more. I already commented above: I do not support limiting the fees in the proposed option, the amounts seem way too low, especially if you are going to limit to 0.8% and $6K per paper. Of all of the options, I do not understand why you are only looking at mid-point - you should be looking at the quality of the journal, aiming to have federally funded research published in high-tier journals - and then look at those costs, not the mid $$$ of everything (e.g., Nature = $12600; JAMA = $6-8K; Lancet = $8680). Maybe reach out to the big publishing firms and ask them why and how they set their fees (Elsevier, Lippincott, Wiley).

## 420. Sudipta Baroi

**Submit date:** 8/18/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Sudipta Baroi

**Name of Organization:** UAMS

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
My vote goes for : Cap it at a certain value and compensate reviewers. Below are five reasons why I think so_

1. Reviewing is hard intellectual work and should be compensated.

2. Academia has a reputation for poor financial compensation overall, reviewer compensation could be a way to improve the situation for positive.

3. Publication houses generate a lot of revenue. They should not have free labor expectations.

4. This would also reduce the number of fake journals and fake publications.

5. Financial compensation might bring more accountability from the reviewer's side.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
My vote goes for : Cap it at a certain value and compensate reviewers. Below are five reasons why I think so_

1. Reviewing is hard intellectual work and should be compensated.

2. Academia has a reputation for poor financial compensation overall, reviewer compensation could be a way to improve the situation for positive.

3. Publication houses generate a lot of revenue. They should not have free labor expectations.

4. This would also reduce the number of fake journals and fake publications.

5. Financial compensation might bring more accountability from the reviewer's side.

**4. Publishing best practices:**

**5. Other Comments:**

## 421. Ravi Prakash

**Submit date:** 8/18/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Ravi Prakash

**Name of Organization:** University of Michigan

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
If journal is charging publication fee to authors, reviewers or editors must be paid for the peer reviews. Manuscript handling editors and reviewers are asked to provide their response in constructive timespan without any payments which is totally unfair.

**4. Publishing best practices:**
Either pay to reviewers and editors or do not ban all publication charges

**5. Other Comments:**
Either pay to reviewers and editors or do not ban all publication charges

## 422. N/A

**Submit date:** 8/18/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Cap at $2,000 per paper or $3,000 if peer reviewers are compensated.

**2. Available evidence related to publication costs and proposed options:**

| Peer reviewed journal | Article processing charges |
|---|---|
| Stem Cells Translational Medicine | $2,822 |
| Stem Cell Research and Therapy | $3,190 |
| Cell Stem Cell | $9,350 |
| Advance Science | $6,120 |
| Small | $5,510 |
| JEV | $3,466 |
| Cells | $3,348 |

**3. Peer review compensation:**
Publication is a primary means for PIs to disseminate research findings, gain recognition, and advance the field. The rigor of research can be further improved through a peer review process. However, current article processing charges are very high and have become a barrier to publication in high-impact journals. Thus, peer review compensation is necessary for dissemination and control of the quality of sponsored research.

**4. Publishing best practices:**

**5. Other Comments:**

## 423. Svenja Illien-Junger

**Submit date:** 8/19/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Svenja Illien-Junger

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 5: Cap at $6,000 per paper and 0.8% of the award (up to $20,000 total).

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Paying peer reviewers would be nice

**4. Publishing best practices:**
checking for fraud (automated) should be a requirement for every journal before sending it to the editor.

**5. Other Comments:**
checking for fraud (automated) should be a requirement for every journal before sending it to the editor.

## 424. Jinsong Huang

**Submit date:** 8/19/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Jinsong Huang

**Name of Organization:** University of North Carolina at Chapel Hill

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Several journals do charge some extra cost for color figures, such as Science, Nature. Unless NIH can change the business mode of these publisher, researchers have to secure funding to cover these costs. Researchers should be encouraged to publish, which is very good training and hard-working process, and the peer review process is the fairest process to evaluate the researchers' advance, despite of some minor issues.

What is concerning to me is the large amount of publication in open access journals. Their cost is ridiculously high without justification. The publishers are private companies.

Among all the options, I feel this one is most reasonable:

NIH could limit allowable costs to $2,000 per publication and allow a higher cost of $3,000 for journals that compensate peer reviewers

**2. Available evidence related to publication costs and proposed options:**
Nature Comm charge $5600 for a paper.

Some others charge even higher for open access publications.

**3. Peer review compensation:**
Reviewers should be compensated for the work they do. Scientific researchers already have the lowest payment for extra amount large work they do. They have already devoted a lot of time for public service. It is NOT fair to ask one to devote a lot of scientific input for free.

**4. Publishing best practices:**

**5. Other Comments:**

## 425. N/A

**Submit date:** 8/19/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
In the musculoskeletal field, receiving payment for review is so uncommon that I count reviewer payment as a relevant consideration at this time.

**4. Publishing best practices:**
I would recommend considering set agreed payment levels for non-predatory journals (or having established "voucher" style payments for reputable publishers) to adapt for the journal-specific costs.

**5. Other Comments:**
I would recommend considering set agreed payment levels for non-predatory journals (or having established "voucher" style payments for reputable publishers) to adapt for the journal-specific costs.

## 426. Matthew Redinbo

**Submit date:** 8/19/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Matthew Redinbo

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I support the proposed limit of allowable direct costs at $2,000 per publication. Publication costs have risen to truly uncomfortable levels, up to $10,000 in some cases for full open access. This is untenable.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 427. Emerson Wickwire

**Submit date:** 8/19/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Emerson Wickwire

**Name of Organization:** University of Maryland School of Medicine

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 4 balances the goal of balancing flexibility in providing research results with maximizing the use of taxpayer funds to support research while supporting reasonable and necessary investigator autonomy.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 428. Kristin Koutmou

**Submit date:** 8/19/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Kristin Koutmou

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
This change in policy would severely hamper the processes that scientitsts use to ensure that reliable, quality data are shared. It would also make US scientists unable to publish in high impact journals (ie. all Nature-family journals), and make us uncompetitive on the international market.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 429. N/A

**Submit date:** 8/19/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Non-profit Research Organization

**Role:** Investigator/Researcher

**1. Proposed policy options:**
This is a multi-tiered response with many questions to guide policy:

- If you're an online-only journal, why are you still charging publication costs beyond like $50?

- If you're not an online-only journal, become an online-only journal.

- If you want to charge publication costs, then pay the reviewers to do the reviews under a more expedited timeline. In my field, no one is paid for reviews.

- I do recognize that publication costs also probably go to paying the people who work for that publication house. So, if you charge publication costs, pay reviewers and hire more people to expedite review. Science should not have to wait as long as it does.

Ultimately, I CANNOT understand exorbitant publication costs without paying reviewers to do the reviews. Further, science's culture of "publish or perish" in the most prestigious journals has essentially allowed publication houses to charge high fees for publication. I have no issue with some journals being more prestigious than others.

**2. Available evidence related to publication costs and proposed options:**
See #1

**3. Peer review compensation:**
See #1

**4. Publishing best practices:**
Limiting allowances for publication costs will likely not change what publication houses do. They are private companies. I can imagine that if someone has the opportunity to publish in an incredibly prestigious journal, some of the better funded scientists who have established successful careers (or work at institutions with opportunities for publication-fee waivers) will still pay for their publication to be in those journals.

**5. Other Comments:**
Limiting allowances for publication costs will likely not change what publication houses do. They are private companies. I can imagine that if someone has the opportunity to publish in an incredibly prestigious journal, some of the better funded scientists who have established successful careers (or work at institutions with opportunities for publication-fee waivers) will still pay for their publication to be in those journals.

## 430. Caitlin Sayegh

**Submit date:** 8/19/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Caitlin Sayegh

**Name of Organization:** University of Southern California

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I support the • Option 3: Set a limit on allowable costs per publication and allow a higher amount to be paid when peer reviewers are compensated.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 431. N/A

**Submit date:** 8/19/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
This proposed policy changes must be weighed carefully as publication is key for dissemination of research, and investigators need to work within the confines of the current publication system which often charges significant amount for color figures, for open access that is disseminated to the public. If NIH funds prevent investigators from paying for publications, how are we supposed to publish?

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 432. N/A

**Submit date:** 8/19/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Other

**Type of Organization - Other:** Healthcare Industry -- Hospital

**Role:** Institutional Information Sciences Professional/Librarian

**1. Proposed policy options:**
Of the presented options, I believe Option 4: Set a limit on the total amount of an award that can be spent on publication costs is the best. It provides a cap on the expenditure as either a monetary amount or a percentage of the award, giving the grant recipients some flexibility.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 433. Tiffany Stone Wolbrecht

**Submit date:** 8/19/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Tiffany Stone Wolbrecht

**Name of Organization:**

**Type of Organization:** Non-profit Research Organization

**Role:** Investigator/Researcher

**1. Proposed policy options:**
While I support NIH's goal of ensuring taxpayer funds are used efficiently, I urge caution in adopting rigid caps that may undermine open science. Of the options presented, none adequately balance the need to regulate excessive APCs with the importance of sustaining equitable open access publishing. Options 2, 4, or 5 (cost limits with flexibility) are preferable to Option 1 (disallowing publication costs), but they should be revised upward and paired with systemic publisher negotiations or consortial agreements. NIH should avoid policies that unintentionally disadvantage early-career researchers, smaller institutions, or those publishing in higher-cost but reputable open access venues.

**2. Available evidence related to publication costs and proposed options:**
Open access is critical to the rapid and equitable dissemination of NIH-funded research. Studies consistently show that open access articles receive higher citation rates and broader public readership, directly advancing NIH's mission. The average APC for U.S.-based journals ($2,177)

is already above NIH's proposed $2,000 per-publication limit, suggesting that this cap will force grantees toward less-visible or lower-quality venues. Evidence from institutional agreements (e.g., "Read and Publish" contracts in Europe) suggests that collective bargaining can reduce costs without restricting researchers' publishing choices.

**3. Peer review compensation:**
If NIH pursues Option 3, the principle of compensating peer reviewers is commendable. However, tying higher allowable APCs exclusively to reviewer compensation may create perverse incentives. NIH should instead encourage a suite of publishing best practices, of which reviewer compensation is one. Compensation models should be transparent, fairly distributed, and not used as a justification for disproportionately higher APCs.

**4. Publishing best practices:**
In addition to reviewer compensation, NIH could support higher allowable APCs when journals demonstrate clear commitments to:

Automated fraud detection and research integrity checks,

Transparent pricing models,

Data-sharing compliance,

Accessibility standards (e.g., Section 508 compliance), and

Nonprofit or society-led publishing models.

Rewarding these practices would incentivize publishers to invest in community-beneficial infrastructure rather than simply raising APCs.

**5. Other Comments:**
In addition to reviewer compensation, NIH could support higher allowable APCs when journals demonstrate clear commitments to:

Automated fraud detection and research integrity checks,

Transparent pricing models,

Data-sharing compliance,

Accessibility standards (e.g., Section 508 compliance), and

Nonprofit or society-led publishing models.

Rewarding these practices would incentivize publishers to invest in community-beneficial infrastructure rather than simply raising APCs.

## 434. Laura Raffield

**Submit date:** 8/19/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Laura Raffield

**Name of Organization:** UNC Chapel Hill

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Please consider option 4, which I think gives reasonable flexibility, but consider delaying to apply to new grants not grants with already approved budgets. I would also strongly support efforts to use NIH's standing as one of the world's biggest biomedical research funders to negotiate group rates for NIH funded researchers for lower publication fees. As of right now researchers will be left to balance the demands of job search committees, grant review committees, tenure review committees etc for high impact factor publications without adequate funds to publish open access , or publish at all, in many of these journals. This will further advantage researchers at well funded institutions who are more likely to have access to discretionary funds.

**2. Available evidence related to publication costs and proposed options:**
Many graduate students and early career researchers have publications in process at journals with publication costs over 2000, and even over 6000, for example prestigious Nature family journals which are weighted highly when researchers are searching for jobs, trying to obtain grants etc. While reducing publication fees is admirable, an abrupt change to NIH policies and caps on fees may significantly impact careers of early career researchers. This could have many negative consequences, and many institutions don't have funds to fill in the gap and cover higher fees (folks are counting on grant budgets already approved ).

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

# 435. Sean P.A. Drummond

**Submit date:** 8/19/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Sean P.A. Drummond

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
For context, I was awarded my first NIH grant in 1996.

While I agree with the need to maximise research funding going to the actual research, we must face the reality that publishers would not produce scientific journals if they did not turn a profit. Therefore, they should not be considered the bad guys for wanting to do so. Furthermore, in my experience, majority of APCs are under about $3000. That amount of money cannot actually pay for much research, when you consider the cost in personnel, equipment/supplies, renumeration, and other expenses required to collect data on one more person or animal.

Thus, I agree it is reasonable to place a cap on APC in NIH grants, however, that cap should still allow access to strong open access journals. I would suggest $5000. That would allow investigators to publish one paper in a higher profile journal or 2 papers journals with more modest costs, while also preventing unreasonable APCs from being paid via NIH grants.

Another option I would offer is to disallow APC charges for hybrid journals. That is, journals which publish with both standard, subscription-based models (which are free to authors) and open access models (which incur an APC). This would not prevent authors from publishing in hybrid journals, while also opening up a growing number of journals fully committed to open science principles. Such a policy would provide greater freedom of choice to authors and make it more likely papers can be published in a journal that then makes them free to the public (which clearly advances NIH's goal of disseminating findings to the public).

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
I know from my experience as an author, a reviewer, and an editor, science has a peer review crisis. With an increasing number of journals comes an increasing number of review requests, making it impossible to accept them all. This inevitably leads to long delays in the peer review process, which slows down the dissemination, and therefore the progress, of science. Paying peer reviewers is an often discussed option to break this logjam. I am not sure the extent to which such a strategy would help.

If, however, part of a journal's APC was committed to compensating reviewers somehow, that would make me even more supportive of spending NIH budgets on APCs.

**4. Publishing best practices:**
It is very clear some people are using AI to generate publications. Sometimes, these algorithms access publicly available data, analyse it, and write a paper, with only minimal human input. This results in poor quality science. That, in turn, risks damaging the reputation of very well done science, such as that funded by NIH. It is imperative journals protect against this type of fraud, and that protection costs money. So, to the extent a journal can show their APCs help pay for such protection, then it is a good investment on NIH's part to allow budgets to pay for APCs.

An alternative is for NIH to make a massive investment in technology to detect various types of fraud (e.g., fake articles, plagiarism, etc) and make that technology freely available, at least to US-based journals. That would be a tremendous service to all areas of science.

**5. Other Comments:**
It is very clear some people are using AI to generate publications. Sometimes, these algorithms access publicly available data, analyse it, and write a paper, with only minimal human input. This results in poor quality science. That, in turn, risks damaging the reputation of very well done science, such as that funded by NIH. It is imperative journals protect against this type of fraud, and that protection costs money. So, to the extent a journal can show their APCs help pay for such protection, then it is a good investment on NIH's part to allow budgets to pay for APCs.

An alternative is for NIH to make a massive investment in technology to detect various types of fraud (e.g., fake articles, plagiarism, etc) and make that technology freely available, at least to US-based journals. That would be a tremendous service to all areas of science.

## 436. Anonymous Assistant Profrssor

**Submit date:** 8/20/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Anonymous Assistant Profrssor

**Name of Organization:** Anonymous R1 university

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Capping publication costs in any way will be catastrophic for the careers of both trainees and PIs. Grant reviewers look for publications in high IF journals as evidence of ability/productivity. Tenure decisions depend on such publications too. Those journals charge high fees. If not from the grant that funded the work, how else can we possibly cover those costs? For many of us NIH funds are the only funds, there aren't any other discretionary funds for cover such expenses.

If NIH wants to limit those expenditures, they should somehow pressure the journals to lower their costs. We can't just stop publishing in expensive journals if our grant award and renewal depends on publishing in those journals.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
I've never been compensated when I served as a peer reviewer.

**4. Publishing best practices:**
The journal fees are abusive but it should be journals who are regulated, not the PIs being disallowed to publish in places best for their careers.

**5. Other Comments:**
The journal fees are abusive but it should be journals who are regulated, not the PIs being disallowed to publish in places best for their careers.

## 437. N/A

**Submit date:** 8/20/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
While I support the initiative of NIH to limit publication costs, the method used for calculation of actual costs might not reflect reality. It may also have unfortunate consequences. For instance, it is common for society journals to offer discounts for members. A low APC cap may "force" the journal to significantly increase membership fees, unjustlt affecting members that do not intend to publish in the journal.

In my personal experience, high quality journals charge more (although it is true that some charge a lot, probably more than they should). I would say that 3000$ is probably closer to a minimum required for high quality publication that actually reject some manuscripts before and also after review. But the >5000$ charged by some journals is likely more for profit.

**2. Available evidence related to publication costs and proposed options:**
There are many not for profit society journals that charge APCs above the suggested "per publication cap", just to cover costs ( as mentioned, many even subsidize apcs for members).

Moreover, many low quality journals (which tend to proliferate fast) likely skew the average by having very low apcs to encourage authors to submit in order to increase impact factor as fast as possible.

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 438. Institute for Evolutionary Sciences Montpellier

**Submit date:** 8/20/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** GALTIER Nicolas

**Name of Organization:** Institute for Evolutionary Sciences Montpellier

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I support Option 2.

To limit NIH support to a $2000 fees per article would be a fantastic move, and a real opportunity to finally regulate a dysfunctional market detrimental to science, scientists, and tax payers.

**2. Available evidence related to publication costs and proposed options:**
The two preprints below show that publishers charging the highest fees are the ones doing the worst job of ensuring the quality of the research they publish:

https://ecoevorxiv.org/repository/view/9495/

https://ecoevorxiv.org/repository/view/9659/

This concerns research in ecology but likely translates to other fields.

**3. Peer review compensation:**
I think paying for reviewing is a bad idea and should decrease the quality of the evaluation of research, and that's because AI can produce a plausible review in a second. The future big challenge with peer reviewing will be to make sure it is achieved by humans. To pay for reviewing is an incentive to go in the other direction.

**4. Publishing best practices:**

**5. Other Comments:**

## 439. Breno Diniz

**Submit date:** 8/20/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Breno Diniz

**Name of Organization:** UCONN HEALTH

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 3 is the most valid since it combines both a cap on APCs and a reformulation of the peer-review process. Option 1 is the least valid since it will skew the publication at higher impact journals towards well-funded labs or large institutions that can support their investigators cost for publishing. The other options are of intermediate impact and may not help correct the biases in the systems.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Two options may be considered: payments for each peer-review complete at a flat fee or use of tokens that can be exchanged for APCs fee reduction or waivers. The latter can constitute a problem since it can transform a specific journal into a “private club” and perpetuate publishing biases currently observed.

**4. Publishing best practices:**
The publication of the peer-review process with accepted papers would help increase transparency of the publication process and reduce fraud.

**5. Other Comments:**
The publication of the peer-review process with accepted papers would help increase transparency of the publication process and reduce fraud.

## 440. Shayna Rae Killam

**Submit date:** 8/20/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Shayna Rae Killam

**Name of Organization:** University of Montana

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Set a limit on allowable costs per publication and allow a higher amount to be paid when peer reviewers are compensated.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Set a limit on allowable costs per publication and allow a higher amount to be paid when peer reviewers are compensated.

**4. Publishing best practices:**

**5. Other Comments:**

## 441. N/A

**Submit date:** 8/20/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
The NIH should not allow any publication costs to be funded.

**2. Available evidence related to publication costs and proposed options:**
By preventing any publication costs from being allowed, multiple problems will be addressed simultaneously:

1. the predatory nature of publishers (which includes all corporate publishers) and journals to maximize profits.

2. the hierarchical nature of publication in prestige journals with apcs. In other words, the worth of science should not be primarily determined by where it is published.

3. the cost can be redirected to research itself

**3. Peer review compensation:**
any payment for peer review could create many new problems. logistically, it is difficult to set up. it will increase the legitimate cost of publication.

**4. Publishing best practices:**
The best thing the NIH could do in terms of influencing publishing practices would be to promote:

1. publication of fewer articles overall with more emphasis on quality

2. make assessment of previous publications more formally a part of the review process. note: assessment of the work itself, not the journals where it was published.

3. discourage the use or mention of impact factors

**5. Other Comments:**
The best thing the NIH could do in terms of influencing publishing practices would be to promote:

1. publication of fewer articles overall with more emphasis on quality

2. make assessment of previous publications more formally a part of the review process. note: assessment of the work itself, not the journals where it was published.

3. discourage the use or mention of impact factors

# 442. Anne Giblin

**Submit date:** 8/20/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Anne Giblin

**Name of Organization:** Marine Biological Laboratory

**Type of Organization:** Non-profit Research Organization

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I favor option 4. Having some dollar limits will help put downward pressure on publishers while giving the individual PI the most flexibility. PIs closely guard their resources yet there are times when one might chose to publish in an expensive journal. This can be offset on a grant by choosing other less expensive options for other papers coming from that grant.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Peer review takes a great deal of time. Yet I hesitate to directly pay for each review because I worry some people will agree to do a lot of reviews to earn more money. These may not be high quality reviews. Instead I advocate: 1) reviewers get recognized for their service to the community both by the journals and by their institutions. This is starting to happen more; 2) journals provide other sorts of compensation, such as reduced page charges to frequent reviewers.

**4. Publishing best practices:**
Obviously, better fraud detection would be very valuable but I have no idea how much this would cost. The other factor is better editing. An increasingly greater number of papers are coming from non-native English speakers and this puts a lot of strain on the reviewers. Journals should take more responsibility for editing papers for language and not leave it up to the reviewer.

**5. Other Comments:**
Obviously, better fraud detection would be very valuable but I have no idea how much this would cost. The other factor is better editing. An increasingly greater number of papers are coming from non-native English speakers and this puts a lot of strain on the reviewers. Journals should take more responsibility for editing papers for language and not leave it up to the reviewer.

## 443. N/A

**Submit date:** 8/20/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 4 seems most reasonable to me, because publishing in some fields is much more expensive than others, and we need some flexibility. Some people will still need to publish in more expensive journals, especially early career investigators, who need publications in high impact journals to help demonstrate the quality of their work. It is also consistent with how my field works: smaller datasets can be published in less expensive journals, larger projects (which are published less often) are usually published in more expensive (and more respected) journals. This option allows labs to use the publishing approach that is the best fit for their kind of research.

**2. Available evidence related to publication costs and proposed options:**
There is not a single journal that I have published in that has an open access publication cost under $2000, so this limit would be virtually impossible for Neuroscientists. These include Elife, Nature Communications, Journal of Neuroscience, PLoS One, eNeuro, Neuropharmacology, among others. Importantly, even the Journal of Neuroscience, which is the journal of the non-profit Society for Neuroscience, costs $5620 for an open access research publication.

**3. Peer review compensation:**
In theory this is a reasonable idea, however I imagine that some employers will not allow this kind of income for reviewers, which will produce more iniquities and might lead to those people turning down review invitations even when they are the best suited for a review assignment.

**4. Publishing best practices:**
NIH could disrupt the publishing industry by creating its own system for publicly reporting research in a way that is respected by fellow scientists. One possibility is to invent a new format for reporting data that can accelerate people making their findings public that can also be cheaper and updated as people add studies to an ongoing larger project. One challenge is that in the current model, people often keep their work secret for years until they can publish a larger article with many experiments. NIH has the opportunity to encourage people to make findings public as they come in through a system that can be updated as new experiments are completed. Raw data could also be uploaded to such a system, to facilitate compliance with other NIH policies.

A major problem in my field is that less expensive journals are not respected, so in order to maintain my stature in the field, I feel that it is extremely important for me to publish in more expensive journals. Those publications help me maintain my reputation for strong research in the field, which is not only

important for promotion and collaboration in the field, it is important for earning grants, from NIH and other funding institutions.

**5. Other Comments:**

NIH could disrupt the publishing industry by creating its own system for publicly reporting research in a way that is respected by fellow scientists. One possibility is to invent a new format for reporting data that can accelerate people making their findings public that can also be cheaper and updated as people add studies to an ongoing larger project. One challenge is that in the current model, people often keep their work secret for years until they can publish a larger article with many experiments. NIH has the opportunity to encourage people to make findings public as they come in through a system that can be updated as new experiments are completed. Raw data could also be uploaded to such a system, to facilitate compliance with other NIH policies.

A major problem in my field is that less expensive journals are not respected, so in order to maintain my stature in the field, I feel that it is extremely important for me to publish in more expensive journals. Those publications help me maintain my reputation for strong research in the field, which is not only important for promotion and collaboration in the field, it is important for earning grants, from NIH and other funding institutions.

## 444. Frances Sladek

**Submit date:** 8/20/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Frances Sladek

**Name of Organization:** University of California Riverside

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
None of these options would cover the costs of publishing results generated from a typical NIH R01 grant. Even the highest allowance of $20,000 for the life of the grant would allow only 4 papers to be published in a 5-year award. This is on the low side.

**2. Available evidence related to publication costs and proposed options:**
Anecdotally, publication costs in the biological sciences average much more than $2000-$3000 per paper. It would be a good idea for the NIH should do an analysis of the average publication costs across different disciplines.

**3. Peer review compensation:**
I have reviewed for many journals over the past 30+ years as a PI and have never been compensated. Reviewing is a huge burden on researchers who have many demands on their time and yet peer-review is absolutely essential for the integrity of the results that are produced by tax payers dollars. As an editor, I also know that it is increasingly difficult to find qualified reviewers for journal articles. Paying for reviews could help with that but it could also have unintended consequences in terms of who actually does the reviewing -- a more junior person who really needs to increase their income versus a more seasoned investigator at a higher pay scale who actually knows the material better. Already there is a problem with junior researchers with too little experience doing the reviews.

**4. Publishing best practices:**
Automated fraud detection is a good idea, if it can be done accurately. Although I do not see why that should increase the cost of publishing by that much.

**5. Other Comments:**
Automated fraud detection is a good idea, if it can be done accurately. Although I do not see why that should increase the cost of publishing by that much.

## 445. Richard McKenney

**Submit date:** 8/20/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Richard McKenney

**Name of Organization:** University of California - Davis

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Dear NIH Leadership,

Thank you for the opportunity to provide feedback on the "Request for Information on Maximizing Research Funds by Limiting Allowable Publishing Costs" (NOT-OD-25-138).

I am writing to express my strong support for the proposed Policy Option #4.

However, I believe this policy's success is contingent on a critical addition: that grant reviewers be explicitly and firmly instructed to disregard journal names, citation metrics, and journal impact factors when evaluating an applicant's work for funding.

My concern is that without this directive, the underlying issue of equity will persist. Many prestigious, high-impact journals charge exorbitant publication fees that are often beyond the reach of smaller labs or researchers with more limited funding. Tying grant funding decisions to publication in these specific venues creates an inequitable system where the ability to pay, rather than the quality of the science, can influence a project's perceived value.

Implementing this policy without simultaneously reforming the evaluation criteria would inadvertently penalize innovative research from smaller institutions and undermine the goal of fostering a more inclusive and equitable scientific community.

Thank you for your consideration of this important matter.

Sincerely,

Richard McKenney

**2. Available evidence related to publication costs and proposed options:**
Publication costs in the most prestigious journals such as Nature, Science, Cell etc. are publicly available and often more than $5000.

**3. Peer review compensation:**
I have never been compensated or offered to be compensated as a peer reviewer at any major scientific journal.

**4. Publishing best practices:**
No comment.

**5. Other Comments:**

No comment.

## 446. Frederic Chedin

**Submit date:** 8/20/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Frederic Chedin

**Name of Organization:** University of California Davis

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Dear NIH Leadership,

Thank you for the opportunity to provide feedback on the "Request for Information on Maximizing Research Funds by Limiting Allowable Publishing Costs" (NOT-OD-25-138).

I am writing to express my strong support for the proposed Policy Option #4. This will contribute to limiting publication costs by NIH while providing flexibility to individual laboratories about how to best spend these monies.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 447. Karine Le Roch

**Submit date:** 8/20/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Karine Le Roch

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
None of these options would cover the costs of publishing results generated from a typical NIH R01 grant. Even the highest allowance of $20,000 for the life of the grant would only allow a maximum of 4 papers to be published in a 5-year award. This is extremely low. Any of these option will cap the amount of publication per US faculty and our world ranking will decrease significantly.

**2. Available evidence related to publication costs and proposed options:**
99% of the publication costs in the biological and medical fields average much more than $2000-$3000 per paper. The NIH should do an analysis of the average publication costs for most scientific journals. I am usually paying between $4,500 and $10,000 per publication.

**3. Peer review compensation:**
I have reviewed for many journals over the past 20+ years and I have never been compensated. While Reviewing has a significant burden on our working load , It is absolutely essential for the integrity of the results that we are publishing. As an editor, I know that it is increasingly difficult to find qualified reviewers to review a scientific article. Paying for reviews could help but it could also have unintended consequences in terms of who does the reviewing. Some of these payed "researchers" could have too little experience doing the reviews.

**4. Publishing best practices:**
Automated fraud detection is a good idea, if it can be done accurately. Some of the AI software are still hallucinating some results or publication. In any case that should not significantly increase the cost of publication.

**5. Other Comments:**
Automated fraud detection is a good idea, if it can be done accurately. Some of the AI software are still hallucinating some results or publication. In any case that should not significantly increase the cost of publication.

## 448. N/A

**Submit date:** 8/20/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Suggest: • Option 4: Set a limit on the total amount of an award that can be spent on publication costs. Other options seem too complicated.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
I do peer-review for journals on a regular basis and have never been offered compensation, nor have I heard of others being compensated. Perhaps we should be but currently this does not seem to be a common practice.

**4. Publishing best practices:**
As noted in (3), I am not aware reviewer compensation is contributing to publication costs. I do not know to what extent automated fraud detection screening would add cost. The principal cost I am aware of is what journals call "publication fees" or what open-access journals call "open access fees." A review of this practice - including how much are the costs on average, are they justified, etc. - would be helpful for guiding these NIH policy changes.

**5. Other Comments:**
As noted in (3), I am not aware reviewer compensation is contributing to publication costs. I do not know to what extent automated fraud detection screening would add cost. The principal cost I am aware of is what journals call "publication fees" or what open-access journals call "open access fees." A review of this practice - including how much are the costs on average, are they justified, etc. - would be helpful for guiding these NIH policy changes.

## 449. Gerald Hammond

**Submit date:** 8/21/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Gerald Hammond

**Name of Organization:** University of Pittsburgh

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
The gold star should be for peer-reviewed publications from NIH-funded research to be freely available to the public who have paid for the research.

A higher per-publication page charge should be permitted for open-access entries. I believe the NIH cap should be tied to the open-access nature of the publication. Of course, the journals need revenue to operate. Since we are already spending hundreds of thousands on the research, $6,000 to ensure it undergoes high-quality peer review and is published in a high-quality, clearly presented, and accessible format adds excellent value.

If the journal bills universities for subscriptions or places articles behind a paywall, then we should not let them charge NIH page charges!

**2. Available evidence related to publication costs and proposed options:**
For example, in my current MIRA funding period, I have published 3 J Cell Biology papers with an open access model at $6,000 each - page charges are $2,000 behind a paywall. I expect to publish a fourth, taking my total to $24,000 - above the threshold proposed in option 5.

**3. Peer review compensation:**

**4. Publishing best practices:**
Yes! Journals that invest in fraud detection, inappropriate use of AI, etc., should be allowed to offset those costs with additional page charges (my example of J Cell Biology with a $6000 open access fee does perform such checks). This is more value added over the pre-print servers. Again, this could be used to unlock page charge recovery (along with open access publication and rigorous peer review).

**5. Other Comments:**
Yes! Journals that invest in fraud detection, inappropriate use of AI, etc., should be allowed to offset those costs with additional page charges (my example of J Cell Biology with a $6000 open access fee does perform such checks). This is more value added over the pre-print servers. Again, this could be used to unlock page charge recovery (along with open access publication and rigorous peer review).

# 450. Michael S. Marks

**Submit date:** 8/21/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Michael S. Marks

**Name of Organization:** Children's Hospital of Philadelphia Research Institute

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
The proposed limits on publication costs will impose additional hardships on grantees on top of the many other hardships that have been recently imposed by the NIH. I am sympathetic to concerns that publication costs are rising and are a burden on NIH funds and thus on taxpayers, but the proposals do not appear to appreciate the realities on the ground. Most NIH funded investigators have no other source of funds to pay for publication costs, and thus eliminating funding for these costs (Option 1) would make it impossible for many such investigators to comply with the requirements of NIH funding to report their findings. Limiting costs (options 2 and 5) will have knock-on effects. Many of the higher priced publications are for journals that are considered by the field to be "the best" based on a variety of metrics (many of the metrics are flawed, but unfortunately the perception persists); publication in these journals is increasingly considered a requirement for a faculty position at a research-intensive institution (again a flawed but persistent perception). Thus, by limiting funding for publication in such journals, the NIH will be limiting the hiring potential for trainees supported by NIH grants. Moreover, recent NIH requirements to have published papers available immediately upon publication adds to the publication costs even at otherwise lower-cost journals. Frankly, option 3 makes no sense to me because currently I know of no top-tier journal that pays their referees; these are likely low-level journals who have trouble getting referees for their papers. Option 4 is not a bad idea, but 0.8% might be too low for investigators that publish at a high rate.

**2. Available evidence related to publication costs and proposed options:**
I recently published a paper at Current Biology, a somewhat high impact journal that is in the middle of the pack among the Elsevier/ Nature/ AAAS journals that dominate the field of Molecular and Cell Biology and related fields. To publish the paper for immediately accessibility, the cost was $7500. Luckily for me, the home institution of my international collaborator on the paper has a deal with Elsevier to lower the cost of open access publication to $5000, and her institution paid the bill. If I went with their lower cost option ($3500), I would not have been in compliance with NIH policy for publishing only open access.

I most often publish in a society journal (Molecular Biology of the Cell; MBoC) or a higher impact journal that is informally associated with the society (Journal of Cell Biology; JCB). Publication costs for members of the American Society for Cell BIology at MBoC are $2400 for standard publication or $3500 for open access, and at JCB the costs are $2000 and $6000 respectively. For compliance with recently implemented NIH rules, the higher costs would be required. These are considered "inexpensive" journals in my field.

**3. Peer review compensation:**
It would be nice if reviewers were compensated for their reviews, but this is not standard practice and would dramatically increase publication costs if it were implemented. Typically, not even editors are compensated at many journals. Paying reviewers would be completely impractical for society journals such as Molecular Biology of the Cell, as society dues barely cover the costs of running the journal as it is. As an editor at this journal, I would balk at paying a reviewer but not getting paid myself. I do not see reviewer payment as a practical means to ensuring solid review.

**4. Publishing best practices:**
Many of the fraud detection systems for the types of research that I do are inexpensive to run and are shared among multiple journals with similar foci. NIH should encourage more journals to share their fraud detection algorithms, but I do not think that employing these practices should add significantly to the publication cost. At the two journals in which I have served at a high level on the editorial board (Molecular Biology of the Cell - an ASCB journal - and Traffic - a Wiley journal), algorithms developed largely at Journal of Cell Biology (Rockefeller Press) were implemented routinely on journals by the single managing editor and it did not take much of their time.

**5. Other Comments:**
Many of the fraud detection systems for the types of research that I do are inexpensive to run and are shared among multiple journals with similar foci. NIH should encourage more journals to share their fraud detection algorithms, but I do not think that employing these practices should add significantly to the publication cost. At the two journals in which I have served at a high level on the editorial board (Molecular Biology of the Cell - an ASCB journal - and Traffic - a Wiley journal), algorithms developed largely at Journal of Cell Biology (Rockefeller Press) were implemented routinely on journals by the single managing editor and it did not take much of their time.

## 451. N/A

**Submit date:** 8/21/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
While the evidence provided with regards to average APCs, this commentor wonders 1) how these caps might change, if they change, in the light of increasing APCs, which are likely to happen especially for-profit journals that are often considered 'high profile'. 2) The caps might impact labs with limited funding more than well-funded labs who might have other avenues to pay exorbitant APCs for such 'high-profile' journals, effectively locking them out of the opportunities to publish in such journals. 3) In this commentor's experience, the society journals' APCs for immediate access is higher than the proposed caps.

Perhaps, the NIH could consider policy(ies) where NIH funding for APCs for non-profit/society journals is not capped but NIH funding for APCs for for-profit is capped at proposed amounts or even lower amount. This would encourage researchers to publish in society/non-profit journals that are mission-driven and are often the gatekeepers of quality science as opposed to publishing in profit driven and sometimes predatory journals. This would eventually also empower and financially support the society journals and community at large.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Paying for peer review could potentially be a conflict of interest, and this commentor does not view this option favorably. However, considering the time and effort that is put into peer-review process, a formalized way of getting credit for this service that is considered while reviewing biosketches and grant applications in the context of career stage and expertise could be potentially a more favorable idea. Such a policy, ideally, should put the onus of peer reviewing on more established PIs (since established PIs should be taking on more responsibilities in this area) than new PIs, who often feel overwhelmed with other responsibilities. Lastly, any policy that might allow receiving credit in some form should have room for giving credit to postdocs or other personnel who are often involved in peer review process in collaboration with their PIs.

**4. Publishing best practices:**
The option for immediate open access without any embargo is often significantly more expensive than the option with embargo. With potential caps on APC for immediate access, smaller labs with limited funding and resources will find it difficult to meet NIH's immediate open access policy.

**5. Other Comments:**

The option for immediate open access without any embargo is often significantly more expensive than the option with embargo. With potential caps on APC for immediate access, smaller labs with limited funding and resources will find it difficult to meet NIH's immediate open access policy.

## 452. N/A

**Submit date:** 8/21/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I appreciate NIH's efforts to maximize the value of research funds and to address the growing burden of publication costs on investigators. I would like to highlight two key points regarding the proposed options:

1. Support for Option 3 – Transformative Potential of Reviewer Compensation

Option 3, which raises the cap when journals compensate peer reviewers and make reviews public, could be transformative. Peer review is the invisible labor that sustains the entire scientific enterprise, yet it remains uncompensated. By incentivizing journals to compensate reviewers at fair rates and to make reviews transparent, NIH would be using its unique leverage to reshape the publishing economy in a way that is more equitable, sustainable, and accountable. If major funders like NIH make this a condition, journals will have to adapt.

2. Publication Costs Are Integral, Not Optional

Publication is not an optional expense: NIH requires productivity in the form of publications, and these outputs are central to grant review, tenure, and renewal. Yet high-impact journals, which are often the most valued, carry some of the highest publication costs. If NIH caps allowable publication costs without simultaneously changing how productivity is evaluated, the policy is becoming contradictory. Investigators would be forced either to publish in lower-cost journals that may not carry the same weight in grant review, or to rely on institutional subsidies that only well-funded universities can provide. This would create inequity, penalizing smaller labs and less wealthy institutions.

3. Recommendation

I strongly encourage NIH to adopt part of Option 3, incentivizing journals to compensate reviewers at fair rates and to make reviews transparent, as a baseline. This could be paired with Option 5 (if one should be chosen) as well as a commitment to adjust peer review criteria so that costs and journal prestige are better aligned with policy.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Reviewing a paper carefully and constructively does take 6h on average — from my own experience. If NIH decides to incentivize reviewer compensation, three factors should guide this policy:

- Use a national benchmark such as Bureau of Labor Statistics wages for medical scientists to reflect the time and expertise required in a fair way.

- Set a maximum allowable reviewer compensation per manuscript (around $1,000) to avoid journals inflating APCs under the pretext of paying reviewers.

- Payment should depend on the quality and substance of the review, not simply on speed, and should not depend on the acceptance or not of the manuscript.

**4. Publishing best practices:**

**5. Other Comments:**

## 453. N/A

**Submit date:** 8/22/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Non-profit Research Organization

**Role:** Investigator/Researcher

**1. Proposed policy options:**

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**
While I fully support an effort to reduce the cost of publication, the limitation on the publication costs without a change in policy by the publishers will disproportionality affect scientists from smaller institutions. Already University of California system has negotiated with publishers so that their faculty do not have to pay APCs based on a flat negotiated rate. However, smaller organizations do not have this negotiation power and if indirect rates fall, will also not have any supplemental money to help pay for publications by their investigators. There needs to be some guarantee that charges for publications will be reduced across the board or publications will simply be biased towards the larger institutions. It is unclear why the NIH is not negotiating directly with the publishers to set an upper limit on the APC charges instead of allowing for the well-endowed organizations to pay whatever they want.

**5. Other Comments:**
While I fully support an effort to reduce the cost of publication, the limitation on the publication costs without a change in policy by the publishers will disproportionality affect scientists from smaller institutions. Already University of California system has negotiated with publishers so that their faculty do not have to pay APCs based on a flat negotiated rate. However, smaller organizations do not have this negotiation power and if indirect rates fall, will also not have any supplemental money to help pay for publications by their investigators. There needs to be some guarantee that charges for publications will be reduced across the board or publications will simply be biased towards the larger institutions. It is unclear why the NIH is not negotiating directly with the publishers to set an upper limit on the APC charges instead of allowing for the well-endowed organizations to pay whatever they want.

## 454. N/A

**Submit date:** 8/22/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Non-profit Research Organization

**Role:** Investigator/Researcher

**1. Proposed policy options:**
The options suggested are too restrictive and do not align with the publishing costs for major journals in neuroimaging. The top tier neuroimaging journals within the US, namely Neuroimage, Neuroimage:Clinical, and Human Brain Mapping cost $3,500 per publication. These are the most cited journals in the field, and NIH should be providing funds for NIH funded research to be included in these publications. If NIH wants to limit the costs, there should be another option available. Option 6: Set a limit on the total amount of an award that can be spent on publication costs, but the limit is set at $32,000. This would allow for 2 publications a year ($3500 each) over the course of a 5 year R01.

To maximize the return on federal investment, NIH should not limit or use a higher $32,000 cap than suggested. NIH invests billions in generating cutting-edge research. Publication is the primary vehicle for translating those investments into knowledge that benefits science, medicine, and society. The marginal cost of APCs is small compared to the total investment in conducting the research itself, but critical to ensuring its impact. Restricting costs at the final dissemination step jeopardizes the visibility and utility of taxpayer-funded science.

**2. Available evidence related to publication costs and proposed options:**
Neuroimage, Neuroimage:Clinical, and Human Brain Mapping cost $3,500 per publication. To allow 2 publications a year ($3500 each) over the course of a 5 year R01, at least $32,000 is needed. The journals listed are the most cited in the field, and their costs reflect quality and services provided. Capping allowable support would make it impossible for NIH-funded investigators to publish in these reputable outlets. Their is an increased risk of predatory publishing when APC support is dropped or lowered. Capping publication cost support would restrict access to high-quality venues, disproportionately harm under-resourced investigators, and drive some toward predatory outlets.

**3. Peer review compensation:**
I review for many top journals across psychology and neuroscience, and I do not know of any that compensate reviewers for peer review. Compensation is highly unusual in this field and should not be used to minimize the amount allocated per publication. Peer reviewers in neuroimaging journals are almost never financially compensated—the peer-review process is largely voluntary. The only occasional benefits from select journals are publication fee discounts, and certificated of recognition.

**4. Publishing best practices:**
With the rise of AI generated manuscripts, I suspect mainstream journals will raise their costs to

subsidize fraud detection capabilities. If prices rise to account for this, NIH should raise it's publication cap limit, as well.

**5. Other Comments:**

With the rise of AI generated manuscripts, I suspect mainstream journals will raise their costs to subsidize fraud detection capabilities. If prices rise to account for this, NIH should raise it's publication cap limit, as well.

## 455. Geoffrey Young

**Submit date:** 8/22/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Geoffrey Young

**Name of Organization:** MGB

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
The high APC are typically for open access publication. Certain publishers effectively require NIH funded researchers to publish open-access as opposed to subscription model (which is typically free to the researcher) by insisting that the researcher agree to an embargo as part of the subscription model copyright agreement (which NIH funded researchers cannot agree to because of the requirement to make research manuscripts supported by NIH immediately available at time of acceptance). A better way to deal with this situation would be to allow the NIH funded researchers to comply with subscription-model publication copyright agreements that include an embargo up to a certain limit (perhaps 6-12 months). An alternative would be to prohibit publishers that wish to publish NIH research from preventing the authors depositing the accepted manuscript in PubMed Central at the time of acceptable. These options are preferable to the well-intentioed, but misguided, options that either limit NIH funded researchers ability to publish, or require them to use non-NIH funding for publication costs. Either will ultimately reduce the effectiveness of NIH funding in supporting research (since institutions must recover the costs of research, including publication from NIH funding).

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
I have performed lots of peer review but never been compensated.

**4. Publishing best practices:**
A final option would be for the NIH to create a peer-reviewed publication that compensates reviewers and allows open-access publication free of charge to researchers. However, because this would essentially require the NIH to take on the costs and work of review, editing and publication currently performed by private sector journals, it is not likely to ultimately save the taxpayers money.

**5. Other Comments:**
A final option would be for the NIH to create a peer-reviewed publication that compensates reviewers and allows open-access publication free of charge to researchers. However, because this would essentially require the NIH to take on the costs and work of review, editing and publication currently performed by private sector journals, it is not likely to ultimately save the taxpayers money.

## 456. N/A

**Submit date:** 8/23/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I favor Option #2. A cap of $2000 on costs per publication. I don't think the issue of paying for reviewers should play a role. We don't need to pay reviewers in my field for high-quality journals.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
As I noted above, I do not think we need to pay reviewers for higher-impact journals. This is an issue with inferior journals and we want to weed them out of science.

**4. Publishing best practices:**

**5. Other Comments:**

## 457. Gina Many

**Submit date:** 8/24/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Gina Many

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Requiring journals to cap publication fees as a condition for indexing on PubMed would be a meaningful step toward improving equity and transparency in scientific publishing. The current cost structure—often thousands of dollars for open-access publication—has become unsustainable and contradicts the principles of open science supported by the current administration. Excessive profit margins by publishers restrict access to publicly funded research and impose significant financial burdens on investigators.

As a reviewer for high-impact journals that charge upwards of $10,000 in open-access fees, I receive no compensation for my contributions—a practice once considered a standard component of scientific service. However, in the context of growing commercial gains by publishers, this model is increasingly difficult to justify. Greater accountability and fee regulation are urgently needed to ensure that the costs of publishing do not hinder the advancement or accessibility of science.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
I've observed a noticeable increase in the leniency of published articles over the past 10–15 years, raising concerns about potential conflicts of interest in the review process should it move to a compensation-based model. Further, in my current position, I would be unable to accept compensation. Rather than offering direct financial compensation, journals might consider alternative models—such as providing reviewers with credit toward future publication fees.

**4. Publishing best practices:**

I'm not aware of journals using fraud detection, but would be supportive of it. That said, I don't believe such software would justify publication costs. Perhaps, journals should be required to use such software.

**5. Other Comments:**

I'm not aware of journals using fraud detection, but would be supportive of it. That said, I don't believe such software would justify publication costs. Perhaps, journals should be required to use such software.

## 458. Tim Triche

**Submit date:** 8/24/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Tim Triche

**Name of Organization:** Myself

**Type of Organization:** Non-profit Research Organization

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 3 seems sensible.

Mandatory preprint deposition also seems sensible. Mandatory deposition of copyrighted works that involve labor by publishers is punitive to both authors and editors (and for that matter, funders).

A fee of $2000-$3000 depending on reviewer compensation is not unreasonable for skilled editing, review solicitation, timely review, and typesetting.

**2. Available evidence related to publication costs and proposed options:**
Preprint servers are funded as a common good and involve minimal input (affiliates screen papers for obviously incorrect or overly contentious claims; the latter are not rejected but are subjected to additional checks for whether the venue makes sense). This is likely the most sensible outlet for release of findings to the public, and the most straightforward way to establish priority of discoveries, provided that sufficient infrastructure funding is made available to e.g. openRxiv.

Professional editors handling dozens to hundreds of manuscripts and soliciting qualified reviewers for each have an unusual skill set that is rare even in career scientists (who typically edit smaller society journals; larger societies typically retain one or more full time professional editors for their journals if cash flow permits). In any event, journals provide some pre-publication vetting while highlighting findings of note in a field.

Peer review for veracity is most likely better handled post-publication and with defined mechanisms for correcting oversights or mistakes. Journals can provide an imprimatur but ultimately only the passage of time separates robust findings from chaff.

**3. Peer review compensation:**
Rubriq and other efforts have attempted to arrange payment for reviews; pilot projects by various organizations including the Company of Biologists have found in randomized (necessarily unblinded) trials that incentives do improve review timeliness without impacting quality.

For a paper with 3-4 reviewers, $200-$300 for a thorough and timely review seems like an appropriate valuation based on that used by NIH for study section participation.

**4. Publishing best practices:**
Support preprint servers with structured metadata and reduce the complexity of the fraud detection enterprise.

A key obstacle to automated and post-publication review is the absurd number of journal formats and metadata styles.

Funding openRxiv as shared infrastructure has the potential to both increase return of results to taxpayers, and decrease the cost of automated screening procedures. This would seem to be a particularly easy win.

**5. Other Comments:**
Support preprint servers with structured metadata and reduce the complexity of the fraud detection enterprise.

A key obstacle to automated and post-publication review is the absurd number of journal formats and metadata styles.

Funding openRxiv as shared infrastructure has the potential to both increase return of results to taxpayers, and decrease the cost of automated screening procedures. This would seem to be a particularly easy win.

## 459. Atu Agawu

**Submit date:** 8/24/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Atu Agawu

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 4: Set a limit on the total amount of an award that can be spent on publication costs.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

# 460. Busra Duygu Ozpolat

**Submit date:** 8/25/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Busra Duygu Ozpolat

**Name of Organization:** Washington University in St. Louis

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
While I agree that we need to change the current system, I have concerns around the proposed policy options. First, however, I would like to thank you for initiating change around this issue. Publishers profit incredible amounts from our hard work and taxpayer-funded research.

My main concern with the proposed options of addressing the issue is that most of these options will cause increased disparities for labs that do not have non-discretionary or private funds. If a lab has only federal funding, they will be limited to publish in journals that cost less, while labs that have private or discretionary funding can pay for publishing in "high impact" journals. Since we cannot change the academic culture immediately, people will perceive these labs as "more successful", and this success will in turn mean more funding for them, increasing disparities.

An option to overcome this could be: if NIH grants are acknowledged as funding resource in a paper, that paper has to have a limit of 2K (or the agreed upon limit), even if the lab may have funds to cover more expensive charges. This would level the playing field.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Honestly, I don't need to be compensated as a reviewer, if publishers stop charging us an arm and a leg for each publications. I am happy to keep reviewing articles for free as long as we can publish articles open access at a reasonable cost, and within reasonable timelines.

In fact, having compensation for reviewers could possibly create a desire to review more papers (to make more money), even tough this may not necessarily mean the reviewers are being thorough.

**4. Publishing best practices:**
Publishers simply could make less profit, I don't think high publication costs are actually driven by real expenses. https://www.newscientist.com/article/mg24032052-900-time-to-break-academic-publishings-stranglehold-on-research/ - according to this article, academic publishing has a 40% profit margin, and is one of the most profitable businesses.

**5. Other Comments:**
Publishers simply could make less profit, I don't think high publication costs are actually driven by real expenses. https://www.newscientist.com/article/mg24032052-900-time-to-break-academic-

publishings-stranglehold-on-research/ - according to this article, academic publishing has a 40% profit margin, and is one of the most profitable businesses.

## 461. Nilu Goonetilleke

**Submit date:** 8/25/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Nilu Goonetilleke

**Name of Organization:** UNC Department of M&I

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 4 seems the most reasonable in the short term. Given that papers submitted 6 months ago at high impact journals (significant publishing cost) may not be published for another 6-12 months. These new policies should allow NIH funding using current rules for funding for all manuscripts 'in revision'. This can be defined as reviewer and editorial comments have been received and the editor has invited authors to address comments. To do otherwise would greater jeopardize timelines for graduation and fellowships for the next generation of biomedical researchers (focus of NIH's 8 initiatives).

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
This is interesting.

Where scientists spend most time is in Study Section review. Two solid weeks ~ 0.6 FTE (minimum) per study section. Finding good study section members is an increasing challenge given the many constraints on our time.

NIH should consider supporting FTE for standing study sections (e.g. equivalent of # study sections/year x 0.6 FTE) or ad hoc study sections (0.6 FTE).

The result will be higher quality review and a broader pool of views.

**4. Publishing best practices:**
Supplements with primary data should be published.

**5. Other Comments:**
Supplements with primary data should be published.

## 462. Martin Ferris

**Submit date:** 8/26/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Martin Ferris

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I prefer Option 2.

I will note that, concurrent with limiting costs allowable to researchers, publishing houses have a history of mandating higher costs when an author requests Open Access (in line with recent NIH pushes for transparency). If journals try to adjust their costs higher to 'ensure' open access, then this 2k limit will not cover costs, and as a result, less of the science that the public funds will be promptly shared.

**2. Available evidence related to publication costs and proposed options:**
A regular survey of publishers should be able to confirm that currently OA options are more expensive then embargoed or paywalled options.

**3. Peer review compensation:**
I appreciate a move towards compensation for reviews, however I am concerned that without a clear mandate or guidelines on compensation, 'predatory' publishing houses will move to implement this and further contribute to the glut of non-reproducible and/or fraudulent results. For example, if there is an implication that 'accepted' results will lead to more requests for review (and therefore payments), the rigor of peer review will eroded.

**4. Publishing best practices:**
While auditing of publishing houses for quality of published manuscripts isn't tenable, strict penalties on publishing houses who allow AI-generated/fraudulent results through their review process should encourage publishing houses to shape up. Publishing houses are INCREDIBLE money makers, and they are so by doing minimal work, outsourcing to volunteer labor and hiding behind a shield of 'peer review'. If their ability to receive Federal funds was contingent on their quality control, it would help immensly.

**5. Other Comments:**
While auditing of publishing houses for quality of published manuscripts isn't tenable, strict penalties on publishing houses who allow AI-generated/fraudulent results through their review process should encourage publishing houses to shape up. Publishing houses are INCREDIBLE money makers, and they are so by doing minimal work, outsourcing to volunteer labor and hiding behind a shield of 'peer review'. If their ability to receive Federal funds was contingent on their quality control, it would help immensly.

## 463. N/A

**Submit date:** 8/26/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Sharing of data from publicly funded research is critical. However, the ecosystem in which we all work does not reward anyone for publishing preprints. NIH does not permit them to be used for data sharing compliance and institutions do not recognize them for promotion. Disallowing all publication fees would be counter productive as data needs to be published and investigators need to get credit for their work.

I agree with the idea of allowing higher costs for journals that compensate reviewers as this is rarely done and desperately needed. It is just about impossible to find reviewers for manuscripts as everyone is overtaxed with requests. I also see value in limiting the total amount of an award that can be spent on publication costs. This gives the investigator the ability to decide if one CNS paper is worth 3 society level papers; a publication budget of $20,000 for an R01 seems reasonable in 2025.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Peer reviewers are rarely compensated; hence their reluctance to give of their limited time to review papers. As an editor for a society journal, I can say that it is very difficult to find reviewers. The excess of predatory journals makes this even more difficult since reviewers are being asked to do more and more free review work as these journals multiply. The requirement to pay reviewers would likely lead to individuals being more willing to review and better quality reviews and perhaps would decrease the incentive for predatory journals to exist.

**4. Publishing best practices:**

**5. Other Comments:**

## 464. Christopher Marcum

**Submit date:** 8/26/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Christopher Marcum

**Name of Organization:** CSM Advising LLC

**Type of Organization:** Not Applicable

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I appreciate the thought that went into the development of the proposed options listed in NOT-OD-25-138. However, none of those options are comprehensive enough to fully achieve NIH's goal of maximizing research funds with its public access policy. The NIH should take the following five steps to do so:

Require all NIH grantees and intramural researchers to deposit preprints of their NIH-funded work in an appropriate publicly accessible repository. Allow for preprints that have undergone transparent peer-review to count towards the NIH public access policy. Fund preprint repository and preprint review services.

Clearly communicate that authors are always able to self-deposit their peer-reviewed author-accepted manuscripts into PubMed Central without cost. NIH needs to directly and publicly counter the misinformation that some publishers are giving to NIH grantees and intramural researchers that they must pay article processing charges in order to comply with the NIH policy. NIH should reward publishers, such as Science/AAAS and AIP, that provide easy paths for authors to comply with NIH public access policies with "green" open access for the federally funded research they publish.

Encourage grantee institutions to provide a percent of NIH award indirect costs to support institutional repositories, community-supported open access journals (i.e., diamond open access), and other shared-resources that institutions can provide to support cost controls.

Enforce NIH's Federal Purpose License to ensure all NIH funded research products including data and publications are accessible to the public. Section 8.2.1 of the NIH grants policy already incorporates the Federal Purpose License into its award contract Terms & Conditions. NIH needs to train its program officers to conduct better oversight and enforcement of that policy.

Modernize public access infrastructure at the National Library of Medicine to lower research burden by: 1) ingesting data from and interoperating with university institutional repositories; 2) creating a discoverable mapping between PMC numbers and any DOIs associated with manuscripts; and 3) improving the submission interface for depositing manuscripts and data (perhaps with AI-based enhancements).

**2. Available evidence related to publication costs and proposed options:**
I encourage NIH leadership to read the three reports that OSTP submitted to Congress between 2022 and 2024 on the costs of scholarly publishing. Sadly, the publisher lobbyists continue to convince

Congressional appropriations staff that these reports do not exist. That's misinformation that the NIH can push back against by citing the latest report in its final policy, which is the most comprehensive compilation of evidence of any source and is available here.

The NIH appears to have relied solely on OA journals without considering the costs that hybrid journals also impose in the analysis presented in the RFI. There are a couple of resources that the NIH can draw from for more data on APCs and "gold" open access charges: Springer Nature publishes their costs here, Elsevier publishes their costs here, and Wiley publishes theirs here. Publishers will claim that it is expensive for them to publish an article and that the APCs are justifiable either because of the prestige-value of specific vanity journals or because of their actual expense. Sadly, most for-profit publishers will never share their realized costs per page, per article. Public accounts of surplus revenues (i.e., profits) sometimes in excess of 40% suggest that their APCs contribute to the very price-gouging that NIH wants to curtail. NIH should demand granular transparency to the public from all publishers they do business with at NLM.

**3. Peer review compensation:**
I am intrigued by any reform proposal that aims to improve the broken peer-review system. However, the peer-review proposal here has little to do with actually controlling costs and I encourage NIH to abandon this option. There is not yet enough evidence to suggest that compensating reviewers improves quality and avoids gaming.

I support policies that require transparent peer-review (non-blinded and shared regardless of final manuscript disposition or editorial decision). See the first bullet in response to this RFI's first question for details on a step that NIH should take here with respect to peer-review.

**4. Publishing best practices:**
It is encouraging that some journals are deploying emerging technology to help improve their value. However, the NIH should be cautious against any automated or AI-based fraud detection, peer-review, summarization, et cetera, system as justifiable for higher publication costs. These systems have risks that have not been fully understood and the risks and consequences of their use should lay fully with the publishers. The AI-based fraud detection systems are in an untenable arms-race as LLMs and computer-vision will continue to advance proportionally for nefarious and beneficial uses alike.

**5. Other Comments:**
It is encouraging that some journals are deploying emerging technology to help improve their value. However, the NIH should be cautious against any automated or AI-based fraud detection, peer-review, summarization, et cetera, system as justifiable for higher publication costs. These systems have risks that have not been fully understood and the risks and consequences of their use should lay fully with the publishers. The AI-based fraud detection systems are in an untenable arms-race as LLMs and computer-vision will continue to advance proportionally for nefarious and beneficial uses alike.

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/My-Response-to-the-NIH-Request-for-Information-on-Proposed-APC-Caps.pdf

**Description:** pdf of complete comments in narrative form with links to resources

## 465. N/A

**Submit date:** 8/26/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Institutional Information Sciences Professional/Librarian

**1. Proposed policy options:**
Option 4 provides the most balance and flexibility for researchers in choosing where to publish and disseminate their research findings. However, perhaps allowances should be made for research projects that result in many multiple publications, which may be necessary for large-scale, multi-year projects.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Exceptions to any caps should be considered in cases where peer reviewers will be compensated.

**4. Publishing best practices:**

**5. Other Comments:**

## 466. Christiana Smith-Anderson, MD, PhD

**Submit date:** 8/26/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Christiana Smith-Anderson, MD, PhD

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
If one of the options has to be chosen, I suppose option 4 would be the least disruptive: (Option 4: Set a limit on the total amount of an award that can be spent on publication costs. NIH could limit the maximum amount of an award that could be spent on publication costs to 0.8% of the award's direct costs over the length of the award or $20,000.00, whichever is greater, in order to not disproportionately impact smaller awards.)

**2. Available evidence related to publication costs and proposed options:**
I agree that publication fees have become unreasonably high. However, all of the options proposed will make it exceedingly difficult for investigators to publish their work. Why not punish the scientific journals that are charging high fees, rather than the investigators that are paying them? Please keep in mind that many investigators (including myself) may have no other way to pay for publication fees other than our grants! Especially in the current financial climate in academia, many universities (including my own) are clamping down on funds that were previously made available to faculty to support journal submissions, conference registrations, travel, society dues, etc. If NIH will also limit their support of journal fees, are investigators supposed to pay out of pocket to publish their work? Or not publish their research at all? This is an unfair position in which to put academic scientists.

**3. Peer review compensation:**
Since when are peer reviewers compensated for their time? I have never heard of this practice, which in fact may bias reviewers' perceptions of some manuscripts and lead to unfair review practices.

**4. Publishing best practices:**

**5. Other Comments:**

## 467. N/A

**Submit date:** 8/26/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
PIs should be able to use grant funding for APC fees and processing. However, reviewers should also be compensated. As an early career scientist, publishing is a challenging and time consuming process. If a manuscript is accepted for publication, but APC fees are not paid, the publication is kept behind a firewall where no one can read it. When APC fees are charged, even for completely online publications, they have been >$3500 in my field of research. (Yet, I receive emails on a daily basis for requests to peer review basically as a volunteer.)

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Reviewers are requested for the expertise. They should be compensated--with the cost of living taken into consideration each year and the amount of time it takes to complete a review:

~$500 for reviewing a manuscript one time

~$250 for reviewing revisions each additional time

**4. Publishing best practices:**

**5. Other Comments:**

## 468. N/A

**Submit date:** 8/26/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Non-profit Research Organization

**Role:** Organizational Official

**1. Proposed policy options:**

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 469. N/A

**Submit date:** 8/27/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I agree with the desire to limit publication costs. I am concerned that policies that are too stringent may leave investigators in a bind, if journals do not change their rates, as it is still imperative at this point to publish in recognized peer-reviewed journals to be competitive when one's grants are being considered by study sections. I would therefore favor a flexible approach that has a fixed total dollar amount per grant and allows grantees the option to spend it on fewer high-cost or more lower-cost options. I think it is important to recognize the difference in publication rate in different fields, so the cap would ideally be higher than the one in the proposed options.

**2. Available evidence related to publication costs and proposed options:**
A single open-access APC for the Journal of Cell Biology is ~$6000. This is not even from a for-profit publicly traded company like Elsevier or Nature Publishing Group, where APCs can go as high as $12,460 for open access. The proposed limits will have negative effects on society journals which need to generate sufficient revenue to support important community-building events such as conferences.

**3. Peer review compensation:**
I am more lukewarm about peer review compensation. I am not convinced -- as an academic editor of a society journal -- that paying a modest honorarium will increase the quality of peer review. It may increase the rate at which reviewers accept the requests. It will increase costs to journals, which will probably eventually filter down to increased APCs (or subscription rates).

**4. Publishing best practices:**
It is unclear to me that automated fraud detection is successful at rooting out fraud. In principle it would but I am not aware of studies showing its effectiveness.

**5. Other Comments:**
It is unclear to me that automated fraud detection is successful at rooting out fraud. In principle it would but I am not aware of studies showing its effectiveness.

## 470. Open Library Society

**Submit date:** 8/27/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Thomas Krichel

**Name of Organization:** Open Library Society

**Type of Organization:** Other

**Type of Organization - Other:** I run https://biomed.news

**Role:** Institutional Information Sciences Professional/Librarian

**1. Proposed policy options:**
I support paying no publications costs to publishers who do not pay peer reviewers. So it's a combination of option 1 and 3. For reviewer pay for US reviewers, submission of 1099 misc tax forms could be used as a relatively cheap enforcement.

**2. Available evidence related to publication costs and proposed options:**
I founded RePEc, an institutional repository system for economics preprints. We published over 1 million papers without any external subsidies. Preprints work, if you have a culture of preprints. If you don't have it, you have to build it. Paying publishers more money will just do the opposite.

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 471. N/A

**Submit date:** 8/27/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
The only even-marginally reasonable option is option 2 - but the amount is too low. It should be $3-3.5K/paper, as that is close to the current publication costs at reasonable journals nowadays.

Option 1 is unreasonable. Journal publication is essential to transmit trusted, peer-reviewed results. Preprints are not reliable as they are un-vetted.

Option 3 is also unreasonable. Researchers peer-review papers without compensation, because they consider it to be part of their professional responsibilities. Offering pay is likely to incentivize less well-motivated people to review. We do not want reviewers who are just in it for the money. n.b. Even NIH does not compensate its Study Section members for their reviewing at the rate that Option 3 demands that journals use; here too the study section members do it out of professional responsibility.

Options 4 and 5 are also unreasonable. The most productive researchers publish the most papers. These options would disincentivize such productivity, by capping the amount of grant funds that can be used to pay for the publications. Academic researchers do not have other funds to tap, to pay publication costs.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 472. Frank Schroeder

**Submit date:** 8/27/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Frank Schroeder

**Name of Organization:** Cornell University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 5 - a cap on total publication costs (0.8% or $20k) and on costs associated with any individual publication - seems to be well considered, respecting interests of everyone involved.

**2. Available evidence related to publication costs and proposed options:**
From my experience, publication fees are growing at an unjustifiable pace at some prestigious journals, e.g., at Nature Communications. Capping publication fees at, e.g., $6k would address this.

**3. Peer review compensation:**
I do not think establishing a pay-for-service model for peer review is a good idea., Peer review quality may be negatively affected by reviewers doing this to generate income, instead of as a service to the public.

**4. Publishing best practices:**
The NIH should aim to keep this process simple. Grading journals according to how much "service" they offer would seem likely to generate ultimately wasteful efforts by the publishers to give the impression that they are more diligent. It's better to let market forces regulate this - there are few things that damage the reputation of a journal more than repeated instances of fraud.

**5. Other Comments:**
The NIH should aim to keep this process simple. Grading journals according to how much "service" they offer would seem likely to generate ultimately wasteful efforts by the publishers to give the impression that they are more diligent. It's better to let market forces regulate this - there are few things that damage the reputation of a journal more than repeated instances of fraud.

## 473. Ethan Ostrom

**Submit date:** 8/27/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Ethan Ostrom

**Name of Organization:** Northern Arizona University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I suggest Option 3 - this incentivizes journals to pay peer reviewers a reasonable fee, and limits absurdly high publication costs of some journals. This tackles the predatory nature of for-profit journals.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
The outlined policy in option 3 is a good start to pay peer reviewers for their time. All journals have benefited from the good will of scientists to provide a service to their field by performing peer review for free. Profit margins for publishing companies are equivalent to some of the most successful technology companies of the last decade - indicating they have the ability to pay peer reviewers for their time and efforts, they just don't want to. Not paying peer reviewers is a predatory practice and should end.

**4. Publishing best practices:**

**5. Other Comments:**

## 474. Rachel Smith

**Submit date:** 8/28/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Rachel Smith

**Name of Organization:** Texas A&M University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**

None of these options address the core issue: the need for sustainable, research-focused funding models that prioritize scientific advancement over publisher revenue streams.

Rather than reinforcing ongoing payments to publishers through the proposed fee-based options, NIH should reinforce lower-cost compliance options for its existing Public Access Policy while expanding open access infrastructure that serves the research community through predictable operational costs rather than arbitrary per-article fees.

Instead Recommend that NIH:

1. Fully enforce existing deposit requirement in the NIH Public Access Policy – Require all funded researchers to deposit copies of their Author Accepted Manuscripts into PubMed Central (or another agency-approved open repository) immediately upon acceptance.
2. Strengthen reuse rights – Enhance the NIH Public Access policy to ensure the public has the right to fully reuse these publications to maximize their value.
3. Support Sustainable Open Access Options – Incentivize the use of publication options that do not rely on expensive fees to publishers, including repository deposit of Author Accepted Manuscripts, preprint sharing, early dissemination of data, code, software and other outputs, and use of community-controlled publishing outlets (such as diamond open access) and infrastructure.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

Financial compensation for peer review could have negative consequences, including encouraging reviewers to review more papers than they really have time for, papers that may be outside their area of

specialization, and papers that are from known peers. These would all reduce the quality and integrity of peer review.

**4. Publishing best practices:**
Access to publications and journals is limited unless they are open-access; limitations include whether the university/library subscribes to the journal and what country you are in. Open-access helps to reduce these barriers and enhance sharing of scientific findings. However, open-access costs more money. So, if we want science to be shared fully, then there is a cost. The university has limited funds for publishing and may run out of annual funds for this purpose. It makes more sense for it to be part of the grant costs, as it is part of the dissemination of information gathered.

**5. Other Comments:**
Access to publications and journals is limited unless they are open-access; limitations include whether the university/library subscribes to the journal and what country you are in. Open-access helps to reduce these barriers and enhance sharing of scientific findings. However, open-access costs more money. So, if we want science to be shared fully, then there is a cost. The university has limited funds for publishing and may run out of annual funds for this purpose. It makes more sense for it to be part of the grant costs, as it is part of the dissemination of information gathered.

## 475. Douglas Andres

**Submit date:** 8/28/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Douglas Andres

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I understand the motivation but a unilateral decision to limit publication costs would harm the ability of NIH funded researchers to publish. Has the NIH analyzed the current cost of publication in well regarded journals? Will the NIH get into the publication business to provide low cost/no cost options?

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Peer reviewers are generally not compensated - so not it is not fair. Not sure you can pay reviewers and also reduce publication costs.

**4. Publishing best practices:**

**5. Other Comments:**

## 476. An Early Career Academic Scientist

**Submit date:** 8/28/2025

**I am responding to this RFI:** On behalf of myself

**Name:** An Early Career Academic Scientist

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**

**2. Available evidence related to publication costs and proposed options:**
While I understand and encourage a battle to lower publication costs, the policies to restrict compensation for publications will negatively affect scientists and restrict the dissemination of research. The battle should be fought between the NIH and publishers, not using scientists as intermediaries. Yes publication costs are too high, but the cost to publish is out of our hands and the cost to publish will differ depending on fields.

In my field of Neuroscience, the cost to publish in a field-standard journal (i.e. the Journal of Neurotrauma; a journal that properly disseminates work and establishes rigorous peer review) approaches or exceeds 6k per article. A similar journal, the Journal of Experimental Neurology, exceeds 5k. These journals are targeted for their collective expertise and dissemination of research related to Neurotrauma and are important staples for our field. There are always higher impact journals that cost more money but are not ideal for a bulk of work in our field. Within the Neurosciences, publication fees rarely approach a low end of 2-3k/article and when they do, typically are in journals with less rigorous scientific peer review. These policies would push us further away from achieving a gold-standard of science.

Could there be a reciprocal forcing of publishers to reduce their publication costs? Maybe. But likely not. There is a contrast between the NIH mandating open access (which is almost universally supported by researchers for better public availability) and the fact that journals now need to charge open access fee's on top of the publication fees, making it near impossible to find a journal that fits both the open access policy as well as total cost to publish.

Ultimately this policy is short-sited and will harm our attempts to disseminate work provided by tax-payers dollars, disproportionately hurt early-career scientists who dont have endowments to help publish, as well as steer more scientists to publish in near-predatory journals with less rigorous peer review, moving US science further away from a gold-standard. I strongly encourage the battle to reduce publication costs to continue, but please find another way that does not penalize the scientists trying to advance and better the world.

**3. Peer review compensation:**
If you pay people for peer review, you incentivize people to do a fast job, not a good job, and will reduce the quality of review.

**4. Publishing best practices:**

Scientific fraud is an emerging problem but mostly coming from only a few countries and the use of paper-mills. Still, even journals like Springer Nature are now being infiltrated and blasted by this fraudulent industry and sending countless falsified papers out of journals like Scientific Reports. I 100% support any efforts to stop this.

**5. Other Comments:**

Scientific fraud is an emerging problem but mostly coming from only a few countries and the use of paper-mills. Still, even journals like Springer Nature are now being infiltrated and blasted by this fraudulent industry and sending countless falsified papers out of journals like Scientific Reports. I 100% support any efforts to stop this.

## 477. Esther Dupont-Versteegden

**Submit date:** 8/28/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Esther Dupont-Versteegden

**Name of Organization:** University of Kentucky

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
In my opinion option 4 is the best.

Option 1 should not be considered. Placing values on things such as preprints is not a good idea, since non-peer reviewed publications should not be used as evidence for clinical practice and do not move science forward.

Option 3 is problematic, as people who review for money are not always the best reviewers. I can see a person just reviewing paper 'as a living' without having the expertise to review the manuscripts.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
The problem with paying for peer review is that people who need the money will review papers for which they are not experts, just to make some money.

**4. Publishing best practices:**

**5. Other Comments:**

## 478. N/A

**Submit date:** 8/28/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 1

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 479. Kate Lawrenson

**Submit date:** 8/28/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Kate Lawrenson

**Name of Organization:** UTHSCSA

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**

**2. Available evidence related to publication costs and proposed options:**
Since the publication costs are outside of the control of investigators, but publication is essential for for disseminating our research, I do not think there should be a limit on allowable publication costs. Adding limits will cause disparities - better funded institutions will still find a way to pay the costs, whereas institutions without large endowments will have less ability to pay the costs of publishing in high impact journals. One way to limit these costs would be to impose restrictions on how much journals are allowed to charge.

**3. Peer review compensation:**
Peer review service should be a requirement of funded investigators, and the amount of service proportional to the amount of NIH funding an investigator/team have received within a given window.

**4. Publishing best practices:**

**5. Other Comments:**

## 480. N/A

**Submit date:** 8/28/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I strongly support Option 1: Disallow all publication costs.

I have been in academics for over 25 years. Peer review is broken. It is a colossal waste of everyone's time. And time is money. So $ is wasted in terms of reviewer time, publication charges, and most importantly, the massive waste of time involved in submitting, resubmitting papers to different journals.

Moreover, peer reviewed papers still contain fraudulent data, errors, results that are not reproducible, etc. So its not like peer review is flawless.

Lately it has taken 4-6 months to get reviews back, and the quality of the reviews is terrible.

If NIH refuses to pay for publication costs, the entire biomedical research field will default to submitting preprints. This is outstanding as they are published immediately,. It is not difficult for experts in the field to then see the paper and attempt to reproduce the results. So the error correction process will happen faster.

NIH should do something bold that simultaneously speeds dissemination of research results and dramatically reduces costs to $0. So go with Option 1.

**2. Available evidence related to publication costs and proposed options:**
$0 and rapid publication is best option (option 1)

**3. Peer review compensation:**
This is a dumb idea. Most faculty make far more that $50/hour. It is not worth our time to review even for $50/hr. Plus this adds complexity in terms of getting $ back to reviewers, tax implications, etc...

Better option is no peer review, since peer review is broken anyway.

**4. Publishing best practices:**

**5. Other Comments:**

## 481. Hannah Tiffin

**Submit date:** 8/28/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Hannah Tiffin

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 3 and option 5 balance the need for scientific dissemination of results and communications within the scientific community with fiscal responsibility. Option 3 also elevates the role of reviewers and would emphasize the importance of reviewer's time and expertise by giving more weight to review processes that compensate reviewers. This would need to have oversight to ensure that these are not predatory journals compensating nefarious actors though. Journal costs have become increasingly expensive all while rarely compensating their reviewers. While I think it reasonable to have publication costs associated with society-associated or society-led journals, as these feed into society initiatives and build scientific communication channels, it is not reasonable to be paying exhorbitant fees for non-society journals, particularly those considered "predatory" and often with lax review processes.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 482. James MacLeod

**Submit date:** 8/29/2025

**I am responding to this RFI:** On behalf of myself

**Name:** James MacLeod

**Name of Organization:** University of Pennsylvania

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I prefer the clarity and simplicity of option 2.

Option 2: Set a limit on allowable costs per publication. NIH could limit allowable direct costs to $2,000.00 per publication, including APCs and other fees. This amount is between what NIH found as the average global APC ($1,235.51) and the average requested in budgets (approximately $2,600.00-3,100.00), and close to the average for U.S. published journals' APCs ($2,177.00).

**2. Available evidence related to publication costs and proposed options:**
Your analyses sound appropriate.

**3. Peer review compensation:**
I am rarely compensated for peer reviews, but think that is an interesting idea and something to explore. To avoid individuals exploiting such a system, I would limit eligible manuscripts to higher tier journals as well as the total number that one individual can review for compensation in a given year.

**4. Publishing best practices:**
Good idea.

**5. Other Comments:**
Good idea.

## 483. Clare Rittschof

**Submit date:** 8/29/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Clare Rittschof

**Name of Organization:** University of Kentucky

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 1 seems to go against the stated goals, as it will limit taxpayers' ability to access publicly-funded research by discouraging open access publishing. The entire ethos behind open access publishing is to make work available to the public. However, investigators can't afford the increasingly steep fees on top of supporting research personnel and other project costs.

Options 2 & 3 seem workable. 4 &5 also seem possible.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Peer reviewers for publications are almost never compensated, even for very high impact journals like PNAS, Nature Communications, etc. Sometimes they are compensated indirectly, e.g., through waiving page charges for an open access (but still competitively reviewed) article. I like the idea of limiting predatory behavior on the part of for-profit journals, which I think you are trying to achieve by incentivizing places that pay for peer review. However, this could back fire, as not for profit journals may not have the funds to support peer review payment. As a result you may be pushing people to publish more in for-profit journals. I wonder if the NIH could focus on a policy that supports society-based journals (typically not for profit) instead of for-profit journals. Paying for peer review services is nice, as it is a lot of work. I do worry about changing this precedent - peer review is typically viewed as a service activity for the scientific enterprise.

**4. Publishing best practices:**
As science becomes increasingly interdisciplinary, journals that readily publish work that does not fit squarely into a discipline box are more necessary. Many of these are open access, and incur publication costs. For some studies, the choices are submitting it to a lower impact field-specific journal (because the study does not fit a disciplinary framework, even if it is high-quality), or a well-read open access journal that accepts non-traditional work; the latter often have publication charges that can be very high.

**5. Other Comments:**
As science becomes increasingly interdisciplinary, journals that readily publish work that does not fit squarely into a discipline box are more necessary. Many of these are open access, and incur publication costs. For some studies, the choices are submitting it to a lower impact field-specific journal (because the study does not fit a disciplinary framework, even if it is high-quality), or a well-read open access

journal that accepts non-traditional work; the latter often have publication charges that can be very high.

## 484. Hannah Knudsen

**Submit date:** 8/29/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Hannah Knudsen

**Name of Organization:** University of Kentucky

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I am a researcher and a former Editor-in-Chief of a scientific journal, so my comments are informed by both of those perspectives. Option 2 provides the scientific community the opportunity to maximize their scientific impact while reining in publication costs. By setting a limit per-publication, that will signal to journal publishers about what is expected and allowable. It sets a fair amount for all journals. The other policy options that limit total costs to $20,000 will impede the dissemination of scientific findings, as many NIH grants collect a lot of data that represents many possible publications. Setting a limit of $20,000 per grant will likely not encourage journal publishers to reduce fees, so the impact will be that research teams publish fewer papers per grant. Lower productivity per grant is not a good use of taxpayer funds. Fewer papers will be particularly detrimental to early stage investigators and trainees (e.g., graduate students, medical students, fellows) as their publications are critical to future success as independent researchers. Therefore, Option 2 is the best option for the advancement of science and the training of the next generation of scientists.

**2. Available evidence related to publication costs and proposed options:**
Current journal fees in my field typically are $3,500-$4,500 per article. If capped at $20,000, that would mean an R01 could only publish 4 articles. While 4 articles may allow for publishing a protocol paper and main findings related to three specific aims, a lot of productivity would be lost because there would be no funding for sub-group analyses which are critically important to identify "what works for whom."

**3. Peer review compensation:**
I have no interest in being compensated as a peer reviewer. Reviewing journal manuscripts is part of my job as a faculty member. Furthermore, getting paid per review would only make my taxes more complicated, likely requiring me to submit a Schedule C. If a journal offered peer review compensation, I would decline it because it simply is not worth the hassle.

**4. Publishing best practices:**

**5. Other Comments:**

## 485. N/A

**Submit date:** 8/29/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 486. Chandra Orrill

**Submit date:** 8/29/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Chandra Orrill

**Name of Organization:** Rethink Learning Inc

**Type of Organization:** Non-profit Research Organization

**Role:** Organizational Official

**1. Proposed policy options:**
The problem is that the government requires that findings be published in publicly accessible journals. But, most quality journals charge (a lot) for publishing open source articles. So, the researchers are in a bind. Both at my previous organization (a small research university) and my current organization (a small non-profit), the workplace cannot provide funding to the researcher for publications. Yet, the researchers are expected to publish in order to move their careers forward and to meet the federal mandates for open source articles.

Given all of this, perhaps guidance can be offered to the researchers to include only X publications per year in their budget. I know in grants I've submitted, I tend to include only 1 per year, knowing that this will limit both how much and where I can publish.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Peer reviewers in my field are rarely compensated - and when they are it is not with money, but rather with access to the journal's or publisher's library. So, it costs literally nothing for the journal/publisher. The issue is that for many people who work in university settings, this is meaningless as they can get any article through interlibrary loan already. For an organization like mine, it is more meaningful because we don't have as much access, but it is often hard to use that service in the timeframe it is offered. As someone who reviews 15 or more articles per year, I can say that it is a burden on my time and energy and should be somehow compensated.

**4. Publishing best practices:**

**5. Other Comments:**

## 487. N/A

**Submit date:** 8/29/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Other

**Type of Organization - Other:** NIH

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I would advocate for Option 1: Disallow all publication costs.

The main reason is the predatory journals onslaught situation that every researcher is facing today.

The APC situation enables 'more money, more publication' scenario.

The preprint and unpaid publication approach or an NIH served publication platform would serve the research community better than the APC situation.

But, if option 1 doesnt have enough support, my second choice would be option 3, with a firmly set cap at $3000 without any exceptions. If both of the options dont have enough support, I would choose option 2, with a firmly set cap at $2000 without any exceptions.

**2. Available evidence related to publication costs and proposed options:**
This is a welcome policy. On top of the savings for the tax payers, it provides a situation for the reviewers to seriously contribute to the scientific discourse. Would it help if the reviewers are also capped on how much maximum they can receive in terms of the compensation ? If reviewing is compensated, the pool is going to increase and it would be helpful for everyone to get the share of the pie, instead of a few.

**3. Peer review compensation:**
NIH should ask publishers to include the fixed peer review cost in their invoice as a line item, to make sure they are done properly documented.

**4. Publishing best practices:**
NIH could either purchase and use an already available service for fraud detection,  or build its own platform for that purpose and there by removing any additional cost issues and keep things stream lined.

**5. Other Comments:**
NIH could either purchase and use an already available service for fraud detection,  or build its own platform for that purpose and there by removing any additional cost issues and keep things stream lined.

## 488. Jonathan Peled

**Submit date:** 8/29/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Jonathan Peled

**Name of Organization:** Memorial Sloan Kettering Cancer Center

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I am highly supportive of putting a cap on publication costs.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
I am highly supportive of incentivizing publishers to pay peer reviewers. The $50/hour figure is a very low estimate. See for example the American Association of Medical Colleges (AAMC) annual faculty salary survey that gives salaries of medical school faculty. The wages are considerably higher than $50/hr. The 2022 edition of that publication, for example, lists for Clinical Sciences Total for all medical schools across the US, a median salary of $224k for Instructors, $283k for Assistant Prof, $328k for Associate Prof, and $347k for Full Prof, which comes to $107-166/hr. And that was before the considerable inflation in the past few years.

**4. Publishing best practices:**

**5. Other Comments:**

## 489. Beryl Jones

**Submit date:** 8/29/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Beryl Jones

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Of the proposed options, Option 4 is the most likely to achieve the goals of NIH in terms of dissemination of research findings to taxpayers. As I am sure you are aware, nearly all publishers charge to make articles open access, which is the best way to ensure that taxpayers have access to the data and findings regardless of their affiliation with an institution that may subscribe to the journal. Enabling the PI to publish work funded by NIH in open access journals is critical, and option 1 would be highly prohibitive of this practice. Options 2 and 3 would also hinder the ability for PIs to publish their work in the most appropriate journal for the research, as if a publisher has a higher publishing fee then this journal would be eliminated from consideration. Option 5 is similarly restrictive due to the per publication cost limit. OPTION 4 is the ONLY option that would allow almost enough flexibility for the PI to ensure the publication reaches the correct audience and is also open access and available for all taxpayers to access. The 0.8% or 20k spending limits proposed in Option 4 also are in line with recent requests by investigators, suggesting these limits represent a reasonable threshold for publication charges while maximizing research funds. I would suggest increasing the limit to 1% or 30k to ensure that rising publication charges do not inhibit research from being published in an open access format.

**2. Available evidence related to publication costs and proposed options:**
Based on my previous publication charges and rate of article submissions, article charges for open access journals in my field are in the range of $2-4k per article. I publish approximately 2 of these articles each year, which is why I requested $5k per year in publication charges. This is likely on the low end in terms of productivity, so it's likely that other PIs would need more than the 20k limit for publication charges. I would suggest increasing the proposed limit to 1% or 30k to ensure that rising publication charges do not inhibit research from being published in an open access format.

**3. Peer review compensation:**
While it would be great for peer reviewers to be compensated for their work (I peer review MANY articles a year, and it's a lot of work restricted to just the people who have the relevant expertise), requiring publishers to compensate peer reviewers will absolutely result in even higher article processing and open access fees, which would require increased limits for publication costs on the part of NIH and other funding agencies. Academic institutions such as the one I am employed by do NOT have extra pots of money they can contribute to these costs, and so ultimately any rise in publication fees without corresponding increases in grant budgets allotted to these fees will result in fewer publications, less access to those publications, or forcing PIs to publish their work in whichever journals

happen to have reduced fees, even if those journals are not the best venue for the research in terms of reaching the appropriate audience and expertise.

**4. Publishing best practices:**
Journals with more "prestige" tend to have the highest publication costs, which means that only PIs at "elite" institutions with large endowments who have additional sources of revenue they can use for these fees can publish in these journals. This creates even more inequity across institutions. Metrics such as citations, impact factors, and journal rankings could be used to determine which journals are most "prestigious" and potentially correct for the biases associated with publication fees at those publishers.

**5. Other Comments:**
Journals with more "prestige" tend to have the highest publication costs, which means that only PIs at "elite" institutions with large endowments who have additional sources of revenue they can use for these fees can publish in these journals. This creates even more inequity across institutions. Metrics such as citations, impact factors, and journal rankings could be used to determine which journals are most "prestigious" and potentially correct for the biases associated with publication fees at those publishers.

# 490. Good Question Research & Evaluation

**Submit date:** 8/29/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Kerri Wingert

**Name of Organization:** Good Question Research & Evaluation

**Type of Organization:** Non-profit Research Organization

**Role:** Investigator/Researcher

**1. Proposed policy options:**
This is clearly a concerted effort to kill science publication. If you want to stop the US from having good, peer-reviewed research (not pseudoscience), good science processes that compete in a global economy, and good medicine and healthcare systems, this is how you would do it.

I review for free for academic journals, and it takes many hours of time. Most research institutions require publication as part of their promotion and scholarly activity. These costs will fall on individuals' personal salaries, leading to other problems for promotions because the people who need promoted (and more money) don't have it to spend on a $1000 or $2000 publication support.

These costs are high because they are labor intensive - reviewing a journal article requires dozens of hours of coordination. The costs are associated with LABOR not hubris.

**2. Available evidence related to publication costs and proposed options:**
Reviewing one journal article takes me about 6 hours of time. This is to accept, encourage resubmission with major revisions, accept with minor revisions, or decline. I do this for free, but many years I get asked to do 6-10 reviews of articles, while I also review and meta-review for conferences and federal grants. I have to say no to 90% of these because most are unpaid, and editors have a really hard time getting submissions.

**3. Peer review compensation:**
I am almost never compensated for peer review, and this means that the reviews I see or give are lower-quality than they would be if I were compensated. I do reviews late at night or in off-hours because I care about the field. My projects are hourly, so this is completely unpaid labor. (I don't get a salary - I only get paid for time that I am working on compensated projects, not for service.)

**4. Publishing best practices:**
The future of publication must be prepared to meet the needs of bot and AI-generated references, in particular. It is extremely easy to get a list of bad, but impressive-appearing, references, and these cannot be cheaply hand-checked. For example, ChatGPT and Google Gemini are notoriously bad at respecting peer-reviewed journal publications and offer false or lower-quality journal publications as citations for cheating writers. American taxpayers are well-served by having cutting-edge technologies prevent fraud in our research systems.

AI software may well be able to strengthen the ability to detect the use of "bad references" but investments in the peer review process, beyond volunteer reviewers, would be absolutely necessary.

The time it takes to hand-check references is going to go up as AI use increases in the future, and we will need to meet the moment.

**5. Other Comments:**

The future of publication must be prepared to meet the needs of bot and AI-generated references, in particular. It is extremely easy to get a list of bad, but impressive-appearing, references, and these cannot be cheaply hand-checked. For example, ChatGPT and Google Gemini are notoriously bad at respecting peer-reviewed journal publications and offer false or lower-quality journal publications as citations for cheating writers. American taxpayers are well-served by having cutting-edge technologies prevent fraud in our research systems.

AI software may well be able to strengthen the ability to detect the use of "bad references" but investments in the peer review process, beyond volunteer reviewers, would be absolutely necessary.

The time it takes to hand-check references is going to go up as AI use increases in the future, and we will need to meet the moment.

## 491. Mark Bishop

**Submit date:** 8/29/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Mark Bishop

**Name of Organization:** University of Florida

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Of the options presented, I am most in favor of #1 and #2. An option not list is for the NIH to publish the work funded grants from NIH - this would control the costs in house. I suggest this without knowing the amount of money that it actually takes to have a full-time editorial and managerial staff for an enterprise that extensive. The journals on whose boards I serve have staffs of 3-10; however, the throughput is likely to be much lower than what I am suggesting here.

**2. Available evidence related to publication costs and proposed options:**
Hmmm.....I think the $2000 suggest in options 2 and 3 is low considering the last OA papers I published cost >$3000 each respectively. These publications were paid from grant direct funds and institutional IDCs.

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 492. Robert Cook

**Submit date:** 8/29/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Robert Cook

**Name of Organization:** university of florida

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
On the one hand - I agree - but there needs to be good journals that will publish papers at reasonable costs. With the new federal policy saying that there can be no embargo period for journals and making the manuscript available online on NIH MS system- journals are now charging more. What are researchers to do if the "good" journals all start requiring payments due to the new policy?>

**2. Available evidence related to publication costs and proposed options:**
We recently submitted a paper before July 1 to a journal that currently provides the option to publish for low cost/free (with a one year embargo) or immediate online access. The paper was accepted after July 1, 2025. We told the journal that we are required to upload the "author accepted manuscript" so that it would be immediately available. ANd the journal has told us this is only possible in their journal if we pay the $4000 open access fee. In summary, if NIH seeks to reduce publication costs, it may either need to come up with new journals that do not charge, or address the most recent issue about requiring open access without embargo.

**3. Peer review compensation:**
Peer review does take a lot of time. Perhaps there could be a way that doing peer review helps to reduce the costs related to future open access publication.

**4. Publishing best practices:**
I think the journals say that they rely on subscriptions from libraries in order to keep the publication costs down. And that libraries will not subscribe if the papers are public access immediately. So perhaps need a way to ensure that journals can still receive payments from libraries to pay their editors, etc.

**5. Other Comments:**
I think the journals say that they rely on subscriptions from libraries in order to keep the publication costs down. And that libraries will not subscribe if the papers are public access immediately. So perhaps need a way to ensure that journals can still receive payments from libraries to pay their editors, etc.

## 493. University of Utah

**Submit date:** 8/29/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Caren Frost

**Name of Organization:** University of Utah

**Type of Organization:** Academic Institution

**Role:** Other

**Role – Other:** Associate Vice President for Research Integrity and Compliance

**1. Proposed policy options:**

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/Utah_NIH_RFI_2025-09-15.pdf

**Description:** Letter from the University of Utah

## 494. Mark A Palmer

**Submit date:** 8/29/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Mark A Palmer

**Name of Organization:** Siena Heights University

**Type of Organization:** Not Applicable

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Dissemination costs should be limited to $1000 per article and $1000 per conference. So if one presents three papers at a single conference the cost would be limited to $1000 not $3000. It does not cost much to post an electronic file to a website. I pay about $200 per year to maintain my website registration. Virtual conference sessions are much more effective than sessions at a conference, the dialog is much more intense. Very few, if any people attend the maximum number of sessions when attending a conference. Since most conferences require papers to be submitted in advance of the conference, there is no reason these papers could not be made available to session attendees shortly before the conference to stimulate discussion. There is no reason the dialog could not be recorded, electronically transcribed and made available to session attendees. We can be a lot more effective and spend a lot less.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Peer reviewers should not be compensated, nor should editors.

**4. Publishing best practices:**

**5. Other Comments:**

## 495. Sterling Paramore

**Submit date:** 8/29/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Sterling Paramore

**Name of Organization:**

**Type of Organization:** Not Applicable

**Role:** Member of the Public

**1. Proposed policy options:**
I earned a PhD in Physical Chemistry in 2007. While I no longer work in academia, I did publish several papers while I was a grad student and postdoc. I remember how ridiculous the peer review and publishing process was. Peer review felt like rubberstamping (I published in Biophys J and J Chem Phys), and the fact that we had to pay to publish and pay to read is nothing short of a scam. When I wrote my dissertation at the University of Utah, there were specific instructions saying that we could only cite publications of ours from journals that weren't "vanity publications", which is where people pay to have their work published. However, this policy only applied to the non-science departments.

What I really think should have been done a long time ago is for the institutions that fund scientific advancement to get a cut of any technology that comes out of it. Our current system where the public taxpayer accepts all the risk and gets none of the financial reward whereas private corporations get all the reward and let the public take on the risk is absurd.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 496. N/A

**Submit date:** 8/30/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 3 could offer the best benefits. Regarding APC, it may reduce average costs. For journals, it require they compensate peer reviewers, which is usually free labor they receive.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

# 497. Adrienne Roeder

**Submit date:** 8/31/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Adrienne Roeder

**Name of Organization:** Cornell University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
As a PI on an NIH grant, none of the options work for me. They essentially leave the investigator with an unfunded mandate to publish open access without the money to pay for it. As far as I understand the policy, the fact that we have to make the paper available on pubmed central as soon as it is published means that we now have to publish open access because that is the only option I know of that will allow us to make it available on pubmed central immediately. Open access costs a lot! Typically $5,000 to $12,000 per article. All of the proposed restrictions limit how much we can pay for publications from the grant in various ways. But if we can't afford open access fees, I don't know how meet mandate to have it immediately available on pubmed central. There is pressure to publish as many high quality papers as possible to justify that we have been productive on the grant, but how can we do that when the amount that can be spent on publications is severely limited. What is going to happen is that wealthy labs that have other resources will be able to pay the open access fees and will then look more productive than labs that do not have other sources of money to pay the open access fees. This is already true with the current situation, but all of the possible policies exacerbate the situation.

I strongly support publishing open access and making our research available to everyone, but if that is the mandate, we have to be able to pay for it. Telling us we both have to publish open access and cannot pay for it on the grant puts the PI in an untenable situation. The NIH needs to negotiate directly with the journals, not put the PIs in a no win situation.

**2. Available evidence related to publication costs and proposed options:**
NIH is using publication costs estimated in grant budgets to justify the amount of money to spend, but that is not a fair approach. 1 Those budgets were made before the latest mandate to make everything accessible immediately, which dramatically raises the costs of having to publish open access. Those estimates were usually made based on a mix of open access and traditional publications, and traditional publications are often free or much cheaper (~$1000). 2. Prices of publication, like everything else have increased in recent years and our budget requests have not caught up.

The open access publication fees are generally easily available online. Here are a few examples of the open access fees:

Nature Communications $6790

Nature $12,690

Science Advances $4950

PLOS Biology $5,500

Cell Reports $5620

Cell $11,400

Current Biology $7030

Developmental Cell $10,400

Molecular Cell $10,400

Neuron $10,400

**3. Peer review compensation:**
I have never been compensated for peer review from a journal. For academic society journals, compensating reviewers is not a realistic option in the budget.

**4. Publishing best practices:**
Many journals are using this software.

**5. Other Comments:**
Many journals are using this software.

## 498. Michael Lissack

**Submit date:** 8/31/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Michael Lissack

**Name of Organization:** Second Order Science Foundation

**Type of Organization:** Non-profit Research Organization

**Role:** Other

**Role – Other:** Executive Director

**1. Proposed policy options:**
The most effective option is to cap allowable Article Processing Charges (APCs) at $2,000 per article, consistent with actual costs of legitimate publishing services and international benchmarks. NIH should further require publishers to refund APCs when articles are retracted for fraud or editorial failure, and deny reimbursement to publishers or journals with repeated integrity failures. PubMed Central deposit should remain a compliance pathway at zero APCs.

A limited exception to $3,000 could be allowed if (1) all reviews are published with the article, (2) reviewers are paid transparently at Bureau of Labor Statistics (BLS) rates, and (3) journals demonstrate robust automated fraud detection. This balances access needs with fiscal responsibility.

References:

Lissack, M. (2025). Academic publishing's systematic fraud: Legal remedies for a corrupted enterprise (under review at multiple law journals). ATTACHED

Deutsche Forschungsgemeinschaft. (2024). Guidelines for publication funding. https://www.dfg.de/en/research-funding/funding/publication-funding

UK Research & Innovation. (2024). UKRI open access policy. https://www.ukri.org/publications/ukri-open-access-policy/

CNRS. (2024). The CNRS encourages its scientists to stop paying to be published. https://www.cnrs.fr/en/cnrsinfo/publication-costs-we-are-edge-abyss

**2. Available evidence related to publication costs and proposed options:**
Evidence shows APCs are inflated and often fund corrupted peer review. In 2023, over 10,000 research papers were retracted, largely from paper-mill infiltration (Van Noorden, 2023). Wiley's Hindawi subsidiary retracted 8,000+ articles in a single year yet retained APCs (Retraction Watch, 2023).

Meanwhile, publishers charge NIH-funded researchers up to $11,000 per paper (Nature Publishing Group, 2023). NIH's own reporting shows average reimbursed publication costs around $2,565–$3,104 per article (NIH RePORT, 2023). International evidence confirms that caps work: Germany enforces a €2,000 cap, the UK limits reimbursement, and France discourages APCs altogether.

References:

Lissack, M. (2025). Academic publishing's systematic fraud: Legal remedies for a corrupted enterprise (under review). ATTACHED

Van Noorden, R. (2023). More than 10,000 research papers were retracted in 2023. Nature. https://doi.org/10.1038/d41586-023-03974-8

Retraction Watch. (2023, Dec. 19). Hindawi reveals process for retracting more than 8,000 paper-mill articles. https://retractionwatch.com/2023/12/19/hindawi-reveals-process-for-retracting-more-than-8000-paper-mill-articles/

Springer Nature. (2023). Publishing options for Nature journals. https://www.nature.com/nature/for-authors/publishing-options

NIH Research Portfolio Online Reporting Tools (RePORT). (2023). Publication cost data. https://report.nih.gov

Deutsche Forschungsgemeinschaft. (2024). Guidelines for publication funding. https://www.dfg.de/en/research-funding/funding/publication-funding

**3. Peer review compensation:**
Paying peer reviewers may improve quality if tied to transparent safeguards. NIH should only allow higher APC reimbursement when:

Reviewer reports are publicly posted alongside accepted articles.

Reviewers are paid at BLS hourly rates based on documented hours.

Conflicts of interest are disclosed, and editorial override systems are auditable.

Compensation is contingent on substantive, criterion-based reviews (methods, data, limitations), not perfunctory notes.

Without these controls, paying reviewers risks entrenching networks that already drive mass retractions.

References:

Lissack, M. (2025). Academic publishing's systematic fraud: Legal remedies for a corrupted enterprise (under review). ATTACHED

Else, H. (2024). Paper mills are bribing editors at scholarly journals. Science. https://www.science.org/content/article/paper-mills-bribing-editors-scholarly-journals-science-investigation-finds

Ross-Hellauer, T. (2017). What is open peer review? A systematic review. F1000Research, 6, 588. https://doi.org/10.12688/f1000research.11369.1

**4. Publishing best practices:**
NIH could justify reimbursement up to $3,000/article if journals demonstrate costly but essential practices, such as:

Automated fraud detection (image forensics, text forensics, anomaly detection).

Open peer review (full review history published).

Data and code availability (linked to repositories; reproducibility checks).

Cryptographic provenance systems (tamper-proof logs of review events, authorship, and COI disclosures).

Refund guarantees for retracted work.

Absent these, higher charges are unjustified given that baseline dissemination is already met through PubMed Central deposit.

References:

Lissack, M. (2025). Academic publishing's systematic fraud: Legal remedies for a corrupted enterprise (under review). ATTACHED

Bik, E. M., Casadevall, A., & Fang, F. C. (2016). The prevalence of inappropriate image duplication in biomedical research publications. mBio, 7(3), e00809-16. https://doi.org/10.1128/mBio.00809-16

Ross-Hellauer, T. (2017). What is open peer review? A systematic review. F1000Research, 6, 588. https://doi.org/10.12688/f1000research.11369.1

van Rossum, J. (2017). Blockchain for research: Perspectives on a new paradigm for scholarly communication. Digital Science. https://www.digital-science.com/resources/digital-research-reports/blockchain-for-research/

**5. Other Comments:**
NIH could justify reimbursement up to $3,000/article if journals demonstrate costly but essential practices, such as:

Automated fraud detection (image forensics, text forensics, anomaly detection).

Open peer review (full review history published).

Data and code availability (linked to repositories; reproducibility checks).

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Absent these, higher charges are unjustified given that baseline dissemination is already met through PubMed Central deposit.

References:

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Bik, E. M., Casadevall, A., & Fang, F. C. (2016). The prevalence of inappropriate image duplication in biomedical research publications. mBio, 7(3), e00809-16. https://doi.org/10.1128/mBio.00809-16

Ross-Hellauer, T. (2017). What is open peer review? A systematic review. F1000Research, 6, 588. https://doi.org/10.12688/f1000research.11369.1

van Rossum, J. (2017). Blockchain for research: Perspectives on a new paradigm for scholarly communication. Digital Science. https://www.digital-science.com/resources/digital-research-reports/blockchain-for-research/

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/af1.pdf

https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/af2-combined.pdf

**Description:** Article currently under review at several law journals: Lissack, M. (2025). Academic publishing's systematic fraud: Legal remedies for a corrupted enterprise

Transmittal letter

## 499. Professor Emmanuel Oluyinka IDOWU, MD.FACEP.FAAEM

**Submit date:** 9/1/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Professor Emmanuel Oluyinka IDOWU, MD.FACEP.FAAEM

**Name of Organization:** College of Medicine, University of Ibadan, Ibadan, Nigeria; Beth Israel Deaconess Medical Center, Boston, Massachusetts; University of Ibadan, Ibadan, Nigeria

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Use of taxpayer funds is a welcome development but for sense of co-ownership with government as well as joint accountability to the public that was taxed, a strict, transparent and responsible oversight committee or organ would be required that both monitors and evaluate use of the funds at local levels while efficiently coordinating the disbursement and administration of the fund pool centrally. With strict and well- defined inclusion and exclusion criteria, as well as allowable thresholds set in place, public trust and government accountability will be on a safe pedestal.

NIH-governed grant project-tailored publishing platforms could be put in place for authors to publish grant project manuscripts either for free or at a highly subsidized rate to principal investigator(s) (or recipient institutions) so as to relieve the financial burden to authors (or recipient institutions ) and as such maximize grant funds. Reviewers in these platforms can be encouraged through a reward system that favors high-quality, scientifically rigorous, ethically sound, purely-human powered reviews. AI-assisted review platforms should not be rewarded.

**2. Available evidence related to publication costs and proposed options:**
Other suggested alternative option : Proposed Best ratio Tripartite Recycling Model

Right from the point of development and submission of research protocol for NIH approval, a tripartite recycling model of shared burden of accruable cost from publishing grant projects could have been established in the grant procedures. This potentially looks more sustainable through the signing of memorandum of understanding by the relevant stakeholders: donor agency (NIH), recipient university (or equivalent institution), and the Principal investigator in the relevant institution, especially with respect to publication costs and other allied costs. The best ratio may be selected after piloting 20: 40: 20; 40: 20: 20; 20:20: 40 sharing formulae etc. adaptable to local variabilities in the context of other related factors to be considered. This can augment the taxpayer fund pool especially in situations that warrant emergency donor agency grant policy switches putting strain on the conduct and publishing of basic and/or clinical grant projects.

**3. Peer review compensation:**
NIH-governed grant project-tailored publishing platforms could be put in place for authors to publish grant project manuscripts either for free or at a highly subsidized rate to principal investigator(s) (or recipient institutions) so as to relieve the financial burden to authors (or recipient institutions ) and as such maximize grant funds. Reviewers in these platforms can be encouraged through a reward system

that favors high-quality, scientifically rigorous, ethically sound, purely-human powered reviews. AI-assisted review platforms should not be rewarded.

**4. Publishing best practices:**
NIH-governed grant project-tailored publishing platforms could be put in place for authors to publish grant project manuscripts either for free or at a highly subsidized rate to principal investigator(s) (or recipient institutions) so as to relieve the financial burden to authors (or recipient institutions ) and as such maximize grant funds. Reviewers in these platforms can be encouraged through a reward system that favors high-quality, scientifically rigorous, ethically sound, purely-human powered reviews. AI-assisted review platforms should not be rewarded.

**5. Other Comments:**
NIH-governed grant project-tailored publishing platforms could be put in place for authors to publish grant project manuscripts either for free or at a highly subsidized rate to principal investigator(s) (or recipient institutions) so as to relieve the financial burden to authors (or recipient institutions ) and as such maximize grant funds. Reviewers in these platforms can be encouraged through a reward system that favors high-quality, scientifically rigorous, ethically sound, purely-human powered reviews. AI-assisted review platforms should not be rewarded.

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/NIH-RFI-ACEP-SAEM-Maximizing-Research-funds-by-Limiting-Allowable-Publishing-Costs-Emmanuel-Oluyinka-IDOWU-MD.FACEPFAAEM.docx

**Description:** National Institutes of Health (NIH): Request for Information on Maximizing Research Funds by Limiting Allowable Publishing Costs- Emmanuel Oluyinka IDOWU,MD.FACEP.FAAEM

# 500. Victoria L Bautch

**Submit date:** 9/1/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Victoria L Bautch

**Name of Organization:** University of North Carolina at Chapel Hill

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
In my opinion each of the presented options would hamper the ability of me and my colleagues to publish our research findings, which is the gold standard for research progress. First, I have not had a publication in at least 10 years that did not have article processing charges (APC). Second, new NIH policy says that research must be publicly available at publication, which I agree with, but this entails "buying" an Open Access license in most journals respected in my field. Third, these APC and Open Access licenses are in the range of $4,000-$6,000 USD, with some even costlier. Fourth, in my field the bar is at least 6-7 primary research papers to support the renewal of the average R01 award, leading to publication costs of AT LEAST $25,000 per 4 year grant. Fifth, agreements with publishers for reduced charges are largely restricted to investigators associated with restricted research entities such as HHMI and Max Planck. Very few universities are able to negotiate the cost reductions enjoyed by those in those prestigious organizations. Finally, in the current climate it is unlikely that investigators and universities will have pots of money to help investigators who manage to get grants to then publish their work. Reviewed preprints also incur charges to be "handled", at at this point they are not considered with the same weight (if at all) in funding and promotion decisions.

I do not believe that the current charges reflect the costs of the publishers and yes, the system needs to be fixed. However, I believe that NIH is mis-guided in these proposals rather than working to change the system at he publishers charges level. These proposals, if enacted, will continue to allow a small group of elite scientists to publish in high impact journals, but many scientists will not be able to publish their work in ways to make it visible and impactful. This will lead to even more concentration of resources to the few at prestigious places and diminish the overall impact of work throughout the enterprise on biomedical research.

**2. Available evidence related to publication costs and proposed options:**
See above.

**3. Peer review compensation:**
I have reviewed for journals for over 30 years and I have never been financially compensated for this work. I've sometimes gotten access to a database for 30 days (to better do the review) but nothing else. Honestly, I don't even want to be compensated directly, I just want for me and my colleagues to be able to publish our work without having to pay $5,000/paper to do this.

**4. Publishing best practices:**
I'm not aware that there is strong justification for the higher publication costs, other than some elite investigators have the resources to pay the charges or have "deals".

**5. Other Comments:**
I'm not aware that there is strong justification for the higher publication costs, other than some elite investigators have the resources to pay the charges or have "deals".

## 501. N/A

**Submit date:** 9/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
If the public access policy were to set a per publication cap, that cap would likely become the de facto fee for most publications. For-profit (commercial) publishers would decrease APCs for high-profile titles and increase APCs for lower profile titles in their ecosystem. In other words, the cap would become a floor instead of a ceiling. Such a shift would be very likely to increase the total spending on publication fees from grant funds and to reduce taxpayer funds available to support the research itself. For this reason, a per publication cap is to be avoided.

None of the five proposed public access policies distinguish between publication fees levied by for-profit (commercial) and non-profit publishers. Policies that favor non-profit publishers would serve several goals: 1) Most, but not all employ working scientists as editors. These individuals gain a wide view of their fields and the opportunity to promote good practices in reviewing and in research. This implicit advocacy benefits the editor as well as the field. 2) The income that non-profit publishers receive from APCs is used to support activities of professional societies. Professional societies are especially important for the development of early-career scientists and for hosting conferences that promote open discussion about research practices and results. Thus, a public access policy that incentivizes publishing with non-profit publishers would maximize the return on taxpayer funds by supporting research ecosystems and researchers alongside high-quality peer review.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Monetary compensation for peer review would incentivize reviewers to identify the shortest path to generating a review that will be accepted by editors. Here are some ways an unscrupulous reviewer could achieve that: 1) use an LLM to do the review; 2) fail to disclose a conflict of interest; 3) review manuscripts outside their expertise. If incentivized by the proposed public access policy, direct monetary compensation to peer reviewers would pass additional taxpayer dollars to peer reviewers with no certainty of a positive return on this investment in the form of faster, better, more considered critiques.

**4. Publishing best practices:**
For-profit (commercial) publishers seem to set publication costs based on what they believe authors are willing to pay relative to the perceived prestige of the publishing venue. Thus, under current conditions, the actual publishing costs are a minor factor for these publishers. Without explicit expectations for

services provided, a higher per publication cost would empower commercial publishers to increase their fees but might not improve best practices in any meaningful way.

**5. Other Comments:**

For-profit (commercial) publishers seem to set publication costs based on what they believe authors are willing to pay relative to the perceived prestige of the publishing venue. Thus, under current conditions, the actual publishing costs are a minor factor for these publishers. Without explicit expectations for services provided, a higher per publication cost would empower commercial publishers to increase their fees but might not improve best practices in any meaningful way.

## 502. N/A

**Submit date:** 9/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Funds must be provided for publication costs, especially in light of the new requirement that researchers must make their publications using NIH funding immediately public (versus the 1 year embargo that was previously working well). To comply with this, journals are already requiring authors to pay open access fee costs, which may be higher than or separate costs from "article processing charges." Some journals may have institutional agreements to cover all or a portion of these costs, but this is not typical. With high costs of publishing becoming the new norm this year, now only researchers who can afford to publish are able to do so. This is antithetical to the principles of scientific dissemination. Additionally, more analysis of the typical publishing costs should be done and made public, including determining whether for each journal evaluated, an author would incur article processing charges and/or open access fees to comply with the new NIH policy, and also conducting something like weighted analyses that account for some journals receiving more submissions and publishing more research than other journals (e.g., because they have a good reputation or higher impact factor). These "better journals" may be more expensive than other journals, whose costs were likely given an equal weight in the analysis of average costs described in this announcement.

**2. Available evidence related to publication costs and proposed options:**
Many students, trainees, and early investigators rely on existing data from large, well-curated studies for their first research projects. A major advantage of this approach is that they can conduct and publish important research (secondary data analysis) without the typical costs of doing research; investigators may propose to use data without any funding. These publications derive from data use requests proposed to the large studies, and are endeavors separate from the study itself. This is a wonderful feature of our government's strong legacy of funding these studies, and then continuing to fund their follow up and data management. Scientists in these crucial early career stages do not typically have money to spend on publications (either open access fees or article processing charges), so the proposed changes will likely cripple their ability to publish research. Additionally, established investigators may wish to continue to publishing articles using data from their own studies, years after a grant funding that study has been completed; being able to do so is the mark of a well designed study that produces a wealth of data, and is typical in public health and epidemiologic research settings. Large epidemiologic studies can result in hundreds of publications after the life of the original grant. By not helping cover costs of publishing, the government is putting a 5-6 year term limit on data usefulness for the very studies it is funding, because investigators will not have money to publish new research findings using existing resources.

**3. Peer review compensation:**
Most scientists feel that peer review is part of their duty to perform as scientists. Yes, it does take a great deal of time, but it is a system we are confident in because we know peers reviewing our own research are not merely doing so because they are paid.

**4. Publishing best practices:**

**5. Other Comments:**

# 503. Mitchell Grayson

**Submit date:** 9/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Mitchell Grayson

**Name of Organization:**

**Type of Organization:** Not Applicable

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I am writing to most strongly discourage NIH from choosing option 1. Not supporting publication costs, while still expecting immediate open access would make publication of NIH research very difficult for investigators. This would require investigators to obtain external funding (or just publish in non-peer-reviewed preprints) to publish their work. Please do not do this.

Option 2-5 are all reasonable, although the upper limit for publication costs in option 2 should be higher (if the average is above $2K, as indicated in the notice, then the allowable costs should be enough to cover this -- so I would recommend a limit of $3-4K per publication, with an adjustment for inflation, should those costs rise). Most biomedical journals do not pay peer reviewers and this makes option 3 less attractive. While the NIH may think this will encourage publishers to pay peer-reviewers, this is not likely to happen.

The key issue is for limiting the amount of publication costs (total, not per paper) is whether the NIH has a limit on the number of publications expected from a grant. If so, then limiting total publication costs makes sense; however, if not, then this is not something that should be done. In the grant application the investigators will indicate how many papers they plan to publish, and this should justify the publication funds requested.

The key throughout all of this, is that for open access to occur, the NIH must provide the appropriate funds in the specific grants (or work with publishers to arrange "free" open access for all NIH sponsored research, so that this is not a burden placed on the investigator).

**2. Available evidence related to publication costs and proposed options:**
In our subspecialty there are limited options for immediate open access publication. These all come with costs (as the publishers will only provide open access after a year), and this is something that was not budgeted for in current ongoing grants. It does make sense to require this going forward, but to allow for all new grant submissions to properly budget for this added expense. In my experience open access ranges from $3-4K depending on the journal, and it would make sense for the NIH to figure out an appropriate cost (with increases for inflation) that can be budgeted in a grant.

**3. Peer review compensation:**
Paying for peer review is a nice idea, but in reality it does not work. There are a limited pool of reviewers who will do most of the reviews. In fact, NIH does not appropriate compensate their own peer reviewers for study sections (and in the notice - the option 3 discussion even indicates that each paper reviewer should get about $300, while the NIH give $400 for grant peer reviewers to review up to 9 proposals). I

really think that until the NIH properly compensates study section reviewers, it should not try and influence the publication world on peer review compensation.

**4. Publishing best practices:**
Inflation is going to raise the cost of publication just like everything else. Historically the NIH has been a bit slow to increase with inflation. In addition, as publishers add more features to detect fraud and AI generated content, the cost of their business will increase (beyond just that due to inflation). I do not know how much this will add to the cost of publishing, but it should be considered. There is also the eventual end of print publications -- which should (although I do not have great hope for this) reduce the overall costs of publication. Again, I do not have insight into how much these factors will affect the overall costs, but it is something the NIH could discuss with publishers to figure out how to deal with this.

**5. Other Comments:**
Inflation is going to raise the cost of publication just like everything else. Historically the NIH has been a bit slow to increase with inflation. In addition, as publishers add more features to detect fraud and AI generated content, the cost of their business will increase (beyond just that due to inflation). I do not know how much this will add to the cost of publishing, but it should be considered. There is also the eventual end of print publications -- which should (although I do not have great hope for this) reduce the overall costs of publication. Again, I do not have insight into how much these factors will affect the overall costs, but it is something the NIH could discuss with publishers to figure out how to deal with this.

## 504. Shella Keilholz

**Submit date:** 9/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Shella Keilholz

**Name of Organization:** Emory University/Georgia Tech

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/nihrfi.docx

**Description:** Comments on each of the five options presented in NOT-OD-25-138

## 505. N/A

**Submit date:** 9/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Non-profit Research Organization

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Options 2 and 3 seem most consistent with the ability of scientists to continue to publish good work. One of the concerns of the public seems to be affected by not knowing what happens with the money. Reducing the ability for publications to be open-access, where many tax-payers can then read, will affect the ability of scientists to share the efficacy and importance of their work.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 506. N/A

**Submit date:** 9/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
By arbitrarily setting limits on the publication costs associated with NIH-funded research, the policy would unnecessarily hamper dissemination of publicly-funded research. There is no government intervention to limit the costs imposed by publishers, which are only going up as more and more journals must move to open access to accommodate existing publication openness demands. This policy will significantly hurt early-career researchers and smaller labs that do not necessarily have a lot of research funding, whereas laboratories that are well funded from multiple, non-NIH funding streams would continue to dominate the publication landscape. If this policy were to have any benefit to tax payers, it should simultaneously limit fees associated with publication by the publishers themselves. The policy should not apply to society-sponsored journals where the work is likely to be disseminated to others in the field that would benefit from the findings or are pursuing related research questions.

**2. Available evidence related to publication costs and proposed options:**
In my experience publishing in the translational neuroscience and neuropharmacology space, publication fees for open access, which is the requirement for all NIH-funded work ranges from $800 to $4500/publication, at minimum.

**3. Peer review compensation:**
Peer reviewers currently receive no compensation for this volunteer work in most cases. This can sometimes lead to less than quality reviews because the work is deprioritized over other competing demands. The peer review system only funds the publishers, who are able to charge authors exorbitantly while there is little oversight of the review quality. Limited studies suggest that compensating reviewers may improve the quality of reviews, but there is insufficient evidence - https://www.nature.com/articles/d41586-025-00968-6 . Therefore, the NIH should sponsor more rigorous studies to understand whether paying reviewers during the peer review process and limiting the number of publications from any journal can improve paper quality.

**4. Publishing best practices:**
The government should work with publishers to impose taxpayer-sponsored fraud detection platforms and regulate implementation so that these costs are shared across all publishers, rather than some publishers using different platforms that cost different amounts.

**5. Other Comments:**
The government should work with publishers to impose taxpayer-sponsored fraud detection platforms

and regulate implementation so that these costs are shared across all publishers, rather than some publishers using different platforms that cost different amounts.

## 507. Holly Zink, PhD

**Submit date:** 9/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Holly Zink, PhD

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I support Option 2, which sets a per-publication cap of $2,000. This approach offers the right balance between cost containment and the need for early-career investigators to disseminate their work. It is fair, simple to administer, and ensures that scholars can publish multiple papers within the constraints of their training budgets. Option 2 aligns well with the realities of training programs like TL1/T32 and KL2/K12, where each scholar operates with a modest individual budget but is expected to demonstrate a high level of scholarly productivity.

By contrast, Options 4 and 5, which propose total publication cost limits across the entire award, create unintended consequences for multi-trainee programs. These models introduce internal competition for publication funds and may lead to inequities, where scholars who publish earlier have more access to available funds than those who publish later. Option 1, which eliminates NIH support for publication costs entirely, would disproportionately harm early-career scholars who do not have alternative sources of funding. Option 3 introduces complexity that would be difficult to track and enforce across diverse journals.

Of the five options, Option 2 is the most equitable and scalable across program types and career stages.

**2. Available evidence related to publication costs and proposed options:**
In my experience administering NIH-supported training programs, typical article processing charges (APCs) range from $1,200 to $3,000 per article, with the median cost closely matching the proposed $2,000 limit. Scholars in our TL1/T32 and KL2/K12 programs commonly publish between two and four papers over the course of their training. A $2,000 per-publication cap enables them to meet these expectations while keeping overall program spending within reasonable bounds.

Additionally, NIH's own data shows that on average, grantees request around 0.8% of their total direct costs for publication. This data supports the idea that a $2,000 cap per article would cover most publication needs without creating an undue administrative burden or disincentivizing publication. From a practical standpoint, the per-publication cap approach is easier to implement and more transparent than models that set percentage-based limits on total award budgets.

**3. Peer review compensation:**
Paying peer reviewers is an idea worth exploring, especially to promote ethical and transparent publishing practices. However, implementation should be gradual and should not become a limiting factor for scholars. If peer reviewer compensation is used as a basis to justify higher publication costs,

NIH should ensure that journals are transparent about their compensation models and that these standards are easy to verify.

Appropriate compensation levels could be tied to Bureau of Labor Statistics wage data for relevant research professions. It would also be important for journals to make the review process and reviewer contributions publicly accessible if they are claiming reviewer payment as a justification for higher fees. That said, tying the allowability of higher publication costs solely to reviewer compensation—as in Option 3—could backfire, as very few journals currently operate with such transparency or policies in place. Early-career scholars, in particular, may struggle to determine whether a journal qualifies, making this option difficult to implement equitably.

**4. Publishing best practices:**
If NIH wishes to permit higher publication costs under certain conditions, those conditions should be clearly tied to demonstrated best practices. Examples of such practices might include the use of automated fraud detection systems, transparent peer review processes, compliance with COPE or similar ethical guidelines, and strong policies around data sharing and reproducibility.

However, these features should not be enforced as requirements for every journal. Instead, they could be used to justify elevated per-article caps for journals that offer such features. NIH may consider developing a tiered model in which journals that meet certain standards may be eligible for a slightly higher publication cost allowance. This would help promote quality without excluding legitimate journals that serve specialized or emerging scientific communities but lack resources to implement every best practice.

Any effort to encourage ethical publishing should be implemented in a way that supports—rather than restricts—early-career researchers.

**5. Other Comments:**
If NIH wishes to permit higher publication costs under certain conditions, those conditions should be clearly tied to demonstrated best practices. Examples of such practices might include the use of automated fraud detection systems, transparent peer review processes, compliance with COPE or similar ethical guidelines, and strong policies around data sharing and reproducibility.

However, these features should not be enforced as requirements for every journal. Instead, they could be used to justify elevated per-article caps for journals that offer such features. NIH may consider developing a tiered model in which journals that meet certain standards may be eligible for a slightly higher publication cost allowance. This would help promote quality without excluding legitimate journals that serve specialized or emerging scientific communities but lack resources to implement every best practice.

Any effort to encourage ethical publishing should be implemented in a way that supports—rather than restricts—early-career researchers.

## 508. fei zou

**Submit date:** 9/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:** fei zou

**Name of Organization:** UNC-CH

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I prefer option #2, or the number of publications that may be paid from grant funds is not limited, but the allowable direct cost from NIH is limited to $2,000.00 for any single publication resulting from NIH funding.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 509. Michael E. Goldberg

**Submit date:** 9/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Michael E. Goldberg

**Name of Organization:** Columbia University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Scientists who have accesss to unrestricted funds could probably pay publication costs out of those funds. If not there are two options:: 1) The institution and not the investigator will pay the publication costsl 2) The investigator find aother journal.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
It takes several hours to perform a careful peer review. NIH study sections pay for this time. Journals, even those published by for-profit companies, like Nature and Cell, so not. I should think that it would be reasonable for for-profit jkournals oto pay for peer review, but I don't that the non-profit institutions which publish journals should pay.

**4. Publishing best practices:**
Again this is a function of whether the journal is for-profit or not-for-profit.

**5. Other Comments:**
Again this is a function of whether the journal is for-profit or not-for-profit.

## 510. N/A

**Submit date:** 9/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 2: Set a limit on allowable costs per publication, is the best solution in my opinion.

Option 1 would be a disaster.

**2. Available evidence related to publication costs and proposed options:**
Option 2 fits to my own experience with publications (>100)

**3. Peer review compensation:**
I have never been paid for reviewing for journal articles, so i don't see this as worth considering. On the other hand, having some level of compensation for NIH study section reviews remains a good idea.

**4. Publishing best practices:**

**5. Other Comments:**

# 511. William McCoy

**Submit date:** 9/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:** William McCoy

**Name of Organization:** WASHINGTON UNIVERSITY ST. LOUIS

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I understand the Director's goals, but my impression is that this approach will shift the burden back on the investigators, i.e., someone will still have to pay for the papers to be published. While I don't think that's fair to any investigator, it is particularly problematic for your investigators who do not have larger support from the institutions and extramural sources. Furthermore, an NIH directive mandating publication in the journal with the lowest cost will likely decrease the impact and validity of research findings due to lower-quality peer review that occurs at less esteemed journals.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
I am confused by your question. There is no such thing as a peer reviewer being compensated for their peer review service. Many of us might suggest that it is no longer a feasible strategy to invite reviewers to "do it for the greater good," but your question would suggest that you think that strategy has already been abandoned for a pay-based compensation model. To be clear, that is incorrect. The only compensation we receive for reviewing papers, or grants for that matter, is the self-satisfaction of supporting the scientific community and the potential benefit of learning about different topics, writing styles, etc. Notably, the latter benefit is not always realized, as I find that less than 1 in 10 review experiences benefit my academic career by changing my thinking, research, or writing approaches. In other words, I do it to support science, not to benefit myself or my lab.

**4. Publishing best practices:**
Again, what are you talking about? Peer reviewers are not compensated, so that does not contribute to the publication costs. I would ask, "Where are you getting this misinformation?"

**5. Other Comments:**
Again, what are you talking about? Peer reviewers are not compensated, so that does not contribute to the publication costs. I would ask, "Where are you getting this misinformation?"

## 512. Geoff  Clark

**Submit date:** 9/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Geoff  Clark

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option for a limit of 2000 per publication is reasonable.

**2. Available evidence related to publication costs and proposed options:**
5-6 years ago, Journal of Biological Chemistry published actual paper journals and charged ~ 800$ for an article.

Now it is all electronic, no paper involved, and they are asking 3,400$ per article.  Other respectable journals appear to be in a similar ball park.

This does not seem reasonable at all, and I would like to see some pressure put on journals to limit what certainly feels like profiteering.

**3. Peer review compensation:**
Peer reviewers should remain uncompensated.

**4. Publishing best practices:**
Unconvinced this really justifies the higher costs.

**5. Other Comments:**
Unconvinced this really justifies the higher costs.

# 513. Pavan Bendapudi

**Submit date:** 9/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Pavan Bendapudi

**Name of Organization:** Beth Israel Deaconess Medical Center

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Currently, article processing charges are outrageous. I fear that anything short of completely eliminating all taxpayer subsidy for APCs will be insufficient to force academic publishers to change their business model. Eliminating the subsidy will create substantial downward pressure on these charges. Therefore, I am in favor of Option 1 (disallowing all APCs). At the same time, NIH should work directly with major publishers of federally-funded research to encourage them to lower their fees.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
It seems unlikely that any payments for peer review (even if implemented on a broad scale) will ever be more than a nominal sum that does not truly compensate reviewers for their time commitment. At this point, I do not think NIH should consider payment for reviewer services as a factor in deciding how to set the cap on APCs.

**4. Publishing best practices:**
Many academic journals claim to add value by formatting articles/figures to improve readability. We recently paid a publication fee of ~$6,700 (for open access) and were surprised that the journal would only use the raw figures that we had submitted without reformatting. Therefore, I believe that reformatting of article figures should be considered as a factor in deciding whether publication costs are warranted.

**5. Other Comments:**
Many academic journals claim to add value by formatting articles/figures to improve readability. We recently paid a publication fee of ~$6,700 (for open access) and were surprised that the journal would only use the raw figures that we had submitted without reformatting. Therefore, I believe that reformatting of article figures should be considered as a factor in deciding whether publication costs are warranted.

## 514. Libor Velisek

**Submit date:** 9/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Libor Velisek

**Name of Organization:** New York Medical College

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Limiting both the publication costs PER publication and total costs for publication per award.

Example: Total cost per publication cap $2.500. Total per award period $15,000.

So basically I am for the policy capping total costs in the award and costs per article.

**2. Available evidence related to publication costs and proposed options:**
Reasonable journal in my field have pbulication costs close to or even exceeding $2500.

**3. Peer review compensation:**
From all my peer reviewing capacity (50 manuscripts for Neuroreport a year - I am basically Reviewign Associate Editor), and other journals - about 20 manuscripts per year on top, nobody ever offered me a compensation. I understand that with the expansion of business model of Open Access, i.e. author-based publicatoin costs, there is a frantic search for reviewers among newly establishing journals that want a slice of pie and are even willing, during this hunt, to share few crumbs.

However, I still think that peer review should be free and acknowledged in ORCID or similar....

**4. Publishing best practices:**
Automated fraud detection capabilities: A noble idea. However, this means that the AI would be fighting AI. THose with slighly better LLM (or little bit more "learned") will prevail (and this can change twice per month). This is a really significant issue and cnnot be resolved easily a probably not by throwing more and more mony on it.

**5. Other Comments:**
Automated fraud detection capabilities: A noble idea. However, this means that the AI would be fighting AI. THose with slighly better LLM (or little bit more "learned") will prevail (and this can change twice per month). This is a really significant issue and cnnot be resolved easily a probably not by throwing more and more mony on it.

## 515. Stephen Kron

**Submit date:** 9/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Stephen Kron

**Name of Organization:** University of Chicago

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Publication costs charged to NIH per manuscript need to be severely limited. Anyone who wants to pay above the base rate is welcome to do so, using personal, non-federal or institutional funds. The NIH has been subsidizing publishers far too long.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
I don't think peer review compensation makes sense except at the discretion of the journal. Journals should have wide latitude as to how to encourage reviewers. In general, paying reviewers asks for low quality reviews, since some papers may take a few days of work and others a few minutes. Most of us think of payment as being related to effort and time. This is not the way to think about manuscript review.

**4. Publishing best practices:**
NIH can implement its own fraud detection and require it be performed on the proof or published paper before the invoice can be submitted for payment.

**5. Other Comments:**
NIH can implement its own fraud detection and require it be performed on the proof or published paper before the invoice can be submitted for payment.

## 516. Christopher Edward Niemczak

**Submit date:** 9/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Christopher Edward Niemczak

**Name of Organization:** Dartmouth Hitchcock Medical Center

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Make journals accept manuscripts that used NIH funds for free (or at least a nominal fee).

**2. Available evidence related to publication costs and proposed options:**
Have you seen the cost of some journals? It's getting out of hand. Plus they charge for people to view the articles and don't pay the reviewers. The publication costs need to be reduced at the level of the journal. No journal should be behind a paywall and no researcher should have pay to submit an article (again unless it's nominal fee for the editorial staff).

**3. Peer review compensation:**
Peer review should absolutely be compensated and should not be anonymous. It's an honor to be selected to review a manuscript/grant and should be compensated as such. Also, to often researchers hide behind anonymity especially when reviewing manuscripts and grants.

**4. Publishing best practices:**
If the journal does marketing or provides a video abstract as part of the publication, that may warrant higher publication costs.

**5. Other Comments:**
If the journal does marketing or provides a video abstract as part of the publication, that may warrant higher publication costs.

## 517. Timothy Baran

**Submit date:** 9/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Timothy Baran

**Name of Organization:** University of Rochester

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Prefer Option 2 (Set a limit on allowable costs per publication) or Option 3 (Set a limit on allowable costs per publication and allow a higher amount to be paid when peer reviewers are compensated), as these would encourage publishers to reduce APCs.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 518. Bruce Hamilton

**Submit date:** 9/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Bruce Hamilton

**Name of Organization:** UC San Diego

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
The proposed policy shifts address a very minor problem using problematic comparative data to propose solutions at odds with other NIH policies. First, as the RFI notes, publication costs account for less than 1% of grant expenditures. Even if policy were able to cut this cost in half (which is highly doubtful), the savings would be quite small relative to the burden on authors and publishers. Second, the DOAJ comparison list is highly dubious to NIH-sponsored research and reflects offers from lower-quality journals. Those cost data notably omit US-based open access publications such as AAAS's Science Advances ($5450 APC), Public Library of Sciences flagship (PLOS Biology, PLOS Medicine; $5500) and community (e.g., PLOS Genetics, PLOS Pathogens, PLOS Computational Biology; $3043) journals, and US society-based journals open access fees (~$2500-4000). Third, the new NIH Public Access Policy, effective July 1 of this year, requires author accepted manuscripts in PubMed Central without embargo; this directly conflicts with any non-OA publication options. And NIH review panels continue to emphasize peer-reviewed publication as the gold-standard measure for research output. Rather than proposing mandates on grantee authors, I strongly recommend that NIH engage publishers to better understand the costs and opportunities for making peer-reviewed science widely available.

**2. Available evidence related to publication costs and proposed options:**
As note above, the actual costs of publication are ascertainable. In this competitive market, non-profit publishers that were founded in reaction to traditional publishers would seem the best simple estimate. PLOS and eLife currently charge $3000 to $5500 for open access publishing. This is in line with costs for open access with more traditional non-profit publishers, including congressionally-chartered AAAS ($5450 for Science Advances) and the Proceedings of the National Academy of Sciences ($5495 for non-embargoed open access) and flagship journals of American scientific societies (e.g., Society for Neuroscience, $3750; Genetics Society of America, $2894; American Society for Microbiology, $3100). Again, these are non-profit organizations operating at scale in a competitive environment, often with volunteer labor from academic editors and reviewers.

**3. Peer review compensation:**
Paying reviewers typically requires either an upfront submission fee for authors or a higher publication cost scaled to the selectivity of the journal. An alternative would be for funders like NIH to compensate reviewers either directly on behalf of grantees or as a pool to publishers (but calculating a basis would likely invoke Goodhart's Law and be open to manipulation). I personally have always considered peer review a necessary professional obligation and invitations to review as an indicator of success. I dislike

the micro-transactional approach to public science, but I may be against a generational shift in attitude on this.

**4. Publishing best practices:**
Conventional peer review for publication produces binary yes/no outcomes. This leads to a number of inefficiencies, including additional peer review burden and venue shopping. An alternative I would like to see studied would be a rating by reviewers on separate axes for factors that typically figure into publication decisions, such as: (1) intellectual and methodological rigor, (2) innovation/novelty/originality, (3) comprehensiveness/depth, (4) timeliness/currency/immediacy of the topic, (5) generalizability across fields or translatability from lab to clinic. This could be displayed for both initial reviewers and possibly post-publication reviews separately as a spider graph or line plot to connect criterion scores from each reviewer.

**5. Other Comments:**
Conventional peer review for publication produces binary yes/no outcomes. This leads to a number of inefficiencies, including additional peer review burden and venue shopping. An alternative I would like to see studied would be a rating by reviewers on separate axes for factors that typically figure into publication decisions, such as: (1) intellectual and methodological rigor, (2) innovation/novelty/originality, (3) comprehensiveness/depth, (4) timeliness/currency/immediacy of the topic, (5) generalizability across fields or translatability from lab to clinic. This could be displayed for both initial reviewers and possibly post-publication reviews separately as a spider graph or line plot to connect criterion scores from each reviewer.

## 519. Joanna Hart

**Submit date:** 9/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Joanna Hart

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Many journals now require APC, even those without open-access publishing policies. To maximize the transparency of federal spending, open-access papers should be published when the research was supported by NIH dollars. However, APC and open access fees are prohibitively high without funding sources. That is, the NIH should not make a mandate that investigators cannot used NIH funds to pay for publishing costs without also coupling that with restrictions (voluntary or imposed) on journal charges. That is, the NIH should not pass the expenses for publishing the work to individual investigators or organizations, as this will result in the lack of publications from NIH-funded research.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
I have never been paid for peer review or editorial roles on journals. I have served for several years as an Associate Editor and on Editorial Boards and the most I have received is a lunch at the annual conference and a small token (e.g., an umbrella or coffee mug). I have received several awards for being a "top reviewer" at a wide range of top journals, all of which was unpaid work. Because we as researchers are the appropriate peer reviewers, we are in a position of paying to publish (or, in some cases, just submit a paper for review) and review others' work for free. It has become unsustainable, as peer reviewers are harder and harder to find and the quality of reviews have declined. As a reviewer, I feel that at the least I should be "compensated" by having a credit system through which APC or publishing costs are waived or reduced for my own papers. Alternatively, journals should provide a small stipend from their APCs, subscriptions, and other revenue sources, for reviewers who do essential work to allow for revenue generation in the first place (and authors who write the material they then sell).

**4. Publishing best practices:**

**5. Other Comments:**

## 520. N/A

**Submit date:** 9/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Non-profit Research Organization

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I support option #2, setting a $2,000 limit on publication costs per article. This balances the need to cover costs of publishing (which is central to scientific progress) while limiting publishing options that may be more costly.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
In my experience peer reviewers are not compensated nor should they be compensated for reviewing articles for journals as this may incentivize reviewing large numbers of articles without sufficient rigor.

**4. Publishing best practices:**
AI detection software should be included in peer review and allowable as a portion of publication costs.

**5. Other Comments:**
AI detection software should be included in peer review and allowable as a portion of publication costs.

## 521. Matt Thimgan

**Submit date:** 9/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Matt Thimgan

**Name of Organization:** Missouri University of Science and Technology

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
There is no definition of reasonable stated. I'm sure that NIH administration will put out another AI written report with fabricated citations to back up a political agenda to undermine science and set a "reasonable limit" that is not grounded in any type of data or reasoning other than actual malice.

**2. Available evidence related to publication costs and proposed options:**
All you are doing is punishing those trying to publish work. It is a sad state that NIH has been put in by leadership.

**3. Peer review compensation:**
Peer review is a challenge and expecting faculty to carry this burden without compensation. Cutting costs and just expecting faculty to do it out of the goodness of their heart. It's what this this administration wants is to clog the system to derail science.

**4. Publishing best practices:**
I don't trust any assessment by this administration and its malice toward science. This will be bastardized to hurt scientists, and this has become an untrustworthy organization that does not do things in Americans' interests.

**5. Other Comments:**
I don't trust any assessment by this administration and its malice toward science. This will be bastardized to hurt scientists, and this has become an untrustworthy organization that does not do things in Americans' interests.

## 522. Amanda Nelson

**Submit date:** 9/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Amanda Nelson

**Name of Organization:** University of North Carolina at Chapel Hill

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
It is absolutely unreasonable to REQUIRE all NIH-funded research to publish open access and disallow these fees from grant funding when they are in excess of $2000 each. Thus option 1 is utterly untenable.

Option 2 is reasonable, and provides at least partial support for these hefty fees while still allowing the researcher to estimate how many publications will result in a given time frame. I might suggest $2500 per publication. Unfortunately many of the higher impact journals that NIH is probably most interested in (Cell, Nature) have much higher fees.

I have never been paid for a peer review and have done hundreds of them, so not sure how option 3 would apply.

Options 4 and 5 seem reasonable if the limits are reasonable, say $2500/paper as noted above for a maximum of 10 papers in a 5-year grant period, or something. I like the idea of exemptions for situation like very high publication settings, very high impact journals, larger/longer grants.

We really need publication charge coverage on TRAINING GRANTS where it is not currently available since trainees do not have the funds to cover this.

Many institutions, especially public institutions like mine, do NOT have extensive publisher agreements in place to cover these fees, so maybe setting should also be a consideration.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 523. Lauren Bain

**Submit date:** 9/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Lauren Bain

**Name of Organization:**

**Type of Organization:** Not Applicable

**Role:** Member of the Public

**1. Proposed policy options:**
Has the NIH considered efforts to curb the publication costs by increasing regulation of scientific journals? These journals seem to be operating on a predatory mechanism, often charging both investigators for publication as well as charging the public to then access the results. I understand that the introduction of PubMed Central requirements seeks to address this double-pay wall situation, but it is not clear to me whether the NIH or federal government has considered measures that target the source of the situation (i.e. the journals), rather than the investigators seeking to share their science with the scientific community and the public.

**2. Available evidence related to publication costs and proposed options:**
Institutional subscriptions are often the only way for scientists to access the latest results of NIH-funded research. Why are academic journals allowed/expected to generate a profit on taxpayer-funded research findings? This also presents a barrier for members of the public interested in staying informed.

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 524. Melissa Ditmore

**Submit date:** 9/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Melissa Ditmore

**Name of Organization:**

**Type of Organization:** Not Applicable

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I support the use of research funds to defray publication costs, with limits, and with higher limits for compensating reviewers.

**2. Available evidence related to publication costs and proposed options:**
I saw the use of research funds for publication with two recent papers, with costs for both under $3000, one around $1800 and the other around $2700.

**3. Peer review compensation:**
Some peer reviewers are not subsidized by academic careers. As an independent researcher, I have seen how the diminishing numbers of tenure track positions has led to the literal devaluing of research, in terms of the money paid to researchers. Republican  administration funding cuts to universities and science research will exacerbate this. Without careers that subsidize reviewing, people will not do the work of peer review because it takes time away from earning money. This goes for adjuncts and graduate students as well as consultants like me. I have seen the results: one paper was recently under review for over a year because reviewers have become scarce. It was not like this when I first submitted to publish, this is a new development in line with the loss of full-time academic positions.

**4. Publishing best practices:**
Fraud detection will become more necessary, as we have seen the rash of retractions.

**5. Other Comments:**
Fraud detection will become more necessary, as we have seen the rash of retractions.

# 525. james gold

**Submit date:** 9/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:** james gold

**Name of Organization:** university of maryland school of medicine

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
The policy appears to be putting investigators in an impossible position. On the one hand, we are being asked to make publications available without an embargo while on the other hand, proposing restricting the money needed to pay for immediate open access. The potential solution would be for NIH to consider the posting of preprints to be providing public access. There will be fewer and fewer print journals and fewer and fewer outlets that do not have high APCs.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
As a journal editor, it has become increasingly difficult to recruit reviewers. If it were possible for NIH to provide financial support for serving as a peer reviewer I think that might be transformative. However, if support for peer review reduces funds available to support research, I would not be in favor of pursuing this possibility.

**4. Publishing best practices:**

**5. Other Comments:**

## 526. Nancy Krieger

**Submit date:** 9/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Nancy Krieger

**Name of Organization:** Harvard T.H. Chan School of Public Health

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I would most favor something akin to Option 5 of the RFI, setting:

(a) an overall cap of $5k for the APC for any given publication, and

(b) an overall amount for the total grant (if 3 publications for year, and average of $3k/publication, then $9k per year for each year of the grant starting in Year 2 of the grant, hence $18k for a 3-year grant, $27k for a 4-yr grant, $36k for a 5-yr grant)

AND: I would permit no-cost extensions to allow for cost of publications that hit in the year AFTER the grant is over, because it is taking longer and longer to get articles reviewed, such that if one submits articles in the final year of a grant, it is unlikely that the journal reaches a decision till after the grant is over (whether if on the first submission or, more likely, a re-submission) -- and one can only pay the APC cost at the time that the article is accepted.

ALSO: these caps must take into account inflation -- because what $5k is worth now will be much less in 10 years from now (which is also a problem that affects the direct costs permitted for NIH grants -- they have had the same limit for the past 30 years I have been writing grants, but what $500k covered in, say, 1995 is considerably less than what $500k covers now, given inflation).

I do not support "Option 1: Disallow all publication costs" because there are some very good journals that are open-access only, and not allowing any costs to cover open-access would remove some apt journals that would have been good fits for the study submitted.

I do not support "Option 2: Set a limit on allowable costs per publication" if the cap were restricted to $2k/publication (as per what is in the RFI), since in my experience the cost has been on average $3k/publication.

I am concerned about "Option 3: Set a limit on allowable costs per publication and allow a higher amount to be paid when peer reviewers are compensated" because this might tilt the field towards submitting to journals that compensate peer reviewers, and that likely would be solely for journals published by major for-profit publishers (as opposed to journals published by scientific societies).

I am concerned about "Option 4: Set a limit on the total amount of an award that can be spent on publication costs" if it assumes that average APC cost is $2k/article -- and it also does not allow for variation in type of grant (some might be expected to produce more publications than others).

**2. Available evidence related to publication costs and proposed options:**
For my two recent R01 grants, we have been paying approx $3k/article for APC costs, and have been producing approx 3 articles/yr in all but the 1st year of the grant -- and also, a no-cost extension (granted in 2024) has enabled us to pay APC costs that would otherwise have hit after the grant had reached the end of its initial project period.

**3. Peer review compensation:**
I do not have experience with peer reviewers being paid for peer review. I do not know enough about which journals do vs. do not compensate peer reviewers to know if this would tilt the balance towards publishing only in journals that can afford to pay peer reviewers (which are presumably journals published by large commercial publishers, as opposed to published by scientific societies).

**4. Publishing best practices:**
I do not know enough about what journals charge for automated fraud detection to know if this should be factored into the amount permitted to charge per publication. As predatory journals continue to rise in number, however, it seems prudent to offset the costs required for journals to do due diligence and prevent publication of studies that do not meet the test of being written by actual investigators who are not plagiarizing other investigators, either directly or by use of AI.

**5. Other Comments:**
I do not know enough about what journals charge for automated fraud detection to know if this should be factored into the amount permitted to charge per publication. As predatory journals continue to rise in number, however, it seems prudent to offset the costs required for journals to do due diligence and prevent publication of studies that do not meet the test of being written by actual investigators who are not plagiarizing other investigators, either directly or by use of AI.

## 527. Gabriel Lopez-Berestein

**Submit date:** 9/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Gabriel Lopez-Berestein

**Name of Organization:** UT MDAndersaon Cancer Center

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
The publication costs are exorbitant for many journals. The Journals should make their costs more realistic. So, I don't see why investigators should be paying those fees  after all, the Journals are making money on  the Investigator's work.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 528. Angela J Glading

**Submit date:** 9/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Angela J Glading

**Name of Organization:** University of Rochester

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Provide a free way to satisfy the public availability requirement that does not involve the publishers. If the NIH does not pay them, they will come out of the pocket of the scientists themselves. The institutions don't have the money to pay.

If you want the data publicly available- pay for it.

**2. Available evidence related to publication costs and proposed options:**
Publication costs have skyrocketed. Publishers used the NIH's requirement that papers be publicly available as an excuse to gouge scientists.

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 529. Brian Keane

**Submit date:** 9/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Brian Keane

**Name of Organization:** University of Rochester

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Allow publication costs if and only if the journal is non-profit (e.g., Science, PLOS, etc). The profit margins of many journals are egregiously high and so I think a shift away from these predatory journals is needed.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 530. N/A

**Submit date:** 9/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
It is not clear how the proposed policies will be able to address many competing interests:

1. There are now many options for publishing in non-open access journals for free. The costs that would otherwise be applied to publication fees can instead be funneled into the actual costs of conducting the research (e.g., staffing, analysis time, assaying, participant costs).

2. If NIH insists that all publications become immediately available to the public, the journals that offer free publication in exchange for an embargo period will no longer have an incentive to offer free publication options, as the value to subscribers to pay for a subscription to the journal will disappear.

3. Investigators who lose the ability to publish freely due to #1 and #2 above will be disincentivized from publishing their work, as they would need to pull funds from other critical areas of their grants to support such costs. Pulling funds from such areas (e.g., staffing, supplies and materials, participant costs) is often impossible without jeopardizing the aims of the science. Not publishing the work means that the findings will not be disseminated to change the course of US health.

4. It is unclear how journals will respond to NIH limits on publication costs. Now, journals with the highest impact factor can charge very high fees. If they do not adjust their pricing structure, investigators will be encouraged/forced to publish in lower impact outlets.

5. Pre-prints cannot replace peer-review. Relying on pre-prints will greatly diminish the quality of science generated in the U.S., allow massive amounts of fraud to go uncaught, and decrease any faith in scientific findings.

**2. Available evidence related to publication costs and proposed options:**
Please see above.

**3. Peer review compensation:**
I have never been compensated or seen an option for compensation as a peer reviewer across multiple journals in my field.

**4. Publishing best practices:**
In my experience to date as a PI, the application of AI to review of submitted manuscripts has decreased rather than increased the quality of review, especially when there is lack of human oversight of the products that AI is producing.

**5. Other Comments:**

In my experience to date as a PI, the application of AI to review of submitted manuscripts has decreased rather than increased the quality of review, especially when there is lack of human oversight of the products that AI is producing.

## 531. N/A

**Submit date:** 9/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I believe this is nuts. For the public to benefit from the findings from the research that their taxes have supported, the results of the research need to be peer reviewed and published so that other scientists can potentially repeat the work and also for people to even know about the results so they can let the public know about the findings. In the grand scheme of things the amount of money requested in a grant proposal budget is tiny. If the funds from the grant can't pay for the entire costs of publication, then where is the investigator supposed to get the money to publish?

I do agree that many of the journals charge way too high of a fee for publishing the work and that they should be pressured to keep charges reasonable.

I totally did not understand the consideration of how much reviewers were compensated. I have never received a penny for reviewing a paper! My reviewing a paper has nothing to do with my needing to pay for the costs of my publishing a paper. Maybe I missed something here. I do consider that I should agree to review at least 3 times as many papers as I publish, since my papers will need someone to review them and it is often 3 reviewers.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
I have never been compensated for reviewing a paper. I don't know what you are talking about.

**4. Publishing best practices:**

**5. Other Comments:**

## 532. Konasale Prasad

**Submit date:** 9/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Konasale Prasad

**Name of Organization:** University of Pittsburgh

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
My proposal is not to allow any APC with the NIH dollars. Peer review should not be compensated and should stay on a voluntary basis. Peer review compensation could set up a COI and also give reasons for journals to charge APC or increase the existing fee. To make the research funded by NIH to be available to the public, the accepted version should be on the preprint. If nonprofit preprint cannot support, NIH or government can establish a preprint with capabilities for automatic formatting according to a pre-set format. Alternatively, researchers can be asked to format the paper in a certain way like what we do for some IEEE journals. It does not take a long time to do it since the journal provides the template, we just fit the text and figures into the format they provide. Journal publishing company can publish as subscription only, which does not matter since the peer reviewed paper is available on the NIH or some other preprint server. Accepted papers that appear on the preprint server can be pulled into the PubMed to index them.

**2. Available evidence related to publication costs and proposed options:**
Most journals that i want to publish have more than $3000 as APCs and I have avoided as much as possible to publish in such journals. It does affect me in terms of citation since the published paper is not available immediately for other researchers to cite.

**3. Peer review compensation:**
I do not support peer review compensation.

**4. Publishing best practices:**

**5. Other Comments:**

## 533. Jessica Polka

**Submit date:** 9/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Jessica Polka

**Name of Organization:** Astera Institute

**Type of Organization:** Non-profit Research Organization

**Role:** Organizational Official

**1. Proposed policy options:**
Thank you for the opportunity to provide a response. I'm thrilled that the NIH is considering ways to maximize the impact of its resources, which I believe can be achieved through redirecting support to open scholarly infrastructure. This will not only reduce over all costs, but also promote reproducibility, a culture of collaboration, more equitable access to publishing, and rapid innovation.

Option 1, or disallowing NIH funds to be used to pay for publication expenses, is most consistent with necessary changes to the research ecosystem. The NIH should direct resources saved toward supporting open infrastructure, such as preprint servers, other repositories, and scholarly PID providers.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Peer reviewers would ideally be compensated in the same way that authors are compensated: by professional recognition of their service by the community, funders, and institutions. The NIH could support this cultural shift by encouraging peer reviews to be published and listed as research outputs in ORCID profiles.

**4. Publishing best practices:**

**5. Other Comments:**

## 534. N/A

**Submit date:** 9/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 4 seems to be the most optimum option to achieve the desired balancing flexibility and maximizing the use of taxpayer funds.

**2. Available evidence related to publication costs and proposed options:**
It is unreasonable to set a limit on the amount per publication because each journal charges very different amount of fees. With the increased number of open access journals, the fees are continuing to increase. $2000 is not enough for many journals.

**3. Peer review compensation:**
I have reviewed for numerous journals, and I was never compensated for the review. I am not aware of any compensation for journal reviewing.

**4. Publishing best practices:**
Not setting a limit per publication, but setting a limit for total budget, is the right way to go.

**5. Other Comments:**
Not setting a limit per publication, but setting a limit for total budget, is the right way to go.

## 535. N/A

**Submit date:** 9/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Other

**Role – Other:** Research administrator

**1. Proposed policy options:**
Unless you limit the amount that journals can charge, this policy will just transfer more of the publication costs to the universities/other institutions. With the elimination of the embargo period before making publications available on PubMedCentral, some journals are already charging a much higher rate for publication, which creates a double whammy of additional expenses for scientists and institutions.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 536. Arlan Richardson

**Submit date:** 9/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Arlan Richardson

**Name of Organization:** University of Oklahoma Health Sciences

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
This seems rather a trivial way of saving money because publication costs are such a small part of the budget compared with other expenses! In other words, why spend time on this when our Director and the Secretary of Health and Human services seem to be fine with a 40% cut in NIH funding.

**2. Available evidence related to publication costs and proposed options:**
I am no fan of journal charging publication costs because I remember when only the premier journals such as Nature and Science charged for publishing articles. However, does this mean researchers have to find other sources of funds for publication costs? What journals will now publish without charging publication costs? It seems to me that preventing (or limiting) the NIH funds that can be used for publication costs is counter productive if it means there would be fewer publications reporting the latest scientific discoveries/observations. WHERE IS AI GOING TO GET ALL ITS INFORMATION SO WE DON'T NEED TO STUDY ANIMALS ANYMORE.

**3. Peer review compensation:**
I think paying for reviewer's time reviewing manuscripts for the journals would be fair; however, we all do it free now as part of our responsibility to the scientific community. However, this would just add to the cost of publishing. I also do not feel paying reviewers would improve the quality or rigor of the review process and therefore the quality of research published.

**4. Publishing best practices:**

**5. Other Comments:**

## 537. Kathleen Gould

**Submit date:** 9/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Kathleen Gould

**Name of Organization:** Vanderbilt University School of Medicine

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
It costs money to properly edit and publish a manuscript, more money than the NIH has ever been willing to pay. If the NIH funded investigators appropriately, publication costs would not be an issue.

**2. Available evidence related to publication costs and proposed options:**
My NIH grant budget is insufficient to cover real publication costs. These costs are high (like everything else) if we want scientifically trained professionals to handle our manuscripts. I'm certain that to ensure Gold Standard Science, we do.

**3. Peer review compensation:**
How about appropriately compensating reviewers that review for the NIH? The token compensation provided by the NIH for grant review does not begin to cover my time or reflect my expertise.

**4. Publishing best practices:**
Yes, the automated fraud detection capabilites are very important. Again, it costs money to publish Gold Standard Science.

**5. Other Comments:**
Yes, the automated fraud detection capabilites are very important. Again, it costs money to publish Gold Standard Science.

## 538. Michael P Stryker, Ph.D.

**Submit date:** 9/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Michael P Stryker, Ph.D.

**Name of Organization:** UCSF

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
The exploitation of science funders by "high-profile" journals must end. The NIH (and other Federal agencies) should severely limit the TOTAL article processing charges and other charges imposed for publication of Federally supported research. The limitation should be on thee total charge, which the NIH should be willing to pay for in full as a direct cost to grants. A limitation only to the allowable charge to grants, requiring scientists to come up with the portion over the allowance from other funds, would be counterproductive.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 539. N/A

**Submit date:** 9/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Taxpayers are funding the research and should also fund the publication of research results. What is the point of research if the results (both positive and negative) are not shared? That is a waste of taxpayor money!

**2. Available evidence related to publication costs and proposed options:**
Publication costs are high, often several thousands of dollars. If grant funds cannot be used for publication, then the distribution of knowledge funded by the grants will be severely limited. That seems very counterproductive.

**3. Peer review compensation:**
Peer reviewers are currently not compensated, which can limit people's willingness to participate in peer review. We do it for free to be a good citizen of the research community. While paying reviewers would be fair, it would increase the already high cost of publishing research results.

**4. Publishing best practices:**

**5. Other Comments:**

## 540. N/A

**Submit date:** 9/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Non-profit Research Organization

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 1: Disallow all publication costs.

This will lead to a situation where scientists would need to identify additional resources to publish their work, which is necessary to obtain funding and maintain employment. This would create a bias in ability to publish for those from more financially supportive institutions.

Option 2: Set a limit on allowable costs per publication.

This is a decent option and possibly could lead to some journals lowering prices to be more competitive. But the most 'prestigious' journals will likely not cave to this financial pressure.

Option 3: Set a limit on allowable costs per publication and allow a higher amount to be paid when peer reviewers are compensated.

Paying for peer reviewers seems wrong and doesn't happen in my field.

Option 4: Set a limit on the total amount of an award that can be spent on publication costs.

Not as bad as not allowing any publication costs, but less ideal than a cap that might create a target for journals to strive to be at.

Option 5: Create a free or low cost peer review journal system within the NIH that anyone who is NIH funded can use (and those who aren't could either access for free or pay a nominal charge). No one needs to print physical journals anymore, everything is available online, peer reviewers are/should be free and editors can be nominally compensated and/or work for free. Scientists are doing most of the work here, doing the actual science and manuscript writing, serving as peer reviewers and often as editors. The scientific publishing system is a financial scam in its current state, lots of money being paid for almost nothing in return. Historically, subscriptions should have paid for the costs of printing and shipping journals but authors were still charged. Now authors are charged even more because subscriptions are way down as we have moved to digital journals.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
I have never heard of peer reviewers of publications being compensated. Must be a field-specific phenomenon. I peer review all the time for no compensation with the mindset that this is part of my

service as a scientist to try to ensure that the scientific literature is as accurate and useful as possible. It seems like compensating for peer review is a waste of taxpayer resources and creates a motivational conflict of interest.

**4. Publishing best practices:**
Automated fraud detection, while critical, should not be that expensive. Plagiarism detection systems are ubiquitous and the image manipulation detection systems already exist.

**5. Other Comments:**
Automated fraud detection, while critical, should not be that expensive. Plagiarism detection systems are ubiquitous and the image manipulation detection systems already exist.

## 541. Robert Desimone

**Submit date:** 9/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Robert Desimone

**Name of Organization:** MIT

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I object to limitations on publication costs. They are a necessary research expense, and PIs can choose between alternatives with differenct costs, just as they currently do now with other research services. The current system has worked well - why change it?

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
I personally do not feel that peer review compensation at NIH is necessary. It is more trouble than it is worth considering having to report the taxable income. If this question is about peer reviewr compensation at journals, I do not understand why NIH would want to get involved in those decisions at all.

**4. Publishing best practices:**
Some of the journal with high publication costs use statiticians and fraud detection capabilities that increase their costs. Also, a good editor is worth their weight in gold, and the best journals tend to employ the best editors. By limiting publication charges, NIH will force all journals to the lowest common denominator.

**5. Other Comments:**
Some of the journal with high publication costs use statiticians and fraud detection capabilities that increase their costs. Also, a good editor is worth their weight in gold, and the best journals tend to employ the best editors. By limiting publication charges, NIH will force all journals to the lowest common denominator.

# 542. Albert Folch

**Submit date:** 9/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Albert Folch

**Name of Organization:** University of Washington

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
The problem is that this announcement targets the wrong group (the scientists) when it should target the culprit of double-dipping (the journals). We don't like the double-dipping, we are their *victims*, and imposing a cap on it further punishes us.

One solution lays in imposing legal restrictions on the journals, for ex. if they declare themselves an "open access journal" then they should not be allowed (by law) to charge any subscription to anybody (otherwise it's fraud), and they should not be allowed to mix some closed-access papers in order to call themselves "hybrid" and bypass the "open access" designation.

The other solution (my favorite) would be to end (outlaw) "open access" option by journals, the origin of the problem. Journals would by definition be only closed access and subscription (like it was before this whole mess), and federally-funded scientists would still be required to post an open access copy of every submitted (uncurated) manuscript to the National Library of Medicine (or similar) archives. So there would be two versions of each manuscript: the uncurated (free) version, and the curated ($$) version. Nobody would complain!

The announcement says that "NIH will implement a cap on allowable publication costs starting in FY 2026" but does not says what the cap will be, which generates further confusion.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Not a good idea. Injecting more $ into this process will only make it worse. Peer review should be voluntary -- this will limit the number of reviews that are made and the number of submissions that the system can take. There is too much junk being published.

Everything worked fine until "open access" came along, injecting tons of $$ into publishing and this generated the present publishing bubble with many predatory journals. The solution is to make journals closed access again and make the public aware that they can access an open/free (uncurated) version of the manuscripts through federal archives such as NLM. The vast majority of people that demand open access don't even know about NLM.

**4. Publishing best practices:**

**5. Other Comments:**

## 543. N/A

**Submit date:** 9/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Member of the Public

**1. Proposed policy options:**
I believe that this proposal is, frankly, a pretty silly idea that will amount to very little increase in efficiency or in "grant funds utilized for research activities". As your analysis mentioned, the average is around $3200 and applicants request on average 0.8% of their total direct costs for publication costs. For grants over $1M in direct costs, this is nothing. The cost to pay a data team to analyze this was probably more than your agency will ever "save" by enforcing such a policy.

In terms of options, option 2 has the least amount of burden on both the institution, the investigators, and your agency. Going by a percentage of the award would be difficult for most accounting systems to code to catch this. And putting a different limit on publications where the peer reviewers are compensated will be burdensome from a Purchasing point of view. And disallowing all publication costs would lead to less incentive to publish and put out the research that your agency is trying to promote.

The best option would be to find other methods to find "efficiency" increases. With future inflation, will there need to be adjustments to how much the upper limit on publication costs? If yes, this would require another team of data analysts to study award and financial reporting data. And this, again, will cost more than what was "saved".

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 544. N/A

**Submit date:** 9/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Publications are essential for researchers to share their findings with the public. Funding cuts to publication fees will discourage researchers from submitting their work to high-impact journals, which typically charge substantial fees (e.g., Nature, Cell, Science). This policy will have a greater impact on researchers than on publishers. Many researchers rely heavily on funding agencies to cover these publication costs; without that support, it becomes challenging to publish their work. There should be a standardized flat fee for publishers to alleviate this issue.

**2. Available evidence related to publication costs and proposed options:**
On average, we publish 3 to 4 papers each year. However, top-tier journals like Nature and Cell Press typically charge $6,000 to $7,000 for publication, while the American Society for Microbiology (ASM) and similar journals charge between $2,500 and $3,500. Due to these budget constraints, new and young investigators may be discouraged from publishing 3 to 4 papers annually, as they often rely on a single grant. In contrast, established researchers may receive 2 to 3 grants that allow them to cover publication expenses across multiple projects. This funding limitation can ultimately delay the timely release of important research data.

**3. Peer review compensation:**
Every day, editors face challenges in finding reviewers for submitted papers. The peer review process should be compensated, either through monetary payment or by offering publication credits that can be used to offset future publication fees with the same publisher. Editors should only invite well-known experts or researchers, or at least those who have published on similar topics or have related research interests, to prevent misuse of this compensated peer review system.

**4. Publishing best practices:**
Automated fraud detection, image manipulation deteAutomated fraud detection, image manipulation detection, and plagiarism detection are essential for publications and cannot be overlooked, even in light of funding reductions. It would be beneficial to set a maximum limit on publication fees charged by publishers. If journals are not compensating their editors or reviewers, why do different journals impose varying publication costs? This discrepancy needs to be addressed.

**5. Other Comments:**
Automated fraud detection, image manipulation deteAutomated fraud detection, image manipulation detection, and plagiarism detection are essential for publications and cannot be overlooked, even in light of funding reductions. It would be beneficial to set a maximum limit on publication fees charged by

publishers. If journals are not compensating their editors or reviewers, why do different journals impose varying publication costs? This discrepancy needs to be addressed.

## 545. N/A

**Submit date:** 9/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I support the aim of limiting publication costs in grant applications. Of the options presented, I favor option 4 - an overall cap on the total amount of an award that can be budgeted/spent for publications. This provides the most flexibility while limiting costs.

I would also support option 2 - a limit per each publication, if and only if journals would respond by lowering their charges to meet this threshold. Otherwise, it is unclear where investigators would find funds for the difference between the budget cap and the journal charge.

**2. Available evidence related to publication costs and proposed options:**
None

**3. Peer review compensation:**
Personally, I do not understand the reasoning as to why compensation for peer review would justify a higher cap for publication costs with a specific journal. Additionally, very very few journals actually pay peer reviewers.

**4. Publishing best practices:**
Nothing to add.

**5. Other Comments:**
Nothing to add.

## 546. Ian Davis

**Submit date:** 9/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Ian Davis

**Name of Organization:** The Ohio State University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Publishers should be required to report their actual publication costs vs. what they are charging investigators - costs simply cannot be that high since most reviewers serve for free and everything now is electronic.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
I do not believe I have ever been compensated for a manuscript review in 20 years as a reviewer. I haven't even received benefits such as reduced membership fees for societies publishing the journal, which I feel would be a reasonable and inexpensive thing to do and one which would not create the same conflicts as a direct monetary payment to me as a reviewer.

**4. Publishing best practices:**

**5. Other Comments:**

# 547. Micki Washburn

**Submit date:** 9/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Micki Washburn

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Publication is one of the very essential aspects of the research process and those of us at public institutions often lack the funding to submit to open access journals (which usually charge about $3500 per open access article) - but the majority of clinicians who can benefit from research findings that advance the field often don't have access to journal articles unless they are published "open access"removing or limiting funds for publication from grant budgets continues to keep new research out of the hands of the American public in general and also from the people providing healthcare in the community that most need access to new scientific advances. I publish 10+ articles per year and thus would have to come up with 35K to publish all of them open access - I don't work at an Ivy so there is no way I can afford that in an era of increasingly fewer resources in higher education. Also your H index (productivity metric) is driven by if you publish open access - Open access pubs = more eyes on them, more people citing your work, H index goes up. Look at the majority of scholars who have very high h indexes - they publish in top tier journals and frequently they opt to pay for open access - so your "productivity" is actually determined in part by how many open access articles you can afford - again those of us at state schools are put at a distinct disadvantage here.

**2. Available evidence related to publication costs and proposed options:**
It is the publishers, not the scientists, who are perpetuating these costs. Journals need to either charge less for their open access fees or publish everything as open access so that the general public could benefit more from having access to the most up to date information and recommendations.

**3. Peer review compensation:**
The peer review process, if done correctly, takes a lot of time. Time = money for faculty members whose time is in short supply. I'd review more journal articles if I was compensated for it because journal reviews factor into decisions related to promotion/raises in a very very small way but they take up a lot of time.

**4. Publishing best practices:**
There are ways to do this without raising the already too high publishing costs. AI based fraud detection is free.

**5. Other Comments:**
There are ways to do this without raising the already too high publishing costs. AI based fraud detection is free.

## 548. N/A

**Submit date:** 9/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Unless publishers are willing to cut publication costs, limiting allowable publication costs from research funds will negatively impact how research results will be disseminated in a speedy way. Conversations with publishers should be conducted and sufficient time should be allowed to adjust any changes before any policy should be implemented.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Peer review is part of the job for investigators working in any field. It is often used in tenure considerations as service to the field. It therefore should not be compensated. Compensation for peer review may create issues of unresponsible, lousy reviews due to ulterior motivation of monetary reward.

**4. Publishing best practices:**
Using AI to detect fraud should be used. Guidelines about AI writing should also be established in more clear and transparent way. Though this may cause higher publication cost, this can help safeguard quality of publications.

**5. Other Comments:**
Using AI to detect fraud should be used. Guidelines about AI writing should also be established in more clear and transparent way. Though this may cause higher publication cost, this can help safeguard quality of publications.

## 549. Matthew Eddy

**Submit date:** 9/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Matthew Eddy

**Name of Organization:** University of Florida

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I fully support significantly reducing publication costs. They are way too high and absolutely ridiculous. This has created a "pay-to-play" environment, where labs are publishing work in "high impact" journals because they can afford to pay huge publishing fees, whereas other labs that are also doing great work have to choose to publish in journals that are of "moderate" impact that charge less in publication fees. The huge publication fees eat up enormous resources that could be applied to fund students or pay for required materials or scientific services needed to carry out research. Publishers are scamming the scientific community and public.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
I have never received any compensation for peer reviews, and I typically serve as a peer reviewer for 12 to 20 submitted manuscripts per year. I would be hesitant to tie a direct fiscal reward to peer review. That said, I would be supportive of providing incentives for peer review, such as reducing or waiving publication costs if peer review services are provided.

**4. Publishing best practices:**

**5. Other Comments:**

## 550. Andrea Goldschmidt

**Submit date:** 9/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Andrea Goldschmidt

**Name of Organization:** University of Pittsburgh

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
This proposal seems like it would limit, rather than increase, return on research investment for taxpayers, especially for research produced by early stage investigators and/or unfunded investigators. Open access fees will prevent people who do not have alternative sources of funding from publishing their data and making it accessible to the public.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 551. Janine Jurkowski

**Submit date:** 9/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Janine Jurkowski

**Name of Organization:** University at Albany

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Many R1 and R2 institutions do not provide university level support for the cost of publishing. Therefore, NIH limiting the use of grant funds, limits the ability of researchers at these types of research institutions from publishing. More and more journal are charging leaving fewer options for publishing for those who cannot afford to publish. Limiting publishing expenditures in grants will increase the existing researcher hierarchy based on the ability of a university to pay for publications. This will hit public universities particularly hard.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
If peer reviewers are financially compensated, there will be more reviewers. However, reviewer pay cannot be so much that it warps the reviewers objectivity.

Other options are: publishers pay a reviewer for a year of service or a certain number of publications in their expertise area for any journal owned by that publisher.

**4. Publishing best practices:**

**5. Other Comments:**

## 552. Alessandro venosa

**Submit date:** 9/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Alessandro venosa

**Name of Organization:** UC Davis

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Ideally, publication costs and travel should be accounted for in a secondary budgetary element (not included in the main budget of $250,000 for R01 for instance). Publication reimbursements should be provided based on actual publication costs up to a limit. For instance if the limit is set for $20,000 for an R01 level grant, investigators may submit request for reimbursement up to that amount each year by providing receipts and confirmation the article falls within the confines of the awarded grant. Similar considerations may be adjusted for R21 R03 and U level submissions

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
A compensation of 75$ should be provided if the grantee links the review to their orcID

**4. Publishing best practices:**

**5. Other Comments:**

## 553. N/A

**Submit date:** 9/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
A unilateral move by the NIH to cap grant funds for publications will almost certainly push those costs to investigators, with a disproportionately negative effect on junior investigators. I share significant concern about the skyrocketing cost of publishing, and I don't know what degree of transparency there is on the part of journals to delineate exactly where that money goes (though as a regular peer reviewer I know that it is not going to me). This is not necessarily an indictment of the system - there may be a number of very good reasons why publication costs are rising.

If the NIH seeks to ensure that taxpayer dollars are being used fairly, it makes the most sense to conduct a data driven analysis of the publication cost issue and utilize that, in coordination with the key stakeholders of investigators and journals, to determine solutions that will not unfairly place the burden on any one group. Further, any new policies that are implemented should be studied both for intended and unintended effects. Essentially, address this significant problem in the same way you would want investigators to address their scientific problems of interest.

**2. Available evidence related to publication costs and proposed options:**
I have not reviewed this evidence.

**3. Peer review compensation:**
This is an interesting question to ask juxtaposed with a question about limiting the use of NIH funds for publication. Again highlights the need for a data-informed approach that engages all stakeholders. I have reviewed many manuscripts over the past decade-plus and have not been compensated for doing so. Although I would love to be paid for the significant amount of time that I spend doing this, I do have some concerns regarding how compensation in such a system might have effects that compromise impartiality.

**4. Publishing best practices:**
The open access issue is a huge one, particularly when some prominent journals are entirely open access (i.e., the investigator is not given a choice by the journal to pay more or less).

**5. Other Comments:**
The open access issue is a huge one, particularly when some prominent journals are entirely open access (i.e., the investigator is not given a choice by the journal to pay more or less).

## 554. Frederic Noo

**Submit date:** 9/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Frederic Noo

**Name of Organization:** University of Utah

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 4 feels most reasonable too me. although I would be more draconian and set the limit to $2500/year no matter the award amount.

**2. Available evidence related to publication costs and proposed options:**
I rarely request more than $1000 per year for publishing costs. Many journals do not apply charges, and I have prioritized those journals while allowing for one more "expensive" article per year. I don't believe this has negatively affected the visibility of my work.

**3. Peer review compensation:**
I have never heard of reviewers being paid for their reviews. The reward of early exposure to new ideas is enough of an incentive to review manuscripts.

**4. Publishing best practices:**
Such costs have become an issue and keep appearing and growing. The journals may feel squeezed and increase their costs when this is compounded with the public access policy. The journals have found financial ways to compensate by placing a commercial page at the beginning of each published manuscript. It could be good to integrate such allowance within the public access policy, in the sense that it could incentivize a reduction in publication costs for the great good of all.

**5. Other Comments:**
Such costs have become an issue and keep appearing and growing. The journals may feel squeezed and increase their costs when this is compounded with the public access policy. The journals have found financial ways to compensate by placing a commercial page at the beginning of each published manuscript. It could be good to integrate such allowance within the public access policy, in the sense that it could incentivize a reduction in publication costs for the great good of all.

## 555. N/A

**Submit date:** 9/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I strongly support Option 4 (total award-based cap) as the most equitable and practical policy for allowable publication costs.

In my field of research (public health, social sciences), most publications incur no publication fees, but a small number of key articles require substantial open-access charges ($3,500–$4,500 per article). These open-access articles are often the most important for equitable dissemination — for example, ensuring access to intervention findings for families, schools, and practitioners who cannot pay for journal subscriptions.

A per-publication cap (Options 2 or 3) would disproportionately restrict the ability to publish in these high-impact open-access journals, even when the overall grant budget could reasonably absorb the cost. This creates unintended inequities across research fields: investigators in areas with low or no APCs would be unaffected, while those in fields where a few key publications are costly would be penalized.

Option 4 provides a fair and proportional solution. By tying allowable publication costs to a percentage of the total award (0.8% of direct costs, with a $20,000 minimum), it ensures cost containment across the portfolio while preserving investigator choice. It also allows flexibility to publish occasional higher-cost papers without jeopardizing overall dissemination.

If NIH wishes to further incentivize responsible publishing practices, Option 5 (combining Option 4 with a per-publication ceiling of $6,000) would be an acceptable compromise. This hybrid model balances fiscal discipline with the need to accommodate legitimate high-cost publications.

I encourage NIH to adopt Option 4 (or Option 5) to ensure continued equitable dissemination of publicly funded research findings.

Overall, the proposed policy seems misguided. NIH should not disincentivize investigators for choices that increase access to knowledge. Instead, NIH policy should be designed to incentivize publishers to create more sustainable, less costly publishing models. Per-publication caps risk shifting the financial burden to researchers and institutions, while leaving publishing practices unchanged. By contrast, an award-level cap preserves flexibility for investigators while signaling to publishers that excessive charges will not be broadly reimbursed.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 556. N/A

**Submit date:** 9/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 5 is my top selection, with option 3 as my second choice

**2. Available evidence related to publication costs and proposed options:**
Option 5 allows for a maximum total budget for publications across the lifespan of a grant but also considers that some "higher level" publications have higher associated costs. It can easily be $5,000-$6,000 for a Nature Communications paper, in my experience. Other, smaller papers will cost less, but these will balance out over the years of the grant for the total allowable cost.

Option 3 is my second choice because it will encourage journals to pay peer reviewers for their time, which I believe to be fair and will encourage more thorough assessment by reviewers or they will not be asked again.

**3. Peer review compensation:**
$0 is not appropriate compensation

**4. Publishing best practices:**

**5. Other Comments:**

## 557. Andrea Bertke

**Submit date:** 9/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Andrea Bertke

**Name of Organization:** Virginia Tech

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
NIH requires publication of research findings. Publication fees are required to publish those findings. If NIH limits the use of grant funding for publication fees, fewer investigators will be able to publish their findings. Many investigators have no other financial source for publication fees besides their grant proceeds. Limiting the use of grant funding for publication fees will limit the ability to publish research findings or force researchers to publish in lower-budget journals with lower fees, which may not be as reputable as higher impact journals. If NIH wants to reduce publication fees, NIH needs to negotiate fee structures with the journals, themselves.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
I have mixed feelings about pay-for-review structures. Yes, it would be nice to be compensated for doing reviews but there are researchers who would use a review-pay approach to simply increase their income by doing more reviews. Furthermore, one would desire reviews from successful researchers in the field, not professional or semi-professional reviewers being paid for their service. Compensating reviewers would also increase publication fees, since one would have to pay a publication fee as well as reviewer fees. The journals will not simply absorb the cost of paying reviewers and will pass that cost on to researchers in the form of higher publication fees, which are already exorbitant.

**4. Publishing best practices:**
Automated fraud detection is not foolproof. AI is notoriously bad at recognizing inaccuracies and may penalize some researchers while rewarding others. These services would also add to publication costs.

**5. Other Comments:**
Automated fraud detection is not foolproof. AI is notoriously bad at recognizing inaccuracies and may penalize some researchers while rewarding others. These services would also add to publication costs.

# 558. Dorothy Supp

**Submit date:** 9/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Dorothy Supp

**Name of Organization:** University of Cincinnati College of Medicine

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I think it is a mistake for NIH to limit publication costs, which are expected to increase given the new NIH guidelines about open access publication. Although publications serve as a metric used to gauge academic success and productivity, they also serve the more important function of disseminating new knowledge. Limiting the use of NIH funds to pay for publication will delay or prevent that knowledge from being disseminated. Many academic researchers, like myself, have no other funds to pay for publications other than grants. Any of the options to limit publication costs from grants will increase the disparities between large, well-funded labs and smaller labs with less financial support. I would strongly encourage NIH to address this issue with publishers rather than the researchers who are just trying to keep their heads above water in difficult times. All of the options listed will discourage publication of research findings. Posting data online is not the same as a well-written publication. If you want the public to get the information faster, you need to encourage publication, not discourage it by putting the onus on principal investigators to find the money to pay to publish.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
I am on the editorial boards of several journals and, based on my experience, paying reviewers of manuscripts is a terrible idea. This will not improve the quality of the peer review system; it will encourage bad actors to get involved just for the money, which will bring down the quality of reviews. There are enough predatory journals; we don't need predatory reviewers, too.

I routinely review articles for dozens of journals. When I am asked to review a paper, I usually accept because I feel it is my duty to contribute to the scientific enterprise in this fashion (particularly for journals where I have previously published). I feel an obligation to ensure that only the best, most accurate research gets published. I would not do a better job if offered payment, but I might expect others who are less qualified to take on the role only for the money--that would not improve the quality of peer review. Nor do I believe publishing reviewer comments or names is a good idea. Anonymous peer review has worked for decades; it needs improvement, yes, but not replacement with a pay-for-play system. I suggest that the service of reviewing manuscripts should be given more weight in tenure review, or even grant reviews, if NIH really wants to get involved. But I really think paying reviewers will only make the situation worse.

**4. Publishing best practices:**

**5. Other Comments:**

# 559. Clemma Muller

**Submit date:** 9/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Clemma Muller

**Name of Organization:** Washington State University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
If these are the only options, I advocate for Option #4. We have a moral and ethnical obligation to publish findings from taxpayer-supported research in journals that offer free public access to the manuscripts. Many of us also live in a world that requires us to publish in peer-reviewed journals (as opposed to preprints) in order to be considered for promotion or other forms of career advancement. For this reason I include higher-than-expected publication costs in my budgets because it is extremely difficult to accurately predict when journal(s) we will want to target when the time comes for submitting manuscripts (usually 2 or more years AFTER submitting the grant application).

A major gap I see in the options presented is that directly address the high fees or public access firewalls that characterize many of the so-called top-tier research publications that are considered more prestigious in terms of research visibility and career advancement. I understand that they journals have paid staff and overhead operating costs, but there is a marked lack of transparency behind the wide range of publication fees and company profits. Paying reviewers $50, or even $100, to review a submission does not equate to allowing for an extra $1000 in allowable costs (option 3), and it seems like this approach could simply incentivize journals to offer nominal fees to they can "line their pockets" with the extra money. I would like to see a concurrent effort that works with journals to restrain publication fees, ideally waiving fees entirely for research that is 100% (or even a lower threshold, say 80%) funded by taxpayer dollars.

Perhaps an addendum to option 4 could be that in the annual reports we submit to NIH we address the topic of publication costs (what has been spent, what is planned, how much more/less do we anticipate needing in total). Another tweak could be to allow us to request up to some proportion, say 0.5% for R01s or 0.8% for smaller budget grants, for publication costs that is not part of the direct costs budget and that can ONLY be used for publications. Anything remaining would go back to NIH 3 years after the grant period ends (to allow for delays in publishing vs. grant timelines). This would address the problem of fairness, public access, and good stewardship of taxpayer dollars while avoiding the zero-sum budget pressures inherent in trying to forecast publication costs within the direct expenses budget cap.

**2. Available evidence related to publication costs and proposed options:**
I don't have any evidence other than my own anecdotal experience, but we have definitely run into the problem of being forced to find venues that do not charge publication costs even though we feel the manuscript in question would appeal to a higher-visibility journal that could have more impact on science and/or public health.

**3. Peer review compensation:**
I think it is reasonable, provided there is some way to make sure the reviewers actually put in the time. I spend hours on each review, but I know for a fact some of my peers "phone it in," so to speak.

Perhaps offering compensation only to more junior-level people, such as postdocs and assistant professors, would be a middle ground option. Even as an Associate Professor, I have to strictly control the number of reviews I agree to take on because of pressure to constantly be pursuing my own publications and/or new funding awards. Compensation that helps offset the personal time typically required to do peer reviews could help offset the strain on junior faculty.

**4. Publishing best practices:**
This is a hard one and I'm not an expert in this topic by any means. I do think we need a system that avoids having each journal create their own wheel in terms of how to address potential fraud and how doing so affects publication costs. An (admittedly imperfect) answer could be to cap the amount any journal can charge for publications supported all or mostly by NIH or other taxpayer-funded sponsors. This could be adjusted periodically similar to FTE salary caps. Research supported by pharmaceutical companies or other for-profit organizations could be charged higher fees to offset costs not covered by the taxpayer-supported research.

**5. Other Comments:**
This is a hard one and I'm not an expert in this topic by any means. I do think we need a system that avoids having each journal create their own wheel in terms of how to address potential fraud and how doing so affects publication costs. An (admittedly imperfect) answer could be to cap the amount any journal can charge for publications supported all or mostly by NIH or other taxpayer-funded sponsors. This could be adjusted periodically similar to FTE salary caps. Research supported by pharmaceutical companies or other for-profit organizations could be charged higher fees to offset costs not covered by the taxpayer-supported research.

## 560. N/A

**Submit date:** 9/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Publication costs are set by journals and not by NIH. The title includes the term "limiting allowable publication costs" but that is not accurate. Instead the policy would limit the amount of grant funding that would be allowed to cover publication costs. This is an important distinction. Given the July 1 policy change that now forces currently funded researchers to use Open Access publishing to avoid publication embargos, funded researchers have no choice to pay publication costs. Any attempt by NIH to limit the amount of grant funding that would be allowed to cover these costs will result in fewer publications, and less dissemination of scientific findings. For this reason I am opposed to all proposed options, but particularly options 1, 4 and 5.

**2. Available evidence related to publication costs and proposed options:**
The only access I have to monies for publication costs is through my currently funded grant. If those monies are eliminated, there are extremely limited options for publication. This seems to defeat the purpose of the funding as scientific findings from the project would not be shared.

**3. Peer review compensation:**
In my field, journal reviewers do no expect compensation. They consider it a service to the field and in return, they get their work reviewed when it is submitted.

**4. Publishing best practices:**
This would be a question for the journal outlets, not researchers like myself.

**5. Other Comments:**
This would be a question for the journal outlets, not researchers like myself.

## 561. Alfred L. George, Jr., M.D.

**Submit date:** 9/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Alfred L. George, Jr., M.D.

**Name of Organization:** Northwestern University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
The cost of publishing a scientific paper, especially for higher impact journals, has skyrocketed. By restricting use of grant funds to pay these fees will bias who can publish in certain journals to only investigators with non-federal research support (e.g., HHMI investigators) and this seems discriminatory. Investigators in China will likely dominate these journals.

At the same time, requiring all NIH_supported work be made open access compounds the problem; limiting funds for paying open access fees is illogical and not consistent with this policy.

NIH should be negotiating with the major scientific publishers to lower publication and open access fees.

**2. Available evidence related to publication costs and proposed options:**
I seldom use NIH grants exclusive to pay publication fees mainly because grant budgets are tight, and I have the luxury of having discretionary funds available. Most don't have this luxury. I don't have data, but it would be easy for NIH staff to compile a list of open access fees for the major scientific journals. In doing so, it will be come clear that the proposed caps on publication costs will restrict publishing to very few papers per year.

**3. Peer review compensation:**
Peer reviewers of manuscripts for journals is inadequately compensated. More than 90% of the time, there is NO compensation. There can be alternatives to direct financial compensation - example: waive publication costs for frequent reviewers, guarantee review of submitted publications (e.g., J Clin Invest does this). The NIH should negotiate with journals to help make this happen. By simply restricting funds available through NIH grants to pay publication costs only punishes the investigators.

**4. Publishing best practices:**
I think the main driver of higher costs is greed on the part of the publishers. Second driver is inflation generally. Capping publication costs on NIH grant will do nothing to curb either.

**5. Other Comments:**
I think the main driver of higher costs is greed on the part of the publishers. Second driver is inflation generally. Capping publication costs on NIH grant will do nothing to curb either.

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/Making-Your-Research-Free-May-Cost-You.pdf

## 562. N/A

**Submit date:** 9/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 5 with a cap of $4,000.

**2. Available evidence related to publication costs and proposed options:**
I did not look at the NIH calculations carefully, but it has been a long time since I paid $2000 for APC (It is typically in the range of $3000-$6000). I wonder if the low NIH estimate is due to NIH looking at all DOAJ journals rather than the weighted sum of journals that NIH R01 funded investigators publish in.

**3. Peer review compensation:**
I don't think paying peer reviewers is a good idea, or at least it should not be tied to journal publication costs. Some will take advantage of the opportunity to make money, and this will degrade the quality of science and peer-review.

**4. Publishing best practices:**

**5. Other Comments:**

## 563. Marc Nishimura

**Submit date:** 9/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Marc Nishimura

**Name of Organization:** Colorado State University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
None of these options appear to use the immense negotiating leverage that the NIH has to reduce publication fees, but instead just put limits on the researcher as to where they can publish and how many papers they can publish. This will have unintended negative consequences, especially if other funding sources are used to support some, but not all, researchers.

A $2000 limit per pub seems reasonable, but is currently low, and what if the publisher doesn't agree? The NIH/Federal government should negotiate rates with publishers rather than putting the onus on the researcher to "figure it out".

Additionally, any hard cap needs to be written with inflation in mind and a clear policy to adjust moving forward.

Option 1 seems like a non-starter without a free NIH-supported publication route and a major culture change. "Cheap" journals would be OK for some research, but locking NIH researchers out of publishing in Science, Nature, and Cell seems globally non-competitive.

Option 4/5 is extremely low. 0.08% of the typical 1.25M R35 award is $10K. This is 5 papers at $2K each, which won't enough over 5 years to get my R35 renewed and keep my lab afloat. Without negotiated price reductions it is even less than 5 papers in highish-quality journal (~$3K).

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Paying $ for peer review seems fraught.

How about publication fee credits for peer review?

**4. Publishing best practices:**
This sort of thing will just have publishers gaming your system to charge the highest rate possible, not matter if they are providing value, or not.

**5. Other Comments:**
This sort of thing will just have publishers gaming your system to charge the highest rate possible, not matter if they are providing value, or not.

## 564. N/A

**Submit date:** 9/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I wish this policy had been in place a few years ago—it's a much-needed and long-overdue reform. Many of our colleagues worldwide have felt that the academic publishing system is broken in numerous ways. There is a mounting outcry for change, as illustrated in a recent PNAS article: https://www.pnas.org/doi/10.1073/pnas.2401231121. This underscores the urgency of addressing misaligned incentives and reforming publication practices.

**2. Available evidence related to publication costs and proposed options:**
The imposition of unreasonably high APCs by leading publishers is concerning from an ethical standpoint.

**3. Peer review compensation:**
This is essential to ensure high-quality and timely review.

**4. Publishing best practices:**

**5. Other Comments:**

## 565. Elizabeth Parks

**Submit date:** 9/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Elizabeth Parks

**Name of Organization:** University of Missouri

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I am fully supporting of making sure that research results are disseminated and publication is the primary route to move the science forward. However, in clinical research complete analysis of the data can take a year or more before manuscripts can be written and then 12 - 18 months to be published. By this time, the budget period has been completed and the monies exhausted. Thus, for many researchers there is no place to find the $4,000 to $5,000 needed to publish in high impact journals.

One can attempt to use no cost extension to save the funds to cover the publication costs, but as described above the high impact clinical studies can take over 2 years to get accepted to a journal, to type set the paper, and to receive the final invoice for publication. I am aware of some faculty who ended up paying for publication with their own personal funds.

**2. Available evidence related to publication costs and proposed options:**
The evidence is in NIH Reporter. Please analyze the data on the end of a clinical research project's budget period, and match that up with the dates of publication of those findings.

**3. Peer review compensation:**
Publishers are making millions of dollars of profit on the volunteer work of scientists - this needs to stop. Publishing agreements (between universities/the federal government with publishers) to limit the cost of publishing need to be established in the U.S. as they are in Europe.

**4. Publishing best practices:**
I do not believe automated review is the answer to all of the problems.

**5. Other Comments:**
I do not believe automated review is the answer to all of the problems.

## 566. Elizabeth Kopras

**Submit date:** 9/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Elizabeth Kopras

**Name of Organization:**

**Type of Organization:** Not Applicable

**Role:** Investigator/Researcher

**1. Proposed policy options:**
As usual, you are trying to address a complex issue with a simple answer. Maybe you should quit using ChatXI to produce policy.

I would LOVE to be able to publish in top tier journals at low cost. But NIH requiring it won't make it happen. It will just mean that I will have to find the money elsewhere. And there is no elsewhere now that indirects are under attack.

**2. Available evidence related to publication costs and proposed options:**
Scientists. We do the work for less money than warehouse workers. We pay to have it published. We review for free. Then our libraries pay to have access to the journals. All so we can help others live better lives. But that was in the before times, when science meant something.

**3. Peer review compensation:**
Ha ha ha ha ha ha!!! No. Peer reviewers are not compensated. The fact that you even ask this question illustrates how unqualified you are to be asking these questions. I can't believe that this is my life now.

**4. Publishing best practices:**
I have no idea why publication costs are so high. I literally have to create the PDF for most of the journals.

**5. Other Comments:**
I have no idea why publication costs are so high. I literally have to create the PDF for most of the journals.

# 567. Anna Tischler

**Submit date:** 9/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Anna Tischler

**Name of Organization:** University of Minnesota

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
In my opinion, the only policy option that is potentially tenable is option #4, but even for this option the total costs allowed are likely to be too low. For a typical award, I budget approximately 1% of the total costs for publication, not 0.8%. For option #5, the $6,000 per publication maximum will preclude investigators from publishing in certain high impact journals that would generate more visibility for the research results, unless they have alternative funding sources available to make up the difference. Option #1 is ludicrous considering that NIH also is requiring that investigators publish all work as open access and considering that investigators must publish their work in reputable journals for their career advancement and for demonstrating productivity for new grant submissions or renewals. Option #2 allowing only $2000 per publication, would only enable publication in relatively low impact society journals and would not fully cover open access fees. No journals to my knowledge currently offer peer reviewer compensation, which would severely limit investigator's potential to reduce publication costs under Option #3. None of these options take into consideration that some journals have reduced publication costs for investigators using the subscribe to open model. This should be included in any final policy.

**2. Available evidence related to publication costs and proposed options:**
Cost for publication in journal that have a medium impact in my field (impact factor 6.0 - 8.0) are typically around $3000 - 3500 per manuscript in open access format. This is a reasonable cost for publication. Any restrictions on costs per publication should use $4000 as the limit to allow for potential increases in costs associated with publishing, such as hosting large amounts of data on servers.

**3. Peer review compensation:**
It seems extremely unlikely that any scientific journals will offer compensation for peer reviewers, based on their current funding models. Most non-profit society journals that have lower publications costs operate to generate revenue for the society, which is returned to to the scientific community in the form of conferences organized by society, legislative advocacy by the society, etc. For-profit journals may have more flexibility to offer compensation for peer review, but in my opinion they are unlikely to do so since it would reduce their profits. There is no benefit to journals to offer peer review compensation and I think NIH alone is unlikely to be able to have an impact in this area considering that many researchers who publish are not funded by the NIH.

**4. Publishing best practices:**
A higher publication cost should be allowed if the journal offers additional services related to the publication, such as hosting of all raw data that we are now required to provide upon publication based

on data management and sharing plans. There are costs associated with operating the servers that house these data. A higher publishing cost could also be allowable if the journal employs editorial staff who do rigorous copy editing of all manuscripts.

**5. Other Comments:**

A higher publication cost should be allowed if the journal offers additional services related to the publication, such as hosting of all raw data that we are now required to provide upon publication based on data management and sharing plans. There are costs associated with operating the servers that house these data. A higher publishing cost could also be allowable if the journal employs editorial staff who do rigorous copy editing of all manuscripts.

## 568. Mark Pickrell

**Submit date:** 9/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Mark Pickrell

**Name of Organization:** Virtuoso Surgical, Inc.

**Type of Organization:** Healthcare Industry (Biotech/Device/ Pharmaceutical Company)

**Role:** Organizational Official

**1. Proposed policy options:**
Cap the amount that the U.S. government pays in APCs for sponsored research to explicitly only cover the cost of peer review. Publishers should only be making their money from subscriptions.

**2. Available evidence related to publication costs and proposed options:**
I have paid for APCs that are reasonable, and rejected publications that gouge for payments. I should cost $2500-3000 to peer review and prepare an article for publication.

**3. Peer review compensation:**
They should get about $1,000/article reviewed, including preparing public written comments.

**4. Publishing best practices:**
AI-usage tests and copying/copyright checks are cheap. There should be no extra charges for these types of services.

**5. Other Comments:**
AI-usage tests and copying/copyright checks are cheap. There should be no extra charges for these types of services.

# 569. Matthew Bogyo

**Submit date:** 9/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Matthew Bogyo

**Name of Organization:** Stanford University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
It is important to allow grant funds to be used to support publication costs. Publications are necessary in order to secure funding and therefore creating a barrier to publishing work in the highest quality journals will only serve to prevent important future research. The cost of publishing is part of the cost of doing research and the main way in which the work gets shared. Not paying for publication costs is like hiring someone to build a house but saying you will not cover the costs of nails. Those costs are relatively small compared to the rest of the project costs but removing them has a large negative impact on the final product. While pre-print servers are great, there is a lack a peer review which makes it difficult to assess the quality of the work in some cases. The best option in my opinion is to limit the total amount that can be spent in the grant lifetime to prevent exceptionally high spending on publication costs for journals that charge too much (i.e. 5X the average or higher). The use of a reasonable cap as a total amount or percentage of total funds makes the most sense (i.e. option 4) as long as those values are reasonably high . This could also help to put pressure on some of the journals that charge outrageous fees for publication to make changes or risk losing potential content.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
We all do peer review for free. While it is a big time expense, it is also payback for the review that is given to our own work. The problem with paying reviewers is that it can provide the wrong motivation for people to review scientific studies. It would have a tendency to attract people who only care about the financial benefits of peer review without necessarily having the required expertise. I am very picky about the work I review because it does take a lot of effort. So I pick things where I have good expertise and can help make sure that only the best work is published. It also allows me to get value from the review work since it is in an area where I benefit from knowing what the lastest results are. The bottom line is that the people who provide reviews who are thoughtful, constructive and fair are likely not dependent on being paid $300 for each paper they review. The people who would be mainly focused on the compensation have a higher chance of doing it for the wrong reasons or doing a poor job (i.e. spending little time) just to maximize their financial benefits.

**4. Publishing best practices:**
I think it is important to keep up with the current costs of publishing. Labor costs and need for more fact checking could increase overall publication costs and should be considered when setting any caps on total funds  to be used for publishing.

**5. Other Comments:**

I think it is important to keep up with the current costs of publishing. Labor costs and need for more fact checking could increase overall publication costs and should be considered when setting any caps on total funds  to be used for publishing.

## 570. N/A

**Submit date:** 9/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I do not agree with any of the stated options, but would instead favor an approach modeled on elements of options 3 and 5. Specifically, I believe it would be good policy to encourage publications that compensate peer reviewers by raising the allowable expenses for publication in those journals. At the same time, the allowable per-publication charges should remain close to the current standard of ~$6000.

I do not support capping publication costs over the total award, as this could disincentivize researchers from publishing all of their work—some might choose to publish only a portion of their findings to manage costs.

Similarly, I feel that disallowing or capping per-publication costs at a low level (e.g., $2000–$3000) is not realistic. Like it or not, publication in flagship journals carries substantial weight for impact in the field. If NIH caps were set too low, researchers funded solely by NIH would find it nearly impossible to publish in these journals, which would in turn diminish the perceived value of NIH-funded research.

**2. Available evidence related to publication costs and proposed options:**
In my experience, average publication costs for many journals—including society journals in the biological sciences—fall in the $3500–$6000 range. Policy decisions should take these current costs into account, rather than artificially lowering caps, which would shift the financial burden onto investigators and ultimately disincentivize publication. That said, the upper end of fees—most notably those charged by the Nature Publishing Group at ~$12,000–$13,000 per article—is unreasonable. Steps should be taken to negotiate reductions and bring these costs more in line with other journals.

**3. Peer review compensation:**
I would support a motion to extend the allowable costs for individual publications for journals that compensate peer reviewers. I agree with the statement that 6 hours of work is typically involved with reviewing a paper, though it should be acknowledged that some journals have manuscripts reaching epic proportions which are harder to parse and critically evaluate, and thus may require even more time and effort from reviewers.

**4. Publishing best practices:**
I have mixed feeling about automated fraud detection, as the algorithms are rife with false positives. In the end, human expertise will always be best, and I would not support allowing higher per publication costs for a journal that uses AI approaches rather than traditional peer reviewers. I do think that financially compensating peer reviewers could help increase attentiveness to the assignment.

**5. Other Comments:**

I have mixed feeling about automated fraud detection, as the algorithms are rife with false positives. In the end, human expertise will always be best, and I would not support allowing higher per publication costs for a journal that uses AI approaches rather than traditional peer reviewers. I do think that financially compensating peer reviewers could help increase attentiveness to the assignment.

# 571. Melanie Ehrlich

**Submit date:** 9/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Melanie Ehrlich

**Name of Organization:** Tulane University School of Medicine

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
The topic of publication costs pales in comparison to the drastic loss of funding and politically inspired, illogical, and often contrary to science-facts rearrangement of the NIH management.

The science-and-health based leadership and grant administration structure has been decimated. The results are already starting to turn the US's leadership in health-related research into a ghost of its former self. Our country will be far behind China and European nations if the funding and the science-expertise of grants management is not returned to pre-2025 levels.

**2. Available evidence related to publication costs and proposed options:**
Just one of many examples of the false rejection of science facts by the current NIH administration is in the area of vaccine use and development. Millions of Americans will suffer needlessly because of the rigorous and scientifically disproven idea that current vaccines do more harm than good. This is nonsense as readily demonstrated in many articles in prestigious scientific journals. Moreover, mRNA-based vaccines, one of the modern miracles of US science, not only saved millions of Americans from death but have the potential in the near-term to treat non-infectious diseases like cancer. NIH should not be relegating vaccine research to the dustbin but rather promoting this amazing new type of research.

**3. Peer review compensation:**
Another way that the US government is cutting America's nose to spite its face that affects NIH is by policies that treat foreign students and researchers in this country as unwanted and limiting their stay here. The US economy and health, the development of new disease treatments and drugs, US universities, US cities and towns that rely on its universities to prosper, all are hurt by policies that limit foreign students to only four years. This is a reversal of a decades-old policy welcoming such students and is clearly insufficient time.

**4. Publishing best practices:**
In addition, new policies that limit NIH applications from considering effects of gender and race on health are founded on prejudice and not on medicine. It is documented in thousands of articles that these factors are intrinsic to determining many health consequences. Moreover, Genome-wide Association Studies (GWAS) is founded on such effects deriving in part from single-nucleotide polymorphisms (SNPs). Without consideration of such factors, we not only curtail research that will help women and racial minorities but also we cannot use the resulting data to inform better ways to develop

treatments for white males because studying the exceptions in science often reveals essential information to understand the main rules.

**5. Other Comments:**

In addition, new policies that limit NIH applications from considering effects of gender and race on health are founded on prejudice and not on medicine. It is documented in thousands of articles that these factors are intrinsic to determining many health consequences. Moreover, Genome-wide Association Studies (GWAS) is founded on such effects deriving in part from single-nucleotide polymorphisms (SNPs). Without consideration of such factors, we not only curtail research that will help women and racial minorities but also we cannot use the resulting data to inform better ways to develop treatments for white males because studying the exceptions in science often reveals essential information to understand the main rules.

## 572. N/A

**Submit date:** 9/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Ideally allowable funds for APCs should be limited.

However, the new requirement that publications involving NIH-funded research be made immediately available to the public necessitates open access publishing with APCs.

Without budgeting $3-4k per manuscript within each NIH award, the researcher will be limited to publishers with which their home institutions have agreements for open access publishing.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
For grant reviewers:

Easy. The current compensation does not equal the time, effort and expertise required for a quality review. At current rates the NIH receives an extraordinary product for its money.

For publication reviewers:

The NIH is requiring immediate free public access to publications requiring investigators to publish open access. Thus, the cost is the cost and since the NIH requires it the grant budgets should pay for it.

**4. Publishing best practices:**
We should all aim for journals with impact factor of >5. These journals now have APCs of $3-4k.

**5. Other Comments:**
We should all aim for journals with impact factor of >5. These journals now have APCs of $3-4k.

# 573. Philip Kern

**Submit date:** 9/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Philip Kern

**Name of Organization:** University of Kentucky

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
If there is a limit on publication costs, then there should be low cost options for publication. Many (most?) journals are print-free or online only journals. Yet the article charges continue to rise. Authors get prestige from "high impact" journals, however impact can be "gamed". Could NIH or the federal government sponsor a journal that is peer reviewed, respectable, online, with appropriate depositing of papers into pubmed?

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
The compensation should be the learning experience from the peer review. The amount of money that would incentivize me would not be $50-100. It would be much more. I do not think financial compensation is the answer.

**4. Publishing best practices:**
NIH wants funded work to be published. Even negative results. If funding is given to a project and the results are "negative", meaning nothing exciting happened, publishing this will help ensure that future NIH funds are not wasted on the same or similar project. But "negative results" are not sexy, and top journals will not take such papers. Often these studies go to online journals that charge high fees.

**5. Other Comments:**
NIH wants funded work to be published. Even negative results. If funding is given to a project and the results are "negative", meaning nothing exciting happened, publishing this will help ensure that future NIH funds are not wasted on the same or similar project. But "negative results" are not sexy, and top journals will not take such papers. Often these studies go to online journals that charge high fees.

## 574. N/A

**Submit date:** 9/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Of these options, I personally prefer option 4 - a limit on the total publication cost.

An alternative option that is even better is a sliding scale depending on Impact Factor or other reputational score - perhaps use Impact Factor quartiles or quintiles to determine rate amount of money a researcher can pay from direct costs. A journal with a relatively low Impact Factor should be worth less of my tax dollars than a journal with a considerably higher impact factor. For example, a researcher publishing in a journal with an impact factor less than 0.5 (or in Quartile 4 of a field if using quartiles) would be able to pay less for publication from direct costs than an researcher publishing in a journal with an impact factor of 2.5 (or 2nd quartile in a specific field). Yes, I realize this is more complicated, but groups that are funded would be responsible for keeping these records and submitting that in annual reports.

**2. Available evidence related to publication costs and proposed options:**
Every journal I have paid a publication fee to charges more than $2,000. Some of the best open access journals are higher in cost than $2,000. Lower cost journals (that require a fee) often (not always) are newer, have poorer quality publication assistance (checks on papers for plagarism, etc), or far lower Impact factors. In addition, the lack of money for publication for me has meant publishing in “traditional journals” that are locked or blocked to the public or scientific community unless they have access through an institution. This means those papers may receive fewer views and less distribution than those in open access “pay to publish” journals.

**3. Peer review compensation:**
Peer review should not be compensated in my opinion. Compensating peer reviewers could easily result in many reviewers doing a fast, poor job, just to get compensated. This could especially be true for researchers in low income countries where reviewing for compensation could become quite lucrative. As a journal editor, I am seeing an increased number of poor quality reviews especially from developing countries where science is not the most current. Although I try to screen reviewers, the publisher, in order to gain positive metrics, often chooses reviewers who are fast over those who are good. I personally believe paying reviewers will exacerbate this problem - fast, but not necessarily good.

**4. Publishing best practices:**
Fraud detection, plagarism, and AI writing detection programs should be in place by EVERY publisher that NIH allows to be paid publication costs.

**5. Other Comments:**

Fraud detection, plagarism, and AI writing detection programs should be in place by EVERY publisher that NIH allows to be paid publication costs.

## 575. N/A

**Submit date:** 9/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Options 1-5:

- This will impact more junior investigators (e.g. trainees) and investigators who do not have access to large funds of money to support their research. It will make it more and more difficult to encourage younger or less well established individuals to publish and as a result only Pharma and those who have access to large amounts of money will be able to publish.

- The open access journals that are considered "high impact" frequently charge much more than this. As with option 1, capping the amount on the grant at levels that are not feasible with the current costs going to disproportionately affect newer investigators, those with access to less resources, and trainees.

Alternative options:

a.

- Make publishers apply (and pay a fee) to be listed on an NIH list of preferred publishers.

Those publishers should adhere to a set of standards, including limiting the cost of individual publications for NIH funded research. These publishers are making enormous profits - see https://group.springernature.com/gp/group/media/press-releases/results-financial-year-2024/27762650

Neither the US taxpayer, nor taxpayer funded researchers should be required to pay the astronomical fees that are leading to huge profits for these publishing companies.

b.

- Have a NIH run peer reviewed journal collection that can be open access. Reviewers can be paid for their contributions, with open acknowledgements, and financial compensation. Advertisers can pay the NIH to advertise in these journals to offset the running costs.

- NIH funded researchers will be encouraged to publish in this online journal series.

- Fees will come from NIH research grants, or other federal funds (could be agreements with DoD and VA), or could be free for US investigators.

- If non-US funded investigators wish to publish in this journal collection, then the appropriate negotiations could be made with their government research sponsors or institutions to allow for

discounted / free publications. (Or free publications after a certain number of reviews for the publication)

- Advantages - the NIH could more closely monitor publications, compliance and social media engagement, citations, and access to the articles.

**2. Available evidence related to publication costs and proposed options:**
Profits for springer.

https://group.springernature.com/gp/group/media/press-releases/results-financial-year-2024/27762650

**3. Peer review compensation:**
Most journals do not compensate peer reviewers. Peer reviewers should be compensated for their time for the journals that are making huge amounts of money from this publishing industry.

See above for alternative option b.

**4. Publishing best practices:**

**5. Other Comments:**

## 576. Theresa Osypuk

**Submit date:** 9/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Theresa Osypuk

**Name of Organization:**

**Type of Organization:** Not Applicable

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I support a HIGH LIMIT for spending on article processing fees, ESPECIALLY IF A RESEARCHER IS PUBLISHING IN THE ABSOLUTE TOP JOURNALS. So, I would like to see NIH come up with a rule that combines Option 4 (a maximum amount per grant budget spent on APC), with some exemption that allows MORE money to be spent on APC's if a researcher publishes in a top journal with very expensive APC's. This exemption would act as a bonus for exceptional research placement in a top journal, and perhaps there could be up to three bonuses per grant or something for APC's that exceed an $8,000 threshold or something.

The main concern is that THE TOP SCIENCE JOURNALS HAVE VERY HIGH APC'S AND NIH GRANTS NEED TO HELP PAY FOR THESE. If NIH does not help to pay, then this policy discourages publishing in top journals.

In my opinion, although Option 4 is the best of the NIH brainstormed presented options, it is still inadequate. NIH Option 4 0.8% proposed amount of direct costs (or $20K over the life of a 5y R01 grant) is insufficient, as this is $4K/year for 5 years, and the APC charges for this selection top science and medical journals are as follows in 2025: NATURE $12,690; SCIENCE $5,450; PNAS $2890-5650; CELL $11,400; LANCET $8,680; BMJ $7,525.

NIH also needs to provide researchers flexibility to publish in expensive journals that are TOP TIER. These journals are high impact for a reason -- they are read, indexed, and cited by more researchers than other journals. This is why the publishers can charge these high APCs. These Top high APC journals are VERY DIFFERENT than lower quality journals with high APC's. Therefore, in sum, I believe NIH should generate some list of THE TOP JOURNALS with high APC's that should be exempted from this NIH spending limit rule, so as not to discourage publishing in top journals.

Another important consideration is: researchers need to remain free to pay for the APC's through multiple sources, including NIH; and regardless of how they pay for the APC's, this should not impact how the researcher cites the grant in pubmed central. THERE SHOULD NOT BE ANY JOURNALS THAT ARE CUT OFF FROM BEING CITED VIA PUB MED CENTRAL BECAUSE OF THIS APC FUNDING POLICY. THESE POLICIES NEED TO BE COMPLETELY SEPARATE.

**2. Available evidence related to publication costs and proposed options:**
as articulated in question1, In my opinion, although Option 4 is the best of the NIH brainstormed presented options, it is still inadequate. NIH Option 4 0.8% proposed amount of direct costs (or $20K over the life of a 5y R01 grant) is insufficient, as this is $4K/year for 5 years, and the APC charges for this

selection top science and medical journals are as follows in 2025: NATURE $12,690; SCIENCE $5,450; PNAS $2890-5650; CELL $11,400; LANCET $8,680; BMJ $7,525.

Publishing in any of these journals would go through the budget too quickly.

**3. Peer review compensation:**

**4. Publishing best practices:**
I think that having a HIGHER QUALITY JOURNAL as rated by its impact factor or rank in its field as a TOP TIER journal, should be the main criteria for whether the journal is allowed to have a higher APC .

**5. Other Comments:**
I think that having a HIGHER QUALITY JOURNAL as rated by its impact factor or rank in its field as a TOP TIER journal, should be the main criteria for whether the journal is allowed to have a higher APC .

## 577. Jonathan Pasternak

**Submit date:** 9/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Jonathan Pasternak

**Name of Organization:** University of Kentucky

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 2 (limit to the amount that can be spent on publication of a single article), but modify the wording to prevent wealthy institutions from simply covering any additional cost above 2000$, and there by disadvantaging smaller institutions. The policy should be that the NIH will not reimburse funds for any publication that charges more than 2000$ per article. This will force publishers to reduce OA publications fees to stay under this limit.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
The current system is not sustainable so it is good to see the NIH is trying to effect change here. Open access publication is critical for the future of science, but the publishers should not be allowed to profit excessively from publicly funded science.

**4. Publishing best practices:**

**5. Other Comments:**

## 578. N/A

**Submit date:** 9/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
the journal Science has an open access fee of is $5,450. This seems pretty standard. If one hopes to publish 2 articles per year under an NIH award, which is needed to get the award extended, then you are looking at around $11k per year.

**4. Publishing best practices:**

**5. Other Comments:**

## 579. James J Bull

**Submit date:** 9/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:** James J Bull

**Name of Organization:** University of Idaho

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Any of the five options listed in the RFI seem an improvement over the current system, although I suspect option 1 (no support for publication) would discriminate in favor of wealthy institutions that provide faculty with endowments that could be used for publication costs. (Indeed, such discrimination will likely happen under any of the options.) As I expect that unforeseen consequences will require future modifications to any policy that is implemented, there seems little reason at present to fine tune the other four options. Putting a cap on total publication costs may reduce publications per award, which could be a good outcome. But I strongly approve of limiting the amount of federal money that can go for publication, especially when arXiv, bioRxiv and medRxiv publish for free.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
This one is tricky because NIH does not pay especially well for its panel service. Implementing a policy that pays well for journal reviews could put pressure on NIH to pay their reviewers more. On the one hand, a paid-review policy could improve ease of finding reviewers. But I can see lots of potential problems. So, I don't have a strong feeling on this, other than it should not become a loophole for publishers to bypass the intent of NIH policy.

At least one publisher I know of offers expedited review (presumably for an extra fee -- I did not inquire). It is not difficult to imagine variations of such a policy whereby an author pays more for different levels of review. I would hope that such variations can be contained.

**4. Publishing best practices:**
I worry that any such exceptions will be exploited to the publisher's advantage and undermine the intent of NIH.

**5. Other Comments:**
I worry that any such exceptions will be exploited to the publisher's advantage and undermine the intent of NIH.

## 580. N/A

**Submit date:** 9/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I appreciate working towards avoiding excessive amounts of money being garnered for article processing fees. However, these efforts need to be directed towards publishers and not researchers or institutions. If journals do not lower their processing fees, and if funders are unwilling to cover these costs, then researchers will not be able to publish their work in the most impactful journals and the cost will be borne by institutions (many of which are also publicly funded), or worse, personally by researchers. With NIH limiting the funds researchers can request for publication processing fees, this will ultimately limit the publication of important and cutting edge research in high-tier journals (more likely to reach the public). As such, this proposal is likely to have unintended consequences -- actually stifling public access and knowledge of important research findings. For reference, I was lucky to recently have a paper accepted in a high-tier journal (impact factor 50), and the open access publication costs were over $13,000 USD. Again, the part of this process that needs change is the journals themselves.

**2. Available evidence related to publication costs and proposed options:**
I had an article published in within the last year in a high impact journal (impact factor 50.0) and the open access publication costs were $13,000 USD. These exorbitant costs need to be reigned in. By NIH limiting the funds they will provide to pay for article processing fees will do nothing to rectify this. These costs will then fall on the institutions (many of which are publicly funded), and generally not willing to cover these costs; or worse, personally on the researchers.

**3. Peer review compensation:**
I have never been compensated for peer review, and I have reviewed for both mid-tier journals and high impact journals (e.g., Nature family journal). My colleagues also report never having been compensated for peer review.

**4. Publishing best practices:**
Even with exorbitant article processing fees, the publishers frequently make mistakes with editing and generating proofs.

**5. Other Comments:**
Even with exorbitant article processing fees, the publishers frequently make mistakes with editing and generating proofs.

## 581. Jin Wang

**Submit date:** 9/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Jin Wang

**Name of Organization:** Baylor College of Medicine

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
To effectively control escalating publication costs, the NIH should move beyond simply capping the allowable APCs paid with grant funds. The most powerful policy would be to prohibit NIH-funded researchers from publishing in any journal that charges an APC above a set threshold, such as $2,000, regardless of the funding source used for payment. This is a crucial distinction from Option 2, as it does not allow for supplemental funding from other sources. Such a policy would directly compel publishers to lower their overall APCs to retain access to NIH-funded research.

A common concern is that such a ban might inadvertently penalize researchers by preventing them from publishing in prestigious, high-APC journals. This argument fundamentally misunderstands the market dynamics and underestimates the NIH's significant leverage as a primary funder of premier biomedical research. The world's top journals are not prestigious in a vacuum; their reputation is built upon the high-impact research they publish, a significant portion of which is funded by the NIH.

Faced with a hard publication ban for its grantees, these publishers will face a simple economic choice: either lower their prices for all authors to comply with the cap, or lose access to a vast and essential stream of top-tier scientific discoveries. Given this reality, they will be compelled to adjust their pricing. Therefore, this policy is not a limitation on researchers, but rather a powerful and necessary market correction that will force publishers to adopt more reasonable pricing models.

**2. Available evidence related to publication costs and proposed options:**
While a single cap is effective, a more nuanced policy could involve a tiered APC cap system. This would acknowledge variations in journal production costs and operational standards while still imposing rigorous cost controls. For example, the NIH could establish a framework such as:

Tier 1 (e.g., Top-tier journals with demonstrable high editorial standards): $2,000 APC Cap

Tier 2 (e.g., Reputable society and mid-range journals): $1,500 APC Cap

Tier 3 (e.g., Other vetted journals): $1,000 APC Cap

The success of this model would depend on the NIH establishing a transparent, fair, and objective system for classifying journals. Instead of relying on flawed and easily manipulated metrics like Journal Impact Factor, the NIH could directly survey its funded researchers and ask them to vote for the most important journals they read in their specific fields. This democratic, community-driven approach is the best way to identify high-quality, impactful journals and effectively sweep out the predatory and low-

quality ones. This classification can be supplemented with other robust criteria, including the rigor of the peer-review process, editorial quality, and ethical practices.

**3. Peer review compensation:**
I am not sure about the ideas of compensating peer reviewers, especially if the APC is set at $2K.

**4. Publishing best practices:**
The NIH stands at a pivotal moment. As one of the world's largest and most respected research funders, it has both the power and the responsibility to reform a broken academic publishing system. Beyond imposing caps, the NIH could pioneer a truly transformative model for scientific communication.

Consider having the NIH launch its own non-profit, open-access journal or publishing platform. This would create a direct, cost-effective venue for its grantees. On this platform, the NIH could manage a rigorous peer-review process, potentially compensating reviewers to ensure high-quality and timely feedback. Crucially, this would shift the measure of scientific impact away from the prestige of a journal's brand. For the purposes of promotion, tenure, and grant evaluations, the impact of work published on the NIH platform could be assessed through more direct and meaningful metrics, such as the number of positive citations the work receives.

To further enhance scientific exchange and integrity, this platform—and existing repositories like PubMed Central—could incorporate functionalities for ongoing, post-publication peer review. Allowing registered users to ask questions and post comments directly on articles would foster a dynamic scientific discourse, accelerate progress, and serve as a powerful community mechanism to challenge questionable data and deter academic fraud.

By implementing a strong policy with firm APC caps while simultaneously building a new, interactive publishing infrastructure centered on the quality of the science itself, the NIH can lead the global community toward a future where knowledge is not dictated by a publisher's profit margin.

**5. Other Comments:**
The NIH stands at a pivotal moment. As one of the world's largest and most respected research funders, it has both the power and the responsibility to reform a broken academic publishing system. Beyond imposing caps, the NIH could pioneer a truly transformative model for scientific communication.

Consider having the NIH launch its own non-profit, open-access journal or publishing platform. This would create a direct, cost-effective venue for its grantees. On this platform, the NIH could manage a rigorous peer-review process, potentially compensating reviewers to ensure high-quality and timely feedback. Crucially, this would shift the measure of scientific impact away from the prestige of a journal's brand. For the purposes of promotion, tenure, and grant evaluations, the impact of work published on the NIH platform could be assessed through more direct and meaningful metrics, such as the number of positive citations the work receives.

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By implementing a strong policy with firm APC caps while simultaneously building a new, interactive publishing infrastructure centered on the quality of the science itself, the NIH can lead the global community toward a future where knowledge is not dictated by a publisher's profit margin.

## 582. Jill Smith

**Submit date:** 9/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Jill Smith

**Name of Organization:** Georgetown University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I (personally- not my university) think there should be a cap on indirect costs (30-40%) is adequate(15% is too low. There is no reason why schools like Harvard /Yale should get more indirect costs than State Universities. Everyone (every school) should be the same just as there is a cap on PI salary.

**2. Available evidence related to publication costs and proposed options:**
Universities do not cover publication costs. Journals are charging more and more and some researchers opt for lower tier journals just to save cost.

The problem is the journals, not the NIH.... When the authors do most of the formatting and use templates and since most of the journals are online, there is absolutely no reason why the cost to the authors should be several thousand dollars and the higher the impact score - the greater the cost- so ONLY the Ivy League schools with big endowments can publish in these journals- not fair.

**3. Peer review compensation:**
Yes peer reviewers should be compensated and maybe if you paid them more, they would dedicate appropriate time and do a better job. Reviewing 8-10 grants for a couple hundred dollars a day is most likely why the reviewers do such a superficial job and miss important details in the grant.

Also NIH should somehow change the format so the review in double blinded because there are too many biases. I sat on a study section and and there was a horrible grant being presented and the reviewer wanted to give it an outstanding score because of who the PI or what University is applying was- grant should be judged on the scientific merit.

CSR is not doing a good job selecting reviewers and also I have used their ART tool to select a study section and they typically do not acknowledge my assignment sheet and just place grants in study section because maybe they need more grants there.

I do not like the new system of scoring. Is there a way to have the reviewers just judge the science and after they submit the score on the science- then look at the investigators and facility? There are too many biased reviewers.

**4. Publishing best practices:**
Along with making articles available on NCBI website for federally funded grants, the NIH should require journals to offer a discount for federally funded publications.

Societies often offer and (very small) discount for publishing articles of their members but not enough.

Another journal (MDPI) offers vouchers for discounts on submitting papers for publication if authors review for the journal- since reviewers are not paid it is hard to find good and willing reviewers for manuscripts

**5. Other Comments:**

Along with making articles available on NCBI website for federally funded grants, the NIH should require journals to offer a discount for federally funded publications.

Societies often offer and (very small) discount for publishing articles of their members but not enough.

Another journal (MDPI) offers vouchers for discounts on submitting papers for publication if authors review for the journal- since reviewers are not paid it is hard to find good and willing reviewers for manuscripts

## 583. N/A

**Submit date:** 9/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Other

**Type of Organization - Other:** Non-Profit Other than Higher Education (Health System)

**Role:** Investigator/Researcher

**1. Proposed policy options:**
If one of these options should move forward, option 4 seems the most reasonable. Many top tier, high impact, peer-reviewed journals are well over any of the options that would limit the per publication cost to $2000, especially if at non-profit other than higher education that may not have contracts with publisher that provide discounts. It would only seem reasonable to provide funding for this when we are to adhere to the 2024 NIH Public Access Policy that had the effective date moved up to July 1, 2025, an only a news article that the NIH was planning to crack down on excessive publisher fees.

**2. Available evidence related to publication costs and proposed options:**
Not all institutions that are non-profit have contracts in place with publishers to obtain discounts on publication fees. Thus, we are paying much higher prices to publishers to follow regulations surrounding all federally sponsored research needing to be published as open access. Another factor in publication fees that should be considered for calculations, is the impact of the journal. Many high-impact journals have publication fees well over $2,000. This year alone, our research group has paid a total of $20,545.06 for six publications with most being well over the proposed $2000.00 per publication limit ($5250.00, $5378.63, $3500.00 $3090.00, $2092.80, $1233.63). Calculations on the cost of publications should take into consideration how many of the articles were published under agreements between Universities and the Publishers who have discounts.

**3. Peer review compensation:**
As far as I know and in discussions with other that provide peer review, compensation for their time has never been provided.

**4. Publishing best practices:**

**5. Other Comments:**

## 584. N/A

**Submit date:** 9/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I prefer Option 4: Set a limit on the total amount of an award that can be spent on publication costs or

Option 2: Set a limit on allowable costs per publication.

I believe "Option 1: Disallow all publication costs" is not acceptable. Since NIH requires investigators to follow public-access policy, it does not make sense if NIH is not willing to pay for the expenses associated with public-access.

**2. Available evidence related to publication costs and proposed options:**
"PLOS One" is the pioneer of the public-access journals. It currently charges $2,290 per article. Another well-known public-access journal, Scientific Reports, charges ($2590 + tax) per article. The allowable costs per publication at $2,000 is acceptable, but NIH should match these flagship journals.

**3. Peer review compensation:**
As an editor and a reviewer, I believe "peer review compensation" makes sense. As an editor, I experienced a large percentage of declination to review invitations. As a reviewer, I declined a lot of requests myself. However I try my best to review two manuscripts for each editor who handles one of my manuscripts. Unfortunately, many investigators are too busy in writing grants due to low funding rate, and they simply delete review invitations (not even bother to click the decline link). Review compensation will likely help the situation.

**4. Publishing best practices:**

**5. Other Comments:**

## 585. jerome dempsey

**Submit date:** 9/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:** jerome dempsey

**Name of Organization:** UW_Madison

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 586. Aaron Grossberg

**Submit date:** 9/2/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Aaron Grossberg

**Name of Organization:** Oregon Health & Science University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
In general, I agree with the sentiment addressed by this proposal - more of the award should be applied directly to science. However, because 1) publications are the most widely used and recognized productivity metric and 2) NIH policy explicitly forces NIH grantee to publish in an open access format, which can entail a tremendous increase in publication costs (sometimes in excess of $10,000), a policy limiting grant expenditures on publication fees may actually restrict data and research sharing. All decisions undertaken by PIs related to research are informed by financial limitations, and this policy is high risk for suppressing the distribution of discoveries and insights. Of the presented options, option 3 is the best, but its successful implementation would require active pressure on major publishing houses to limit fees.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Terrific idea. Compensation level of $50/hr is reasonable.

**4. Publishing best practices:**

**5. Other Comments:**

## 587. Chunrong Jia

**Submit date:** 9/3/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Chunrong Jia

**Name of Organization:** University of Memphis

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

I firmly advocate for compensating peer reviewers. The existing system is under significant strain, driven by an overwhelming influx of unpaid submissions and a declining willingness among established scholars to volunteer their time without remuneration.

**4. Publishing best practices:**

**5. Other Comments:**

## 588. N/A

**Submit date:** 9/3/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 4 or 5 are best.

Limiting the total amount spent on publications (option 4) seems most straightforward to achieve the goal.

Also implementing a per publication max (option 5) is less preferable and should not be set too low - the proposed level of $2000 per publication is lower than typically required for open source option for journals in my field (i.e. no embargo, now required for all NIH funded studies). Determining the costs ahead of publication are not always clear due to variable institutional discounts and other adjustments.

**2. Available evidence related to publication costs and proposed options:**
Typical open access option for journals in my field (to avoid any embargo): for example, $3500 paid in July for Radiology journal

NIH can not mandate both no embargo (i.e. open access, incurring extra costs) and low publication fees!! These are competing interests.

**3. Peer review compensation:**
I am not aware of paid peer reviewers. I would like to review for these journals myself. It raises the question if these are low ranked journals (needing to recruit reviewers for high volumes), or reputable journals that are finally compensating for quality reviews - something i will look into further.

**4. Publishing best practices:**
Scrap the per publication cost idea. It's too convoluted and difficult to police.

**5. Other Comments:**
Scrap the per publication cost idea. It's too convoluted and difficult to police.

## 589. Elizabeth McGuier

**Submit date:** 9/3/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Elizabeth McGuier

**Name of Organization:** University of Pittsburgh

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
NIH should continue to allow grant funds to be used for publication expenses. Option 4 is the most realistic. Limiting costs per publication is an overly rigid approach that will require more time and resources to oversee, and the specific amounts will quickly become outdated. Monitoring costs per publication and whether or not journals compensate peer reviewers creates additional costs to taxpayers and will reduce potential savings. Investigators are already incentivized to avoid journals with especially high fees. Limiting the total amount that can be spent on publication costs (option 4) provides more flexibility while also meeting the goal of constraining the total amount of taxpayer funds spent on publication fees.

**2. Available evidence related to publication costs and proposed options:**
Top implementation science journals are open access with fees that exceed the proposed limits in Options 1-3.

Implementation Science: $3390

Implementation Science Communications: $2290

Implementation Research and Practice: $1800

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 590. N/A

**Submit date:** 9/3/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Non-profit Research Organization

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Now, option 5 is meaningful. To me, this option has a real chance to help contain the escalation in publication costs for open access while still supporting the need to get these publications out in the current editorial landscape. I also like that flexibility is maintained on the PI to make some decisions within the limits, and that smaller grants are not unnecessarily penalized.

I would go as far as suggest that it could be implemented rather than harsh limits, as a budget suggestion for PIs instead.

Often, PIs have to eyeball these numbers; and having a line in the RFA saying "in most cases, it is good practice to direct 0.8% of the award's direct costs or $20,000.00 over the life of the award to publication costs, in addition to limiting the amount per publication to $6,000.00" could really go far in seeing many people just take this option without perhaps creating a harsh boundary for special situations that might arise and could be addressed in the budget justification.

**2. Available evidence related to publication costs and proposed options:**
In my last 6 years as PI, I have not had a single publication costing less than 3K, with some exceeding 5.8K. I publish 3-6 articles per year, across medical, neuroscience and mathematical/computational journals. I expect every grant of mine (and every grant application I review) to produce 2-5 papers depending on duration (2-3 for R21s and 4-5 for R01s).

**3. Peer review compensation:**
It would be great if journals were pushed to publish reviewer rates, for post-docs vs PIs, for example. as of now, I've been reviewing for 15+ years, and never saw a penny for papers.

**4. Publishing best practices:**
I will leave this to people who are more embedded in the publication system.

**5. Other Comments:**
I will leave this to people who are more embedded in the publication system.

## 591. Gang Han

**Submit date:** 9/3/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Gang Han

**Name of Organization:** Texas AM University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 1, no nih fund allowed for publication is the best.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 592. Robert Vining

**Submit date:** 9/3/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Robert Vining

**Name of Organization:** Palmer College of Chiropractic, Center for Chiropractic Research

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option #4 offers the greatest flexibility while still maximizing the use of taxpayer funds.

**2. Available evidence related to publication costs and proposed options:**
Open access publishing costs are often over $3,000 U.S. for relevant journals in my field. Costs may be higher in journals with greater reach/impact. Limiting costs too much will encourage authors to favor publishing in journals with the lowest article processing fees, instead of those most relevant and with the greatest potential for impact.

**3. Peer review compensation:**
I have served as a peer reviewer for over 15 years. I typically spend several hours peer reviewing a single article. I have never been compensated for any peer review activities. Good peer review requires high level skills and a great deal of time. Peer reviewers should be compensated for this service if a system can be developed to ensure integrity and accountability.

**4. Publishing best practices:**

**5. Other Comments:**

## 593. N/A

**Submit date:** 9/3/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Non-profit Research Organization

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I support a mix of options 3 and 4. Setting a reasonable limit on per publication costs will help keep journals from increasing costs too much and reduce possibility of unscrupulous researchers paying a high price just to get a paper through without reasonable peer review. However, journals still need to make a profit so allowing a higher reimbursement for journals that pay peer reviwers is reasonable. Paying peer reviewers likely streamlines the review process and gets reviews completed faster with less administrative work in seeking reviwers and followup.

Limiting the total amount that can be spent on publications will encourage researchers to publish fewer more comprehensive papers, rather than numerous sequential papers to pad their publication count.

However, allowable publication costs should be assessed frequently to ensure they are realistic to cover actual costs researchers encounter.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Quality peer review takes time and is mostly done for free with no recognition. The recognition that some journals are starting is okay, but it's not worth much in terms of scientific stature. I try to review as many papers as it takes to make up for papers I publish in a year so if I submit two papers, I try to agree to review six. However, my position requires me to allocate my time down to 0.1 hour for everything I do to meet federal timekeeping requirements and only so much overhead can be spent on things like this. Most of the time on peer review is done on my own time. As a parent with small children I don't have a lot of spare time and I don't want to give it away for free. Paying for reviews would make the time sacrifice worthwhile. Not paying may be skewing the pool of reviewers to certain demographics or people in positions that don't care as much about how each 0.1 hour is spent.

**4. Publishing best practices:**

**5. Other Comments:**

## 594. Christopher Krebs

**Submit date:** 9/3/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Christopher Krebs

**Name of Organization:** RTI International

**Type of Organization:** Non-profit Research Organization

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I think Option 5 is best. It makes sense to limit the per paper cost and the total cost.

**2. Available evidence related to publication costs and proposed options:**
I think $2K per article and a total cost of $10K maximum (for 5 articles) seem like reasonable limits.

**3. Peer review compensation:**
This concept is new to me but I'd appreciate it.

**4. Publishing best practices:**
With AI, fraud detection is more important than ever.

**5. Other Comments:**
With AI, fraud detection is more important than ever.

## 595. Brett Wilson

**Submit date:** 9/3/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Brett Wilson

**Name of Organization:**

**Type of Organization:** Not Applicable

**Role:** Member of the Public

**1. Proposed policy options:**

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 596. N/A

**Submit date:** 9/3/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Currently, the NIH is mandating open access immediately upon publication, but is not allowing grant funds to be spent on open access fees that allow this mandate to be fulfilled. I applaud the NIH effort to limit publication costs, as well as requesting information on how to best spend grant funds to pay publication fees. To this end, I would strongly disagree with Option 1 that disallows all publication costs. The best option to achieve the NIH's stated goal is Option 3, which sets a limit on allowable costs per publication and allows a higher amount when peer reviewers are compensated.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
One concern with Option 3 is whether the NIH will seek to limit who is considered a paid reviewer or leave this to journal editors to decide. Reviewer pay should be based on the area where the reviewer works, not where the journal is published or headquartered.

**4. Publishing best practices:**

**5. Other Comments:**

# 597. Louis M Messina. M.D.

**Submit date:** 9/3/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Louis M Messina. M.D.

**Name of Organization:** University of Massachusetts Medical School

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**

**2. Available evidence related to publication costs and proposed options:**
To put this question into a fair light, while the cost of publishing in Open Access Journals is substantial, the benefit is that there is no advertising in the Journal. Therefore, publication in Open-Access Journals has some merit.

A way to balance the considerations is to limit one publication in an Open-Access journal per RO-1 grant or whatever the grant mechanism is.

**3. Peer review compensation:**
I have participated in approximately 50 Study Sections.

The non-monetary benefits are considerable: reviewing and learning about leading-edge research and techniques, being federally funded through the RO-1 mechanism, participating in Study Sections is a way to give back to NIH, and Reviewers have the opportunity to get to know leaders in their fields and form professional relationships.

However, there is no denying that conducting an effective review of an R01 proposal requires significant time and effort. Reviews are often completed outside of regular work hours, which can encroach on personal and family time. This important aspect should be acknowledged and appreciated by all.

In balancing these considerations, I believe there should be an increase in the reimbursement for Study Section review activities to better recognize the commitment involved.

**4. Publishing best practices:**
Automated fraud detection offers the NIH an efficient and accurate way to safeguard public funds by using AI and machine learning to identify potential fraud, plagiarism, and other misconduct with greater speed and accuracy than manual review alone. These costs are well justified.

**5. Other Comments:**
Automated fraud detection offers the NIH an efficient and accurate way to safeguard public funds by using AI and machine learning to identify potential fraud, plagiarism, and other misconduct with greater speed and accuracy than manual review alone. These costs are well justified.

## 598. N/A

**Submit date:** 9/3/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 4 is the most reasonable:

Option 4: Set a limit on the total amount of an award that can be spent on publication costs. NIH could limit the maximum amount of an award that could be spent on publication costs to 0.8% of the award's direct costs over the length of the award or $20,000.00, whichever is greater, in order to not disproportionately impact smaller awards. Limiting the award to 0.8% or $20,000.00 is consistent with recent requested average amounts for publication costs and provides institutions flexibility in publication while containing future cost increases. NIH may consider exemptions to the cap with agency approval for unusual, high-volume publication situations.

Example: NIH awardees may not request more than $20,000.00 from their award or 0.8% of the direct costs of the award, whichever is higher, with no limit on the per publication costs, until the maximum allowable amount is reached.

This would need to be reevaluated if Journals continue to raise publication costs.  Tere is no other source to support these costs.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
I have never been compensated for this.

**4. Publishing best practices:**

**5. Other Comments:**

## 599. Candice Brinkmeyer-Langford

**Submit date:** 9/3/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Candice Brinkmeyer-Langford

**Name of Organization:** Texas A&M Health Science Center

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
The requirement to have published articles freely available to the public should be maintained if the research being reported was supported by taxpayer money. However, as it puts an extra burden on the PI to pay the associated charges, and because good work should be published where it can receive maximum publicity (i.e., in a reputable journal, which usually will have higher charges), Option 5 seems most fair: set a $6,000 limit for per-publication costs.

**2. Available evidence related to publication costs and proposed options:**
Publishing in a journal that has less-expensive article charges often results in less visibility than publishing in a well-known journal, like Nature or Cell or Science. On the other hand, the public may not know the difference between journal reputations, and they may not be equipped to critically evaluate the research they are reading.

Unfortunately, being able to publish in the big-name journals often comes with time and reputation, and so newer faculty members may publish more often in less-reputable journals just to try to stay employed.

**3. Peer review compensation:**
Peer review takes up to 10 hours per article, in my experience, depending on the journal and the complexity of the subject matter. This is time taken away from teaching and research. Ideally, reviewers would be incentivized so that they could be compensated on a sliding scale: based on how in-depth the article is, and how quickly the reviewer submits a detailed review.

**4. Publishing best practices:**
Review details such as reviewer comments on experimental methodology, statistical methods used, percentage of text that could be AI, etc. could be made public for some of the journals with broad readership and reach.

**5. Other Comments:**
Review details such as reviewer comments on experimental methodology, statistical methods used, percentage of text that could be AI, etc. could be made public for some of the journals with broad readership and reach.

## 600. Mary Ganguli

**Submit date:** 9/3/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Mary Ganguli

**Name of Organization:** University of Pittsburgh

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I totally agree with Sec HHS and Dir NIH that publishing houses should not be encouraged to maximize their profits at taxpayer expense through charging hefty APCs.

However, until now it was possible to choose journals that were not totally Open Access, and, at those journals, not to opt for Open Access, but rather to wait for the 12-month embargo to pass and only at that point to upload the accepted manuscript to NIHMS, or have the publisher upload it to PMC.

But once NIH directed us to upload manuscripts immediately upon acceptance - then it became necessary to choose Open Access and pay the APCs.

If NIH goes back to allowing the 12-month embargo, a lot of these publication costs can be avoided.

Also - more publishers are going 100% Open Access, or creating sister/ daughter journals that are 100% Open Access. And their APC charges are in the $3,000 range. More and more publishers are going to take this approach, and only the least reputable journals- that nobody trusts and almost nobody reads - will be free. That is not the best way to disseminate the results of NIH-sponsored research into which investigators have poured their expertise and effort.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**
Detection of fraud and plagiarism are important to maintain integrity. Perhaps the government can support the development of open-source software for these purposes.

**5. Other Comments:**
Detection of fraud and plagiarism are important to maintain integrity. Perhaps the government can support the development of open-source software for these purposes.

## 601. Nukhet Aykin-Burns

**Submit date:** 9/3/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Nukhet Aykin-Burns

**Name of Organization:** UAMS

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Although I completely agree that the publication costs are moving upward at an unsustainable rate, I am not sure how limiting the funding to pay for them will help investigators from smaller institutions to publish their work in reputable journals. How about NIH provides a peer reviewed platform / journal to publish our data at a reasonable cost? So we have a decent place to present our work instead of stuck with predatory or low cost-low impact journals.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 602. N/A

**Submit date:** 9/3/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 1: Disallow all publication costs. --> This is really problematic and not realistic for academic researcher unless academic institutions build new system to provide the support. For a researcher who has passed the early career stage and ran out of the start-up and the research only funded by NIH grants, where would the APC to cover come from with option 1. It is also inconsistent with the current evaluation system, where the number and impact of publications are key criteria for renewing grants as a productivity

Option 2: Set a limit on allowable costs per publication. --> Unless NIH influences journal press to lower APC, this hurts especially the researcher whose works are usually published in high impact journals. Also it will reduce the competitiveness of American researchers as the funding agency of other countries not only cover the APC, but also even incentivise when publish well. We do not want to be in the situation, that we are forced to consider journals based on the APC. At the same time, NIH (and other government agency) should work together to lower the APC. For example, some of online yet prestigious journals have raised their APC over 7K, which is ridiculous. While not ideal, it is true that most high impact, rigorously performed research outcome is published in journals with higher APC than 2K. If limited to 2K and no other funding available to cover the publication cost, the researchers will be forced to split a single work into multiple small works to publish to fit the criteria.

Option 3: Set a limit on allowable costs per publication and allow a higher amount to be paid when peer reviewers are compensated. I vote for the idea of the reviewers need to be properly compensated and the reviewer' report should be publicly available but still 3K per publication does not meet most reputable journals.

Option 4: Set a limit on the total amount of an award that can be spent on publication costs. This gives the most flexibility in publications, as a research group might have a luck to have a few high impact papers and multiple other smaller publications. 20K limit is quite a stretch, considering 6-7 average publications, which means there will be a research group who publishes more, which is always evaluated better in renewing the grant.

Option 5: Set a limit on both the per publication cost and the total amount of an award that can be spent on publications. NIH really need to work with journal press if they want to set a limit of publication cost.

**2. Available evidence related to publication costs and proposed options:**
Currently, to publish in open access immediately, Nature Cell Biology's APC is over 10K, Nature

Communications APC is ~7K. Science Advances is $4,500, for an example of high cost journal. Mol Cell is over $9,000 to be open access.

Together with the recent NIH policy changes that in press manuscript need to be open access, the new policy to limit the publication cost is forcing the years' of work in very specialized journals only, limiting the impact of the work to publish.

**3. Peer review compensation:**
Considering the burden of the reviewers, but the peer reviews are necessary, there should be some compensation. However, it is not clear how the compensation can be made. Monetary compensation might not be the best options, as less qualified reviewers could opt to review more for monetary motivation. Probably, the reviewers can receive some universal points/credit that can be used to get discounted APC or fixed NIH-rate APC would be ideal.

**4. Publishing best practices:**
Maybe limiting the journal press to make the number of sister journals as major press all suck up the manuscript submission. For example, previously reputable specialty journals' impact factors have gone down significantly as most researchers opt to publish in sister journal of the most reputable journals.

**5. Other Comments:**
Maybe limiting the journal press to make the number of sister journals as major press all suck up the manuscript submission. For example, previously reputable specialty journals' impact factors have gone down significantly as most researchers opt to publish in sister journal of the most reputable journals.

## 603. Jennifer Ross

**Submit date:** 9/3/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Jennifer Ross

**Name of Organization:** University of Washington

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I favor option 5. I depend on NIH funding to pay article processing charges since I don't receive any funding from my university for these costs. Consider making a higher percentage available for K awards since the total awards are relatively small, but K awardees are unlikely to have many other funding sources.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 604. Christy Ledford

**Submit date:** 9/3/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Christy Ledford

**Name of Organization:** Medical College of Georgia

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I support option 5. I recommend limiting the cost paid for each publication. Some journals are charging unreasonable fees for little effort. A cost ceiling of $3,500 would be an economically feasibile limit for most journals.

Open access is essential for the public. In my work, we value the opporuntinty to share our work with the participants within the study as well as community members who supported it. Open access allows us to maintain access for these audiences who do not have access through academic libraries.

Regarding the increased cost for journals that pay reviewers, I alternately recommend allowing scientists to budget an additional .01 of their time on grants to peer review. See #4 below.

**2. Available evidence related to publication costs and proposed options:**
As an author, I have paid article processing charges only to open access publications for people in my community to be able to read our findings. Costs have ranged from $1750 to $3500.

**3. Peer review compensation:**
I worry about allowing higher payments to journals that compensate reviewers. This creates a "self-licking ice cream cone." These reviewers are the scientists who are also authors. Peer review should be a role scientists provide within the scope of their scientific appointment. If scientists' home institutions are not protecting that time, they need to be able to request an additional budget line for supporting their time to scientific review. For example, on a grant, named key personnel could request a .01 FTE funded by the grant to perform discipline peer review.

**4. Publishing best practices:**
As both an editor of a medical journal and as an author, I have seen reviewers use AI to the detriment of the process. When reviewers employ AI to save their own time, they add time requirements to both editors and authors.

Recently,  in a review of a manuscript I wrote, a review asked for changes that talked about words that were not in the manuscript at all.

As an editor, I find myself reading reviews for clues that reviewers completed the review independently.

**5. Other Comments:**
As both an editor of a medical journal and as an author, I have seen reviewers use AI to the detriment of

the process. When reviewers employ AI to save their own time, they add time requirements to both editors and authors.

Recently,  in a review of a manuscript I wrote, a review asked for changes that talked about words that were not in the manuscript at all.

As an editor, I find myself reading reviews for clues that reviewers completed the review independently.

## 605. Jeffrey Hayes

**Submit date:** 9/3/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Jeffrey Hayes

**Name of Organization:** University of Rochester

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I am in favor of letting PIs decide how to allocate research grant dollars. Most every NIH-funded PI I know tries to carefully maximize every dollar of their grant, so there is already little incentive to spend recklessly on exorbitant publication costs. However to be competitive in renewal, investigators have little choice but to publish in journals that are recognized and respected by review panels. It's not unusual for these journals to charge $4,500 or more per publication. However, I would be in favor of setting a *reasonable* limit that allows choice of journal, say $6,000 but it seems counter-productive to try to micro manage these costs when it costs 2-3 times that much to do one deep sequencing experiment.

**2. Available evidence related to publication costs and proposed options:**
Publication costs: Nucleic Acids Research ($4000), J. Mol. Biology ($4,500) are widely respected and popular open-access journals as examples.

**3. Peer review compensation:**
I feel reviewing is akin to pro-bono work and shouldn't be compensated. Reviewers already benefit from the exercise and compensating reviewers will set up an incentive structure for rapidity with an associated reduction in quality of reviews.

**4. Publishing best practices:**
The somewhat higher cost of open-access journals ensures that there are no barriers to accessing published science.

**5. Other Comments:**
The somewhat higher cost of open-access journals ensures that there are no barriers to accessing published science.

## 606. Anna Steward

**Submit date:** 9/3/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Anna Steward

**Name of Organization:** Palmer College of Chiropractic

**Type of Organization:** Academic Institution

**Role:** Other

**Role – Other:** Clinical Project Manager

**1. Proposed policy options:**
To balance flexibility in disseminating research results with responsible use of taxpayer funds, I recommend Option 5, enhanced with an Integrity & Transparency Uplift (ITU) framework.

Summary of Recommendation

-Option 5: Dual caps—$6,000 per publication and 0.8% (or $20,000) per award—control both outliers and total spend.

-ITU Framework: Higher per-publication allowances only when journals meet verifiable standards that add public value.

Why This Works

-NIH data show most APCs fall between $2,600–$3,100, but some exceed $10,000. A $6,000 cap accommodates legitimate costs while preventing extremes.

-Award-level caps protect smaller projects.

-Linking uplifts to best practices incentivizes transparency and integrity without restricting journal choice.

Illustrative ITU Criteria

-Base Cap: NIH pays up to $6,000 per publication and up to the award-level cap.

-Tier A Uplift (+$1,000): Applies when journals compensate peer reviewers at or above the BLS median wage for medical scientists and publish peer-review reports for accepted NIH-funded manuscripts.

-Tier B Uplift (full $6,000): Applies when journals also meet integrity and transparency standards, including:

---Automated image screening (e.g., Imagetwin, Proofig)

---COPE membership and adherence to editorial ethics

---TOP Guidelines Level 2+ for data/code/materials

---Price/service transparency reporting (e.g., Plan S frameworks)

This approach aligns with OSTP's public access mandate and NIH's Data Management & Sharing policy, ensuring compliance while maximizing research impact.

**2. Available evidence related to publication costs and proposed options:**
Publication Cost Data

-NIH analysis shows requested publication costs average $2,600–$3,100, with some outliers up to $12,000; applicants typically budget 0.8% of direct costs for publications.

-Global APC averages range $1,200–$2,500, but high-impact journals (e.g., Nature, Nature Communications) charge $6,000–$11,000; PLOS titles range $1,931–$6,460, and eLife charges $4,500.

Implication: A $2,000 cap (Option 2) would exclude many reputable journals, while no cap risks overspending. NIH's proposed $6,000 cap (Option 5) aligns with the upper mid-range of legitimate APCs.

Peer Review Burden

-Peer review consumes >100 million hours annually, valued at $1.5B if compensated at U.S. median scientist wages. Median time per review ≈ 5–6 hours.

-Open peer review (publishing review reports) improves transparency without slowing turnaround.

Integrity & Transparency Practices

-Automated image screening detects issues in ~3–4% of accepted manuscripts, reducing retractions.

-COPE and TOP Guidelines adoption improves reproducibility and ethics.

-Price/service transparency frameworks (Plan S) address APC inflation and market opacity.

Summary

Evidence supports Option 5 with an Integrity & Transparency Uplift: dual caps to control costs, plus incentives for journals that compensate reviewers, publish reviews, use integrity checks, and disclose pricing.

**3. Peer review compensation:**
NIH should consider the following factors when assessing whether peer reviewers are appropriately compensated:

Reference Wage

Use the BLS median hourly wage for Medical Scientists/Biochemists (≈$48–$50/hour in 2025) as a baseline.

Time on Task

Compensation should reflect documented average effort—typically 5–6 hours per review—and adjust for complexity (e.g., statistical or specialized reviews).

Transparency and Accountability

Require journals to publish peer-review reports for accepted NIH-funded manuscripts (open reports) and disclose reviewer payment policies.

Conflict of Interest and Training

Journals should demonstrate COI disclosure and provide reviewer training to ensure quality and integrity.

Performance Metrics

Compensation should align with timely, high-quality reviews; NIH could require journals to report average turnaround times and adherence to ethical standards (e.g., COPE).

**4. Publishing best practices:**
In addition to compensating peer reviewers, NIH should consider allowing higher per-publication costs only when journals implement verifiable best practices that enhance research integrity and transparency. Key factors include:

Automated Integrity Screening

Pre-publication image analysis (e.g., Imagetwin, Proofig) to detect duplications or manipulations.

Automated statistical checks (e.g., statcheck) for reporting errors.

Ethics and Transparency Standards

COPE membership and adherence to editorial ethics.

TOP Guidelines Level 2+ for data, code, and materials sharing.

Publication of peer-review reports (open peer review).

Price and Service Transparency

Public disclosure of APC breakdowns and editorial services (Plan S frameworks).

Persistent Identifiers and Metadata

ORCID for authors, ROR for institutions, and machine-readable XML (JATS) for compliance with OSTP's public access mandate.

Rationale: These practices reduce fraud risk, improve reproducibility, and align with federal open science policies. Linking higher allowable costs to these standards ensures taxpayer funds support journals that deliver measurable public value.

**5. Other Comments:**
In addition to compensating peer reviewers, NIH should consider allowing higher per-publication costs only when journals implement verifiable best practices that enhance research integrity and transparency. Key factors include:

Automated Integrity Screening

Pre-publication image analysis (e.g., Imagetwin, Proofig) to detect duplications or manipulations.

Automated statistical checks (e.g., statcheck) for reporting errors.

Ethics and Transparency Standards

COPE membership and adherence to editorial ethics.

TOP Guidelines Level 2+ for data, code, and materials sharing.

Publication of peer-review reports (open peer review).

Price and Service Transparency

Public disclosure of APC breakdowns and editorial services (Plan S frameworks).

Persistent Identifiers and Metadata

ORCID for authors, ROR for institutions, and machine-readable XML (JATS) for compliance with OSTP's public access mandate.

Rationale: These practices reduce fraud risk, improve reproducibility, and align with federal open science policies. Linking higher allowable costs to these standards ensures taxpayer funds support journals that deliver measurable public value.

## 607. N/A

**Submit date:** 9/3/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
It is a reasonable goal to limit how much money from a grant can be spent on publishing costs. BUT, you do not want to incentivize fewer publications (i.e., my grant only supports 1 publication /year but for whatever reason, we had an amazing year and are ready to publish 3 manuscripts) or going to parasitic journals (how may offer lower fees or no fees to get people in the door). So, I would recommend you consider putting a cap the amount per paper that can be charged to a grant. I would use society journals (Journal of neuroscience, e Neuro, Plos journals, PNAS, eLife) to figure out what that cap should be. This way, institutions can choose to support excessive fees if they so desire (5K+) but you encourage PIs publishing in places with reasonable fees.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
This has the potential to be a slippery slope with some bad actors (agreeing to review 100s of pubs, using AI to review, etc).

**4. Publishing best practices:**
Fraud detection and inappropriate statistics, etc is very important and should be supported by the NIH in terms of costs incurred.

**5. Other Comments:**
Fraud detection and inappropriate statistics, etc is very important and should be supported by the NIH in terms of costs incurred.

# 608. Tom Obrig

**Submit date:** 9/3/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Tom Obrig

**Name of Organization:** Retired

**Type of Organization:** Not Applicable

**Role:** Other

**Role – Other:** Retired Researcher

**1. Proposed policy options:**
As publication costs represent a minimal part of an NIH research grant budget, it seems reasonable to maintain past policy allowing funds for this purpose.

**2. Available evidence related to publication costs and proposed options:**
Having been a recipient of NIH research grants, the inclusion of limited funds for publications was essential for submission of my data in peer-reviewed journals. The value of results of any research project depends on the peer-review process.

**3. Peer review compensation:**
During my years of conducting NIH funded research, it was most common for PUBLICATION peer reviewers to volunteer their time and efforts. The costs of publishing resided in the essential activities of employees of the journal. This arrangement worked well. Compensation of peer reviewers of NIH STUDY SECTIONS was minimal.

**4. Publishing best practices:**
It is my opinion that the best research 'fraud protection' of the publishing process resides in the ability of others to reproduce the research results appearing in a publication. If others are unable to reproduce the results, it will cast a legitimacy shadow on the original publication.

**5. Other Comments:**
It is my opinion that the best research 'fraud protection' of the publishing process resides in the ability of others to reproduce the research results appearing in a publication. If others are unable to reproduce the results, it will cast a legitimacy shadow on the original publication.

## 609. Jean Schaffer

**Submit date:** 9/3/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Jean Schaffer

**Name of Organization:** Joslin Diabetes Center

**Type of Organization:** Non-profit Research Organization

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Publication of scientific results is critical for disseminating new findings to advance the field, for transparency to the public, and for establishing a record of productivity that is essential for obtaining future funding. Option 1 to disallow all publication costs would create an unfunded mandate.

Options 2 and 3, which set a limit on allowable costs of $2,000 per publication, seem inappropriate, given that many top tier journals have publication charges that exceed that amount (sometimes by a factor of 2 or more). Highly selective journals can be the optimal place for effective dissemination of important findings, but very few, if any, compensate reviewers, a policy over which individual scientists have no control.

Proposing a maximum on amount that could be spent over the life of the award (options 4 and 5) could be a path forward. However, this should not be tied to a percentage of direct award dollars, because whether a grant provides $50,000 or $500,000 in direct costs/year, the publication charges in any particular journal are the same. It would be better to set a maximum amount that could be spent over the life of the award. In view of the average number of publications/award, and current charges for publications in well-respected journals, $20,000 over the life of an award seems insufficient.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
I have made substantial contributions to peer reviewing; however, I have not received compensation for reviewing.

**4. Publishing best practices:**

**5. Other Comments:**

## 610. Keith R McCrae

**Submit date:** 9/4/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Keith R McCrae

**Name of Organization:** Cleveland Clinic

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Of the options listed, options 4 or 5 seem preferable. Journals need to meet their costs and make a profit on publications to ensure that quality journals continue to exist. There should not be increased fees for journals that financially compensate reviewers--the best journals do not do this. NIH should not limit the amount of grant dollars that can be allocated for publication, but during the review process whether the proposed amounts in a grant are appropriate with past publication history should be carefully scrutinized.

**2. Available evidence related to publication costs and proposed options:**
I am a reviewer for many journals, and a frequent NIH reviewer. I hear frequently that publication costs are becoming more burdensome to the academic community. In the UK, publication costs may not be paid through grants and it has made submission of papers to quality journals challenging. However, publishing is a business and high quality journals are needed. The appropriate balance needs to be reached.

**3. Peer review compensation:**
I do not believe peer reviewers should be compensated. Reviewing is part of the academic mission and a contribution to the scientific community. This might also induce bias.

**4. Publishing best practices:**
Screening for AI usage will be increasingly important and all journals should explicitly state their AI policies.

**5. Other Comments:**
Screening for AI usage will be increasingly important and all journals should explicitly state their AI policies.

## 611. Kelvin Smith Library & Cleveland Health Sciences Library

**Submit date:** 9/4/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Karen Caputo

**Name of Organization:** Kelvin Smith Library & Cleveland Health Sciences Library

**Type of Organization:** Other

**Type of Organization - Other:** Academic Library

**Role:** Institutional Information Sciences Professional/Librarian

**1. Proposed policy options:**
While Case Western Reserve University Libraries agree with the goal of maximizing funds to support research, we do not believe that the options provided here will achieve that goal. All these options still rely on a system of author fees (APCs) which some publishers are now trying to require NIH funded researchers to pay. All these options assume that publishers will react by making publication costs more reasonable, but their current behavior indicates that they will double down on APC payments for all federally funded researchers.

We recommend that NIH encourage researchers to deposit their accepted manuscript in PubMed Central (Green OA) at no cost and assert the Federal Purpose License. Furthermore, NIH should encourage publishers to modify their contracts as they did in 2008 to allow researchers to comply with the Public Access Policy. Generally, we believe that NIH should support sustainable OA options that do not rely on APCs, including repository deposit, and community-led publishing and infrastructure, such as diamond publishers.

**2. Available evidence related to publication costs and proposed options:**
In our experience, researchers will ask their institution or department to cover publication costs when funders do not pay (option 1), so costs just get shifted from funders to institutions. When institutions and researchers cannot pay though, it can result in researchers not sharing their work.

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 612. Srinivasan Dasarathy

**Submit date:** 9/4/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Srinivasan Dasarathy

**Name of Organization:** Cleveland Clinic

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Most society journals are also asking for fees for publication, e.g. JBC, AJP, mBio, etc. cannot afford to publish otherwise

**2. Available evidence related to publication costs and proposed options:**
many of my publications in high imapct journals do cost a large amound of funds and publcations will decrease unless NIH arranges a plan for paying open access via Director Fund or equivalent for NIH funded investigators

**3. Peer review compensation:**
do not beleive peer review should be compensated with cash, some models e.g. JCI that if peer review for 3 papers is done, one of the submissions by teh reviewer will be guarenteed a peer review and will not be triaged. alternative is support for open access fee for next submission

**4. Publishing best practices:**
VErifying plagiarism, image manipulation software costs are increasing, and add to the publication costs. These need to be considered when paying for publication costs that need to be separate from teh direct costs for the PI experiments and effort of personel

**5. Other Comments:**
VErifying plagiarism, image manipulation software costs are increasing, and add to the publication costs. These need to be considered when paying for publication costs that need to be separate from teh direct costs for the PI experiments and effort of personel

## 613. N/A

**Submit date:** 9/4/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
The options that limit per publication costs are the best, with higher costs for publications that compensate reviewers and contribute to the larger scientific community through conferences, etc. The total amount per grant, combined with the per publication cost, also seems ideal.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Peer review compensation also requires boundaries so certain reviewers are not dominating a particular journal, etc. Compensation with money is the most feasible.

**4. Publishing best practices:**
Community ehnancement like resources, conferences, awards, grants etc.

**5. Other Comments:**
Community ehnancement like resources, conferences, awards, grants etc.

## 614. Jeff SoRelle

**Submit date:** 9/4/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Jeff SoRelle

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Of all the options, option 5 is the best proposed as it would give the greatest flexibility and opportunity to comply with the requirements for open access and high impact science. Trying to limit spending and achieve both goals are incompatible in the current journal cost climate.

The method applied is flawed, because it assumes that all journals are of equal quality for publication. Instead, they should have estimated the cost of publication charges based on the reporting history of studies supported by a selection of 1,500 R01's completed. NIH wants to only fund the highest quality research and thus it expects results will go into above average journals, which charge 2-4x the average cost advertised (Nature, cell and science charges range from $8-12,000). Without these high quality publications, future research does not get funded. OR fewer publications are made, which leads to a decrease in research output, which currently is being dwarfed by Chinese funded projects.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

**Description:** Don't consider average journals for APC costs when NIH expects Above average research quality and outputs.

## 615. Blanche Capel

**Submit date:** 9/4/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Blanche Capel

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Publication costs should be limited to $2000-$3000/ article. This is a lot of money for authors.

I dislike any structure where the high end journals cost more. This will basically allow rich labs to control the research that reaches high end journals. Any deviation from a merit system should be strictly avoided.

There should be no limit to the total publication costs over the lifetime of the grant as this would limit sharing of information in the scientific community.

Negotiations should be undertaken with journals to understand how different models affect their financial structure. Many journals support societies, so changes in their financials have ripple effects throughout the system

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Reviews should not be compensated (reviews are part of our obligation as scientists) or if they are, there should be no change in the cost of publication.

**4. Publishing best practices:**

**5. Other Comments:**

## 616. April Craft

**Submit date:** 9/4/2025

**I am responding to this RFI:** On behalf of myself

**Name:** April Craft

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
The prices that high impact journals charge are much higher than $2,000 per publication. Publishing in higher impact journals that have broad readership ensures that the scientific discoveries are disseminated to other researchers and the public much faster with higher visibility.

**2. Available evidence related to publication costs and proposed options:**
Research the costs to publish in Nature, Cell, Nature Biotechnology, Stem Cell Reports, Developmental Cell, Biomaterials, PNAS, etc.

**3. Peer review compensation:**
Peer reviewers do not get paid for reviewing an article submitted to a journal. This is service that is done generally by faculty/PIs to support the idea of and participate in rigorous evaluation of work prior to publication and availability to others. We are not compensated in biology, bioengineering, orthopedics, etc.

**4. Publishing best practices:**
I'm not sure why journals charge so much to publish, it's ridiculous in my opinion. But this is the system.

**5. Other Comments:**
I'm not sure why journals charge so much to publish, it's ridiculous in my opinion. But this is the system.

## 617. Carol A Nacy

**Submit date:** 9/4/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Carol A Nacy

**Name of Organization:** Sequella, Inc.

**Type of Organization:** Healthcare Industry (Biotech/Device/ Pharmaceutical Company)

**Role:** Organizational Official

**1. Proposed policy options:**
Option 4 seems to be the most generous option to achieve what is one of the goals of research science: publication of results and techniques so that the science can be replicated by others and detemined to be sound or unsound.

**2. Available evidence related to publication costs and proposed options:**
Scientists who perform academic research do so under research grants. If you take away or limit the publication costs of that science in the grants, the science will not be reproduced by others, and that will negate the stated goal of NIH and this administration: reproducable science that serves US citizens.

**3. Peer review compensation:**
I have been a peer reviewer of grants (paid a minimal fee for a ton of work) and publications (no pay) and have been (and am) an editor for a variety of journals (no pay). Most reviewers of journal articles feel that this is part of our duties as a scientist, to help other scientists publish the best science possible so that it can be assessed and/or validated by others.

**4. Publishing best practices:**
Journal for which I am currently an editor has AI-driven topic suitability, fraud detection capability (review of figures and Tables), and AI-generated text detection, as well as Editor review of suitability of the manuscript for publication before it is sent for review.

**5. Other Comments:**
Journal for which I am currently an editor has AI-driven topic suitability, fraud detection capability (review of figures and Tables), and AI-generated text detection, as well as Editor review of suitability of the manuscript for publication before it is sent for review.

## 618. W.W.

**Submit date:** 9/4/2025

**I am responding to this RFI:** On behalf of myself

**Name:** W.W.

**Name of Organization:**

**Type of Organization:** Healthcare Industry (Biotech/Device/ Pharmaceutical Company)

**Role:** Organizational Official

**1. Proposed policy options:**
Publishers are raking in money with large publication fees - taxpayers are footing the bill, double paying for research.

I think the NIH should set up a marketplace for their funded research, and tell publishers that they have the option to bid on papers there within - ultimately paying research laboratories/institutions for the copyright of their research, which can then feed into the budget of those institutions.

The thing of value that publishers have is their brand(s), and their platforms for receiving, reviewing, and disseminating research. You would have to get some big labs on board before going to market, but you could do it, because even their customers are not behind their practices.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Peer reviewers are not compensated at all and should be compensated.

**4. Publishing best practices:**

**5. Other Comments:**

## 619. N/A

**Submit date:** 9/4/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Other

**Role – Other:** Research Administrator

**1. Proposed policy options:**
Set a limit on the total amount of an award that can be spent on publication costs over the lifetime of the award. This allows researchers to decide how they want to spend their publication money while also limiting the amount available to research. $20,000 over a 4/5 year award seems reasonable for multiple publications. Don't make it complicated as percentages of an award, I think a clear dollar amount is easy to monitor and if there is an over expenditure or portion that needs to be covered by other funds (ie a gift account or the university/institution) it is clear.

**2. Available evidence related to publication costs and proposed options:**
Audit risks will increase and create greater complications for institutions of it's complicated (ie 0.8% of the award). If you are going to limit it, please make it a clear dollar amount that is standardized across the board.

**3. Peer review compensation:**
N/A

**4. Publishing best practices:**

**5. Other Comments:**

## 620. American Psychological Association

**Submit date:** 9/4/2025

**I am responding to this RFI:** On behalf of an organization

**Name:**

**Name of Organization:** American Psychological Association

**Type of Organization:** Professional Organization/Association

**Role:** Organizational Official

**1. Proposed policy options:**

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/Letter-in-Response-to-NIH-RFI-on-Allowable-Costs.pdf

## 621. American Society for Microbiology

**Submit date:** 9/4/2025

**I am responding to this RFI:** On behalf of an organization

**Name:**

**Name of Organization:** American Society for Microbiology

**Type of Organization:** Scholarly Publisher/Journal

**Role:** Other

**Role – Other:** Policy staff submitting on behalf of a scientific society

**1. Proposed policy options:**

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/ASM-Response-NIH-APC-RFI.pdf

**Description:** Please see attached comments from the American Society for Microbiology

## 622. Elizabeth Blue

**Submit date:** 9/4/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Elizabeth Blue

**Name of Organization:** University of Washington

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 4 seems the best fit to control NIH funds spent on publications while working within the current publication system. This would allow researchers to spend more on fewer publications in high impact journals if needed, or publish more often in less expensive journals. While I agree publication costs have increased, the NIH cannot force journals to set a specific price for publications, and our institutions do not have the funds to pay the difference between the proposed NIH thresholds and publication costs in Science or Nature for example.

**2. Available evidence related to publication costs and proposed options:**
The NIH collected data on publication charges across journals, but it isn't clear that it was restricted to the journals publishing the most NIH-funded work (ex., medical journals vs. economics journals). That information should be paired with metrics like publicly-available impact factors when determining thresholds for publication costs.

**3. Peer review compensation:**
I have been reviewing manuscripts for peer review for about 20 years, and have never been paid for it. I don't know where the money to pay reviewers would come from; if publishers are required to pay for it, then I assume they would just raise their publication costs and pass that back to researchers.

**4. Publishing best practices:**

**5. Other Comments:**

## 623. N/A

**Submit date:** 9/5/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Negotiating rates with publishers (as other funders do, including many European ones) would be better than a cap on costs. Such a cap would currently prevent NIH funded researchers from publishing in some top-tier journals. A numerical cap is also concerning because it would need continuous re-evaluation with regards to the effects of inflation.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Peer review is part of the job description for faculty members who all have a certain percentage of service duties. However, incentives such as reduced open access publication costs could be a good way to achieve the goal of reducing publication costs while providing incentives to reviewers

**4. Publishing best practices:**
Inflation will need to be regularly considered. Journals that employ professional staff as editors will naturally have higher costs. Their contribution improves the final manuscript especially with regards to readability and quality of the figures

**5. Other Comments:**
Inflation will need to be regularly considered. Journals that employ professional staff as editors will naturally have higher costs. Their contribution improves the final manuscript especially with regards to readability and quality of the figures

## 624. Leslie Loew

**Submit date:** 9/5/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Leslie Loew

**Name of Organization:** U. Connecticut School of Medicine

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 2. It is simple and fair. But I would favor raising it to $3000.

**2. Available evidence related to publication costs and proposed options:**
There is a real cost associated with publishing open source. But the costs of some prominent open source journals have clearly been set to maximize profit and are highly unfair to small labs. So this cap is a step in the right direction.

**3. Peer review compensation:**
Peer review has always been uncompensated and has worked. It is part of a scietists job description and doesn't require compensation beyond their regular salary. Encouraging compensation for peer review may in fact to unintended consequences, including the recruitment of unqualified reviewers who accept assignments for the $.

**4. Publishing best practices:**
These should be evaluated based on analysis of costs supplied by publishers.

**5. Other Comments:**
These should be evaluated based on analysis of costs supplied by publishers.

## 625. N/A

**Submit date:** 9/5/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:** University of Pittsburgh

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I just paid $7,000 + for a Nature Comms paper. If I put real costs on an R01, it might be $15-20K or more for the entire grant. We under budget this significantly and I often use personal funds. I have no information regarding cost models at journals but, if NIH ceases coverage it will be very limiting. However, they appear to want to drive the entire process to Biorxiv-type publication which will be a disaster for scientific publishing and research integrity.

**2. Available evidence related to publication costs and proposed options:**
I do not believe that my institution, which is a prominent research university, will subsidize these costs. The only mechanism is NIH support, however, it is currently unrealistically low.

**3. Peer review compensation:**
Participation in peer review is a necessary part of the process. Compensation has always been low and this is just accepted.

**4. Publishing best practices:**
Again, currently publication costs are seriously under budgeted.

**5. Other Comments:**
Again, currently publication costs are seriously under budgeted.

## 626. rob striker

**Submit date:** 9/5/2025

**I am responding to this RFI:** On behalf of myself

**Name:** rob striker

**Name of Organization:** physician

**Type of Organization:** Not Applicable

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I'm not sure why publication costs would be limited. Scientists have an obligation to publish, and frankly not just publish whereever is cheapest, but publish in the highest profile manner that the data merits. this costs funds.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 627. Michael Guertin

**Submit date:** 9/5/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Michael Guertin

**Name of Organization:** UConn Health

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I prefer option 5. Publishing can be expensive and it is reasonable to have publication costs associated with reputable open access journals. I see the problem as predatory journals exploiting this fact. Many journals are predatory and these should be blacklisted from NIH costs.

**2. Available evidence related to publication costs and proposed options:**
I benefit greatly from having articles be open access and having my articles open access, which comes along with publishing cost. However, predatory journals posing as reputable publications gives publication costs a bad reputation.

**3. Peer review compensation:**
I have never been paid for peer review, but I think thoughtful reviewers should be paid. Unfortunately, this will also be exploited by predatory scientists who will just accept every review request, use a LLM/AI to write a review, then get paid.

**4. Publishing best practices:**
If a journal is reputable and does these things, then higher costs are reasonable.

**5. Other Comments:**
If a journal is reputable and does these things, then higher costs are reasonable.

## 628. Li Wu

**Submit date:** 9/5/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Li Wu

**Name of Organization:** University of Iowa

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
NIH grants should cover publication fees as part of research support.

**2. Available evidence related to publication costs and proposed options:**
We don’t have alternative sources to pay high costs for our publication fees

**3. Peer review compensation:**
The current compensation is too low, particularly most if not all of study sections are online and no travel and hotel costs

**4. Publishing best practices:**
Peer review system should be continually improved by journals

**5. Other Comments:**
Peer review system should be continually improved by journals

## 629. N/A

**Submit date:** 9/5/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I favor options 2 and 3, with a preference for option 3. I believe these options make it most likely that journals will actually reduce the APC costs and better compensate reviewers because it places a limit on the cost of each individual publication but does not place a limit on the number of publications.

I am concerned that all the other options, which limit the total amount of money that can be spent on publications, will reduce the frequency of publication, increasing the time that it takes for research to make it to the public because there will be monetary incentives to put more and more data into a single publication.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 630. N/A

**Submit date:** 9/5/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Other

**Type of Organization - Other:** Government

**Role:** Investigator/Researcher

**1. Proposed policy options:**

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 631. N/A

**Submit date:** 9/5/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Other

**Type of Organization - Other:** Government

**Role:** Investigator/Researcher

**1. Proposed policy options:**
These proposed changes are another barrier being added to the process of sharing the results of scientific studies. Scientists must publish their work in order to meet performance requirements and to advance in their careers.

Currently, costs for publication are a reasonable proportion of total research grants. There is no valid justification for reform.

Option 2 is preferred; a maximum amount per publication.

**2. Available evidence related to publication costs and proposed options:**
From my experience, having any arbitrary caps on the number of publications turns science into an accounting exercise. There are many other aspects of scientific publication that should be considered other than the number of publications from a grant.

**3. Peer review compensation:**
I have served as a peer researcher for many years. I am not in favor of compensation for peer reviewers.

**4. Publishing best practices:**
NA

**5. Other Comments:**
NA

## 632. N/A

**Submit date:** 9/5/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Limiting publication funds goes against the goal of scientific research. It will prevent sharing of data and dissemination of findings. By limiting or removing the ability to use funds for publication, you are removing scientific transparency and communication. This will also limit scientific impact and prevent many publications in highly respected journals. Not only will the general public be unable to see where the funds are going by removing the ability to publish in open-access journals, but it also will ensure that scientific groups at different institutions will work on the same problems and promote redundancy in both funding and research endeavors.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Peer review should have always been compensated. The work that goes into reviewing papers takes time, which should be appreciated. Rather than a standard pay, peer review compensation could go towards a publication cost fund the provide additional funding to investigators to publish in journals.

**4. Publishing best practices:**
There are already a lot of safeguards for publishing. Publishing ENHANCES transparency. The changes that have been discussed will minimize, or even at times completely eliminate, scientific transparency. Compensating for peer review and placing more importance on peer review would be the only reasonable way to promote higher quality publications - experts in the field are the best bet for encouraging great scientific output.

**5. Other Comments:**
There are already a lot of safeguards for publishing. Publishing ENHANCES transparency. The changes that have been discussed will minimize, or even at times completely eliminate, scientific transparency. Compensating for peer review and placing more importance on peer review would be the only reasonable way to promote higher quality publications - experts in the field are the best bet for encouraging great scientific output.

## 633. Anand Soorneedi

**Submit date:** 9/5/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Anand Soorneedi

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 634. N/A

**Submit date:** 9/5/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 4 and 5 seem reasonable.  Options 1, 2, and 3 do not.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
To my knowledge most peer reviewers for papers are not compensated.

**4. Publishing best practices:**
Having to post all of the data for an article is expensive.

**5. Other Comments:**
Having to post all of the data for an article is expensive.

# 635. Scott P Kenney

**Submit date:** 9/5/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Scott P Kenney

**Name of Organization:** The Ohio State University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Stop placing more restrictions on researchers. They have to publish their results and capping their abilities to pay for it adds additional burdens. If you would like to fix this issue, place caps on the rates publishers can charge, not the researchers.

If only given the options presented in the RFP designating a specific % cap on the total grant (Option 4) would be the most amenable but will need to be reconsidered annually to ensure the cap is amended regularly to account for inflation and increasing costs.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Peer reviewers are typically not compensated. It creates another massive burden on researchers who have to distribute time for these activities and editors. Some institutions do not recognize this aspect of the job of academic researcher which often limits volunteers. As an academic editor, I typically need to invite between 30 to 50 potential reviewers to find the minimum of 2 required for peer review. This adds significant time and effort that could be utilized elsewhere. Incentives to peer review would always be appreciated and may enhance willingness of reviewers to participate.

Perhaps adding an incentive such as a boost for highly active peer reviewers during NIH proposal submissions could be an alternative to direct payment?

**4. Publishing best practices:**
Why can't the NIH develop an AI that automates fraud detection and provide it at no charge (or with certain cap stipulations to publishers) to all publishers for integration into their review pipeline. Find out the average cost publishers spend on automated fraud detection and ask them to lower their publishing costs by such for access to the central fraud system.

**5. Other Comments:**
Why can't the NIH develop an AI that automates fraud detection and provide it at no charge (or with certain cap stipulations to publishers) to all publishers for integration into their review pipeline. Find out the average cost publishers spend on automated fraud detection and ask them to lower their publishing costs by such for access to the central fraud system.

## 636. Jolene Ramsey

**Submit date:** 9/5/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Jolene Ramsey

**Name of Organization:** Texas A&M University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Since it is mandated that taxpayer-funded research be made publicly available, funds to promulgate the research should be allowable. Restrictions/requirements that journals used be open access or the research be posted openly are reasonable. The NIH could work with the journals/publishers that exact the highest for-profit costs for publishing to reduce those costs or provide alternatives that maintain high integrity.

**2. Available evidence related to publication costs and proposed options:**
Researchers such as myself are required to publish as part of our job expectations. Trainees are also required to publish to advance in their careers. Unless the NIH is prepared to enforce removal of such requirements from university graduation, tenure, and promotion guidelines for all schools that receive any federal funding, then this idea is completely untenable. Many researchers do not have discretionary funds available that can be used to pay for publication of grant-funded research apart from the grant funds themselves.

Publications cost thousands of dollars, but journals charge tiered prices for different universities and even negotiate separate deals with high-volume authors. These costs are necessary for maintaining the websites and servers that allow us to access the information online, as well as reasonable compensation of journal staff. When costs are much higher than the average, then only those researchers with private funding will be able to access the journal for consideration of their manuscripts. Implementing that type of policy will replicate the inequities seen elsewhere in society where it is not the skills of the researcher or ultimate value of the science (merit) that determine the journal tier for publication, but the depth of the researchers pockets, or those of their network.

**3. Peer review compensation:**
Peer reviewers are not compensated and should not be compensated. Instituting compensation is likely to only perpetuate scaled inequalities.

**4. Publishing best practices:**
If the costs of publication rise due to the need to detect fraud, then allowable costs per publication need to be increased.

**5. Other Comments:**
If the costs of publication rise due to the need to detect fraud, then allowable costs per publication need to be increased.

## 637. N/A

**Submit date:** 9/5/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Although the journals included in the NIH analysis were open-access, a substantial subset of those journals are NOT indexed in PubMed--and therefore of questionable quality. I would propose the analysis includes open-source journals from fields that are relevant to NIH research, as evidenced by indexing in PubMed.

With this in mind, I would prefer an option similar to #4.

**2. Available evidence related to publication costs and proposed options:**
We do not target extremely high-impact journals, and focus on those with an impact factor from 2-6. However, our average publication cost in open-access journals is generally $2500-$3500. As such, we believe that the average number reported by NIH is at least slightly skewed towards the low end of the distribution.

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 638. Tracie Delgado

**Submit date:** 9/5/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Tracie Delgado

**Name of Organization:** Seattle Pacific University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I think it is vital for NIH grants to continue to pay for publication costs. For example, as a R15 recipient at a primarily undergraduate institution, the university often does not have the financial capacity to pay for publication costs. As of now, our university has no money in our budget as a university to pay publication costs. Without it included in the NIH budget, I as a PI with a active NIH grant would not be able to cover the expenses.

**2. Available evidence related to publication costs and proposed options:**
I think it is vital for NIH grants to continue to pay for publication costs. For example, as a R15 recipient at a primarily undergraduate institution, the university often does not have the financial capacity to pay for publication costs. As of now, our university has no money in our budget as a university to pay publication costs. Without it included in the NIH budget, I as a PI with a active NIH grant would not be able to cover the expenses.

**3. Peer review compensation:**
I think peer review should be compensated. For how high publication costs are ($3000-3500 on average in my field), paying each reviewer at least $100 would help offset the labor and time.

**4. Publishing best practices:**
Open access makes it more expensive to publish. Also predatory journals charge more and are open access usually. Make a criteria on the rigor of peer review should be indicated and not publishing in predatory journals.

**5. Other Comments:**
Open access makes it more expensive to publish. Also predatory journals charge more and are open access usually. Make a criteria on the rigor of peer review should be indicated and not publishing in predatory journals.

## 639. N/A

**Submit date:** 9/5/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I think there should be flexibility to allow for it; however, the publication costs have become exorbitant. Charging at least $2,500 for folks from the U.S. which this is often double that for folks from developing countries is too much. I believe the issue is with the publisher. Since our research is publicly available, I don't see the need to give journals money for Open Access.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Peer review is time-consuming. I think more money should be allocated for them, esp those from underserved communities and early career scholars.

**4. Publishing best practices:**

**5. Other Comments:**

## 640. N/A

**Submit date:** 9/5/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Non-profit Research Organization

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Limit amount of publications that each grant will pay for, regardless of the APC of that journal. For example, and R01 provide funding to cover 1 publication per year of the grant, or 5 publications total. These 5 publications could cost $2K each or $10K each.

**2. Available evidence related to publication costs and proposed options:**
It is imperative for junior investigators (like myself) to be afforded the opportunity to publish. However, most junior PIs do not have the ability to publish in glamor journals due to limited time in the field to develop suitable stories.

**3. Peer review compensation:**
Journal peer review should absolutely be compensated for. By the journals. The rate should be commensurate with salary, approximately $50/hour for most junior PIs. Good paper reviews take approximately 4 hours.

**4. Publishing best practices:**
Many journals are now publishing work without proper grammatical and scientific editing. This is a shame due in part by ballooning publication quantity generally. This work is in the permanent record and could shape future society. Costs for publishing should include rigorous editing.

**5. Other Comments:**
Many journals are now publishing work without proper grammatical and scientific editing. This is a shame due in part by ballooning publication quantity generally. This work is in the permanent record and could shape future society. Costs for publishing should include rigorous editing.

## 641. Jacquelyn Turcinovic

**Submit date:** 9/5/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Jacquelyn Turcinovic

**Name of Organization:** The University of Texas Medical Branch at Galveston

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Capping funding for publication expenses will effectively prohibit NIH grantees from publishing in high-impact journals, resulting in multiple adverse effects on the nation's scientific prowess. Firstly, high-impact journals will continue to publish articles from scientists in countries whose governments provide funding for publication costs (e.g., China, Canada, and the EU). Since these journals are the most cited and considered the most influential, this will result in American science losing its global dominance. Second, multiple high-impact publications and high citation numbers are necessary for early-career scientists to advance in their careers and obtain funding from both governmental and private sources. The proposed funding cap for publication fees will prevent early-career scientists from publishing in the journals necessary for career advancement and stability. This will ultimately lead to "brain drain" as the best American scientists leave for positions in other countries, such as China and Canada, that support career advancement and job stability.

In short, I agree that publication expenses, particularly those for high-impact scientific journals, are exorbitantly high and should be curtailed. However, I disagree with the proposed policy because it will ultimately decimate American scientific prowess. A more effective policy decision would be to regulate publishers or otherwise negotiate the publication price for American scientists.

**2. Available evidence related to publication costs and proposed options:**
A study from 2024 showed that citation count correlates with journal impact factor, and that journal impact factor correlates with publication cost (https://pmc.ncbi.nlm.nih.gov/articles/PMC10906259/)

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 642. Charles Rice

**Submit date:** 9/5/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Charles Rice

**Name of Organization:** The Rockefeller University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Most of these options would have the opposite effect to the one intended by this policy change.

**2. Available evidence related to publication costs and proposed options:**
Publication costs for many journals are too high. However, the researchers are not responsible for these high prices. Most funded grants through NIAID or NCI, for example, carve out reasonable costs towards publication that are usually far below what is actually spent to publish. Since research funds are limited and usually far below the level really needed, grantees are already hesitant to pay high publication costs using funds that could be spent on research personnel or supplies. Hence there is already a great deal of thought that goes into deciding where to publish, how much is costs, and whether or not the research will reach the largest audience. Unless there are widespread examples of exorbitant publication cost allocations, I think flexibility for the grantee should be maintained.

**3. Peer review compensation:**
I have never been compensated for peer review. I think compensating scientists for routine peer review activities is a bad idea.

**4. Publishing best practices:**
Perhaps NIH should negotiate with the Journals and set a ceiling on publication costs. I don't think this should fall on the shoulders of the researchers. This would have to be at a reasonable level which would be permissible to request on grant applications. However, the range of costs for different journals makes this strategy challenging.

**5. Other Comments:**
Perhaps NIH should negotiate with the Journals and set a ceiling on publication costs. I don't think this should fall on the shoulders of the researchers. This would have to be at a reasonable level which would be permissible to request on grant applications. However, the range of costs for different journals makes this strategy challenging.

## 643. Mark E Peeples

**Submit date:** 9/5/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Mark E Peeples

**Name of Organization:** Nationwide Children's Hospital Abigail Wexner Research Institute and The Ohio State University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Publication of research results is an essential part of research. We build on the findings of other scientists. Covering the costs of publication must remain a part of the research grant.

**2. Available evidence related to publication costs and proposed options:**
If publication costs are not covered by research grants, it would result in unnecessary repetition of experiments and slow advancements.

**3. Peer review compensation:**
I do a lot of peer reviewing. Some of us do, some don't. Being paid might entice more people to accept reviewing assignments. But it would also increase the cost of publication. In a way, peer reviewing keeps the cost of publication down. It's a scientist's way to contribute to this essential process.

**4. Publishing best practices:**
I'm not sure of the cost of automated fraud detection, but it sounds expensive, would be difficult to check, and would unlikely be better than several reviewers who are experts in the field reviewing the manuscript.

**5. Other Comments:**
I'm not sure of the cost of automated fraud detection, but it sounds expensive, would be difficult to check, and would unlikely be better than several reviewers who are experts in the field reviewing the manuscript.

## 644. N/A

**Submit date:** 9/5/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
The peer review process of science publication is a key facet of gold-standard science -- which is a key priority of this administration and of the NIH. Of the options proposed in the RFI, Option #1 ("Disallow all publication costs.") is explicitly bad for science. Without NIH support to publish articles, it would not be feasible to have a journal-based infrastructure for peer review, and thus to make robust, gold-standard science available to the public. Peer review is critical to achieving gold-standard science.

Option #5 ("Set a limit on both the per publication cost and the total amount of an award that can be spent on publications.") seems like the best choice. It is egregious that for-profit journals such as Nature charge excessively high publication fees, while rejecting a record number of papers (and wasting a lot of peer review time), and then have a higher number of retractions than other journals. The cost-benefit ratio is clearly skewed toward negative outcomes, and such practices do not advance gold-standard science. Instead, the cap on per-publication costs should be set by the Article Processing Charge (APC) of the professional society journals for each field. Those professional societies are not-for-profit, and thus will have a reasonable cost structure that supports the peer review process and public accessibility of science.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
It is long overdue to compensate peer reviewers. Doing so will also encourage journals to work on ways to share peer-reviews between journals (with permission), to reduce the chances of paying a reviewer twice to evaluate the same manuscript.

Note that reviewing a revised version of a manuscript should not elicit the same fee as an initial review. Likewise, editors should have ability to evaluate the quality of the peer review as part of any payment process. All editors have encountered lackluster remarks or heavily biased comments on the part of a peer reviewer, and this should not be encouraged or paid equivalently to a high-quality, unbiased peer review.

**4. Publishing best practices:**

**5. Other Comments:**

## 645. N/A

**Submit date:** 9/5/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
NIH can't prohibit funds for publications. That is counter productive and against the best interests of tax payers money. A reasonable cap, ok ($4000/publication). But not to allow any NIH funds for publications is not acceptable.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
If an investigators submits a grant(s), they should be expected to review grants as well. I am not sure if you mean peer reviewers for manuscripts.

**4. Publishing best practices:**

**5. Other Comments:**

## 646. N/A

**Submit date:** 9/5/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Other

**Role – Other:** Administrator

**1. Proposed policy options:**
First of all, to maximize return on investment (which has been excellent, when it comes to biomedical advances) I absolutely agree that it is important to have the highest standards in scientific research (a Gold Standard, if you will). I think that requires trust in our scientists, and opportunities for scientists to be bold and adventurous, and making sure we have the most diverse group of scientists entering the field as possible. If we reduce the pipeline, and only focus on a particular subset of institutions or disciplines, it will greatly damage innovation, and directly cause a decline in the quality of the output and return on investment of public funds. Science should be seeking to expand, not contract at this moment. If the US research enterprise shrinks, we will lose any competitive edge we have in the global market, and it will be incredibly difficult to recover even to where we are today. Now, whether it is best to impose regulations and cap prices on a free and competitive market such as publishing, I believe that it is somewhat counter to all government actions so far under this administration. Would it make things better? It depends on how the journals respond. If journals lower all their prices and downsize their operations, firing all of their workers, will that be better? If journals raise all other subscription and advertising costs to cover their expenses, forcing many institutions to cancel access and reducing readership, would that make things better? I don't see many plus sides to targeting publishers.

**2. Available evidence related to publication costs and proposed options:**
Journals require workers. Workers require pay. Pay requires income. If we force journals to eat the cost of publishing just because it is for the greater good, I don't think it is realistic to expect the same quality or access to services.

**3. Peer review compensation:**
To my knowledge, peer reviewers are not typically compensated for their time and energy by journals. It is a convention that the institutions who fund individual researchers support peer review as a part of their service. It is not evenly distributed, and the quality is not always the same, but everyone is expected to contribute.

**4. Publishing best practices:**
Fraud detection is getting more and more complicated as technologies advance and feed into human bias. Humans tend to like clean, pretty things, and computers are very good at smoothing out the rough edges to make for beautiful images and figures. So the bias goes towards making things look better, and when things look better they have a higher chance of being published and cited. Is that "Gold Standard

Science"? No. It is beautiful science, and exciting science, but that is not the same as a "Gold Standard." But the more that we increase competition for funding and reduce public support, the greater the risks of fraud and people acting in desperation to push their ideas through.

**5. Other Comments:**

Fraud detection is getting more and more complicated as technologies advance and feed into human bias. Humans tend to like clean, pretty things, and computers are very good at smoothing out the rough edges to make for beautiful images and figures. So the bias goes towards making things look better, and when things look better they have a higher chance of being published and cited. Is that "Gold Standard Science"? No. It is beautiful science, and exciting science, but that is not the same as a "Gold Standard." But the more that we increase competition for funding and reduce public support, the greater the risks of fraud and people acting in desperation to push their ideas through.

# 647. Edward Mocarski

**Submit date:** 9/5/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Edward Mocarski

**Name of Organization:** Emory University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
It is a mistake to expect any limitation on publication costs will serve to support any flexibility in dissemination of research results or scholarship associated with taxpayer funds to support research. Limitations placed on publication costs will undermine dissemination of research results, achieving the opposite goal of constricting dissemination of research, particularly impacting in high profile and impactful scholarship.

**2. Available evidence related to publication costs and proposed options:**
Over the past 20 years, my group opened the field of cell death pathways through virus-encoded cell death suppressors. Our publications, particularly in Cell Press/Elsevier and Nature Publications as well as in PLoS journals, have had enormous impact (and helped to drive my overall h-index to over 110). Several prominent publications that have been cited over 1000 times were costly to publish and the costs were born by US taxpayer funding. Dissemination of scientific information requires support of the cost of publication as much as it requires US taxpayer funding for unbiased research, scholarly opinion and clinical investigations.

**3. Peer review compensation:**
Peer review has been considered “giving back” to the system on which academic scholarship and research depends. It has never been compensated to the level that, for example, advising commercial enterprise is compensated. Thus, daily compensation for NIH peer review has been artificially low for decades and has not been market driven at all. Daily compensation for consulting has risen dramatically over the same time period and amounts to thousands of US dollars per day for acknowledged scholarly experts. The goals of peer review has been largely met because the peer review system relies on experts donating their time with only token compensation. Undoing

**4. Publishing best practices:**
Dishonesty in objective scholarship (scientific misconduct) may only be detected using automated text and image analysis that costs time and money. US taxpayer funding must support all aspects of objective scientific investigation, research and publication of results, including detection of fraudulent reporting and plagiarism.

**5. Other Comments:**
Dishonesty in objective scholarship (scientific misconduct) may only be detected using automated text and image analysis that costs time and money. US taxpayer funding must support all aspects of

objective scientific investigation, research and publication of results, including detection of fraudulent reporting and plagiarism.

## 648. N/A

**Submit date:** 9/5/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Not Applicable

**Role:** Member of the Public

**1. Proposed policy options:**
Scientific research data and results need to be published to inform other researchers and the public on scientific findings. If the research is not reported on and made available to the scientific community and public, how can it be shared and others benefit from the findings? If findings are not published, the likelihood of duplicate projects being performed increases substantially leading to the waste of the taxpayer funds this proposal is trying to decrease. Additional, the publication of scientific results is fundamental in stimulating and advancing our scientific knowledge and understanding.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**
The lay public's confidence and trust in science is greatly affected by fraudulent scientific reporting. Automated fraud detection is extremely important for scientific integrity. If the technology had existed in 1998 , Andrew Wakefield and his co-conspirators would not have been able to publish their fraudulent paper in Lancet with the completely unproven theory that vaccines cause autism and the country wouldn't be in the "anti-vaccine" crisis it is now in. RFK Jr's consistent attacks on vaccinations is based on fraudulently/made-up data. See how important fraud detection is!!

**5. Other Comments:**
The lay public's confidence and trust in science is greatly affected by fraudulent scientific reporting. Automated fraud detection is extremely important for scientific integrity. If the technology had existed in 1998 , Andrew Wakefield and his co-conspirators would not have been able to publish their fraudulent paper in Lancet with the completely unproven theory that vaccines cause autism and the country wouldn't be in the "anti-vaccine" crisis it is now in. RFK Jr's consistent attacks on vaccinations is based on fraudulently/made-up data. See how important fraud detection is!!

## 649. N/A

**Submit date:** 9/5/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Other

**Type of Organization - Other:** Governement Research

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 3. A cap on per publication costs makes sense, but limiting total number of publications on each award in counter-productive to the advancement of science.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

# 650. John Williams, MD

**Submit date:** 9/5/2025

**I am responding to this RFI:** On behalf of myself

**Name:** John Williams, MD

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I'm a pediatrician and physician-scientist who's been funded by the NIH for >20 years. I've always worked in academic medical centers, but I am responding as an individual, not on behalf of those organizations.

Reasonable costs for publication should be allowable on grants. The benefit of publicly funded science is for taxpayers and citizens (as well as the humans worldwide). Publishing our research in journals is the major way research gets shared; helps other scientists to adjust their science; advances the entire field; and is the most tangible "product" from taxpayer-funded research. I personally feel like I owe it to my dad and all the other taxpayers supporting our research to publish all of our results whether positive or negative. Otherwise, it feels like we weren't good stewards of public dollars.

So, publishing is essential in my opinion. There are reasonable costs associated with that, usually in the $1000-2000 range for reputable society journals. However, there are two major areas of concern to me and many scientists. First, highly prestigious publishing houses are now charging obscene and unjustifiable charges. For example, Springer Nature (https://www.springernature.com/gp/open-science/journals-books/journals) now charges as much as $5000-7000 for open access "article processing fees". Since everything is online, and much of the final editing is outsourced to lower cost staff in developing countries, this cannot be justified. As a whole, the biomedical publishing industry has become far too profit driven. Numerous editorials have been written about this.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Agree! Many editorials have been written about this as well, plus a hilarious "Dr. Glaucomflecken" bit about Nature charging $11,000 for article processing fees but paying reviewers nothing. One prominent scientist suggested $50/hour )Nature

. 2015 Jan 8;517(7533):145. doi: 10.1038/517145a.) Another editorial:
https://pubmed.ncbi.nlm.nih.gov/38962691/

**4. Publishing best practices:**
1. Compensate peer reviewers a modest amount

2. Fraud detection for sure - quality journals already do this and require raw data

3. Perhaps some kind of rating system for quality vs. predatory journals? I believe in a free press for science, so wouldn't be in favor of gatekeeping. But some kind of rating scale, especially for younger scientists who are less experienced, would be helpful

4. Reasonable allowable limits on "article processing charges", as well as transparency by publishers. What is my taxpayer-sourced $5000 going toward?

**5. Other Comments:**
1. Compensate peer reviewers a modest amount

2. Fraud detection for sure - quality journals already do this and require raw data

3. Perhaps some kind of rating system for quality vs. predatory journals? I believe in a free press for science, so wouldn't be in favor of gatekeeping. But some kind of rating scale, especially for younger scientists who are less experienced, would be helpful

4. Reasonable allowable limits on "article processing charges", as well as transparency by publishers. What is my taxpayer-sourced $5000 going toward?

## 651. Nora M Chapman, Ph.D.

**Submit date:** 9/5/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Nora M Chapman, Ph.D.

**Name of Organization:** University of Nebraska Medical Center

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Funding for publication is as essential as the funding for the research itself. As I have had research funding from NIH and from the American Heart Association, I feel an obligation to ensure that the results of that research are available to other researchers in general in order to enhance the chance that my findings will contribute to better understanding of viral disease and possible therapeutics. Most researchers will spend most of their research funding on the costs of research itself, because without completing the work, the publication is not possible. A further limitation on how much can be spent on publication will harm the chance of publishing all the findings. The risk is all on the side of forcing publication in the least reputable journals rather than overspending on publication. If any restriction must be made, I would suggest option 4 which allows funding to be spent on publication.

**2. Available evidence related to publication costs and proposed options:**
I have had to consider whether I would publish my papers as open access, in order to ensure that all researchers, regardless of the funding of their institutional libraries, would be able to read and respond to my work. If funding was not available, some of my work was not available to non-subscribers for a period of time after publication.

**3. Peer review compensation:**
I still review for journals in my field. I know that the editors of these journals are pressed to find reviewers since most have considerable demands on their time. Limiting compensation for reviewers seems likely to limit the number of reviewers and thus impair adequate peer review.

**4. Publishing best practices:**
With the advent of AI, it seems likely that the chance of fraudulent manuscripts with fraudulent data submitted will increase. The risk to science is considerable because researchers rely on what has been proven and published to guide their research. Fraudulent data costs all the researchers in a field. For this reason, tools to determine whether data has been altered or manufactured are important.

**5. Other Comments:**
With the advent of AI, it seems likely that the chance of fraudulent manuscripts with fraudulent data submitted will increase. The risk to science is considerable because researchers rely on what has been proven and published to guide their research. Fraudulent data costs all the researchers in a field. For this reason, tools to determine whether data has been altered or manufactured are important.

# 652. Julio A Aguirre-Ghiso

**Submit date:** 9/5/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Julio A Aguirre-Ghiso

**Name of Organization:** Albert Einstein College of Medicine

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Proposed policy options should allow for publication costs to be budgeted. The caps are in range with what investigators are willing to pay, however this is not aligned with what journals are charging. Flagship, high-impact journals (Nature, Science, Cell family): The APC (Article Processing Charge) for gold open access is around $10,000–$12,500 per article (e.g., Nature Cell Biology: $12,690 USD; Cell Research: $4,990 USD; Cell Discovery: $3,390 USD). These are the journals that also peer review sees as meritorious of funding . In comparison, the average APC across all open access journals worldwide is roughly $1,200–$3,000. For “hybrid” journals (subscription-based, but allow open access for a fee), high-impact titles often fall at the upper end of this range ($3,300–$12,000+). So the allowable caps are not aligned with marker value for top tier journals. The question is whether the government should regulate the system by only capping costs, which may hinder publication in top tier journals even if papers are accepted, vs making an effort to regulate the industry that is out of control. Publication costs are not only the endpoint costs but the costs of response to peer review that are also not regulated. Reviewers and editors go wild on sometimes unnecessary revisions that suck funds to revise a paper when it should go to supporting the project. The questions are then: has there been any attempt by governments to regulate the science publication industry to reduce costs? Only to cap on allowable publication costs (this initiative). There has been no action to limit the excessive costs of open access payments, which are obscure as to why they are so high. What are institutions and federal grants actually paying? As long as impact factor dominates decisions the top tier journals will charge whatever they want and drain funds necessary for actual research. It is even as or more important top target the publishers. Has there been any government control to reduce burden from peer review requests on federal funds? there is no evidence of direct federal regulation specifically targeted at reducing the peer review workload imposed by journals (it is in the end a publication cost). No reforms have addressed journal-initiated burden, capping the number of peer review requests that delay publication of findings.

**2. Available evidence related to publication costs and proposed options:**
See above. This policy mostly limits the researchers while letting the publishers run wild and only those with "other funding sources" will be able to publish in top tier journals. This policy (https://www.nih.gov/news-events/news-releases/nih-crack-down-excessive-publisher-fees-publicly-funded-research) does not protect science and health for all.

https://www.acs.org/policy/publicpolicies/science-policy/peerreview.html

**3. Peer review compensation:**
Peer review for NIH grants is meager considering what a consultant would charge or a lawyer would

charge for consultation only. There has never been compensation of reviewers in journals, which has huge profit margins. This should be regulated and journals should not take time paid by NIH from reviewers to work on the reviews for free. Essentially the cost of publication is also been supported by federal funds and the publishers have no cost.

**4. Publishing best practices:**
NA

**5. Other Comments:**
NA

## 653. Ian Mohr

**Submit date:** 9/5/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Ian Mohr

**Name of Organization:** NYU School of Medicine

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
NIH funded scientists need to be able to publish in premier journals, whether they be society specialty journals or general interest journals (ie Science family journals, Cell press family journals, Nature family journals, etc). Currently these fees together with open access costs can be as much as $5,000 - $6,000 per publication.

The policy changes being considered could substantially limit NIH funded investigators ability to publish in high-quality journals.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Peer review service should be compensated --- in my experience, the level of compensation is quite small considering the burden of work required. That said, receiving compensation is not the primary reason for serving as a reviewer.

**4. Publishing best practices:**

**5. Other Comments:**

## 654. N/A

**Submit date:** 9/5/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
As a Principal Investigator and lab head, I strongly oppose "Option 1: Disallow all publication costs." I think the most reasonable and flexible option that supports researchers' ability to disseminate knowledge to the public while applying pressure on the publishing industry to lower costs is "Option 4: Set a limit on the total amount of an award that can be spent on publication costs." I would propose increasing Option 4's limit to $25,000, to align with the upper end of the reported average cost and average number of applications per lifetime of an R01 ($3,647.47 x 6.9 publications = $25,167.54). Option 5, limiting per-publication cost and the cap, could also be a reasonable solution. Limiting per-publication cost to $2000-3000 as in options 2-3 would be prohibitively low and would further bias publishing in high-impact (expensive) journals to labs with large amounts of private foundation funding.

**2. Available evidence related to publication costs and proposed options:**
While preprints should absolutely be encouraged, the peer review process is still a highly valuable way to improve the quality of scientific work, identify and correct errors, and provide feedback from experts in the field. Peer-reviewed publications are still required for grant evaluation and for researchers' career progress. Labs critically depend on NIH funding to support publication and the dissemination of their research to the public. Moreover, many NIH initiatives and grants require open-access publishing, which I absolutely support as the public must be able to read about our findings for free. However, many journals' open access publishing fees are even higher than their normal publishing fees (for instance, over >$10,000 USD at some of the Springer Nature journals, in my experience), and these would be prohibitively expensive without NIH support (but must somehow be paid to comply with NIH publishing requirements). Option 4 sets a reasonable yearly limit (if elevated to $25,000) and gives labs the flexibility to publish the number of papers and target the range of journals in line with standards in their specific field. As this limit is still potentially pretty low over the 5-year lifetime of an R01, it will still apply pressure to lower publishing costs (if that is a goal of this proposal).

**3. Peer review compensation:**
I know of very few journals that actually compensate reviewers for peer review, though I would certainly support if that were occurring more regularly!

**4. Publishing best practices:**
Open access if one of the highest publishing costs currently, but it is also important to have taxpayer-funded work be published in an open access format. Since the NIH requires open access publishing under many of its grants, it should ensure that researchers can pay these fees.

**5. Other Comments:**

Open access if one of the highest publishing costs currently, but it is also important to have taxpayer-funded work be published in an open access format. Since the NIH requires open access publishing under many of its grants, it should ensure that researchers can pay these fees.

## 655. N/A

**Submit date:** 9/5/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Taxpayer funds to support research is a necessary cost associated with the cost of dissemination of peer-reviewed research results and is critical to ensuring the the information is not driven by private or self-interested motivations.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Peer review should not be compensated

**4. Publishing best practices:**
Publishers dedicated to dessemination of peer-reviewed results should be non-profit (not-for-profit) organization.

**5. Other Comments:**
Publishers dedicated to dessemination of peer-reviewed results should be non-profit (not-for-profit) organization.

## 656. N/A

**Submit date:** 9/5/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
None of the proposed solutions will address the fundamental problem, which is high impact-factor journals can charge what they want and researchers will pay because this is how research funding decisions and promotion (i.e., whether a researcher can keep a job) are determined. Even eliminating direct funding for publication costs will not solve the problem, as other NIH indirect or institutional funds will be used to pay the fees given the current incentive structures in place. The proposed solutions will simply siphon public money from other buckets into the journals.

In the modern era, what is a journal other than a mechanism to publicize studies and an intermediary in the peer-review process? Does it matter what journal a study is published in in the age of AI-search and intelligent agents, other than to give a subjective imprimatur of "impact" if the journal is highly selective on what it publishes, correlated with the APC?

If you want to solve the problem, stand-up one source for all government-funded research outputs that is freely available to the public that paid for the research. Call it "Public Research." Pay researchers to handle peer-review as a handling editor for a paper, and peer-reviewers to review the paper. Or if you don't want to pay, require this service as a pre-condition for receiving a research grant from the government. You control the costs of publication for government-funded research. Problem solved.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 657. Parijat Bhatnagar

**Submit date:** 9/5/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Parijat Bhatnagar

**Name of Organization:** Tribe Research

**Type of Organization:** Not Applicable

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 1: Disallow all publication costs:  I strongly favor this option.

Option 2-5: I disagree with all these options as there leave certain room to spend the funds in a manner that does not benefit taxpayers.

**2. Available evidence related to publication costs and proposed options:**
I chose to publish my manuscripts in the journals that do not charge the researchers and make publications open access after the embargo period.

**3. Peer review compensation:**
I have never been offered or asked for compensation of my time to peer-review the research articles. I expect this is a voluntary service that also benefits reviewers. Reviewers should not be compensated.

If the Journal is unable to find reviewers for a manuscript, they should approach NIH and work with NIH's intramural researchers for obtaining peer-reviews. The Journal should pay NIH for this service. I am unable to decide if the NIH should pass the part or whole payment to its intramural peer-reviewer.

**4. Publishing best practices:**
Unable to comment

**5. Other Comments:**
Unable to comment

## 658. N/A

**Submit date:** 9/5/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Non-profit Research Organization

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I am in favor of Option 2: Set a limit on allowable costs per publication.

More importantly, I believe that all NIH-funded research should be made publicly available by requiring publication in open access journals. Since this research is supported by taxpayer funds, the results should be accessible to everyone without additional barriers.

**2. Available evidence related to publication costs and proposed options:**
NA

**3. Peer review compensation:**
There should be no peer reviewers are compensation.

**4. Publishing best practices:**
I believe that all NIH-funded research should be made publicly available by requiring publication in open access journals. Since this research is supported by taxpayer funds, the results should be accessible to everyone without additional barriers.

**5. Other Comments:**
I believe that all NIH-funded research should be made publicly available by requiring publication in open access journals. Since this research is supported by taxpayer funds, the results should be accessible to everyone without additional barriers.

## 659. Denise Cornelius

**Submit date:** 9/5/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Denise Cornelius

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
The only option that I greatly oppose is the option to not cover any publication costs. The requirement for researchers to begin publishing open access, which is very expensive, and now a move to limit support to comply is conflicting and burdensome on investigators and institutions who pay for subscriptions for their faculty. The limit per publication to avoid exaggerated costs is necessary as predatory journals do take advantage.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
I have never been compensated for reviewing an article. I do not know that this is common practice for the more reputable, high impact journals.

**4. Publishing best practices:**

**5. Other Comments:**

## 660. N/A

**Submit date:** 9/5/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Clearly the problem is the cost of publication in top journals in America. Publication in these journals (and the requirement for open access) is required to be scored as a successful grant applicant. Instead of capping the amount of money that can be spent on publications, the government should assist in reducing the charges from the publishers. At the least, these efforts should be done in concert.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Peer reviewers are currently NOT COMPENSATED. This makes it difficult to find reviewers for journals and makes the turn around time long for authors. It also makes it challenging for editors to find appropriate reviewers in a timely fashion.

**4. Publishing best practices:**
Presumably the NIH still wants its scientists to publish in top journals with open access. Top American journals with open access currently cost more money than other options that may be cheaper, but less respected.

**5. Other Comments:**
Presumably the NIH still wants its scientists to publish in top journals with open access. Top American journals with open access currently cost more money than other options that may be cheaper, but less respected.

# 661. Danelle Orange

**Submit date:** 9/5/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Danelle Orange

**Name of Organization:** Marquette University

**Type of Organization:** Academic Institution

**Role:** Institutional Information Sciences Professional/Librarian

**1. Proposed policy options:**
I have worked in scholarly communications as a librarian for over 12 years. While I applaud efforts to pressure publishers to lower APC costs, there are several issues that need to be addressed here.

For background, APC charges have not decreased in my years as a librarian or as a student and in fact have become ubiquitous and more onerous. This is a logical outcome of the transfer of government funds to publishers with grantees as the mediators for this exchange. Applying limits to the grantees is not going to solve the problem of these costs. It is best to understand academic publishing is a monopoly. Any given article can only be published in one journal at a time and is a unique product. The only way to access an article is to subscribe to or pay for the article. Researchers at every level are unlikely to stop using academic journals since they are required to understand the field and any changes that are occurring. The demand is unlikely to relent given the increase in publications and citations.

This means that if the supply and the demand for scientific research articles are not things that we can effectively change without overhauling half a millennia of academic practice, the root causes of these fees must be addressed. An ideal policy would shift funds from those who profit from articles in the extreme to the NIH and taxpayers, thus allowing increased availability of scientific content.

The proposed solutions ultimately do not place sufficient pressure on the publishing companies raising APCs faster than the rate of inflation between 2019-2024. As stated in the request for information, without change, costs will continue to go up for the NIH. Adding a specific dollar amount or percentage could increase confusion, processing for each grant, and additional time used to adjust any funding limits to the rate of fee increases.

Fees will not fall unless the financial bottom line of major publishers are affected. It should be relatively easy to charge these fees back to the publishing companies in addition to a fee for processing. This would ultimately do more to limit the costs of APCs and potentially increase potential income for the NIH by leaving grantee to perform a core function of their grant (publication of results) with less administrative burden.

A modest proposal would be to annually assess the average APC costs across all NIH grantees and publishers using the data already being reported. Once this assessment is completed, NIH can then charge publishers for APCs above the average or a percentile for the full costs of these articles plus a small percentage of costs for APCs below the agreed upon number. As proposed in this instance, a functional decrease in profits from APCs would incentivize publishers to lower these costs over time. The combination of lower costs overall and recouped funds via charging the costs for excessive fees to

the publishing companies could foreseeably create a longer term budget solution for this part of grant funding. To enact this, however, NIH would need to work more closely with the IRS and existing tax law to ensure that this fee does incentivize lower article costs and is not merely offset by a loophole.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Peer review compensation will be used to justify a higher APC for most journals. Since the vast majority of journals do not pay peer reviewers, this would probably exponentially raise the costs of publication across the board, and lead to a disproportionate increase in the costs of APCs beyond the the cost of paying 3 peer reviewers.

I am not opposed to paid peer review as a concept, but without meaningful controls on journal publication costs, it would be an excuse to increase fees.

**4. Publishing best practices:**
With the rise of AI, automated threat detection becomes more fraught as it provides these LLMs access to the the articles. If there are suitable protections in place for the articles and article authors that prevented these works from being harvested by the publishers at the outset, it could be useful.

**5. Other Comments:**
With the rise of AI, automated threat detection becomes more fraught as it provides these LLMs access to the the articles. If there are suitable protections in place for the articles and article authors that prevented these works from being harvested by the publishers at the outset, it could be useful.

## 662. Kshitiz

**Submit date:** 9/5/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Kshitiz

**Name of Organization:** University of Connecticut Health

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
This is a timely and a very important topic. The concern for open access in science had started emanating when I completed my PhD about 15 years ago, and since then we have seen a mushrooming of open access journals, with very few hybrid options remaining. Even traditional journals are now moving into OA. Even though we are a well funded lab, we also produce many papers, and the cost of their publication is a significant cost. So much so that we have kept an internal list of journals that do not charge OA fee, and publish most of our manuscripts through those route.

Here are some policy suggestions:

1. Although NIH plans to limit use of funds for publication cost, this will result in a more biased publication playing field between top institutions that can provide support for publication (big universities), vs state universities where such support may be not easily defensible. Already, we find that we do not even submit to journals which may be the most subject appropriate for us, simply because we know the cost that awaits us at the end of the tunnel. Without institutional support, it is impossible. But institutional support will likely be available in a small number of them. This is not a matter of unfairness ---- it is a matter of biased hierarchy of quality research products.

2. My suggestion is to limit/prohibit use of NIH funds for use towards any research product to be published in OA journals. People who want greater access to their research output can put it on bioRxiv/medRxiv etc. While, publishes would be incentivized to curate journals which libraries and researchers actually want to subscribe. This will significantly reduce the race for new journals that are coming out every single day, simply because they are a new vehicle for collecting OA fee.

3. From a free market perspective, the customer (the readers, which include us as scientists), should pay for the product, and not the producers (also, us as scientists). But two sides of the equations are different. When scientists produce and provide free material, and free review for publications, the latter should make profits from those who want to buy their wares (the journals). Not the producers. The old system, with the addition of open access options after an embargo period, or voluntarily by researchers.

The new push towards OA has destroyed what worked for centuries, towards a quest for openness, without realizing the collateral cost of more expense, mushrooming of journals, bad reviews, and bias in access due to coverage of publishing cost available in selected institutions (and not others). I should submit that the cost is much higher than what is gained in this new "open" world.

**2. Available evidence related to publication costs and proposed options:**
Even though we are a well funded lab, we also produce many papers, and the cost of their publication is a significant cost. So much so that we have kept an internal list of journals that do not charge OA fee, and publish most of our manuscripts through those route. Already, we find that we do not even submit to journals which may be the most subject appropriate for us, simply because we know the cost that awaits us at the end of the tunnel.

**3. Peer review compensation:**
I firmly consider that this can open a can of worms and may destroy more than it saves. In unforeseen ways. Money and science should be carefully mixed, and be as impersonal as possible.

May be if there are compensations associated with being a part time reviewer with a journal (on a yearly basis), each article's review payment could be separated from bias in its outcome.

This model could work as follows: Faculty be allowed to take 5% effort as a journal Reviewer, in a declared way. And that means a workload of a given number of articles to be reviewed over an extended period of time. This may allow coverage of effort by partaking with the payment, but dissociating it from each-review & publication charges. Basically, like a part time job as a reviewer for a given journal which gives a set of tasks.

These positions must be declared, and the conflict of interests should be very carefully secured. However, I think that even with the best of intentions and safeguards, payment for review could take unforeseen forays into hurting scientific integrity.

**4. Publishing best practices:**

**5. Other Comments:**

**Description:** Associate Professor, BME, UConn Health

## 663. N/A

**Submit date:** 9/5/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I would be in favor of a uniform policy with a flat fee of $2000 for short manuscripts (less than 3000 word and 4 figures) and $3000 for longer manuscripts.

**2. Available evidence related to publication costs and proposed options:**
For profit publishers that publish journals with very high Impact Factors are in effect "selling their Impact Factors" with OPen Access Publications fees of $12,000 for journals such as Nature, Neuron, Cell etc, and much lower amounts for journals with Lower Impact Factors. Whatever policy is adopted, it should be uniformly applied.

**3. Peer review compensation:**
II think the best way to acknowledge a reviewer's contribution to reviewing for a journal is credit towards publication charges in that journal or in a journal family. Or perhaps, exploring a "reviewing credit that could be banking in a central data base that could be used for publication costs at a number of different journals. That rewards people for spending time, and it acknowledges the importance of reviewing....

**4. Publishing best practices:**
Papers have become too complicated and are today sometimes unreadable. It is time to return to papers that are not bloated by reviewer and editor requests for "more" for no good scientific reason.

**5. Other Comments:**
Papers have become too complicated and are today sometimes unreadable. It is time to return to papers that are not bloated by reviewer and editor requests for "more" for no good scientific reason.

## 664. Stephen Kimmel

**Submit date:** 9/5/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Stephen Kimmel

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I support Option 4.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
I disagree with paying peer reviewers with NIH dollars. The Journals, which are making money of their publications, should pay the bill for their peer reviewers, not the NIH.

**4. Publishing best practices:**

**5. Other Comments:**

## 665. N/A

**Submit date:** 9/5/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Publication costs—including open access fees, page charges, and figure costs—are essential for ensuring that research findings are widely accessible. Restricting NIH support for these expenses could limit researchers' choice of journals and slow the dissemination of research.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
To keep costs low, continue the current volunteer system for peer review.

**4. Publishing best practices:**

**5. Other Comments:**

## 666. N/A

**Submit date:** 9/5/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
These proposed policies are not reasonable given the current open access fees/article processing fees charged by many journals (most journals charge >$2000). However, it is also not reasonable that investigators be required to pay for these publications out of research funds. Often, large studies support tens of publications, if not hundreds, stemming from primary, secondary, and tertiary research questions being answered with the data. This provides the largest return-on-investment from taxpayers when funded studies are used by investigators, staff, and trainees in multiple publications contributing to the wealth of scientific knowledge. As an investigative team member on a NIH-funded large-scale cohort study, our data has supported more than 30 publications to-date. Even at $2000 (which is an extremely low estimate), our study would need $60,000 to support those publications. None of the proposed NIH-policies would allow for this level of productivity.

Of the proposed policies, capping a total amount per publication may be the most reasonable, but this is entirely dependent on the academic publishing industry (notoriously exploitive) to align their pricing with NIH policy. As we've seen with this emerging issue, they are not inclined to follow NIH guidance.

Allowing investigators flexibility for publication funds in their grants would be the *most* reasonable course of action. Often, NIH budgets barely cover the costs of the increasingly technology and biometric-based studies we are conducting leaving little room for inclusion of publication costs. Discretion should be allowed by the investigator in their respective fields to propose publication costs expected based on their field's journals.

**2. Available evidence related to publication costs and proposed options:**
Examples:

JMIR family of journals APC range from $1500-$3350

AIDS and Behavior $4590

Archives of Sexual Behavior $3090

Current Sexual Health Reports $4090

Current HIV/AIDS Reports $4190

Current Epidemiology Reports $4090

**3. Peer review compensation:**

I review 1 article a month, each article takes me 2-3 hours for a thorough review. I receive no payment for this beyond "recognition". Journals should pay their editors and reviewers for their time. It's ridiculous that we are expected to provide free labor for an industry that is now forcing us to pay to publish our own work.

**4. Publishing best practices:**

**5. Other Comments:**

## 667. Jianhua Wu

**Submit date:** 9/5/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Jianhua Wu

**Name of Organization:** Georgia State University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I am in favor of Option #4 (Set a limit on the total amount of an award that can be spent on publication costs). This allows investigators to decide which open-access journals that they want to submit manuscripts for review and publication. It also removes the arbitrary limit on the amount of publication cost per manuscript.

**2. Available evidence related to publication costs and proposed options:**
NIH funds are from taxpayers and should benefit taxpayers when possible. Publishing on open-access journals is an excellent mechanism to share scientific findings with general public freely.

Option #4 is an ideal option as it gives investigators the right to decide where to publish and how much they want to pay for the publication cost. Given that there is a limit on the amount of publication costs allowed in the grant, investigators will make wise decisions on how to spend that fund.

**3. Peer review compensation:**
While some journals pay the reviewers for their work, many other journals do not do that. It is therefore up to the journals to decide their business model.

Given that reviewers spend time and efforts doing excellent work, it is reasonable to pay the reviewers for their work. I think $300 per manuscript review seems to be appropriate.

**4. Publishing best practices:**
I think setting a total amount for publication cost is a way to drive down the publication cost. As investigators decide how to use a given amount of fund for publication, they will shop around and find appropriate journals with reasonable charges to publish their manuscripts. It is possible that investigators want to spend most of their fund to publish one paper in a prestigious journal. That is their right to use the available fund to do it, but it leaves them with less fund to publish other manuscripts.

**5. Other Comments:**
I think setting a total amount for publication cost is a way to drive down the publication cost. As investigators decide how to use a given amount of fund for publication, they will shop around and find appropriate journals with reasonable charges to publish their manuscripts. It is possible that investigators want to spend most of their fund to publish one paper in a prestigious journal. That is their right to use the available fund to do it, but it leaves them with less fund to publish other manuscripts.

## 668. Kenneth Stedman

**Submit date:** 9/6/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Kenneth Stedman

**Name of Organization:** Portland State University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I find option #3 to be the most reasonable of the 5 options presented, but strongly suggest that the maximum value of this option be tied to the Open Access fees of society journals such as those published by ASM or FASEB.

**2. Available evidence related to publication costs and proposed options:**
I do not find setting a maximum "one size fits all" to a grant is appropriate, since there is no way to predict how many publications will arise from funded research and with what timing those publications will be accepted and/or published.

**3. Peer review compensation:**
I find the $50/hr compensation range to be appropriate.

**4. Publishing best practices:**
NA

**5. Other Comments:**
NA

## 669. N/A

**Submit date:** 9/6/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Choose Option 1: Disallow all publication costs. or Option 4: Set a limit on the total amount of an award that can be spent on publication costs.

**2. Available evidence related to publication costs and proposed options:**
While taxpayer dollars are used to support funded awards, there are costs (usually) associated with dissemination of information. If we don't disseminate the information, what is the point of completing the project? Publishers aren't going to stop requiring fees to offset their publication costs.

option 1: this would be the most simple solution as it wouldn't require as much administrative/compliance oversight (and that adds costs which usually are absorbed by the institution).

option 4: if publication costs are allowed, a flat amount would be preferable as there wouldn't be as much compliance/administrative oversight required. However, how do you plan to oversee publication costs if there are subawards? Is the flat amount for the prime and subs or does each site/sub receive a separate budget? This adds administrative burden and in the end may cost the taxpayers even more.

**3. Peer review compensation:**

**4. Publishing best practices:**
Unfortunately, at this time, fraud detection is required. There is so much pressure to receive awards and publish and for some individuals, that can lead to unethical behavior.

**5. Other Comments:**
Unfortunately, at this time, fraud detection is required. There is so much pressure to receive awards and publish and for some individuals, that can lead to unethical behavior.

## 670. James J. Knierim

**Submit date:** 9/6/2025

**I am responding to this RFI:** On behalf of myself

**Name:** James J. Knierim

**Name of Organization:** Johns Hopkins University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
All of these options seem ill-advised and do not take into account the realities of publishing high-impact science, in light of NIH's recent order that all publications derived from NIH funding be made immediately freely accessible. Publishers such as Nature Publishing Group are countering this new requirement with their own requirement that all such articles be published under their Open Access model, which charges up to $12,690 for some of their journals. Thus, NIH is pursuing two new policies that put authors in a bind as they attempt to publish their best work in highly selective journals that will charge an exorbitant fee to meet the NIH Open Access demands, while at the same time NIH does not allow these costs of disseminating research results to be counted as part of the research expenses. I understand NIH's desire to limit the amount of tax-supported research dollars that find their way into the coffers of for-profit publishing companies, but these options will have consequences of only allowing very well-funded labs with discretionary spending accounts to be able to afford publishing in certain journals, which (like it or not) can be critical for the success and career advancement of junior scientists.

Of the 5 poor options, options 4 and 5 seem the least harmful, as they provide investigators with the greatest flexibility. However, it will be difficult to implement such limits fairly across disciplines, as some fields of biomedical research publish more papers per grant than others, based on the inherent difficulty and time-commitment required to do different types of science. It is not clear how to implement any strict limit that would be appropriate across the wide array of publishing frequency standards across these fields.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Although part of some of the options under consideration, this issue is not directly relevant to the issue of how much money NIH should allow for publication fees and should not be part of the discussion. It is not clear why this issue falls within the purview of NIH.

**4. Publishing best practices:**
This is micromanagement that will be more likely to lead simply to publishers claiming to do more in order to justify higher publication fees, and more regulatory oversight and burdens on authors as such practices are monitored, with little overall impact on the quality of science.

**5. Other Comments:**
This is micromanagement that will be more likely to lead simply to publishers claiming to do more in

order to justify higher publication fees, and more regulatory oversight and burdens on authors as such practices are monitored, with little overall impact on the quality of science.

## 671. N/A

**Submit date:** 9/6/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
NIH should seek to reach an agreement with the publishers regarding open access policy on NIH supported project. Simply limiting the allowable NIH grant will only exclude labs with no non-NIH fundings from publishing in certain journals. All high impact journals receives manuscripts from all over the world. Preventing NIH-funded US labs to publish in those journals only diminishes the impact of US science on the international community.

**2. Available evidence related to publication costs and proposed options:**
We publish in some of the high impact journals that charge high open access fee. We have always opted not to pay for the open access fee. But we put our close-to final version of manuscript on BioRxiv to make it accessible. The journals typically provide a sharable link for the authors that allows us to share our published paper on social media. We also always send the PDF version of our paper to people upon inquiry. Overall, I don't feel the current policy prevented us from sharing our works. Nevertheless, I agree that that open access is a good idea but it has to be done through a neutral agreement with the publishers. Otherwise, it just sets barriers for the researchers.

**3. Peer review compensation:**
I peer review many papers without compensation as I see that as my responsibility to the community. I also serve as an associate editor of a reputable journal. Most scientists are willing to review papers in their close field. I think scientists in general are willing to review if they have the bandwidth, but a token of appreciation to the reviewer is a good idea.

**4. Publishing best practices:**

**5. Other Comments:**

## 672. Jay A. Levy

**Submit date:** 9/6/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Jay A. Levy

**Name of Organization:** AIDS Jouornal

**Type of Organization:** Scholarly Publisher/Journal

**Role:** Investigator/Researcher

**1. Proposed policy options:**

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

# 673. Jared Roach

**Submit date:** 9/6/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Jared Roach

**Name of Organization:**

**Type of Organization:** Non-profit Research Organization

**Role:** Investigator/Researcher

**1. Proposed policy options:**

**2. Available evidence related to publication costs and proposed options:**
As a journal editor, I often have to invite many dozen reviewers to get even two who are wiling to review a paper. Sometimes, I invite over 100 reviewers just to find two who are willing. This can take months. It is major delay in scientific publishing. We definitely need to start compensating peer reviewers. Also, the reviewers tend to be underfunded junior scientists. Experienced, well-funded scientists tend to ignore review requests. A certain number of journal reviews should be required of any scientist funded by the NIH, as part of their contract / grant / job description. The combination of making senior investigators obligated to do reviews plus paying junior reviewers for their time will greatly improve the quality of published research.

**3. Peer review compensation:**
Peer reviewers should be paid at least minimum wage, and ideally compensated at least so that they can cover their hourly costs at the going hourly consulting rate for a science professional. Otherwise, the folks doing peer reviews will not be qualified. Peer reviewers who are currently funded by the NIH could be an exception - one might expect their time to have already been paid for by the NIH (as long as their grant/contract/job description includes that they will spend some of their time on review panels).

**4. Publishing best practices:**
Costs probably do not need to be more than $10,000 per publication, adjusted each year for inflation. Anything above this would seem to be excessive. Automated tools should be deployable at massive scale, dropping the per article cost to near nothing.

The proposal suggests that it takes only $2,000 to cover the costs of publishing an open-source article. That probably is an underestimate for many papers or journals. If costs are capped at an average current cost, exceptional papers (such as those with lots of interesting supplemental material or those that are >8,000 words in length) may not get published.

**5. Other Comments:**
Costs probably do not need to be more than $10,000 per publication, adjusted each year for inflation. Anything above this would seem to be excessive. Automated tools should be deployable at massive scale, dropping the per article cost to near nothing.

The proposal suggests that it takes only $2,000 to cover the costs of publishing an open-source article. That probably is an underestimate for many papers or journals. If costs are capped at an average current cost, exceptional papers (such as those with lots of interesting supplemental material or those that are >8,000 words in length) may not get published.

## 674. N/A

**Submit date:** 9/6/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I agree strongly that publication costs should be capped. Option #1 is not a good one. While preprint servers are useful, they accept anything and stuff published there is never peer-reviewed. I could live with any of the other options.

**2. Available evidence related to publication costs and proposed options:**
As an editor of a journal that is published by a major scientific society, I receive a small compensation for conducting the peer review of submitted articles, i.e., I review every article that I receive, and if they are ok, they will be sent out for review. It is a lot of work nd some compensation is appropriate. The society publisher employs a staff that provides important services (plagiarism, paper mills, analysis of the figures for manipulation, ethics violations, etc) that cost a lot of money and are covered by publication costs. Some open-access online journals that are cheaper do not provide these services, and as a researcher, I would never publish in a journal like that. It would be interesting to know which journals were canvassed for your study. I assume that it also included publications that provide minimal to no such services to the scientific community.

**3. Peer review compensation:**
I am not against this; the question is how much it would cost for a journal to set this up. It might attract reviewers who would do this solely for the money and attract non-expert reviewers. But I do not know enough about the topic to have an opinion.

**4. Publishing best practices:**
I think I addressed this above under 2. Very important and costly!

**5. Other Comments:**
I think I addressed this above under 2. Very important and costly!

## 675. Ken Cadwell

**Submit date:** 9/6/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Ken Cadwell

**Name of Organization:** University of Pennsylvania

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I thank the NIH for trying to address this problem. Out of the options presented, I prefer Option 3 because it has the potential to force journals to change their practices. However, I am concerned that the current language for any of the options will give an advantage to individuals who have access to other funding sources. Also, people will use their personal finances to cover the cost if they believe publishing in a particular journal is necessary for career advancement. Therefore, journals will not be incentivized to lower their costs. I suggest modifying the language to remove this loophole. For example, would it be possible to stipulate that individuals receiving NIH funding cannot publish in journals with a publication fee above a designated amount?

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Paying reviewers is a way to force changes by the journals, so I appreciate that this is being considered. If reviewers are paid, it may be appropriate for authors to rate the quality and timeliness of the review.

**4. Publishing best practices:**
Society-run journals and other non-profit journals may require high publication costs to sustain open access models. For such journals, It may be appropriate to exempt them from caps on publication costs.

**5. Other Comments:**
Society-run journals and other non-profit journals may require high publication costs to sustain open access models. For such journals, It may be appropriate to exempt them from caps on publication costs.

## 676. Susan White

**Submit date:** 9/7/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Susan White

**Name of Organization:** University of Alabama

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 2 makes the most sense; and scientific reviewers can judge merit of # of planned submissions, and if the budget fits the scope of science.

**2. Available evidence related to publication costs and proposed options:**
2K per is reasonable, and may help reduce rising APC

**3. Peer review compensation:**
if funds are directed to journals that pay reviewers, it may harm other journals.

**4. Publishing best practices:**

**5. Other Comments:**

**Description:** Requesting annual credit hour production for each department in the College of Arts & Sciences, from 2021-22 (Fall 2021, Spring 2022, Summer 2022) through 2024-25 (Fall 2024, Spring 2025, Summer 2025). Sample from prior request attached.

## 677. Jay Buckey

**Submit date:** 9/7/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Jay Buckey

**Name of Organization:** Geisel School of Medicine at Dartmouth

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 4 (limiting to a percentage of the total grant) seems like it offers the most flexibility. Some high impact journals have very high fees, but they may be worth it for particular publications. This option would not preclude sending to an expensive journal if warranted.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
If peer reviewers are going to be compensated at a market rate, some considerable thought needs to be put into how this would be paid. In the business and legal worlds the kind of specialized expertise peer reviewers offer would be highly compensated. In the scientific community this approach hasn't been taken and instead devoting time to peer review is considered part of what scientists contribute to the field. Offering a market hourly rate for peer review may be a good idea, but would definitely not reduce costs.

**4. Publishing best practices:**

**5. Other Comments:**

# 678. Brandon Roberts

**Submit date:** 9/7/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Brandon Roberts

**Name of Organization:** NA

**Type of Organization:** Other

**Type of Organization - Other:** Military

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Among the options, I favor the scaffold that NIH calls Option 3. A baseline per-article limit of $1000, with a higher allowance up to $3000 when journals compensate peer reviewers and also make the peer reviews public (but anonymous) with the submitted versions and author responses available to benefit trainees. I would strengthen Option 3 by pairing it with an overall per-award limit from Option 4 or Option 5. NIH's own analysis shows applicants currently request about 0.8 percent of direct costs for publication. Keeping total allowable spend near that historical baseline, while retaining a per-article cap, would discourage outliers yet leave room for legitimate higher-cost cases. To guard against predatory journals pricing at the cap without delivering editorial value, NIH should condition eligibility for the higher allowance on objective integrity and transparency criteria, require auditable price-and-service disclosures, and reserve the right to deem venues ineligible for NIH-paid APCs when they do not meet these standards. This combined approach also reduces the chance that savings at the paper level are offset by a higher number of papers per award

**2. Available evidence related to publication costs and proposed options:**
The available evidence supports pairing a per-article cap with an overall award-level guardrail. NIH's own analysis estimates average APCs around $1,236 globally and about $2,177 for U.S. journals, while recent R01 budgets anticipated roughly $2,565 to $3,104 per publication with about 0.8 percent of direct costs earmarked for publishing. Market tracking indicates upward drift in list APCs for fully open access titles year over year and very high maximum charges in hybrid portfolios near $12,000 per article, which argues for price discipline. Costs also vary by society and business model. AAAS's fully open access Science Advances lists an APC near $5,450. The American Physiological Society has moved ten primary research journals to Subscribe to Open with no APCs but retains modest flat publication fees per article (about $995, with a lower member rate). The Obesity Society's journal uses page charges rather than a universal APC (about $65 per page for members and $95 for non-members) with optional open access via the publisher's APC schedule. ACSM's portfolio includes a discounted APC for members in its fully open access journal Exercise, Sport, and Movement (about $2,200 standard and $1,760 for members) plus a targeted assistance fund for students.

**3. Peer review compensation:**
Compensating at $50 per hour for six hours reflects a simple, auditable formula: the average hourly wage multiplied by the empirically typical time to complete a review, which surveys have placed near six hours (PMID: 27683470). At that rate, each review costs $300; with three reviewers, total reviewer

compensation is about $900 per manuscript, which is modest relative to typical APCs and fits under a $3,000 higher-allowance threshold. The benchmark can scale for specialty input, such as statistical or methods reviews that require additional hours, while preserving transparency and cost control.

**4. Publishing best practices:**

**5. Other Comments:**

## 679. Kay M Scheets

**Submit date:** 9/7/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Kay M Scheets

**Name of Organization:** Oklahoma State University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I don't publish any medical research, I just use other author's published results to get input on my health issues or that of my close relations. An example is that a sister and one of our nephews both developed cancers, and if I thought either one wasn't getting the best treatment available, I would have sent their relatives information that they might want to ask their MDs about. I have the most extensive case of heritable osteoarthritis in my generation, and I check PubMed for treatments related to it. At the moment the 'best' situation is using the pain management I've had from my local hospital and medical center. I also use PubMed to search for articles related to my research which is on plant viruses in the family Tombusviridae

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 680. N/A

**Submit date:** 9/8/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Policy options could include 1) a dollar cap that limits the fee for open access publication or 2) uploading the accepted version of the manuscript to the NIH publicly-accessible repository within 48 hours of being accepted by the journal.

**2. Available evidence related to publication costs and proposed options:**
The open access fees for academic journals vary widely in cost. By setting a cap, you will limit the 'tier' or 'quality' of journal that the publication can go into. If the tier is too low, researchers may be forced to publish in low quality/open access journals simply because they cannot afford to pay for the higher cost ones that are more reputable/respected. By making the tier too low, you could also limit the potential impact of the work because researchers simply cannot afford the higher cost of a broader impact journal. Many researchers would prefer to spend $0 on publication costs because they feel the money is better used to fund research. This is why the publicly accessible repository is the best option - open to taxpayers and does not cost additional fees to the researcher. The NSF and DOE have been doing this for years. If you are worried about how quickly the manuscript is uploaded, simply set a limit for when the document must be uploaded.

Examples: https://www.nature.com/nature/for-authors/publishing-options; https://acsopenscience.org/researchers/open-access/; https://www.rsc.org/publishing/open-access/open-access-options

**3. Peer review compensation:**
Peer reviewers are never compensated. I do anywhere from 20-30 reviews per year for different journals and I have never been compensated.

**4. Publishing best practices:**
See point 4 for some concerns and links. As a researcher, I feel asking researchers and taxpayers to pay $8,000-$12,000 dollars for a publication is unsustainable. We want to publish our work for the public, while balancing the cost for our research group, but sometimes the amounts are incredibly high. If you set a cap in the low thousands, you will ensure that most NIH work can not be published in the Nature portfolio of journals.

**5. Other Comments:**
See point 4 for some concerns and links. As a researcher, I feel asking researchers and taxpayers to pay $8,000-$12,000 dollars for a publication is unsustainable. We want to publish our work for the public, while balancing the cost for our research group, but sometimes the amounts are incredibly high. If you

set a cap in the low thousands, you will ensure that most NIH work can not be published in the Nature portfolio of journals.

## 681. N/A

**Submit date:** 9/8/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 3: Set a limit on allowable costs per publication and allow a higher amount to be paid when peer reviewers are compensated.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
The peer reviewers invest significant time and expertise for peer review. Compensation should reflect this workload and the opportunity costs involved. Aligning payment with comparable professional activities and ensuring timely, straightforward reimbursement would improve fairness, recruitment, and retention, strengthening the sustainability and credibility of the NIH peer review system.

**4. Publishing best practices:**

**5. Other Comments:**

## 682. N/A

**Submit date:** 9/8/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
As someone who is entirely grant funded, limiting the ability to publish by restricting funds for publications would be devastating to my career by prohibiting the publication of my findings in peer-reviewed journal. There simply are no sources of funding that can replace grants for covering the cost of publications. High impact and top tier journals cost 3500-4000 per article. Pre-prints are no solution to this - they are not peer reviewed or vetted otherwise. The university can't cover costs for us to publish. Having to choose to publish or not is a terrible prospect for any researcher to face due to limited funds. Furthermore, to select less rigorous and less prestigious journals for high impact work due to lack of funding for publications does not support quality publications, science reporting, and accessibility. Since NIH also wants more open source publications, this is at odds with limitations on funds for publications: open source publications cost MORE than any other article to produce.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 683. N/A

**Submit date:** 9/8/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 3 is the best option, followed by Option 2 .

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 684. Lisa Hiura

**Submit date:** 9/8/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Lisa Hiura

**Name of Organization:** University of Colorado Boulder

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
A limitation on publication costs would stronger hinder our ability to pay for the publications costs associated with all tax-payer funded research. This would impose undue burden on researchers for whom funding sources are already limited, and stands to build an unnecessary obstacle in communicating and disseminating our science.

**2. Available evidence related to publication costs and proposed options:**
Any option from 1-5 would be prohibitively disruptive to our duty to disseminate our science in the best interests of the public and the research landscape. Publications are a vital component to career progression, particularly for junior scientists, and is central to the scientific enterprise. These options are more likely to damage research progress and career prospects rather than limit the total amount of funds that are spent on publications fees, the later of which is entirely up to the discretion of publishers and not scientists.

**3. Peer review compensation:**
Compensating peer reviewers for their extrodinarily important labor is a valuable idea. However, this should not be applied in conjuction with a limit on allowable costs per publication, which is the only NIH proposed context for peer review compensation at this time. This structure of limitation and compensation may inadvertently incentivize speed of review over the rigor of feedback. Reviewers may also be inadvertently incentivized to provide reviews for submissions for which they are not best qualified to review, as the current intrisic motivation for rigorous reviews would be undermined for cost-savings measures.

**4. Publishing best practices:**
The current proposal does not address how the automated fraud detection functions would be implemented, nor what the consequences would be for false positives. This tool may also impose higher costs for smaller journals, including society journals, for which resources are more limited compared to large publishers. How would such a system be implemented to ensure equity across stakeholders? Without this information, we cannot condone this practice.

**5. Other Comments:**
The current proposal does not address how the automated fraud detection functions would be implemented, nor what the consequences would be for false positives. This tool may also impose higher costs for smaller journals, including society journals, for which resources are more limited compared to

large publishers. How would such a system be implemented to ensure equity across stakeholders? Without this information, we cannot condone this practice.

**Description:** Objections to the current RFI for "Maximizing Research Funds by Limiting Allowable Publishing Costs"

## 685. Alice Huang

**Submit date:** 9/8/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Alice Huang

**Name of Organization:** Columbia University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
In reviewing the options presented, Option 5 seems most reasonable in terms of conserving taxpayer dollars and ensuring that researchers are intentional in the journals they publish in. My worry in some of the other options is that junior faculty may be adversely impacted and prevented from publishing in high-impact open-access journals that may charge a relatively high publication fee ($4-6K) since they may need to conserve startup/discretionary funds and this may impact teniure and promotion prospects. If the NIH can bar grantees from publishing in predatory journals (assuming there is a way to identify these), that would also be helpful.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 686. A G Matera

**Submit date:** 9/8/2025

**I am responding to this RFI:** On behalf of myself

**Name:** A G Matera

**Name of Organization:** University of North Carolina

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I guess I would go with Option 4, 0.8% of direct costs per year. Reducing the overall publication costs is a good goal, though I am not sure of the right number.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Although some journals offer to pay the referees, I typically have never bothered to try and recover the funds. Too complicated; generates a taxable income. In the end I felt it not worth my time.

**4. Publishing best practices:**

**5. Other Comments:**

# 687. Daniil Aksenov

**Submit date:** 9/8/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Daniil Aksenov

**Name of Organization:** Endeavor Health

**Type of Organization:** Non-profit Research Organization

**Role:** Investigator/Researcher

**1. Proposed policy options:**

1. Options: Option 4 with enhancements such as a notification mechanism for exceptionally high per-publication fees is optimal.

I appreciate NIH's careful consideration of measures aimed at optimizing research expenditures while ensuring dissemination of impactful research findings. I understand the importance of balancing responsible financial stewardship with maintaining the visibility and quality of NIH-supported research.

Among the proposed policy options, I strongly support Option 4, which sets a limit on the total amount of an award spent on publication costs (the greater of 0.8% of direct costs or $20,000). This option is ideal because it aligns closely with actual historical publication expenditures identified in NIH's analyses and provides essential flexibility for investigators. It allows researchers to strategically allocate publication funds to a combination of higher-cost, high-impact journals and multiple mid-tier venues, depending on the nature of the research and dissemination strategy.

Importantly, Option 4 maintains administrative simplicity, requiring minimal additional tracking or auditing at the individual publication level. In contrast, per-publication caps (Options 2 and 5) risk inadvertently limiting dissemination opportunities, particularly for high-impact studies that naturally incur higher publication fees. Option 3, while well-intentioned, introduces complexities and unrealistic administrative burdens, as few reputable journals currently compensate reviewers or publicly share peer reviews. Similarly, Option 1, although aiming to maximize direct research funding, is impractical because it places the entire financial burden of publication costs onto researchers or their institutions, significantly limiting publication opportunities.

**2. Available evidence related to publication costs and proposed options:**

2. Evidence: My experience confirms NIH's analysis that about 0.8% of direct costs accurately reflects real-world publication expenditures.

**3. Peer review compensation:**

3. Peer reviewer compensation: Although compensating reviewers is commendable, current practical limitations and administrative complexities make widespread adoption challenging.

**4. Publishing best practices:**

4. Other publishing practices: NIH should encourage journals adopting robust editorial transparency, rigorous fraud detection measures, and high ethical standards rather than solely focusing on peer reviewer compensation.

**5. Other Comments:**

4. Other publishing practices: NIH should encourage journals adopting robust editorial transparency, rigorous fraud detection measures, and high ethical standards rather than solely focusing on peer reviewer compensation.

# 688. Manuel Castro-Alamancos

**Submit date:** 9/8/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Manuel Castro-Alamancos

**Name of Organization:** UConn Health School of Medicine

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
- Disallow all publication costs.

- NIH should transition to a model where research outputs are shared as preprints in PubMed Central, paired with open, community-based peer review, and always accompanied by fully curated datasets.

- Shift the emphasis of grant outputs from publications to curated datasets with richly detailed metadata.

- The primary measure of productivity should be the quality, accessibility, and reproducibility of datasets, not journal placement.

- Peer review should be open and community-based, but participation may need to be guided by institutional or societal affiliation to ensure reviewers have the relevant expertise and to avoid unqualified input creating confusion.

- Introducing a scoring of “review points”, similar to community rating models used in online platforms, could help value reviewer contributions. Higher-quality, constructive reviews would be weighted more heavily, ensuring that expert and thoughtful input carries more influence in the evaluation process.

**2. Available evidence related to publication costs and proposed options:**
There is extensive evidence of systemic problems with rigor and reproducibility in biomedical research, as well as concerns about the sustainability of the current publication model. The rapid rise in publication costs, the proliferation of journals (including predatory or low-quality outlets), and the volume of publications have all been documented as contributing to a “publication crisis.” These issues underscore the need to shift emphasis away from journal-based metrics and toward open, verifiable, and reusable scientific outputs such as curated datasets with strong associated metadata.

**3. Peer review compensation:**
Peer review should not be financially compensated, as monetary incentives risk undermining scientific objectivity and motivation. Instead, NIH should encourage models based on open review with broader participation (many reviews that continue to be added, not the traditional 2–3 reviewers), where engagement is driven by scientific interest, transparency, and shared responsibility for rigor in the field. Recognition for reviewers (e.g., through acknowledgment systems, ORCID-linked credit, or institutional service reporting) may be more appropriate than direct payment.

**4. Publishing best practices:**
NIH should prioritize investment in automated systems that validate not only publications but, more importantly, the underlying datasets. This includes tools for verifying metadata completeness and consistency, ensuring adherence to community standards, and supporting reproducible curation methods. Such systems would add real scientific value by improving rigor and transparency, rather than simply raising publication costs without addressing the core issues of reproducibility and data quality.

NIH must transition away from prioritizing the “publication business” and instead lead in building the “dataset business.” In the era of AI and machine learning, high-quality, curated datasets with detailed metadata are far more valuable for advancing science than traditional publications.

**5. Other Comments:**
NIH should prioritize investment in automated systems that validate not only publications but, more importantly, the underlying datasets. This includes tools for verifying metadata completeness and consistency, ensuring adherence to community standards, and supporting reproducible curation methods. Such systems would add real scientific value by improving rigor and transparency, rather than simply raising publication costs without addressing the core issues of reproducibility and data quality.

NIH must transition away from prioritizing the “publication business” and instead lead in building the “dataset business.” In the era of AI and machine learning, high-quality, curated datasets with detailed metadata are far more valuable for advancing science than traditional publications.

## 689. National Society for Histotechnology

**Submit date:** 9/8/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** M. Lamar Jones

**Name of Organization:** National Society for Histotechnology

**Type of Organization:** Professional Organization/Association

**Role:** Organizational Official

**1. Proposed policy options:**

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/NOT-OD-25-138_NSH-Response-Final.pdf

**Description:** National Society for Histotechnology Comments

## 690. Gary L. Westbrook, MD

**Submit date:** 9/8/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Gary L. Westbrook, MD

**Name of Organization:** Vollum Institute/Oregon Health & Science University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I favor limiting the publication costs to those that are actually necessary for publication. My experience is an EIC (J Neurosci) and as a SR ED for eLife suggests that this is the range of 2500 USD. Using the global list of journals is ridiculous as it include many, many hyperspecialized and predatory journals to which no NIH-funded investigator would submit. On the other hand, publishing houses like Cell Press and Nature journals are just making excess profits at the expense of investigators and the public. That should stop.

I suggest 2500 as a reasonable alternative.

**2. Available evidence related to publication costs and proposed options:**
See above.

**3. Peer review compensation:**
Bad idea

**4. Publishing best practices:**
Please leave this issue the journals.

**5. Other Comments:**
Please leave this issue the journals.

## 691. N/A

**Submit date:** 9/8/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I would support Option 4: Set a limit on the total amount of an award that can be spent on publication costs. This option balances the need to distribute NIH funded research through an avenue that allows for peer review and gives flexibility on how exactly that is achieved, while capping the amount of money spent on publication costs.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 692. ConductScience Inc

**Submit date:** 9/8/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Shuhan He, MD

**Name of Organization:** ConductScience Inc

**Type of Organization:** Scholarly Publisher/Journal

**Role:** Organizational Official

**1. Proposed policy options:**
NIH should pair APC reform with policies that steer authors toward outlets that maximize reuse and reproducibility. Specifically: encourage market-based competition that drives APCs down (including models that can reduce or eliminate author fees), require FAIR, computation-ready outputs for NIH-funded articles, reward replication-driven publishing where Methods link directly to reagents/instruments, incorporate methodology innovation/tech-transfer plans into grant review, and tie funding incentives (scoring, supplements, renewals) to use of outlets that comply with FAIR, DMS, and reproducibility mandates.

**2. Available evidence related to publication costs and proposed options:**
CSO operates a sustainable open-access model with Article Processing Charges (APCs) held between $350 and $750 by directly integrating publishing with the research supply chain. In this model, an article's Methods section is transformed into an interactive protocol that links readers to the exact reagents and instruments used in the study. The instruments designed and manufactured by CSO are built to natively output FAIR-by-design, DMS-compliant datasets, such as structured CSV or JSON-LD files with embedded metadata. This approach effectively closes the loop between methods, materials, and data. It enables immediate replication by other laboratories and allows market demand for the underlying tools to subsidize publication costs. The result is clear evidence that lower-APC, high-quality publishing is both technically feasible and economically sustainable in practice.

**3. Peer review compensation:**
NIH should allow flexible, transparent reviewer compensation without inflating APCs: modest stipends, service credits, research-supply discounts/memberships, and public recognition. Guardrails should include COI disclosures, separation of editorial decisions from compensation, reasonable compensation caps, and auditability. These mechanisms sustain reviewer participation, preserve quality, and keep costs low by tying rewards to the research ecosystem rather than raising author fees.

**4. Publishing best practices:**
When justified and clearly documented, NIH may allow higher per-publication costs for outlets that provide measurable benefits in research integrity and data reuse. Such outlets should demonstrate capabilities such as delivering computation-ready, FAIR outputs with persistent identifiers, controlled vocabulary enrichment, and repository-linked data packages or notebooks. They may also support methodology replication by offering interactive Methods sections linked directly to reagents and instruments, along with pre-publication reproducibility checks. Additional practices could include deploying research-integrity tools such as image manipulation detection, plagiarism screening,

authorship verification, and maintaining transparent peer-review records. Finally, strong accessibility and provenance measures—such as machine-readable formats, version control, and detailed provenance logs—should be standard. Importantly, any allowance for higher costs should be tied to these documented capabilities and outcomes rather than to the prestige of the outlet or its format alone.

**5. Other Comments:**

When justified and clearly documented, NIH may allow higher per-publication costs for outlets that provide measurable benefits in research integrity and data reuse. Such outlets should demonstrate capabilities such as delivering computation-ready, FAIR outputs with persistent identifiers, controlled vocabulary enrichment, and repository-linked data packages or notebooks. They may also support methodology replication by offering interactive Methods sections linked directly to reagents and instruments, along with pre-publication reproducibility checks. Additional practices could include deploying research-integrity tools such as image manipulation detection, plagiarism screening, authorship verification, and maintaining transparent peer-review records. Finally, strong accessibility and provenance measures—such as machine-readable formats, version control, and detailed provenance logs—should be standard. Importantly, any allowance for higher costs should be tied to these documented capabilities and outcomes rather than to the prestige of the outlet or its format alone.

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/ConductScience_Response_NIH_RFI_PublishingCosts-1.pdf

**Description:** Response from ConductScience.org to NIH RFI (NOT-OD-25-138) advocating low-cost, FAIR-compliant, replication-driven publishing models that align with open science and maximize taxpayer value

## 693. Sandra Poulson

**Submit date:** 9/8/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Sandra Poulson

**Name of Organization:**

**Type of Organization:** Not Applicable

**Role:** Investigator/Researcher

**1. Proposed policy options:**
This should absolutely be done. Taxpayers already pay for the research to be done. They should not have to pay twice to get access to the peer-reviewed result. I trained originally to become a public school educator and one of the many reasons I chose to go into research instead was a severe drop in access to primary scientific literature by not being associated with a university. Our school teachers, who are supposed to teach our children how to think and what science is -critical reasoning and discovery- do NOT HAVE ACCESS to most scientific literature. What kind of psychopathy is that? I was lucky to become a researcher, but now as a junior scientist, I am staring down a perspective career where I have to win a lottery to be able to pay not only for the research supplies and the salary for laboratory staff and building/administrative overhead but also to pay for the publication of the findings. It's no wonder so few women make it as principal investigators compared to men. Taxpayers deserve better access to the data and they do not deserve to pay for it twice. Help researchers get their peer reviewed findings out to the scientific community. Help American students become scientifically trained by ensuring they have access to high quality materials with which to learn.

**2. Available evidence related to publication costs and proposed options:**
Researchers who peer review for top journals, such as Nature, Science, and Cell, among many other publications, DO NOT RECEIVE PAYMENT for their time spent peer-reviewing. Who is getting these thousands of dollars? There is no reason the publishers should be pulling in that much money. There is no justifiable explanation except for personal gain of the people employed by those journals. I do not agree with spending taxpayer dollars on helping these individuals gain personally.

**3. Peer review compensation:**
I think peer reviewers should be compensated, but I do not think it should be a tremendous amount. I think it should perhaps scale with experience. I think there should be proper training for how to do it well. I think there should be elements put into place to discourage negative reviews by competitors in the same grant spaces - I have personally received a negative review on what clearly was a competition between my senior-most coauthor and the reviewer because the statements made were falsehoods. And I think that it would be a very nice piece of service for senior researchers to be paid (maybe $200 so not excessive) to lead small reviewer training sessions. I think that funding directed toward building a strong scientific community that seeks truth over personal competition would really make American research much stronger.  I don't see that this will dramatically increase the cost of publication because a single piece is already charging several thousand dollars instead of like $50-100/hr for a reviewer.

**4. Publishing best practices:**
The thing is, these publishers are currently not compensating reviewers. So it would have to be mandated that they compensate reviewers before the publishers would do that. They currently get the labor for free.

Why doesn't the NIH make a forum like Twitter for researchers? Twitter was this fun place so a government-run forum might feel kind of odd for people to join - but you all are already on Twitter. The thing about Academic Twitter is the research papers get shared and everyone comments on the good and bad aspects, so you get to see more perspectives than a peer review, but you don't have to have it roped into a formal peer review so the researchers still get their publication out to the public. I could see a NIH online forum becoming an extremely useful resource. My lab shares papers seen on Twitter. I know a lot of you also see new papers shared on Twitter. That could be a better way to spend federal dollars than at private publishers. It could post BioRXiv papers and such. And it could have a great search function to highlight useful discussions. We already use social media like this so why not make a NIH Forum?

**5. Other Comments:**
The thing is, these publishers are currently not compensating reviewers. So it would have to be mandated that they compensate reviewers before the publishers would do that. They currently get the labor for free.

Why doesn't the NIH make a forum like Twitter for researchers? Twitter was this fun place so a government-run forum might feel kind of odd for people to join - but you all are already on Twitter. The thing about Academic Twitter is the research papers get shared and everyone comments on the good and bad aspects, so you get to see more perspectives than a peer review, but you don't have to have it roped into a formal peer review so the researchers still get their publication out to the public. I could see a NIH online forum becoming an extremely useful resource. My lab shares papers seen on Twitter. I know a lot of you also see new papers shared on Twitter. That could be a better way to spend federal dollars than at private publishers. It could post BioRXiv papers and such. And it could have a great search function to highlight useful discussions. We already use social media like this so why not make a NIH Forum?

## 694. Josh Bolick

**Submit date:** 9/9/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Josh Bolick

**Name of Organization:** University of Kansas Libraries

**Type of Organization:** Academic Institution

**Role:** Institutional Information Sciences Professional/Librarian

**1. Proposed policy options:**
See attached.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/NIH-RFI-Capping-APCs-Personal-Response-signed.pdf

**Description:** PDF of my signed letter

## 695. Regine Choe

**Submit date:** 9/9/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Regine Choe

**Name of Organization:** University of Rochester

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 3

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 696. Sara Zimmer

**Submit date:** 9/9/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Sara Zimmer

**Name of Organization:** University of Minnesota

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
A per-grant cap seems most flexible for investigators (Option 4), particularly since this is the first time they will have had to consider publication cost caps in their decision making process.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
One reason peer review compensation is difficult is it will not be known ahead of time how much effort will be put forth. Mostly, because "major revisions" or "minor revisions" decisions will result in additional time for the reviewer, as they have to then also review the resubmission(s). There may be a conflict of interest - if compensation is by manuscript, will a reviewer pass over making some critiques if it will require an additional round of review for which they are not compensated? Conversely, if they are compensated for each round of review, will they nitpick so that they have the additional chance to collect compensation?

**4. Publishing best practices:**
One critical thing is that the numerical value of the publication caps should be sufficiently high so as to include opportunities for open access options. After all, NIH values equal access to the results of these studies that are taxpayer-funded. I did not see any evaluation of whether the journals included in publication cost analysis were easily accessed by the public, that may not know to go to PubMed Central for access. Also, supplementary data may be more difficult to access by PubMed Central.

**5. Other Comments:**
One critical thing is that the numerical value of the publication caps should be sufficiently high so as to include opportunities for open access options. After all, NIH values equal access to the results of these studies that are taxpayer-funded. I did not see any evaluation of whether the journals included in publication cost analysis were easily accessed by the public, that may not know to go to PubMed Central for access. Also, supplementary data may be more difficult to access by PubMed Central.

## 697. N/A

**Submit date:** 9/9/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I agree that publishing costs are high, especially for the most highly regarded journals. However, it can not be overstated how important it is for continued recognition (and funding) to publish our research in the best journals possible, and researchers NEED NIH grant dollars to cover these costs. For most of us, there is no other source of funding for publication costs.

**2. Available evidence related to publication costs and proposed options:**
I don't think publication costs should be limited. This would be unfair to researchers who must rely entirely on their research grants for publication costs. With all the restriction options offered, the researchers without other sources of funds would be at a severe disadvantage and would not be able to compete with those at wealthier departments/universities.

**3. Peer review compensation:**
NIH peer reviewers are compensated for reviewing grant proposals. The level of compensation does not come close to covering the amount of time and effort invested. The level of compensation should at least be doubled.

I personally have never been compensated by a peer-reviewed journal for providing a review for a manuscript.

**4. Publishing best practices:**
Fraud detection is provided by the reviewers. If they suspect fraud or other poor practices, it is reported.

**5. Other Comments:**
Fraud detection is provided by the reviewers. If they suspect fraud or other poor practices, it is reported.

# 698. Anthony Fehr

**Submit date:** 9/9/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Anthony Fehr

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I completely agree, the cost to publish a paper is outrageous for many high-profile journals. And identifying ways to curb the prices paid just to distribute your research needs to be addressed.

While I'd love to pick one of these policies and say that it will fix a lot of the problems, I think the NIH needs to ask some simple questions. 1. What is the real cost to publish a paper open access without any subsidies, etc.? 2. Why do some journals charge substantially larger amounts for their publications? 3. What would be the impact of such drastic changes on the ability of US researchers to publish in high-profile journals and continue to receive grant funding? 4. Which of these options might actually force journals to lower their costs?

Now I will run through my thoughts on the options.

Option 1: Not feasible - While some universities and other groups might find alternative ways to pay for manuscripts, this option would massive unevenness in researchers being able to publish their work at all. Without the ability to publish, many researchers will not be able to advance in their careers and likely won't be competitive for grant funding.

Option 2: Not as bad as #1, but still leads to inequality in publishing, as some researchers only option to publish would be in lower-tiered journals where others that have institutional support or other means may still publish in high-level journals. May force some journals to reduce their cost, but many journals charge far more than $2000, and so this option probably only has limited effects on overall journal cost. Most of the journals I publish in cost between 2 and 4 K, so having to pay the extra some funds from who knows where would suck.

Option 3: I know of no journals that currently compensate for reviewers, and I have reviewed for almost 50 journals. So this is off-the-table. However, forcing journals to pay reviewers is an idea I am in favor of but is a completely separate topic. Some journals do provide vouchers for reviewers to publish in their journals, but these often are only for the lower-level journals from a publishing group. If journals I publish in would give out vouchers to me for reviewing their papers I would be very inclined to review for them.

Option 4/5. These are probably the best options, giving researchers the ability to publish in high-profile journals and providing enough funds to publish several in average cost journals at the same time. I don't necessarily like having a limit on a specific publication, but I would also acknowledge that a limit of $6000 per paper may be enough to force some high-profile journals to lower their cost.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
I'll reiterate that I have never been paid to do a review, though I have done >200 for ~50 journals. So I just don't understand where option 3 is coming from.

I would first like to see if we could force journals to actually do this. Maybe we need to invoke fair labor laws against the journals.

**4. Publishing best practices:**
Again, a full-investigation on the true cost of publishing a manuscript needs to be done with full-transparency provided to researchers and funders. Do some journals pay editors much higher salaries than others? Do they use different software? Fraud detection? etc.. Only once we have a full investigation will we better understand the discrepancy in publication charges.

**5. Other Comments:**
Again, a full-investigation on the true cost of publishing a manuscript needs to be done with full-transparency provided to researchers and funders. Do some journals pay editors much higher salaries than others? Do they use different software? Fraud detection? etc.. Only once we have a full investigation will we better understand the discrepancy in publication charges.

# 699. eLife

**Submit date:** 9/10/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Dr Fiona Hutton

**Name of Organization:** eLife

**Type of Organization:** Scholarly Publisher/Journal

**Role:** Organizational Official

**1. Proposed policy options:**
Publication, peer review and dissemination is a costly exercise. Whilst we agree that many organisations are making substantial profits, other organisations like eLife do not make profit. In order to publish and produce a quality product, there are many costs to publishing including editorial, production, communication and dissemination, marketing and significant ongoing technology development costs, so it is clear that option 1 is not an answer to this problem.

Other consequences of a cap policy:

A drive to cap direct APC payments would lead to increased uptake of transformative agreements which would allow NIH-funded researchers to escape from restrictive caps. Large commercial publishers would then gain further market share of NIH papers, blocking out society and not for profit publishers. Caps impact only a small number of papers published in high-profile journals and will be mitigated in many cases by transformative agreements through institutions.

Publishing is cheaper at scale. Promoting caps on APCs, unless related to the scale of the publisher, punishes small societies, small publishers and not for profits that have not cashed in on the megajournal concept. If a cap were introduced, it should include a formula related to the number of articles produced by the publisher. You may want to consider a tiered system with higher APC for small society publishers.

Option 2. We believe a cap of some kind could help drive efficiencies and better practices across the publishing industry. At present many publishers make very large profits from their publishing activities. For corporate publishers these profits go to stakeholders, for societies they go towards supporting the other activities of the society (and in some instances, support the extremely large remuneration packages of the society's staff). We do not believe publishing should be a means for making money, but instead should efficiently support the needs of the users (in the case of the NIH, the taxpaying public).

eLife publishes only one journal, and uses its APC revenue only to support its publishing activity. Our APC is set at $3000, for which we can cover most of our costs. We therefore believe that $2000 is too low as an option, but that $3000 is sufficient for a journal that relies on paid academic editors to support editorial operations. Journals that use in-house full-time editors are likely to be more expensive, although we are not convinced they offer higher quality. However it should be noted that publishing operations are significantly cheaper at higher publishing volumes. For eLife, a tripling of our volume would only lead to a 37% increase in our costs. So large publishers publishers thousands of articles should be able to do so at a significantly lower per-article cost than those publishing a few hundred. To

that end it may be necessary to offer higher APCs to smaller publishers to allow them to support their costs.

Option 3. An extra $1000, to make $3000 covers the cost of an article and editors (paying editors accounts for 2X% of our overall costs), but not peer reviewers. To pay peer reviewers $300 each, we would have to increase our APC to $4000. Although peer reviewers do need proper recognition, there are ways to do this that wouldn't take more money out of the research system. We think it would lead to warped incentives for peer review and peer review mills (see point 3).

Option 4. Setting a limit of the percentage in a grant seems sensible on the surface, but when you break it down then it is likely that certain subject areas and certain labs will be the only ones able to pay the high costs associated with publishing in the exclusive journals and so the whole research system becomes corrupted towards labs privileged to get the high value grants but are not necessarily getting the high impact results.

Key recommendations:

-Mandate all NIH grantees and intramural researchers to deposit preprints in a publicly accessible repository.

-Preprints must be publicly peer reviewed.

-It should be mandated that all peer reviews written by NIH researchers need to be shared regardless of decision. This important work by NIH researchers needs visibility and to stop waste of effort and resources by NIH researchers.

-Enable transparently reviewed preprints to count towards research assessment, speeding up trustworthiness of research that has been preprinted and ensure peer review contributions are recognised as a core part of research assessment.

-Enable recognition of different research outputs and formats.

-NIH should demand complete transparency from all publishers they do business with including a detailed granular cost breakdown on what APCs cover, including profit.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

Whilst we believe that peer reviewers should be recognised formally as part of research assessment, paying reviewers takes even more money out of the system of research and will lead to a range of warped incentives that can only act to worsen the current system. Namely:

- Equal payment will lead to those in economically disadvantaged economies prioritising peer review over doing research, whilst making it not worth the time and effort for those in high GDP economies.

- Payment will lead to warped incentives to do peer review, not for the value it adds to the academy, but to the value it adds to personal circumstance.

- Publishers will use the payments as an excuse to charge even higher prices to publish and access content.

- Payment is an extra cost out of the research system, money that could have otherwise been used to do more important ground breaking research.

- Incentivitising systems through payment will lead to peer review mills in the same way that paper mills have become so prevalent. With the advance of AI, it will become easy to imitate human review and therefore much research will be reviewed by AI bots - devaluating the whole system of research.

**4. Publishing best practices:**
All publishers have moved to using AI screening tools to detect fraudulent papers. Publishers use screening tools to check for data availability, and numerous other tools they subscribe to or purchase for better ways of reporting, and better ways of displaying research. All of these tools are valuable to authors, readers and institutions and add costs to publishing.

**5. Other Comments:**
All publishers have moved to using AI screening tools to detect fraudulent papers. Publishers use screening tools to check for data availability, and numerous other tools they subscribe to or purchase for better ways of reporting, and better ways of displaying research. All of these tools are valuable to authors, readers and institutions and add costs to publishing.

## 700. Geoffroy Laumet

**Submit date:** 9/10/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Geoffroy Laumet

**Name of Organization:** Michigan State University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
The compensation for serving on NIH study sections is disproportionately low compared to the substantial time and effort required. NIH should significantly increase monetary compensation for reviewing grant proposals.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
The compensation for serving on NIH study sections is disproportionately low compared to the substantial time and effort required. NIH should significantly increase monetary compensation for reviewing grant proposals.

**4. Publishing best practices:**

**5. Other Comments:**

# 701. Prof Alison Avenell

**Submit date:** 9/10/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Prof Alison Avenell

**Name of Organization:** University of Aberdeen, UK

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
None of the current options has sufficiently wide a scope to address the imbalance between publishers' costs and providing and peer reviewing open access research results, and the use of public funds. These issues are international. I've provided some general comments from the UK, especially in 4.

**2. Available evidence related to publication costs and proposed options:**
Setting a cap on fees will lead to those publishers who are cheaper increasing their fees to that cost.

**3. Peer review compensation:**
A separate fee for peer review will lead to more gaming, where collusion between editors and peer reviewers will occur (already an increasing problem with paper mills). In order to try to ensure adequate peer review, peer review would by necessity need to be open and signed, e.g. British Medical Journal's long-standing policy, and even then it is clear that some peer reviewers provide minimal feedback.

**4. Publishing best practices:**
As a professor of health services research, clinical trialist, and evidence synthesis methodologist, who works as a research sleuth, I question the very limited scope of this policy for addressing publication costs.

Firstly, in the UK, academic institutions negotiate as a group to drive down costs for packages for both access to reading and open access publication from each of the major publishers. Individual journal open access fees are not paid to these publishers, who represent the vast majority of academic journals.

There is a widespread problem amongst all academic publishers relating to adequate and timely responses to integrity concerns, e.g.
https://www.sciencedirect.com/science/article/pii/S0895435625002513

This is an opportunity to negotiate broader, better business practices from all journals and publishers, including those relating to research integrity, e.g. linking all published research articles directly to comments on PubPeer (so enhancing peer review), providing online comments to all articles (for example, as in the BMJ), ensuring open access code and data policies.

**5. Other Comments:**
As a professor of health services research, clinical trialist, and evidence synthesis methodologist, who works as a research sleuth, I question the very limited scope of this policy for addressing publication costs.

Firstly, in the UK, academic institutions negotiate as a group to drive down costs for packages for both access to reading and open access publication from each of the major publishers. Individual journal open access fees are not paid to these publishers, who represent the vast majority of academic journals.

There is a widespread problem amongst all academic publishers relating to adequate and timely responses to integrity concerns, e.g.
https://www.sciencedirect.com/science/article/pii/S0895435625002513

This is an opportunity to negotiate broader, better business practices from all journals and publishers, including those relating to research integrity, e.g. linking all published research articles directly to comments on PubPeer (so enhancing peer review), providing online comments to all articles (for example, as in the BMJ), ensuring open access code and data policies.

## 702. N/A

**Submit date:** 9/10/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Much of NIH funding already supports "science culture" rather than research. This includes travel to meetings, mentorship programs, and any variety of incidental costs. Page charges are just one such cost. There have been reports noticing a correlation between "impact factor" (a scientifically dubious metric) and page charges. This raises the concern that for example a tobacco company could publish a paper on how cigarettes are healthier than vitamins. They can certainly afford the page charges to publicize their findings! You can essentially increase the visibility and impact of your ideas by paying for it. But why should the taxpayer be on the hook for this type of "advertising" via page charges allocated to NIH grants? One can also see the process effectively leading to financial censorship of science. Novel ideas can be suppressed to archival journals if the authors don't have the money for page charges. Similarly, new investigators or investigators around the world not supported by NIH will not be able to pay page charges through NIH grants. While I don't know the figures, my guess is that a lot of important research is not supported by NIH, particularly with current pay lines in single digits.

As a non-NIH supported investigator myself, I have decided to only publish in journals without page charges. Except when my work involves collaborations with NIH-funded researchers. It is still possible to do so. You can always publish free of charge in BioRxiv or other preprint servers. Your reputation should be based on what you publish, so I'm not sure what the benefit of legacy peer review is these days. Page charges are purported to somehow be necessary for "more elite peer review".

As a taxpayer, I'm furious that my money is going to support ever increasing publication costs that have little to do with research (or curing the diseases that advocates of unrestrained NIH funding always cite to the media and congress).

**2. Available evidence related to publication costs and proposed options:**
NIH review panels increasingly focus on Impact Factor and review panels have preferred journals like Nature Communications. Yet the page charges for this journal are close to $7000 per paper. The same research can be published for free in BioRxiv or journals with lesser impact factors. The reason for publishing in these glossy 'science tabloids' are mostly psychological - the psychology of institutionalized review panels that view these journals as more "prestigious" or "elite". I feel this is hardly worth $7,000 of my taxpayer money per paper.

**3. Peer review compensation:**
Peer review has been done for free in the past and I don't see the point of monetizing yet another aspect of science. I haven't thought out the ramifications but the potential for further corruption of the

scientific process are huge if peer review starts becoming a business. Will we have different "peers" in different pay-scale brackets. How is per review compensation going to be prevented from going into an inflationary spiral like journal page charges?

**4. Publishing best practices:**
This is already done for free at PubPeer by community peers and works well. Who would run "automated fraud detection"? There is a potential that "automated fraud detection" could be politicized by a government agency with a political agenda.

**5. Other Comments:**
This is already done for free at PubPeer by community peers and works well. Who would run "automated fraud detection"? There is a potential that "automated fraud detection" could be politicized by a government agency with a political agenda.

# 703. Craig Lee

**Submit date:** 9/10/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Craig Lee

**Name of Organization:** UNC-Chapel Hill

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 1 (NIH grant funds could no longer be used to support publication costs) is not viable. Dissemination of results is critical for NIH funded research to have impact, and relying on non-grant sources of funding would create inequity in what investigators could afford publication. This would impede the best and most important science from being published.

The most desirable option would be to follow the European model: Free to publish/free to read open access publishing platform with publication costs covered by the federal government through agreements with the publishers (i.e., the investigator would not be responsible for costs because the journals would no longer have manuscript level publication charges). This is not likely feasible in the short term.

Of the remaining options, Option 3 is preferred. Highly productive investigators should not be constrained by a dollar limit on publication costs. Setting a limit on each publication would be more reasonable, with a higher limit for journals that adhere to best practices. Rather than linking this to reviewer compensation, it would make more sense to have a higher limit for publishers that immediately deposit publications in PMC to adhere to the federal open access policy.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Financial compensation for peer review is not essential. However, other incentives such as providing a "credit" for peer review that can be applied to publication costs (to lessen charges to investigators) or professional society membership fees would be preferred. Additionally, journals should provide CE credit (not just for physicians, but also for pharmacists, nurses, and other professionals) for peer review activities that would be accepted by state licensure boards. These indirect forms of compensation would have greater impact than direct financial compensation.

**4. Publishing best practices:**
Allowing higher costs per publication in Option 2 for publishers that use best practices for automate fraud detection as well as directly deposit published articles immediately in PMC

**5. Other Comments:**
Allowing higher costs per publication in Option 2 for publishers that use best practices for automate fraud detection as well as directly deposit published articles immediately in PMC

## 704. N/A

**Submit date:** 9/10/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Other

**Type of Organization - Other:** Academic Medical Center

**Role:** Investigator/Researcher

**1. Proposed policy options:**
If a journal has been established for more than 24 months and is not published on PubMed or Scopus, they should not be allowed to charge more than $1000 or the equivalent. Otherwise, it should be classified as predatory.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Coming from a faculty member's perspective: Peer review compensation is nice, but unnecessary. Most faculty are benefiting from serving on grant study sections, so monetary compensation is not necessary. Not only does participating in grant study sections help with promotion and tenure, but there is also the benefit of being able to submit grants after the regular timeline.

Peer review of manuscripts is also beneficial as it helps faculty members keep up with emerging research. Again, the journals and manuscripts that one reviews is often a criterion that has to be met for promotion and tenure.

So in essence, peer review is a mandatory criterion of a faculty member's job that they are already getting paid to do. Our job is to provide a service, and whether our time is allocated into research, education, clinical or service, peer review has a place in all of these areas.

**4. Publishing best practices:**
Data storage costs. A lot of journals require data to be stored in certain repositories. Where is the cost for doing this going to come from?

**5. Other Comments:**
Data storage costs. A lot of journals require data to be stored in certain repositories. Where is the cost for doing this going to come from?

## 705. Jenny Lenkowski

**Submit date:** 9/10/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Jenny Lenkowski

**Name of Organization:** Goucher College

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I support proposed Option 5. It seems the most flexible for researchers while being conscientious of costs.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 706. Howard Hughes Medical Institute (HHMI)

**Submit date:** 9/10/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Erin O'Shea

**Name of Organization:** Howard Hughes Medical Institute (HHMI)

**Type of Organization:** Non-profit Research Organization

**Role:** Organizational Official

**1. Proposed policy options:**

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/250910-HHMI-response-to-NIH-RFI.pdf

**Description:** HHMI urges NIH to address deeper structural inefficiencies rather than just capping APCs. We recommend recognizing preprints for public access compliance and restricting NIH funds to pay for peer review services, with open sharing of reviews, author respo

## 707. David Sherman

**Submit date:** 9/10/2025

**I am responding to this RFI:** On behalf of myself

**Name:** David Sherman

**Name of Organization:** University of Washington

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Publication costs were always too high, and they are now seriously out of hand. To add insult to injury, we are now asked to pay extra to make articles open access. I was recently asked to pay more than $7000 for a simple article

**2. Available evidence related to publication costs and proposed options:**
I was recently asked to pay $5000 for one article, and another journal wants more than $7000 for a simple article.

**3. Peer review compensation:**
I don't think it's a good idea to pay for people for peer review. There are other incentives (for articles -- free publication in journals; for grants -- flexibility in submission dates) that are appropriate

**4. Publishing best practices:**

**5. Other Comments:**

## 708. Lauren Phegley

**Submit date:** 9/10/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Lauren Phegley

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Institutional Information Sciences Professional/Librarian

**1. Proposed policy options:**
In response to Option 1, disallowing all publication costs does not solve the problem of inconsistent and rising fees in scientific publications. The publication process does incur costs and the goal of reducing the currently inflated prices of publications to reasonable levels is more likely to succeed if government funds are capped, rather than removed. Currently, libraries bear quite a lot of the cost burden for both accessing pay walled journals and covering article processing charges through transformative agreements. Due to academic libraries at research universities being an element of indirect costs for grants, the cost still will be shouldered by the government. Libraries are a pivotal element of the success of federally funded research by providing updated resources, supporting data management, and teaching critical research skills. Without realistic costs of article processing charges being covered by the federal government, libraries will bear the brunt of the costs and be unable to provide the critical support necessary for successful research.

For Options 2-5, the concern is that setting a price cap, whether by cost per publication or through a flat amount, will set the new floor for publishing costs. Instead of reigning in publishing costs, it will actually end up increasing them by ensuring that researchers have to pay at least this amount. This will end up consolidating the market, reducing competitiveness, and spending taxpayer money in ways that doesn't go directly towards ensuring research is openly accessible.

Figuring out an appropriate allowable and reasonable cost for publications is an incredibly complex topic and I commend the NIH for wrestling with the nuances of the topic. I am look forward with hopeful anticipation for the NIH's approach to balancing the needs of researchers and the maximization of taxpayer funds.

One suggestion would be to run a new evaluation on the current costs of article processing charges. Unfortunately, the data analysis that was run by the NIH was run solely on journals that are listed in the DOAJ. DOAJ only indexes journals that are fully open access, and does not include hybrid journals. Hybrid journals are journals that allow researchers to make their article open access if they pay an article processing charge, but otherwise have a paywall to the articles. Many of the most prestigious and highest impact journals that researchers need to publish in to obtain tenure and promotion are hybrid and not fully open access. Hybrid journals have more expensive article processing charges than open access journals. Since the conclusions of the NIH's RFI are based on a dataset that does not reflect the full situation of academic publishing costs, it is critical that a new analysis be run to produce accurate information that informs NIH's decision making. I would suggest considering the evaluation strategies used by Haustein's 2025 ScholCommLab blog post "NIH explores capping APCs: Let’s look at the

evidence" (URL: https://www.scholcommlab.ca/2025/09/03/nih-apc-caps/) and Grossmann and Bremb's 2021 article "Current market rates for scholarly publishing services" (DOI: https://doi.org/10.12688/f1000research.27468.2). As part of this work, the NIH should address inflation over time in these costs, as a normal range of inflation is expected to be part costs. If you do instate a cost cap, I suggest publishing annually the accepted publication costs for the next 5 years with estimated inflation, as this allows researchers to know what is the accepted amount to budget for during the life of their grant.

The second suggestion is to require journal publishers to provide transparent reasoning for the costs of the article processing charge. There are a wide range of costs between journals, even ones that are from the same publisher. Publishers do not provide reasoning for why certain journals are more expensive than others. Taxpayers and researchers are not paying for prestige. I propose that any journal that wants to receive article processing charges paid for from a federal government grant must provide a transparent, publicly available, itemized cost for the article processing charge they are requesting. This information needs to be viewable on the website of the journal publisher prior to initiating the publication process. This allows researchers to choose a journal with a reasonable cost that is based on the realities of the needs of the publisher.

The third suggestion is to increase support for the fundamental work that NIH publication repositories, such as PubMed and PubChem. Without full funding for NIH repositories, it will reduce the ability of the public to find publications and take longer for NIH staff to release the articles once deposited.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Higher quality peer review requires compensation, beyond just service to the profession. Paying peer reviewers ensures the quality of the work that the government is sponsoring, especially with the rise of fraudulent AI papers. Peer reviewers would still need to be individuals who are experts in the field, but they would be recognized for their work through compensation and acknowledgement of service. If the NIH does allow for a higher cap to cover the cost of paying for peer review, the money should go to the peer reviewers and not to the journal publisher.

**4. Publishing best practices:**
Automated fraud detection capabilities are a reasonable cost related to publishing. Since they are an additional cost in the publishing process, allowing for a higher allocation of funds for journal publishers that include this option is important. Unfortunately, there is no current way to know which journal actively implement this capability. This is another reason why I emphasize the idea of transparency of the costs of an article processing charge in the proposed policy option section. Having the itemized costs of the article processing charge ensures that only journals who actually have fraud detection capabilities should receive this higher charge coverage.

**5. Other Comments:**
Automated fraud detection capabilities are a reasonable cost related to publishing. Since they are an additional cost in the publishing process, allowing for a higher allocation of funds for journal publishers that include this option is important. Unfortunately, there is no current way to know which journal actively implement this capability. This is another reason why I emphasize the idea of transparency of

the costs of an article processing charge in the proposed policy option section. Having the itemized costs of the article processing charge ensures that only journals who actually have fraud detection capabilities should receive this higher charge coverage.

## 709. Dianne Cox

**Submit date:** 9/10/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Dianne Cox

**Name of Organization:** Albert Einstein College of Medicine

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
This proposal conflicts with NIH's stated priorities of 1) using publications as the primary mechanism for disseminating scientific discoveries to peers and the public and 2) publishing in peer-review journals to ensure the Gold Standard quality, rigor, and credibility of research findings.

**2. Available evidence related to publication costs and proposed options:**
Setting these publication cost limits puts the onus on investigators rather than addressing the root cause, which is journals charging fees for publications.

Paying higher publication fees hurt individual investigators with small groups and limited funds because many publishers tie immediate or automated compliance to open access fees.

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

# 710. Barbara Milrod, M.D.

**Submit date:** 9/10/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Barbara Milrod, M.D.

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
This is the richest country in the world and public health should and ought to remain a primary focus. As it is, huge cuts are being threatened that will perforce limit investigators' ability to do research. It is enormously time consuming and expensive to gain adequate skills to become an investigator, many of these pathways have recently been threatened by imposed limitations for no good public health reason. My trainees tell me that the cost/benefit of continuing as an investigator are too steep- this will only add to it for no reason

**2. Available evidence related to publication costs and proposed options:**
Currently some European journals charge, these journals have had a lowering in status/standing. I will not review for them

**3. Peer review compensation:**
Sure I would love to be paid for peer review, but this seems unnecessary

**4. Publishing best practices:**

**5. Other Comments:**

# 711. Ben Marwick

**Submit date:** 9/10/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Ben Marwick

**Name of Organization:** University of Washington

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 1: Disallow all publication costs. NIH could no longer support publication costs through any funding mechanism. Some private funders have disallowed costs for peer-reviewed publications as they seek to place increased value on preprints.

My response: This is the best option. Researchers should use Green open access to satisfy open access requirements. Publishers should have further price controls applied to 'transformative agreements', and these should be forced to be transparent and public. In fact scholarly publishing should be entirely non-profit, and costs covered from a central pool. For example, Redalyc (Red de Revistas Científicas de América Latina y el Caribe, España y Portugal) and AmeliCA (Open Knowledge for Latin America and the Global South)

Option 2: Set a limit on allowable costs per publication.

My response: This is a good option, but the allowable APC should be set very low, e.g. 10% of the current global average APC. Publishers must lower their profit margins to improve the efficiency of publicly funded research.

Option 3: Set a limit on allowable costs per publication and allow a higher amount to be paid when peer reviewers are compensated.

My response: Too complex and inefficient to administer

Option 4: Set a limit on the total amount of an award that can be spent on publication costs.

My response: Unfair to early career researchers who are less likely to get larger dollar amount grants than senior researchers. Also unfair to some disciplines when less funding is available. Also complex and inefficient to administer

Option 5: Set a limit on both the per publication cost and the total amount of an award that can be spent on publications.

My response: Too complex and inefficient to administer

**2. Available evidence related to publication costs and proposed options:**
Traditional publishers charge APCs, which are inaccessible and do not speed up the publishing process in any way (it still takes as much time to evaluate and publish an OA article as does a traditional one).

Publishers are not invested in the rapid dissemination of research in the way that NIH is. The 2022 OSTP memo acceleration shows this dedication.

Negative results are less publishable under the traditional system, but they are vital.

Plan S's ambitious goal to realize universal open access to publications by 2021 did not materialize.

APC costs are soaring. In 6 years the estimated cost to federal agencies increased by roughly $100 billion. (Updated report to Congress, 2004)

APCs are a profit model for publishers rather than openly returning that financial investment on a broad scale to the public.

Publishers may take advantage of allowable costs to invent new costs or charges.

Funders have already stepped away from allowable costs. For example, look at Gates Foundation, Astera Institute, and the Austrian Science Foundation.

Decoupling the dissemination of research from formal publication systems using preprints, openly available data sets, tangible materials, and other research outputs increases the rapidity of scientific discovery.

Using machine readable metadata allows for iterative versions of scientific outputs to be tracked and contextualized. E.g. posting datasets alongside preprints, code, or other tangible materials provides for the open use and reuse of science in context.

Providing openly available datasets and preprints allows for the rapid and open evaluation of research to happen after the sharing of research results.

Other funders already embrace the decoupling of outputs from formal publication and evaluation processes. The Preprint Policy Framework outlines funders' approaches to preprints. Other funders also require immediate open availability of other research outputs such as data, code, tangible materials, and more. (ASAP, Gates, Astera, etc.)

Infrastructures for licensing standards (e.g. Creative Commons, MIT, etc) already exist and are widely adopted.

Preprint infrastructures exist (e.g. arxiv, bioRxiv, medRxiv) and are already popular dissemination outlets for scientists.

Investment in community-governed infrastructure that allows for the easeful discovery of scientific outputs (e.g. DataCite, CrossRef) will have a greater ROI than focusing on APCs.

Using widely accepted persistent identifiers in governmental infrastructures that are easily parsed by technologies (e.g. DOIs, ORCIDids, RORids, machine-readable licenses) increases the likelihood of broader dissemination.

Investments in open infrastructures at the systems level opens the door for further innovations for machine readability and machine learning.

References

A review of open access policy options for development research funders. Chadwick El-Ali, A., Johnson, R., Fraser, K., Harle, J., & Drake, T. (2025).

The FWF's Open Access Policy of the last 15 Years - Developments and Outlook. Rieck, K (2019).

Capping APCs May Backfire on NIH. Marcum, C. S. (2025).

The oligopoly's shift to open access: How the big five academic publishers profit from article processing charges. Butler, L. et. al (2023)

bioRxiv and medRxiv response to the OSTP memo - an open letter to US funding agencies (2023)

Preprint Policy Framework (ASAPbio, Creative Commons, 2025)

How are US institutions putting public access into practice? Insights from our 'Reasonable Costs' institutional research (Invest in Open Infrastructure, 2025)

Understanding the publish-review-curate model of scholarly communication (Corker, Waltman, & Coates, 2024)

**3. Peer review compensation:**
I think this is a bad idea as it introduces a lot of friction and complexity to the peer review process.

**4. Publishing best practices:**

**5. Other Comments:**

# 712. Jonathan E. Alpert MD PhD

**Submit date:** 9/10/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Jonathan E. Alpert MD PhD

**Name of Organization:** Albert Einstein College of Medicine

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
This proposal conflicts with NIH's stated priorities of:

1) using publications as the primary mechanism for disseminating scientific discoveries to peers and the public and 2) publishing in peer-review journals to ensure the Gold Standard quality, rigor, and credibility of research findings; and with the NIH public access policy which often leads to authors paying publication fees because many publishers tie immediate or automated compliance to open access fees.

- Setting publication cost limits in grants puts the onus on investigators rather than addressing the root cause, which is journals charging fees for publications.

- Setting limits will shift the burden of covering the cost of publications to individual investigators and to institutions, which lack the funds to cover these costs.

An alternative strategy would be for the NIH to negotiate with publishers about limiting costs of publication. The NIH can refuse to approve cover costs for publishing in journals not willing to reduce their fees.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 713. Society of Nuclear Medicine and Molecular Imaging

**Submit date:** 9/10/2025

**I am responding to this RFI:** On behalf of an organization

**Name:**

**Name of Organization:** Society of Nuclear Medicine and Molecular Imaging

**Type of Organization:** Scholarly Publisher/Journal

**Role:** Organizational Official

**1. Proposed policy options:**
See attached letter.

**2. Available evidence related to publication costs and proposed options:**
See attached letter.

**3. Peer review compensation:**
See attached letter.

**4. Publishing best practices:**
See attached letter.

**5. Other Comments:**
See attached letter.

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/Response-RFI-NOT-OD-25-138-SNMMI.docx

**Description:** Letter in response to RFI (NOT-OD-25-138): Maximizing Research Funds by Limiting Allowable Publishing Costs

# 714. David Loeb

**Submit date:** 9/10/2025

**I am responding to this RFI:** On behalf of myself

**Name:** David Loeb

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
None of the options proposed addresses the underlying problem, which is the exorbitant rate charged by journals. Limiting the ability of investigators to publish papers, which is the certain outcome of any limitation on the use of grant funds to pay publication costs conflicts with NIH's stated priorities of using publications as the primary mechanism for disseminating scientific discoveries to peers and the public and publishing in peer-review journals to ensure the Gold Standard quality, rigor, and credibility of research findings. At best, a limit on the use of federal grant funds to pay publication costs will result in a shift toward investigators publishing behind paywalls, since publishers charge much higher fees for immediate access/open access publications. Of the poor options, the least poor option is Option 4, which at least allows some reasonable use of funds for this purpose and spreads it out across the life of the grant.

**2. Available evidence related to publication costs and proposed options:**
My institution lacks a large endowment that might be an alternative source of funds to cover publication costs. If I cannot spend grant money on publication fees, I cannot publish papers. It's that simple. There is no other source of this money available to me.

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 715. Steven Porcelli

**Submit date:** 9/10/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Steven Porcelli

**Name of Organization:** Albert Einstein College of Medicine

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
The problem is that journals became for profit businesses in the 1980s. Now they follow the corporate mantra of maximizing profit above all else. NIH should establish a reasonable cost per publication and then negotiate with the journals on this, providing the same cost across the board for all journals regardless of "prestige" or perceived quality. No NIH funds should be allowed for publishing costs to journals that refuse to negotiate. This can only change if some strong and inflexible rules are put in place.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
I don't think journals should pay peer reviewers. This will just increase costs and create perverse incentives.

**4. Publishing best practices:**

**5. Other Comments:**

## 716. James I Mullins

**Submit date:** 9/10/2025

**I am responding to this RFI:** On behalf of myself

**Name:** James I Mullins

**Name of Organization:** University of Washiington

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Of the options mentioned, I think #4 is best as it allows one or a few publications in top journals (Nature portfolio, Science, etc). Ideally though, unless I am wrong, this problem arose at least in part to have open access, thus reducing the subscription revenue of the journals. While open access is appropriate and highly desirable, the solution to the problem might involve some limitations on early access. The NIH should work with some of the journals to hammer out a compromise.

**2. Available evidence related to publication costs and proposed options:**
I have 3 papers under review at Nature Medicine, I am getting help to defray costs (if any are accepted!), but this advantage is not available to most.

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

# 717. Erik Herzog

**Submit date:** 9/10/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Erik Herzog

**Name of Organization:** Washington University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
In response to this RFI, I write to express support for “Option 2: Set a limit on allowable costs per publication. NIH could limit allowable direct costs to $2,000.00 per publication, including APCs and other fees." This option responds to the limitations of current and future smaller grant awards, can be easily implemented and enforced, and keeps the APC pricing at a level that supports the publishers while encouraging researchers to publish their best work efficiently.

As a researcher who publishes findings with support from multiple active NIH grants, the incoming Editor in Chief for a society journal, and a member serving on committees for domestic and international scientific societies, I understand the goal is to ensure our tax dollars are wisely and efficiently spent to publish scientific discoveries. I share the concerns that publication costs have become prohibitive for many researchers and excessive compared to the NIH budget. I recognize that the publishing industry has enjoyed extraordinary profits and should be checked. The other options in the RFI make valid points, but any new policy should not focus on rules around compensation of reviewers, prematurely killing the publishers, or punish productive labs that have more publications per research dollar.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 718. Marcel Yotebieng

**Submit date:** 9/10/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Marcel Yotebieng

**Name of Organization:** Albert Einstein College of Medicine

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Arbitrary caps on the among a researcher can spend on publication will hurt highly productive investigators. instead of targeting investigators, NIH could use it's power to negotiate directly with publishers or support not for profit publishers.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 719. N/A

**Submit date:** 9/10/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
This proposal conflicts with NIH's stated priorities of

1) using publications as the primary mechanism for disseminating scientific discoveries to peers and the public and

2) publishing in peer-review journals to ensure the Gold Standard quality, rigor, and credibility of research findings; and with the NIH public access policy which often leads to authors paying publication fees because many publishers tie immediate or automated compliance to open access fees.

Setting these publication cost limits puts the onus on investigators rather than addressing the root cause, which is journals charging fees for publications.

Setting limits will shift the burden of covering the cost of publications to individual investigators and to institutions, which lack the funds to cover these costs.

An alternative strategy would be for the NIH to negotiate with publishers about limiting costs of publication or the NIH will not cover any costs for publishing in those journals.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 720. David Koelle

**Submit date:** 9/10/2025

**I am responding to this RFI:** On behalf of myself

**Name:** David Koelle

**Name of Organization:** University of Washington

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Limitation on use of MIH funds to pay page charges will have an unfair discriminatory effect on researchers who do not have access to supplemental funding to pay the extremely high costs of publishing in high impact journals. The reality of NIH-supported academic research is that funding decisions are made in study section that rely on peer review, and peer reviewers place a high value on PI track record of publication in high impact journals. Yes NIH is trying to change score0-driving criteria during grant review, but the reality in academia has been and will continue to be that prior publication in prestigious journals will be part of grant scoring and thus funding. Some institutions and investigators have access to flexible funds to be able to play the exorbitant price tags at these for-profit journals, while other scientists do not have such access.Therefore institution of these limitations will create an unintended and fundamentally unfair caste system of a sort between scientists with different resources.

**2. Available evidence related to publication costs and proposed options:**
I have had to pay over 10,000 per paper for papers in Nature family journals.

**3. Peer review compensation:**
Peer reviewers are currently not compensated. I have been doing this for > 30 years and easily 100 manuscript reviews and have never been compensated a penny. So no, peer reviewers are not appropriately compensated: they are not compensated.

**4. Publishing best practices:**
Statistical review is appropriate. Journals should be able to hire in-house or contractor statistical reviewers and pass on costs to investigators. Another pain point is public access to primary data. Journals should be resourced to check to see if the data depositions that authors claim they have made are, in reality, actually accessible and as promised.

**5. Other Comments:**
Statistical review is appropriate. Journals should be able to hire in-house or contractor statistical reviewers and pass on costs to investigators. Another pain point is public access to primary data. Journals should be resourced to check to see if the data depositions that authors claim they have made are, in reality, actually accessible and as promised.

## 721. Vinayaka Prasad

**Submit date:** 9/10/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Vinayaka Prasad

**Name of Organization:** Albert Einstein College of Medicine

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Equity among investigators: APCs can run into thousands of dollars per paper. Limiting their coverage disproportionately harms early-career investigators, underfunded labs, and scientists at institutions with fewer resources.

Institutional disparities: Wealthier institutions may subsidize APCs, but smaller universities and minority-serving institutions often cannot. This could widen existing inequities in research visibility and career advancement.

Scientific Progress & Dissemination

Barrier to timely dissemination: If researchers can't afford APCs, their work may be delayed or forced into less visible outlets, slowing down the spread of new knowledge.

Reduced global reach: Open access (which usually requires APCs) makes U.S.-funded science accessible worldwide, including to researchers in low- and middle-income countries who lack subscription access. Restricting APC coverage undermines global scientific collaboration.

Incentive for closed science: Without APC support, researchers may revert to subscription-based journals, reducing public access and contradicting NIH's long-standing open science policies.

Policy Consistency & Public Accountability

Conflict with open access mandates: NIH already requires manuscripts to be deposited in PubMed Central. Discouraging APC use conflicts with broader U.S. and international open science initiatives.

Public investment should yield public access: Taxpayer-funded research should be freely available, not trapped behind paywalls due to financial barriers faced by investigators.

Transparency of costs: Allowing APCs ensures that publication costs are openly accounted for in grants rather than hidden in institutional overhead or charged to individual researchers.

Career Development & Evaluation

Impact on tenure/promotion: Many hiring and promotion committees weigh publications in high-visibility journals. If APCs are unfunded, investigators may be locked out of publishing in these outlets, harming careers.

Reduced competitiveness of U.S. researchers: International funding bodies (e.g., UK Research Councils, European Research Council) typically allow APCs. If NIH does not, U.S. researchers will be at a global disadvantage.

Efficiency & Practical Considerations

Marginal cost relative to grant size: APCs represent a tiny fraction of most NIH grants, but their impact on dissemination is huge. Cutting them saves little but harms a lot.

Administrative burden: If APCs are disallowed, institutions will have to create new bureaucratic workarounds to fund publications, increasing red tape rather than saving costs.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 722. Joshua D Nosanchuk

**Submit date:** 9/11/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Joshua D Nosanchuk

**Name of Organization:** Albert Einstein College of Medicine

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
The costs at some journals is certainly excessive. One reason for people pursuing the so called "top tier" journals is to increase the chance of NIH reviewers finding their work "worthy" and also aids in promotion. There is no clear evidence that work published in Cell/Science/etc is any better than in many society journals. Remove the use of "impact" of journals in grant reviews and people will not feel as much of a need to publish in these tremendously costly journals.

**2. Available evidence related to publication costs and proposed options:**
Investigators need to publish. They need to publish in order to get funding, to be promoted, to gain status in societies so they can participate in leadership, etc. Restricting people's ability to use NIH funding to publish is punitive. Restrictions are also a problem when one works in a specific field where folks really only read a few journals regularly.

**3. Peer review compensation:**
Pay for review does not increase the likelihood of a good review, rather it may do the opposite as some individuals will try to review a lot quickly to gain money. Instead of pay, reductions in costs of publications to reviewers should be offered.

**4. Publishing best practices:**

**5. Other Comments:**

## 723. European Diamond Capacity Hub

**Submit date:** 9/11/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Johan Rooryck

**Name of Organization:** European Diamond Capacity Hub

**Type of Organization:** Non-profit Research Organization

**Role:** Organizational Official

**1. Proposed policy options:**

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/EDCH-response-to-NIH-2.pdf

**Description:** EDCH response to NIH request

## 724. David Entenberg

**Submit date:** 9/11/2025

**I am responding to this RFI:** On behalf of myself

**Name:** David Entenberg

**Name of Organization:** Einstein College of Medicine

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I strongly support Option 3: Set a limit on allowable costs per publication and allow a higher amount to be paid when peer reviewers are compensated. This option best achieves NIH's goal of balancing research dissemination flexibility with responsible use of taxpayer funds.

Option 3 represents the optimal framework because it maintains cost discipline though a $2,000 limit is still somewhat low. Our last publication in Nature Communications cost $5760, while Frontiers in Immunology was $3495. I support working toward the $2000 limit, but this must be done gradually so as to allow publishers time to adjust. The $3,000 allowance for journals with compensated peer review creates appropriate incentives for publishing reform without imposing arbitrary restrictions on productive research programs.

Why other options are inadequate:

Option 1 (complete disallowance) would be catastrophic for scientific progress. Eliminating NIH support for publication costs would force researchers toward predatory journals or limit dissemination to unreviewed preprints, undermining decades of progress toward rigorous, open science.

Options 2, 4, and 5, while more reasonable, lack the critical incentive structure that Option 3 provides for publishing reform. They fail to address the fundamental unsustainability of unpaid peer review and miss an opportunity to drive positive change in academic publishing.

**2. Available evidence related to publication costs and proposed options:**
The NIH data showing average global APCs at $1,235.51 and average U.S. journal APCs at $2,177.00 supports the $2,000 base limit in Option 3. However, this data must be contextualized within the broader open access transition.

Over the past two decades, the scientific community has successfully transitioned from subscription-based, paywalled journals to open access models. This transition has democratized scientific knowledge but necessarily shifted costs from reader subscriptions to author publication charges. Publishers have justified increased APCs as covering the infrastructure needed for rigorous peer review while providing free global access.

Evidence from my own experience in cancer research demonstrates that high-impact, methodologically rigorous studies often require publication in journals with APCs well exceeding $2,000, particularly for open access options in prestigious journals. Limiting support to $2,000 without the flexibility provided in

Option 3 could force researchers back toward subscription journals, reversing progress toward open science.

**3. Peer review compensation:**
Peer review compensation is critical for sustainable scientific publishing. Currently, peer review operates as uncompensated service, making it unique among professional activities where expertise commands payment.

Factors NIH should consider for appropriate peer reviewer compensation:

Hourly rate equivalency: The proposed $50/hour rate aligning with Bureau of Labor Statistics data for Medical Scientists and Biochemists/Biophysicists is somewhat low for Assistant Professors and above, and would thus push review toward more inexperienced post-docs, but is a good starting point.

Time investment: The 6-hour average per review cited by NIH aligns with my experience reviewing complex manuscripts, including time for thorough literature review, methodology assessment, and detailed feedback preparation.

Reviewer qualifications: Compensation should reflect the expertise level required—reviewing cutting-edge research demands senior scientists with specialized knowledge.

Review quality metrics: Journals should demonstrate that compensated reviewers provide more thorough, constructive feedback compared to uncompensated review. This would have the added benefit of addressing the concern of those who oppose paid peer review, which is the creation of a group of people who specialize in peer review without having the appropriate background to do so.

Transparency: Public availability of peer review reports (as required in Option 3) ensures accountability and educational value, justifying the additional cost.

Compensated peer review would professionalize this critical service, likely improving both speed and quality while reducing reviewer fatigue that currently plagues the system.

**4. Publishing best practices:**

**5. Other Comments:**

## 725. Dana Watnick

**Submit date:** 9/11/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Dana Watnick

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I disagree with all options

**2. Available evidence related to publication costs and proposed options:**

This proposal conflicts with NIH's stated priorities of 1) using publications as the primary mechanism for disseminating scientific discoveries to peers and the public and 2) publishing in peer-review journals to ensure the Gold Standard quality, rigor, and credibility of research findings; and with the NIH public access policy which often leads to authors paying publication fees because many publishers tie immediate or automated compliance to open access fees.

Setting these publication cost limits puts the onus on investigators rather than addressing the root cause, which is journals charging fees for publications.

Setting limits will shift the burden of covering the cost of publications to individual investigators and to institutions, which lack the funds to cover these costs.

An alternative strategy would be for the NIH to negotiate with publishers about limiting costs of publication or the NIH will not cover any costs for publishing in those journals.

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

**Description:** NIH should bear the responsibility of negotiating with publishers re: publication fees

## 726. N/A

**Submit date:** 9/11/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
It is unfair and unprodactive to put the burden of paying publication fees on the investigator or institutions. It will, at best, create a dramatic inequality.

Publication fees are excessive.

NIH must regulate or deal directly with the publishers regarding publication fees.

NIH cannot have it both ways, both pressuring investigators to publish but also restricting funds to pay for publications.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Peer review must be compensated, and it is far more work than the proposed 50USD compensation.

**4. Publishing best practices:**

**5. Other Comments:**

## 727. Benjamin Hayes

**Submit date:** 9/11/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Benjamin Hayes

**Name of Organization:** Montefiore Medical Center, Albert Einstein College of Medicine

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I disagree with all options.

If forced into an option, then option 4 is perhaps preferred however not adequate. In option 3, $2000 per publication is too low as most journals charge more than this amount and this would be a deterrent to publishing my findings in an open access journal.

**2. Available evidence related to publication costs and proposed options:**
I recently agreed to submit to a journal that is only open access and charges $2,500 excluding taxes. I would not publish in the journal if I have to pay any amount out of pocket.

**3. Peer review compensation:**
This proposal conflicts with NIH's stated priorities of 1) using publications as the primary mechanism for disseminating scientific discoveries to peers and the public and 2) publishing in peer-review journals to ensure the Gold Standard quality, rigor, and credibility of research findings; and with the NIH public access policy which often leads to authors paying publication fees because many publishers tie immediate or automated compliance to open access fees.

- Setting these publication cost limits puts the onus on investigators rather than addressing the root cause, which is journals charging fees for publications.

- Setting limits will shift the burden of covering the cost of publications to individual investigators and to institutions, which lack the funds to cover these costs.

- An alternative strategy would be for the NIH to negotiate with publishers about limiting costs of publication or the NIH will not cover any costs for publishing in those journals.

**4. Publishing best practices:**
It seems logical to assume that the increased implementation of automated fraud detection and artificial intelligence technologies will increase the cost of publishing. It seems reasonable to assume that this cost is likely to be pushed to the researcher.

**5. Other Comments:**
It seems logical to assume that the increased implementation of automated fraud detection and artificial intelligence technologies will increase the cost of publishing. It seems reasonable to assume that this cost is likely to be pushed to the researcher.

## 728. Konstantin Lukianov

**Submit date:** 9/11/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Konstantin Lukianov

**Name of Organization:** University of North Carolina at Chapel Hill

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I support the "Option 4: Set a limit on the total amount of an award that can be spent on publication costs."

**2. Available evidence related to publication costs and proposed options:**
In my filed (molecular and cell biology, biochemistry) many journals, even not the top-level ones, have APC much higther than the $2000 (or even $3000) limit suggested in the Options 2 and 3. This will strongly restrict researchers in their selection of appropriate journals.

**3. Peer review compensation:**
In general, I support the idea of paying for peer review. At the same time, in my >20-year experience as a reviewer in a variety of journals, I never was paid for article peer-review. Some publishers, such as MDPI, provide vouchers ($100), which can be used to pay for your own papers published in these journals. It's good, but still it's not a direct payment.

**4. Publishing best practices:**

**5. Other Comments:**

## 729. Vikas Dharnidharka

**Submit date:** 9/11/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Vikas Dharnidharka

**Name of Organization:** Robert Wood Johnson Medical School at Rutgers University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I believe that this entire issue needs to be dealt with in a different fashion. I posted the following suggestions on Twitter last year, never got any responses, so posting now to this comment page. We all know that commercial publishers make more than $2 BILLION dollars a year each from work that they did not do, nor did they fund.

1. I recommend that the NIH create its own online-only open access biomedical science journal (eg Journal of the National Institutes of Health). All research that was performed via NIH funds should be first submitted by authors to this journal for peer review before going to any other journal. The advantages would be HUGE. If the paper is accepted, the impact factor of the e-journal would be very high as it would represent the most rigorous research. This journal would get PubMed indexed immediately. The science would be immediately available to the entire community, no 12 month waiting period. The e-journal would be able to charge advertisers and get additional revenue. This revenue could be used to pay manuscript reviewers, so the quality of manuscript peer review would go up. Researcher authors would not be charged the massive publication or page charge fees for manuscript publication, so the submitted publications costs in NIH grants applications would be much less. The costs of an electronic only journal are substantially less than for a print journal, but access would still be high as most people can now access the internet. The USA tax payer would benefit, the scientific community would benefit.

2. If the paper is not accepted by the NIH e-journal, then the co-authors would still be able to submit their work to major non-predatory commercial publisher journals. There would still be enough publishable science that the commercial publishers would stay in business.

3. I do NOT recommend forcing investigators to limit the publication costs in their NIH budgets. That would force some investigators to forego publication of their work, especially important negative results, since the investigators' institutions would not be able to help the investigators too much.

**2. Available evidence related to publication costs and proposed options:**
I published 10-13 PubMed-indexed papers each year. I have to limit which journals I submit to (without publication charges), or pay from startup funds, or my own pocket.

**3. Peer review compensation:**
See above for my comment about manuscript peer review. In addition, I believe that NIH should pay for grant peer review, not just on a per day basis, but based number of grants reviewed. I have been reviewing NIH grants for more than 15 years, including U01, U54, R01, R34 and R21 grants. Each

application takes me at least 2 hours of time, and I might review 3-4 grants per cycle, but only get $200 per day. This is inadequate.

**4. Publishing best practices:**
If you have your own NIH e-journal, you would have your own in-house automated fraud detection capabilities, with reduced cost.

**5. Other Comments:**
If you have your own NIH e-journal, you would have your own in-house automated fraud detection capabilities, with reduced cost.

# 730. Melissa Cantrell

**Submit date:** 9/11/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Melissa Cantrell

**Name of Organization:** University of Colorado Boulder

**Type of Organization:** Academic Institution

**Role:** Institutional Information Sciences Professional/Librarian

**1. Proposed policy options:**
On behalf of myself and my research team that has applicable research in this area we believe that, to support the goal of public access, the NIH must allocate funding for publication in some way. We believe the NIH should not pursue Option 1. Regardless of the other options chosen, should the NIH impose a limit on allowable costs for publications following any of the other four options, the allowable cost per publication should be at or below $1500 USD. This amount is based on evidence from our study assessing authors' perceptions of the reasonableness of APCs (expanded below). We also recommend that the NIH urge publishers to not charge APCs higher than the cap because of the extreme burden of finding supplemental funds.

**2. Available evidence related to publication costs and proposed options:**
As part of a research team, we surveyed 321 authors across four public R1 universities who published open access in the year 2022. The results of this study were published open access and are available at this link: https://doi.org/10.31274/jlsc.18184

We summarize below the key points for the NIH's consideration.

We asked the source for paying for APCs. More than half of respondents reported a grant as the source of funding for APCs. Other methods were cobbled together for those who did not have grant funding. This survey demonstrates that grant funds supply more than half of the APC payments. Respondents shared that they were often able to secure one-time or annual funding from other sources, but that those already-limited sources of additional APC funding were dwindling.

We asked respondents what costs for APCs they considered "reasonable". 32% of respondents reported that fees of $1500 USD or less were reasonable. 38% responded that fees of less than $500 USD were reasonable. 16% of respondents reported that no fees were reasonable. Only 15% of respondents felt that fees above $3000 USD were reasonable.

Therefore, we suggest that if the NIH imposes a limit on allowable APC costs, they position that limit at or below this threshold of reasonableness ($1500), and urge publishers to not charge fees higher than the cap because of the strain of finding supplemental funds from Universities.

Respondents offered qualitative comments to our survey, including that APCs are "legalized extortion," a "cash cow," and a "scam for publishers to make more money". Many were concerned that the fees for APCs took away from their ability to fund research and the staff needed to conduct the research. One

example of a response of this type is: “It stinks to spend a month of a grad student's salary on OA. Supporting trainees is where I'd prefer to spend money.”

In other words, APCs are already perceived to be beyond what is considered reasonable. Using an average of existing APCs to set a limit, as has been proposed with Option 2, fails to factor in how these costs are already straining authors’ budgets and cutting into other research costs.

**3. Peer review compensation:**

**4. Publishing best practices:**
Respondents in our study commented on not knowing the reasons for APCs and, in general, frustration with the lack of transparency around publishing costs. Scholars and researchers, as well as librarians, seek greater transparency in existing, let alone additional, charges.

The following represent some select illustrative quotes from our research survey:

“I also really don't understand where these fees go/what they are funding. They seem exorbitant for, what exactly? Putting my document into a template, loading it on a website, and adding it to some databases?”

“Taxpayers and the public deserve to have open access to research data, but providing access shouldn't be fueling the publishing industry who ultimately works off of the backs of volunteer peer reviewers.”

“I agree with open access publishing, but I do not understand why the onus is on investigators to pay instead of publishers. Journals receive free peer review, pay next to nothing for editorial board stipends, receive ad revenue, and now have small publishing costs as print journals are dwindling. It would be reasonable if investigators covered only costs related to editorial stipends, copy editing, and online hosting (assuming that publishers will provide these data transparently).”

“I am a member of the professional organization, I peer review for the journal, I write editorials and opinion pieces - why can't they published my paper for free?”

“Scientists do the work, review for free, and edit for free. The journals make a fortune off us.”

**5. Other Comments:**
Respondents in our study commented on not knowing the reasons for APCs and, in general, frustration with the lack of transparency around publishing costs. Scholars and researchers, as well as librarians, seek greater transparency in existing, let alone additional, charges.

The following represent some select illustrative quotes from our research survey:

“I also really don't understand where these fees go/what they are funding. They seem exorbitant for, what exactly? Putting my document into a template, loading it on a website, and adding it to some databases?”

“Taxpayers and the public deserve to have open access to research data, but providing access shouldn't be fueling the publishing industry who ultimately works off of the backs of volunteer peer reviewers.”

“I agree with open access publishing, but I do not understand why the onus is on investigators to pay instead of publishers. Journals receive free peer review, pay next to nothing for editorial board stipends,

receive ad revenue, and now have small publishing costs as print journals are dwindling. It would be reasonable if investigators covered only costs related to editorial stipends, copy editing, and online hosting (assuming that publishers will provide these data transparently)."

"I am a member of the professional organization, I peer review for the journal, I write editorials and opinion pieces - why can't they published my paper for free?"

"Scientists do the work, review for free, and edit for free. The journals make a fortune off us."

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/jlsc-18184-cantrell-2.pdf

**Description:** The attached file is a PDF of the research article described in this response.

## 731. N/A

**Submit date:** 9/11/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 4: Set a limit on the total amount of an award that can be spent on publication costs.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

# 732. PREreview

**Submit date:** 9/11/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Daniela Saderi

**Name of Organization:** PREreview

**Type of Organization:** Non-profit Research Organization

**Role:** Other

**Role – Other:** Executive Director, Co-founder

**1. Proposed policy options:**
Of the proposed options, PREreview's vision most closely aligns with Option 1. However, eliminating support for Author Processing Charges (APCs) without simultaneously shifting incentives, updating policies, and investing in valid, free, and open alternatives will likely fall short of achieving the stated goal of "maximizing the use of taxpayer funds to support research."

APCs do not accelerate the dissemination of scientific knowledge—they reinforce the traditional publishing model and make participation more costly. Scholarly publishing is already prohibitively expensive, and APCs add yet another financial barrier. Fees have risen sharply in recent years, and even imposing caps could create unintended market distortions. Most importantly, APCs uphold a system that rewards journal prestige rather than the substance of the research, while disproportionately hurting underfunded groups and institutions around the world who are least able to absorb these costs.

The most effective and equitable way to reduce the costs of scholarly publishing is to reform the incentive structure itself—shifting recognition away from journal brands and toward the quality and impact of the research. This requires decoupling the dissemination of scientific outputs from their evaluation, ensuring that sharing knowledge and assessing its merit are treated as distinct but complementary processes.

To achieve this goal, we recommend NIH considers adopting the following practices:

- Mandating that NIH-funded research outputs be shared as openly licensed preprints—along with openly licensed code and data—either before or at the time of journal submission. This policy, already adopted by a growing number of funders, ensures faster and broader access to knowledge.

- Recognizing that open peer review of preprints—including the reviews that are community-driven such as those published on the PREreview platform—as fulfilling the peer-review requirement in NIH's open access policy.

- Investing a dedicated portion of its budget in supporting the maintenance, growth in adoption, and interoperability capabilities of existing free, open, and journal-independent infrastructure to ensure the free and public dissemination and evaluation of research.

Adopting these measures will not only accelerate the dissemination of critical research findings, making them immediately accessible for feedback and reuse, but will also drive down costs for researchers and

NIH alike. More importantly, it will catalyze the systemic change in scholarly publishing that is urgently needed to create a more open, equitable, and sustainable research ecosystem.

**2. Available evidence related to publication costs and proposed options:**
There is a growing body of literature supporting the value of the movement towards preprint review and away from traditional scholarly publishing. We recommend that NIH consider this evidence in making their final policy decisions.:

- Expert consensus report lists recommendations for researchers, funders, journals, preprint servers, and non-specialist readers on how to engage with preprint review: Recommendations for accelerating open preprint peer review to improve the culture of science

- Preprint feedback improves the quality of the results that may eventually appear in traditional publications: Robustness of evidence reported in preprints during peer review

- Preprint review is cost-effective and draws from the widest possible pool of reviewers at a time when traditional peer-review is in crisis: The present and future of peer review: Ideas, interventions, and evidence

- Preprints can accelerate peer review as peers can discover research and can provide constructive feedback or suggest new studies earlier in the research life cycle: On the value of preprints: An early career researcher perspective

**3. Peer review compensation:**
PREreview believes in the value that voluntary, transparent, and constructive preprint review brings to strengthening the integrity of the peer-review ecosystem. While PREreview recognizes the importance of compensating experts for their time—offering generous honoraria to community members who contribute through user research, to our Champions, and to members of the Advisory Committee—we do not provide monetary compensation for the publication of preprint reviews. Instead, researchers and experts who engage with the PREreview community are supported through recognition and training.

Recognition: PREreview affirms that open preprint reviews are part of a researcher's scholarly contributions and should be recognized in evaluations for promotion, grants, and prizes. To support this recognition, PREreview has developed features that make it simple for reviewers to include their open preprint reviews as part of their public scholarly record. These features also ensure PREreview.org is interoperable with other key platforms, contributing to the long-term sustainability of open scholarly infrastructure.

Training: PREreview believes that all experts should have the tools and opportunities to contribute constructive, impactful preprint reviews that advance a more open and equitable scholarly future. To support this, with contributions from the community, PREreview develops multilingual openly available resources to support all experts in participating in open preprint reviews. We also lead and train others in facilitating peer review trainings and collaborative review sessions.

NIH would substantially accelerate and support the adoption of community-driven, open preprint review by:

- Recognizing and rewarding researchers' contributions to open preprint peer review by granting scoring advantages in funding applications and permitting these contributions to be listed in CVs and biosketches;

- Encouraging universities to recognize contributions to open preprint review as part of their evaluations for academic tenure and promotion;

- Allocating a portion of grant funding—through direct or indirect costs—to support preprint and open preprint review infrastructure that broadens participation in open preprint review;

- Investing grant funding in training researchers and other experts in participating in the review of preprints and other research outputs (e.g., datasets, analytical source code, software, etc.).

**4. Publishing best practices:**

Community-driven, open preprint review is key to building greater trust and transparency in research. At PREreview, we are transforming trust in science by reimagining peer review as a dynamic, transparent process applied to all research outputs—not just journal articles—unlocking faster validation, broader collaboration, and more accountable knowledge creation. When more expert eyes are engaged in evaluating research, fraudulent or scientifically unsound work is far less likely to take root. Our approach to combating fraud and unchecked automation is to build a strong, global coalition of human experts grounded in shared values and a common purpose.

The type of community-driven, open preprint review supported by PREreview is a great foil against some forms of fraud found in academic publishing. For instance, transparent collaborative reviews are less likely to result in reviewers requesting that authors cite reviewer papers in order to win their approval, reduces the ambiguity of motivations behind critical reviewer feedback where conflicts of interest may be involved, and distributes the ownership of the review to a larger pool through consensus rather than concentrating it among just one, two, or three reviewers whose identity is unknown.

Importantly, community-driven, open preprint review does not have to be an alternative to journal-organized manuscript review. Open preprint review works in parallel and in support of more traditional review modalities. Several journals allow for or even require the publication of manuscripts submitted to their journal as preprints (e.g., eLife, PLOS, JMIR Publications and many others). Currently editors can search databases such as EuropePMC and Sciety that index preprints with reviews and consider using the public reviews as part of their review process. Additionally, publishers can choose to more formally partner with services such as PREreview to host crowd-sourced, collaborative review sessions (e.g., Live Reviews), or automate requests for community reviews via standard notification protocols such as COAR Notify—a protocol that PREreview already uses to enable preprint authors to request feedback from the PREreview community at the time of submission to a preprint server.

Finally, while PREreview focuses on developing the technological and social infrastructure to improve human-centered peer review, we believe that, when done responsibly and with proper consideration, there can be additional value brought in by the use of machine-driven automated validation to perform basic checks, integrity checks, and compliance checks (such as datasets being shared appropriately). While the latter should not exist without the former, we believe that together and layered on top of

openly and freely available preprints make scholarly evaluation significantly more transparent and efficient than outdated, opaque journal-organized systems.

To help support the evolution of an inclusive and open ecosystem that allows for easy and seamless integrations between key open infrastructure services and value-aligned publishers, NIH should consider:

- Encouraging publishers to develop partnerships and workflow integrations with open preprint review services, ensuring that community-driven open preprint review can be incorporated into transparent, journal-organized peer review processes;

- Allocating a portion of grant funding—through direct or indirect costs—to support the integration between open preprint review infrastructure with publishers' peer review workflows, thereby helping authors publish preprints and request feedback more easily and enabling publishers to recognize and incorporate community-driven open preprint review into their evaluation processes.

**5. Other Comments:**

Community-driven, open preprint review is key to building greater trust and transparency in research. At PREreview, we are transforming trust in science by reimagining peer review as a dynamic, transparent process applied to all research outputs—not just journal articles—unlocking faster validation, broader collaboration, and more accountable knowledge creation. When more expert eyes are engaged in evaluating research, fraudulent or scientifically unsound work is far less likely to take root. Our approach to combating fraud and unchecked automation is to build a strong, global coalition of human experts grounded in shared values and a common purpose.

The type of community-driven, open preprint review supported by PREreview is a great foil against some forms of fraud found in academic publishing. For instance, transparent collaborative reviews are less likely to result in reviewers requesting that authors cite reviewer papers in order to win their approval, reduces the ambiguity of motivations behind critical reviewer feedback where conflicts of interest may be involved, and distributes the ownership of the review to a larger pool through consensus rather than concentrating it among just one, two, or three reviewers whose identity is unknown.

Importantly, community-driven, open preprint review does not have to be an alternative to journal-organized manuscript review. Open preprint review works in parallel and in support of more traditional review modalities. Several journals allow for or even require the publication of manuscripts submitted to their journal as preprints (e.g., eLife, PLOS, JMIR Publications and many others). Currently editors can search databases such as EuropePMC and Sciety that index preprints with reviews and consider using the public reviews as part of their review process. Additionally, publishers can choose to more formally partner with services such as PREreview to host crowd-sourced, collaborative review sessions (e.g., Live Reviews), or automate requests for community reviews via standard notification protocols such as COAR Notify—a protocol that PREreview already uses to enable preprint authors to request feedback from the PREreview community at the time of submission to a preprint server.

Finally, while PREreview focuses on developing the technological and social infrastructure to improve human-centered peer review, we believe that, when done responsibly and with proper consideration, there can be additional value brought in by the use of machine-driven automated validation to perform

basic checks, integrity checks, and compliance checks (such as datasets being shared appropriately). While the latter should not exist without the former, we believe that together and layered on top of openly and freely available preprints make scholarly evaluation significantly more transparent and efficient than outdated, opaque journal-organized systems.

To help support the evolution of an inclusive and open ecosystem that allows for easy and seamless integrations between key open infrastructure services and value-aligned publishers, NIH should consider:

- Encouraging publishers to develop partnerships and workflow integrations with open preprint review services, ensuring that community-driven open preprint review can be incorporated into transparent, journal-organized peer review processes;

- Allocating a portion of grant funding—through direct or indirect costs—to support the integration between open preprint review infrastructure with publishers' peer review workflows, thereby helping authors publish preprints and request feedback more easily and enabling publishers to recognize and incorporate community-driven open preprint review into their evaluation processes.

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/PREreview_NIH_APC_RFI_2025_09_11.pdf

**Description:** PREreview is writing in response to the NIH NOT-OD-25-138 Request for Information on Maximizing Research Funds by Limiting Allowable Publishing Costs (RFI). PREreview welcomes the NIH's efforts to lower costs for scholarly publishing.

# 733. Society  for Research on Biological Rhythms

**Submit date:** 9/11/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** John Hogenesch

**Name of Organization:** Society  for Research on Biological Rhythms

**Type of Organization:** Non-profit Research Organization

**Role:** Investigator/Researcher

**1. Proposed policy options:**

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/Option-2.pdf

## 734. N/A

**Submit date:** 9/11/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

# 735. Timothy E Holy

**Submit date:** 9/11/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Timothy E Holy

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
My preference is option 3. There are sound reasons to place limits on publication costs, given that many journals are for-profit and make much of their profit from taxpayer funds.

However, it is important to keep in mind that journals may not respond by limiting their fees, and instead demand that faculty members contribute non-NIH funding to boost the fee. Thus, a potential downside of the options under consideration is the risk that some journals become inaccessible to some researchers. Thus in any implemented policy, there may need to be some "escape clause" that places direct or indirect restrictions on journals. For example, one might say that for the journal to be accessible to *any* NIH-funded scientists, the journal is required to offer publication for the NIH fee maximums if the author checks a box saying they cannot contribute other funds.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
I have grown increasingly reluctant to provide peer review services for for-profit journals. Being compensated seems fairer and would somewhat increase my willingness.

**4. Publishing best practices:**
Maintaining a list of "spam" journals and discouraging grantees from publishing in them would be useful.

**5. Other Comments:**
Maintaining a list of "spam" journals and discouraging grantees from publishing in them would be useful.

# 736. philip abbosh

**Submit date:** 9/11/2025

**I am responding to this RFI:** On behalf of myself

**Name:** philip abbosh

**Name of Organization:** fox chase

**Type of Organization:** Non-profit Research Organization

**Role:** Investigator/Researcher

**1. Proposed policy options:**
the 5 proposed solutions arent solutions that seem likely to benefit scientists or taxpayers. These solutions are all targeted to the scientist or taxpayer and not to the actual problem. The problem is that the publishing industry is taking too many research dollars from the public and from budgets that should be spent on scientific inquiry, not to enrich the publishers, who don't even compensate the vast majority of their workforce (ie the reviewer or referee). The better solution is to cap the charge that the PUBLISHER can place on articles that are supported by NIH research. Publishers will cry out that this is anti-capitalistic but there is already ample precedent for this in the US healthcare system, of which NIH-funded research is a vital part. Medicare caps payments for everything that happens in healthcare, including procedures, doctor visits, etc, and famously capped the price of insulin and other drugs recently. This model would increase the value of revenue paid by the US taxpayer to permit more of those dollars to go towards research budgets while maintaining the vital aspect of dissemination of results to other scientists, the public, the press, and industry. Capping the dollar amount through any of the 4 capping scenarios (or the zero payment option) proposed in NOT-OD-25-138 might bring costs down if scientists choose not to publish in journals whose APC exceeds the cap that is placed on NIH budget construction. Decreased demand to publish in journals with APCs that exceed the cap will eventually decrease the APC to a point where it is affordable again. However, publications is to scientists as gasoline is to the public. Gasoline prices haven't really come down because we (mostly) all still have to drive to work. We need publications in order to maintain our career trajectories. it will take a long time to reign in publication prices and they may not come down. NIH needs to rethink its approach to adjusting APC costs.

**2. Available evidence related to publication costs and proposed options:**
analysis of some of NIH's proposed solutions: https://www.scholcommlab.ca/2025/09/03/nih-apc-caps/

analysis of the estimated APC costs paid to publishers: https://arxiv.org/abs/2407.16551

**3. Peer review compensation:**
I have never been compensated as a peer reviewer for a journal. i do publication peer review typically off hours and i would appreciate being compensated. compensatoin would likely increase scientists' willingness to participate and increase the turnaround time for reviews, which often arrive late.

**4. Publishing best practices:**

**5. Other Comments:**

# 737. Joshua Meyer

**Submit date:** 9/11/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Joshua Meyer

**Name of Organization:** Fox Chase Cancer Center

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**

The 5 proposed solutions are not solutions that seem likely to benefit scientists or taxpayers. These solutions are all targeted to the scientist or taxpayer and not to the actual problem. The problem is that the publishing industry is taking too many research dollars from the public and from budgets that should be spent on scientific inquiry, not to enrich the publishers, who don't even compensate the vast majority of their workforce (i.e. the reviewer or referee). The better solution is to cap the charge that the PUBLISHER can place on articles that are supported by NIH research. Publishers will cry out that this is anti-capitalistic but there is already ample precedent for this in the US healthcare system, of which NIH-funded research is a vital part. Medicare caps payments for everything that happens in healthcare, including procedures, doctor visits, etc, and famously capped the price of insulin and other drugs recently. This model would increase the value of revenue paid by the US taxpayer to permit more of those dollars to go towards research budgets while maintaining the vital aspect of dissemination of results to other scientists, the public, the press, and industry. Capping the dollar amount through any of the 4 capping scenarios (or the zero payment option) proposed in NOT-OD-25-138 might bring costs down if scientists choose not to publish in journals whose APC exceeds the cap that is placed on NIH budget construction. Decreased demand to publish in journals with APCs that exceed the cap will eventually decrease the APC to a point where it is affordable again. However, publication is to scientists as gasoline is to the public. Gasoline prices haven't really come down because we (mostly) all still have to drive to work. We need publications in order to maintain our career trajectories. It will take a long time to reign in publication prices and they may not come down. NIH needs to rethink its approach to adjusting APC costs.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 738. Camillo Padoa-Schioppa

**Submit date:** 9/11/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Camillo Padoa-Schioppa

**Name of Organization:** Washington University in St Louis

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 3 seems the most reasonable to me. In alternative, I would also support Option 5.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
I have reviewed manuscripts for >20 years, and I have *never* been compensated for my work.

**4. Publishing best practices:**

**5. Other Comments:**

## 739. N/A

**Submit date:** 9/11/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
The proposed solutions are not reasonable solutions since the scientist or taxpayer ends up footing the costs. The problem is that the publishing industry is taking too many research dollars from the public and from budgets that should be spent on research. The publishing system has devolved to the point where they enrich themselves off of the scientists who (a) provide the content (i.e. high-quality scientific manuscripts) that is the lifeblood of these journals; and (b) serve as the publishing workforce, by creating content (journal articles), reviewing manuscripts, and providing rigorous peer review so that the journal can publish high-quality articles. Since authors and reviewers do not get paid for any of this work, it is unclear why publishing fees need to be so high, particularly since most journals do not publish many print copies anymore. It makes more sense to cap the amount that publishers can charge, since most of the work is done by an unpaid workforce (authors and reviewers).

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 740. Toby Green

**Submit date:** 9/12/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Toby Green

**Name of Organization:** Coherent Digital

**Type of Organization:** Other

**Type of Organization - Other:** Content aggregator

**Role:** Other

**Role – Other:** Publisher

**1. Proposed policy options:**
The journals market is powered by prestige and career advancement, not publishing per se - and that, combined by the fact that each article is a mini-monopoly bundle, is why publishing journals is so profitable. Just as the low-cost airline industry democratized air travel by unbundling their product, I believe unbundling the mini-monopoly bundle that characterizes today's journal model is key to getting value for money into the system (simply capping prices won't work). To get their papers published, what if scholars simply posted them on preprint platforms (where the cost per post is roughly one hundredth the cost of publishing in an average journal). Then, separately, set up preprint services to do peer-review. These could be run by learned societies, universities or, yes, even publishers, independently from the publishing function. This would strip out all the costs of submission and rejection, which is so wasteful of resources. Of course, this option would provoke a backlash from authors who crave the career-enhancing 'hit' of being published in a blue-riband journal like Cell or Nature et al. But why should the public purse fund that?

**2. Available evidence related to publication costs and proposed options:**
I've published two papers with my ideas on reforming journals publishing: https://doi.org/10.1002/leap.1116 and https://doi.org/10.1002/leap.1219

**3. Peer review compensation:**
I don't have an opinion on this.

**4. Publishing best practices:**
Prestige and career advancement is also a driver for fraud and things like paper mills. If academic institutions evaluated and promoted their staff based on WHAT they've done not WHERE they were published, then the need for fraud and paper mills would weaken. That said, if the publishing process was unbundled, then the peer-review component would be where fraud detection, plagiarism etc - and associated costs - would sit.

**5. Other Comments:**
Prestige and career advancement is also a driver for fraud and things like paper mills. If academic institutions evaluated and promoted their staff based on WHAT they've done not WHERE they were published, then the need for fraud and paper mills would weaken. That said, if the publishing process

was unbundled, then the peer-review component would be where fraud detection, plagiarism etc - and associated costs - would sit.

# 741. Nancy Keating

**Submit date:** 9/12/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Nancy Keating

**Name of Organization:** Harvard Medical School

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I certainly appreciate the goal of maximizing the use of taxpayer funds, but this new open access policy is going to create major challenges, especially if researchers cannot use grant funds to cover the costs. Perhaps what is needed is a complete shake up of the publishing industry... but in the meantime, researchers must be able to charge fees to grants. Even as it is, ther will be many papers from a grant that are not charged to the grant because they are published after the grant has ended... this is very common, often the best papers are not published during the grant period. so PLEASE don't set a cap on what can be charged to the grant.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
At present peer reviewers are not compensated except in rare circumstances. Those of us who do a lot of peer reviewing are providing a service to maintain high standards in academic publishing. If journals or the NIH has funds to cover payment for peer review, i woudl prefer those funds go to lowering the costs of publishing via open access. While I agree that Americans should have access to NIH funded research findings... this new policy is likely to have many unanticipated consequences, including some papers never getting published because researchers do not have the funds to pay for this. Another unintended consequence is that research that is related but somewhat "adjacent" to the direct aims that were proposed in a project may now not be attributed to the NIH funding. It is also important to note that these policies are likely to disproportionately affect junior researchers and those at smaller institutions that don't have large discretionary funds.

**4. Publishing best practices:**

**5. Other Comments:**

## 742. Jack E. James

**Submit date:** 9/12/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Jack E. James

**Name of Organization:** Reykjavik University, Iceland

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Please see the attachment.

**2. Available evidence related to publication costs and proposed options:**
Please see the attachment.

**3. Peer review compensation:**
While referring to the attachment, please note that the suggestion that NIH could consider funding payments to reviewers should be abandoned. Any such payment will not merely escalate existing wasteful expenditure of taxpayer money but will draw the scholarly and scientific community into ever greater entanglement with for-profit publishing. In turn, greater entanglement will create conflicts of interest, the harmful effects of which in other areas of professional and scientific pursuits have proven impossible to counter. Total severing of NIH-funded ties to monetized publishing is the only way of ensuring taxpayer money is used to maximum benefit in the dissemination of scholarly and scientific knowledge.

**4. Publishing best practices:**
Please see the attachment.

**5. Other Comments:**
Please see the attachment.

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/NIH-Comment.James_.pdf

**Description:** Response to NIH Request for Information on Maximizing Research Funds by Limiting Allowable Publishing Costs

# 743. Don Workman

**Submit date:** 9/12/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Don Workman

**Name of Organization:**

**Type of Organization:** Other

**Role:** Member of the Public

**1. Proposed policy options:**
Given the lower quality of peer review, I do not think taxpayers dollars should support publications in pay to play journals. Peer review is already not intense enough to keep junk science from being published sometimes in fairly good journals. I would vote for option 1: no funding for publication.

**2. Available evidence related to publication costs and proposed options:**
Only annecdotal evidence from having been a reviewer for two pay to play journals.

**3. Peer review compensation:**
Peer review is an honorary duty for professional academicians. It is both an honor to review a peers work ahead of publication, and an opportunity for the journal to ensure there is credibility in the contribution to science. I do not think reviewers need to be compensated financially. I have found a recent opportunity to have one's name associated with the publication to be an interesting way to "compensate one" and also to hold a reviewer accountable to the scientific community.

**4. Publishing best practices:**

**5. Other Comments:**

# 744. Edna Cukierman

**Submit date:** 9/12/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Edna Cukierman

**Name of Organization:** Fox Chase cancer center / Temp

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
The five proposed approaches outlined in NOT-OD-25-138 are inadequate remedies that fail to address the core issue and instead place the burden on researchers and taxpayers rather than the actual source of the problem. These measures target scientists and taxpayers while ignoring the fundamental issue: the publishing industry's excessive extraction of research funding that should support scientific investigation rather than publisher profits. Publishers extract these funds while providing minimal compensation to the vast majority of their essential workforce; the peer reviewers who evaluate manuscripts.

A more effective approach would involve establishing direct price controls on what publishers can charge for articles derived from NIH-supported research. While publishers may object to such regulation as anti-competitive, robust precedent exists within the U.S. healthcare system, of which NIH-funded research forms an integral component. Medicare systematically caps reimbursements across all healthcare services, from medical procedures to physician consultations, and recently extended price controls to pharmaceuticals, notably insulin and other essential medications.

This regulatory model would maximize the value extracted from taxpayer investments by ensuring more research dollars support actual scientific inquiry while preserving the essential function of research dissemination to the scientific community, public, media, and industry. Implementing cost limits through any of the proposed capping mechanisms in NOT-OD-25-138, or adopting the zero-payment alternative, might theoretically reduce expenses if researchers avoid journals with APCs exceeding established thresholds. Reduced demand for high-fee journals could eventually force publishers to lower their charges to sustainable levels.

However, this market-based approach faces a critical limitation: scholarly publication functions as an essential professional requirement for scientists, comparable to gasoline's necessity for daily commuters. Just as fuel price volatility persists despite consumer concerns because driving remains unavoidable for most workers, publication costs may remain elevated because researchers require publications to maintain viable career trajectories. Achieving meaningful cost reductions through demand suppression will likely require extended timeframes and may prove unsuccessful entirely. The NIH must fundamentally reconsider its strategy for controlling publication expenses.

**2. Available evidence related to publication costs and proposed options:**
Implementing cost limits through any of the proposed capping mechanisms in NOT-OD-25-138, or adopting the zero-payment alternative, might theoretically reduce expenses if researchers avoid

journals with APCs exceeding established thresholds. Reduced demand for high-fee journals could eventually force publishers to lower their charges to sustainable levels.

However, this market-based approach faces a critical limitation: scholarly publication functions as an essential professional requirement for scientists, comparable to gasoline's necessity for daily commuters. Just as fuel price volatility persists despite consumer concerns because driving remains unavoidable for most workers, publication costs may remain elevated because researchers require publications to maintain viable career trajectories.

**3. Peer review compensation:**
Publishers extract research funds while providing minimal compensation to the vast majority of their essential workforce (e.g., the peer reviewers who evaluate manuscripts). This represents a fundamental inequity where publishers profit from uncompensated labor that is critical to maintaining scientific quality and integrity.  They are for profit, while the vast majority of publishing researchers are not.

**4. Publishing best practices:**
My proposed regulatory model would maximize the value extracted from taxpayer investments by ensuring more research dollars support actual scientific inquiry while preserving the essential function of research dissemination to the scientific community, public, media, and industry.

**5. Other Comments:**
My proposed regulatory model would maximize the value extracted from taxpayer investments by ensuring more research dollars support actual scientific inquiry while preserving the essential function of research dissemination to the scientific community, public, media, and industry.

# 745. The American Society for Clinical Investigation

**Submit date:** 9/12/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Sarah Jackson

**Name of Organization:** The American Society for Clinical Investigation

**Type of Organization:** Scholarly Publisher/Journal

**Role:** Organizational Official

**1. Proposed policy options:**
The American Society for Clinical Investigation (ASCI) self-publishes 2 highly rigorous journals in the biomedical research landscape, The Journal of Clinical Investigation (JCI) and JCI Insight. The ASCI is a nonprofit honor society of physician-scientists representing all medical specialties. We agree that it is reasonable to request a limit on allowable costs per publication. We recommend a modified version of Option 2 in the NIH "Request for Information on Maximizing Research Funds". Based on our nearly 30-year history of providing free access to research, we recommend that the limit on allowable costs per publication be set at $6,000, with annual adjustments for inflation in recognition that any cap should not be static. This price point is based on our experience as a US-based, nonprofit organization that spans all steps in the evaluation and publication process, including editorial boards and staff; copy editing and layout of published content; IT staff responsible for manuscript submission and publishing platforms; and downstream delivery of our content to PubMed, PubMed Central, Crossref, the Directory of Open Access Journals (DOAJ), and other content repositories. We suggest that the NIH focus its policies on mandating that NIH-supported studies be published in fully open-access journals, rather than hybrid journals that charge both high APCs and subscription fees. The JCI/JCI Insight model demonstrates the viability of the gold open-access model in a rigorous and competitive scientific publishing landscape.

**2. Available evidence related to publication costs and proposed options:**
The JCI and JCI Insight are gold open-access journals almost entirely funded by APCs (please see Appendix 1 in the included PDF file). Our journals have no subscription revenue and minimal royalty and advertisement revenue. The APCs that we charge cover the costs of publication, with an average of just 3% of APCs going toward support of ASCI programs in the past 5 years. Please see Appendix 2 in the provided PDF file, which details what our APC costs cover, including a details on the percentage spent on our scientific editorial board-related costs, author services, copy editing and layout, and online publication. Publishing does not produce a windfall for the society; rather, the journals serve as one mechanism to fulfill the ASCI's mission to support the scientific efforts, educational needs, and clinical aspirations of physician-scientists to improve the health of all people.

A recent NIH analysis used publicly available data from the DOAJ to gauge the range of publication costs. This use of DOAJ as a reference point for allowable APCs, however, fails to appropriately consider costs associated with journals that publish both preclinical and clinical research studies. There are higher costs associated with evaluating the in-depth experimental work beyond what is incurred by journals publishing in other disciplines included in the DOAJ, such as arts and humanities. It is important when comparing journals to consider both the scope and the quality of the content published. We have

appended a table of open access APCs in journals publishing high-quality biomedical research (please see Appendix 3 in the included PDF file). The table delineates full open access journals and those with a hybrid model, providing a relevant comparator dataset for APCs. We recommend that the NIH consider APCs from open-access journals that currently or historically have published NIH-funded studies (i.e., the average cost per publication specifically in open-access journals, which are meeting goals of public access, that NIH-funded researchers use).

**3. Peer review compensation:**
The current system of peer review relies on the scientific community to provide opinions on work in their field without compensation. We contend that paying peer reviewers introduces a host of new challenges and costs and would fail to alleviate the cost burden for American taxpayers.

First, the market value for peer review is substantial (as measured in time and therefore dollars) and would add unacceptably to the cost of publishing. The NIH proposed allowing an additional $1,000 in APCs for journals that pay peer reviewers, with $300 per reviewer and a $100 administrative fee (Option 3 in the NIH "Request for Information on Maximizing Research Funds). This new cost to pay reviewers would need to be paid for by the NIH and/or authors themselves. Importantly, the journals would also need to pay peer reviewers for manuscripts that were sent for peer review but were not published. At the JCI, we currently send about 25% of submissions for external review but only publish about 10% of submissions. Since our journals are open access with no subscription revenue and nearly all revenue comes from APCs, the additional cost of paying peer reviewers would be unsustainable. In 2024, the JCI and JCI Insight combined sent 1,744 manuscripts for external review, not counting revised submissions. At $300 per review, this would cost over $1.5 million annually. If the payment were the same for review of the revision, the cost would double. This does not include the costs associated with tax form documentation for domestic and international reviewers and devoting administrative staff to handle the burden. If the NIH offered to pay an additional $1,000 in APCs for journals that pay peer reviewers, we would still opt not to pay peer reviewers, because this amount simply would not cover the related costs.

Second, peer reviewers derive additional benefit from reviewing beyond monetary compensation. Peer reviewers gain knowledge, although confidential, as well as experience and networking contacts. In response, at our journals, we reward frequent reviewers with benefits that are more meaningful. Specifically, frequent reviewers are granted the opportunity to submit a manuscript and request immediate external peer review, thus bypassing the potential for immediate rejection. In this way, we express the value we place on the input of frequent reviewers and ASCI members.

**4. Publishing best practices:**
To assess submitted content, the JCI and JCI Insight rely primarily on academic editors who are active researchers themselves. With broad scientific knowledge, our editors scrutinize the rigor, quality, and potential impact of manuscripts both before and after the peer review process, relying on their ongoing experiences as active investigators. At the JCI, about 25% of submitted articles are judged to be of a quality and impact deserving of more detailed external peer review. For this, we depend on input provided by subject matter experts who provide technical analysis of the research under consideration, as well as assessment of the work’s importance, as part of the peer review processes. Nearly all manuscripts ultimately accepted undergo one major revision, necessitating an additional round of editor/reviewer assessment before acceptance. For the top 10% of papers that we determine to be acceptable in principle, we then apply another round of rigorous screening that utilizes both software

tools and expert professional staff to identify potential issues with statistical analysis, data presentation, provision of raw data, appropriate database deposition, and, critically, data integrity. This last step requires extensive human effort, aided by software, and is essential for reproducibility and reliability.

While software for artificial-intelligence (AI) -based image screening and plagiarism screening plays a crucial role in this process, these tools are insufficient on their own. The output of any screening software still requires staff members and editors to interpret the findings, as those screenings are known to produce false positive as well as false negative results. Humans still need to understand the context of any identified issues (e.g., there could be acceptable reasons for similar images in a manuscript, including time-course experiments, serial sections for histology, single and multichannel images of the same immunostained sample). In cases with uncertainty about any issue, we devote extensive time to asking authors for an explanation of potential irregularities for evaluation by the editors. Ensuring adherence to standards of transparency and reliability involves substantial staff efforts that are not covered by any available software, such as manually screening data for transparent presentation (e.g., whether the paper clearly shows the number of replicates in graphs and provides supporting values underlying graphical data), ensuring that high-throughput data are deposited in publicly accessible repositories, manually vetting raw data for Western blot experiments, and assessing statistical analysis. For clinical studies, staff members also cross-check trial registration, ensure that the ClinicalTrials.gov has been appropriately updated, vet conflict of interest disclosures, and evaluate clinical trial checklists. The JCI and JCI Insight are among the most rigorous in taking these added measures beyond the peer review process. Importantly, we view these steps as vital to ensuring that the content we publish is of the highest caliber.

Importantly, recent advances in AI have allowed incredible advances in scientific discovery. At the same, however, the scientific community faces growing threats from fraudulent papers (generated in well-described paper mills) entailing added time for expert review, as described above. In recent months, more and more scientific submissions and peer reviewer comments have been documented to be completely generated by AI. In a time when anyone can post anything online, it is more important than ever that journals assess scientific findings at all levels for veracity and integrity, verify the identity of peer reviewers, and ensure trusted content. We emphasize the importance of this validation process for journals that publish laboratory-conducted experiments, which have data that can and should be made available for all readers to evaluate, consistent with NIH policies.

Publishers also play a key part in helping meet NIH goals for transparency in data reporting and data availability. At the journal level, we ensure that published articles include a relevant statement on data availability and enforce requirements to deposit data in public repositories, whenever those repositories exist. The journals also host raw manuscript data directly on our website. This includes gel and immunoblot images and individual data values underlying presented graphs. Every single one of these steps has associated costs.

**5. Other Comments:**

To assess submitted content, the JCI and JCI Insight rely primarily on academic editors who are active researchers themselves. With broad scientific knowledge, our editors scrutinize the rigor, quality, and potential impact of manuscripts both before and after the peer review process, relying on their ongoing experiences as active investigators. At the JCI, about 25% of submitted articles are judged to be of a

quality and impact deserving of more detailed external peer review. For this, we depend on input provided by subject matter experts who provide technical analysis of the research under consideration, as well as assessment of the work's importance, as part of the peer review processes. Nearly all manuscripts ultimately accepted undergo one major revision, necessitating an additional round of editor/reviewer assessment before acceptance. For the top 10% of papers that we determine to be acceptable in principle, we then apply another round of rigorous screening that utilizes both software tools and expert professional staff to identify potential issues with statistical analysis, data presentation, provision of raw data, appropriate database deposition, and, critically, data integrity. This last step requires extensive human effort, aided by software, and is essential for reproducibility and reliability.

While software for artificial-intelligence (AI) -based image screening and plagiarism screening plays a crucial role in this process, these tools are insufficient on their own. The output of any screening software still requires staff members and editors to interpret the findings, as those screenings are known to produce false positive as well as false negative results. Humans still need to understand the context of any identified issues (e.g., there could be acceptable reasons for similar images in a manuscript, including time-course experiments, serial sections for histology, single and multichannel images of the same immunostained sample). In cases with uncertainty about any issue, we devote extensive time to asking authors for an explanation of potential irregularities for evaluation by the editors. Ensuring adherence to standards of transparency and reliability involves substantial staff efforts that are not covered by any available software, such as manually screening data for transparent presentation (e.g., whether the paper clearly shows the number of replicates in graphs and provides supporting values underlying graphical data), ensuring that high-throughput data are deposited in publicly accessible repositories, manually vetting raw data for Western blot experiments, and assessing statistical analysis. For clinical studies, staff members also cross-check trial registration, ensure that the ClinicalTrials.gov has been appropriately updated, vet conflict of interest disclosures, and evaluate clinical trial checklists. The JCI and JCI Insight are among the most rigorous in taking these added measures beyond the peer review process. Importantly, we view these steps as vital to ensuring that the content we publish is of the highest caliber.

Importantly, recent advances in AI have allowed incredible advances in scientific discovery. At the same, however, the scientific community faces growing threats from fraudulent papers (generated in well-described paper mills) entailing added time for expert review, as described above. In recent months, more and more scientific submissions and peer reviewer comments have been documented to be completely generated by AI. In a time when anyone can post anything online, it is more important than ever that journals assess scientific findings at all levels for veracity and integrity, verify the identity of peer reviewers, and ensure trusted content. We emphasize the importance of this validation process for journals that publish laboratory-conducted experiments, which have data that can and should be made available for all readers to evaluate, consistent with NIH policies.

Publishers also play a key part in helping meet NIH goals for transparency in data reporting and data availability. At the journal level, we ensure that published articles include a relevant statement on data availability and enforce requirements to deposit data in public repositories, whenever those repositories exist. The journals also host raw manuscript data directly on our website. This includes gel and

immunoblot images and individual data values underlying presented graphs. Every single one of these steps has associated costs.

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/FINAL-An-open-letter-to-the-NIH-for-NIH.pdf

**Description:** Letter from ASCI + Appendices 1-4

# 746. American Society of Tropical Medicine and Hygiene

**Submit date:** 9/12/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Alison Jaeb

**Name of Organization:** American Society of Tropical Medicine and Hygiene

**Type of Organization:** Professional Organization/Association

**Role:** Other

**Role – Other:** Managing Editor and Publisher of American Journal of Tropical Medicine and Hygiene

**1. Proposed policy options:**
Option 1: Immediate Public Access Without Author Fees

We respectfully oppose Option 1. While we fully support the principle of public access, there are substantial and unavoidable costs associated with the editorial, peer review, production, and digital hosting of high-quality scientific publications. For small, nonprofit journals such as ours, eliminating cost recovery mechanisms would jeopardize the sustainability of our operations.

Option 2: Capped Author Fees (e.g., $2,000 per article)

Our journal maintains relatively low publication fees that are slightly above the proposed cap. However, we seek clarification on whether the proposed $2,000 cap would be expected to cover the full range of necessary publishing services, including academic editor support, author assistance, plagiarism screening, figure and data checks, copyediting, typesetting, online hosting, dissemination, and long-term archiving. Even with a lean operational model, it would be challenging to sustain these services under the proposed cap and believe that enforcing such a limit without flexibility may disadvantage smaller, mission-driven publishers.

Option 3: Payment for Peer Review - Please see below.

Options 4 and 5: Allowing Grant Funds to Cover Publication Fees

We view these options as constructive and potentially beneficial. However, we caution that researchers with smaller grants—particularly those in resource-limited settings—may still face challenges covering publication costs. A more equitable approach may involve dedicated funds or supplemental support specifically earmarked for open-access publishing, especially for authors from low- and middle-income countries.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Option 3: Payment for Peer Review

We have serious concerns about Option 3, which proposes compensation for peer reviewers. While we recognize the significant contributions of peer reviewers, we believe peer review should remain a

scholarly service and part of academic responsibilities. Formal compensation introduces financial and ethical concerns, including potential motivations misaligned with scientific integrity. From a logistical standpoint, managing international payments to thousands of reviewers annually—including exchange rates, banking systems, and tax compliance—would be a significant burden for our small journal office. Additionally, compensating peer reviewers for manuscripts that are ultimately rejected would place a disproportionate financial strain on smaller publishers, with questionable benefit to overall scientific quality.

We instead advocate for academic institutions and funding agencies to better recognize and formally support peer review as a valued academic contribution, including integrating it into workload assessments and promotion criteria.

**4. Publishing best practices:**
In regards to higher per publication costs, please consider the following: publishing services, including academic editor support, author assistance, plagiarism screening, figure and data checks, copyediting, typesetting, online hosting, dissemination, long-term archiving and post-publication issues such as errata, corrigendum and retraction. Even with a lean operational model, it would be challenging to sustain these services under the proposed cap and believe that enforcing such a limit without flexibility may disadvantage smaller, mission-driven publishers.

**5. Other Comments:**
In regards to higher per publication costs, please consider the following: publishing services, including academic editor support, author assistance, plagiarism screening, figure and data checks, copyediting, typesetting, online hosting, dissemination, long-term archiving and post-publication issues such as errata, corrigendum and retraction. Even with a lean operational model, it would be challenging to sustain these services under the proposed cap and believe that enforcing such a limit without flexibility may disadvantage smaller, mission-driven publishers.

## 747. Katie Greenzang

**Submit date:** 9/12/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Katie Greenzang

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
As the NIH has recently mandated public access for all manuscripts resulting from NIH-funded research, the NIH must allocate funds to support this added expense. This is particularly important for junior investigators who do not have alternative, additional funds available. It is also important to anticipated costs of mentorship. Finally, limiting the funds available for publications may lead investigators to limit the number of publications they disseminate due to cost concerns which would be antithetical to the idea of public access to research findings!

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

# 748. Federation of American Societies for Experimental Biology (FASEB)

**Submit date:** 9/12/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Eric E. Kelley, PhD

**Name of Organization:** Federation of American Societies for Experimental Biology (FASEB)

**Type of Organization:** Professional Organization/Association

**Role:** Investigator/Researcher

**1. Proposed policy options:**
The Federation of American Societies for Experimental Biology (FASEB) appreciates the opportunity to provide feedback on the Request for Information on Maximizing Research Funds by Limiting Allowable Publishing Costs (NOT-OD-25-138), which seeks input on five proposed strategies being considered by the National Institutes of Health (NIH) to limit and reduce publishing costs covered by grant awards. As a coalition of 22 scientific societies representing over 110,000 individual biological and biomedical researchers, FASEB appreciates NIH's efforts to maximize grant awards and fund as much research as possible to enhance the health and wellbeing of Americans. However, in addition to supporting individual researchers by fostering community and professional development, the majority of FASEB's member societies also play critical roles in communicating the outcomes of research activities as publishers of topical journals. Thus, we bring a unique and important perspective to this conversation. Our comments reflect input gathered from our Science Policy Committee and Board of Directors as well as member society publishing staff.

As advocates for predictable and sustainable funding for NIH, we understand the need to ensure appropriate stewardship of federal funds and minimize waste, fraud, and abuse. However, throughout our response, we dispute the proposed approaches as furthering another administration priority – Restoring Gold Standard Science. Enacting arbitrary caps on publication costs, or worse, eliminating the ability of researchers to utilize NIH grant funds to publish their work in reputable, peer-reviewed journals would not only stymie the communication of research findings but also increase the risk of low-quality, unvalidated information being used to guide critical healthcare decisions. Thus, while FASEB is steadfast in its assessment that none of the proposed options are suitable to attain the opposing goals of reducing publication costs while ensuring high quality research communications, Option 1 (Disallow all publication costs), is entirely untenable.

We are also deeply concerned that the proposed timeline for implementing any reduction mechanism – on or after January 1, 2026 – is not only too abrupt, it also will not allow the factoring of updated information regarding requested publication costs to reflect the recent (and accelerated) requirement for immediate public access. Originally slated to go into effect on December 31, 2025, it is likely that most of the grants evaluated in underlying analysis for this RFI included publication costs reflective of costs prior to accelerated implementation of the Public Access Policy and thus skew much lower than current actual costs.

As noted in the preamble, FASEB believes that none of the proposed options are feasible for balancing flexibility in providing research results while maximizing the use of taxpayer funds. Both the RFI and the

NIH Director's Statement that preceded it highlight concerns about increasing costs of Article Processing Charges (APCs); however, none of the options actually address APC costs. Rather, the approach aims to cap APCs without consideration of factors that drive these costs, namely high-quality, unbiased peer review, research integrity assessments, and other elements that comprise the NIH's own plan for achieving Gold Standard Science. Arbitrary caps on publication costs risk the ability of investigators to share their data – including negative results – with their scientific peers and the taxpaying public.

Option 1 would be the most detrimental and untenable for both the scientific community – particularly early-career researchers – and the American public. The inability to utilize grant funds to defray costs associated with communicating research findings will result in a) researchers not publishing their work, and/or b) publishing their work in forums that may not adhere to practices such as unbiased peer review or substandard research integrity checks. We have similar concerns regarding impacts on early-career researchers for Option 2 and have included additional data in our response to Question 2 regarding the calculation of the $2,000 cap proposed in this option.

Option 3 proposes allowing a higher ($3,000) cap on publications if peer reviewers are compensated. In addition to limited testing, compensation of peer reviewers increases publication costs, as both manuscripts that are accepted for publication as well as those that are rejected would be subject to peer review. Thus, compensation of peer reviewers affects the sustainability of peer review. Similarly, as a result of limited testing of this model, there is little information regarding whether compensation improves review quality or increases risks for conflicts of interest.

Options 4 and 5 lack appropriate context to allow appropriate assessment. For instance, would this be a flat system applicable to all grants, or tiered by mechanism or amount of award. Regardless, our community expressed concerns that a complex formula would add another layer of administrative burden to the grant application and award management processes.

While we have identified key flaws in each of the options presented in the RFI, the FASEB community also recognizes that we are in an environment facing significant change. Therefore, we offer the following suggestions for NIH's consideration to develop a model that maintains research integrity while balancing the desire to decrease costs associated with publishing federally funded research outcomes:

1) FASEB recommends that NIH work with the community to establish guidelines for researchers to utilize when selecting appropriate journals within which to publish their work. Such a resource would not only highlight the desired journal attributes to fulfill the tenets of Gold Standard Science but also deter researchers from publishing in predatory journals.

2) For longer-term impact, FASEB recommends convening a Blue Ribbon Panel or National Academies study to engage stakeholders across disciplines and conduct a more fulsome assessment of journal attributes that would meet the administration's goals of decreasing publication costs and other secondary costs to taxpayers while maintaining Gold Standard Science. Since NIH is not the only agency that funds research activities, this initiative could be conducted in concert with the White House Office of Science and Technology Policy.

**2. Available evidence related to publication costs and proposed options:**
As noted in the preamble, FASEB believes that the underlying data used to determine the proposed caps

are not reflective of current publishing costs within the biomedical sciences and certainly do not factor costs associated with the accelerated implementation of NIH's Public Access Policy. The options presented in the RFI relied on data gleaned from the Directory of Open Access Journals, which is not representative of the average APC price of journals published in the U.S. and is limited to journals that adhere to a single business model – gold open access. In practice, however, many high-quality publications utilize a hybrid model, publishing a mix of open and paywalled content, allowing authors to choose the solution that best meets their needs. In many cases, this hybrid model and paywalled content has allowed publishers to support the lower cost of gold open access journals. Furthering the point that the data utilized in the RFI are not representative, the nonprofit European Molecular Biology Organization shares its annual costs of publishing, which indicate a much higher per article cost than those proposed in the RFI.

Similar to NIH policies that have inadvertently led to increased workload associated with the peer review of grant applications, increasing challenges for research integrity have increased both workload and costs associated with publishing (O'Grady, 2025; Richardson et al., 2025). Implementing a system driven by cost rather than quality creates an environment where researchers may be more susceptible to publishing in journals that do not adhere to the tenets of Gold Standard Science, hence our recommendation 1 in response to Question 1.

**3. Peer review compensation:**
As briefly noted in our response to Question 1, compensation of peer reviewers is in the pilot phase at a few small journals and outcomes on research integrity and conflict of interest are limited. However, we do know that compensation of peer reviewers will increase publication costs. The amount proposed in the RFI for reviewer compensation is inaccurate, as it is based only on articles accepted for publication and does not factor in costs associated with the review of articles ultimately not selected for publication. Similarly, compensation of peer review will drive up administrative costs associated with peer review, ultimately increasing the costs of publication with unclear returns for review integrity.

**4. Publishing best practices:**
Journals have adopted a wide range of best practices that vary by field, including:

- Practices to improve research integrity, including both technological tools and human resources. Both strategies incur costs – licensing fees for tools and staff salaries – but provide a multi-pronged approach to detect and prevent publication of fraudulent research.

- Journals or their respective publishers can be members of organizations that facilitate the establishment of standards and best practices, such as the Committee on Publication Ethics, or adopt standards developed by the National Information Standards Organization.

- Journals can include value-added metadata and tagging that supports discoverability of research findings

- Rather than providing cash payments to peer reviewers, an increasing number of journals provide recognition to reviewers via Publons or ReviewerCredits.

- Encourage the continued adoption and use of ORCiD and other persistent identifiers to assist all stakeholders in verifying identity/provenance and reduce research integrity costs.

**5. Other Comments:**
Journals have adopted a wide range of best practices that vary by field, including:

- Practices to improve research integrity, including both technological tools and human resources. Both strategies incur costs – licensing fees for tools and staff salaries – but provide a multi-pronged approach to detect and prevent publication of fraudulent research.

- Journals or their respective publishers can be members of organizations that facilitate the establishment of standards and best practices, such as the Committee on Publication Ethics, or adopt standards developed by the National Information Standards Organization.

- Journals can include value-added metadata and tagging that supports discoverability of research findings

- Rather than providing cash payments to peer reviewers, an increasing number of journals provide recognition to reviewers via Publons or ReviewerCredits.

- Encourage the continued adoption and use of ORCiD and other persistent identifiers to assist all stakeholders in verifying identity/provenance and reduce research integrity costs.

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/FINAL-FASEB-Response_NIH-RFI-on-Allowable-Publication-Costs_20250912.pdf

**Description:** Complete FASEB comments formatted on letterhead and signed. Includes hyperlink citations to key resources that did not transfer to the form.

# 749. Amanpreet Kaur

**Submit date:** 9/12/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Amanpreet Kaur

**Name of Organization:** University of Pennsylvania Libraries

**Type of Organization:** Academic Institution

**Role:** Institutional Information Sciences Professional/Librarian

**1. Proposed policy options:**
Option 1 does not solve the problem of cost in scientific publication. Not being able to cover the cost with federal funding means the cost will shift even more to academic libraries, which the NIH already labels as indirect costs of its grants. Libraries will still have to bear the burden of the publishing fees. This shift in burden still costs the government. Additionally, with recent federal government funding changes, many libraries are already facing budget cuts. Libraries will not be able to keep up with increased publishing costs, while their budgets are shrinking.

Options 2 through 5 explore different cost models, which set a price cap that becomes the new price floor. This will, unfortunately, further fuel market consolidation of the scientific publishing industry pushing out small publishers. The large publishers will still get paid, while shifting the cost again to the library or individual researcher. Again, this does not address the root problem of cost.

Alternatively to Options #1 through #5 the NIH RFI proposed, I propose the following solutions:

1) Increase funding towards PubMed to further build out its capabilities and build its capacity.

2) As in Option 3, compensate peer reviewers. I will further explain in my response to the "Peer Review Compensation" question below.

3) Publishers need to be held accountable for the cost. Require publishers for transparent reasoning for the cost of publishing in each journal, by providing itemized, publicly accessible information on the factor that goes into determining each journal's cost. This allows researchers and funders to evaluate "reasonableness."

4) Re-evaluate cost options based on all formats of making articles open access (hybrid, green, gold, etc). This means that publishers will need to be transparent about its anti-fraud needs and justify the cost coverage for these anti-fraud needs.

**2. Available evidence related to publication costs and proposed options:**
The data analysis on DOAJ data only includes fully open access journals but not hybrid titles that give the option to publish open access. Thus, the analysis is incomplete. Publishers are requiring the hybrid option for researchers who need to comply with NIH's public access mandate. For a broader perspective on this issue, please read the ScholCommLab's recent analysis published online (https://www.scholcommlab.ca/2025/09/03/nih-apc-caps/).

Additionally, the NIH's 5 options do not address "normal" inflation that occurs over time. Additionally, it does not address any additional publisher-imposed cost inflation, which should not be considered "reasonable."

Libraries with existing transformative open access agreements will still experience increase in expenses, as publishing costs increasingly move to libraries. To address these issues, I propose that if that NIH instates a cap, the NIH needs to annually publish the acceptable publication costs, estimating the next 5 years of inflation.

**3. Peer review compensation:**
Currently, peer review is perceived as service to the profession. Hence, it goes uncompensated. However, higher quality peer review requires compensating experts from the field to knowledgeably review manuscripts. Higher quality peer review ensures the higher quality of the research publications. This is especially important for research that uses government funding. Particularly, higher quality peer review would prevent future retractions of NIH-funded research, maxmizing the NIH's efforts to support more trustworthy research. Any NIH funding used to cover the costs of publishing, the money should go to towards compensating the peer reviewers.

If public funds are not used to cover the publishing costs, compensation could be in multiple forms such as:

1)Honorariums

2) APC waivers (This option would allow peer reviewers to submit their future manuscripts for free, addressing the overall publication cost issue and further incentivizes researchers to review the work of their peers.)

**4. Publishing best practices:**
Automated fraud detection capabilities are a "reasonable" cost related to publishing. Due to this being an additional cost in the publishing process, this becomes a justification for a higher publishing cost for the NIH to cover. This is another reason why the NIH needs to require transparency from publishers in the form of the itemized factors that go into the publication cost within a journal.

Please keep in mind that many universities already subscribe to anti-plagiarism checkers that frequently mistakenly flag and identify text as plagiarism, when it is not. Any automated fraud detection capabilities and systems require human intervention.

**5. Other Comments:**
Automated fraud detection capabilities are a "reasonable" cost related to publishing. Due to this being an additional cost in the publishing process, this becomes a justification for a higher publishing cost for the NIH to cover. This is another reason why the NIH needs to require transparency from publishers in the form of the itemized factors that go into the publication cost within a journal.

Please keep in mind that many universities already subscribe to anti-plagiarism checkers that frequently mistakenly flag and identify text as plagiarism, when it is not. Any automated fraud detection capabilities and systems require human intervention.

# 750. Taylor & Francis

**Submit date:** 9/12/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Priya Madina

**Name of Organization:** Taylor & Francis

**Type of Organization:** Scholarly Publisher/Journal

**Role:** Organizational Official

**1. Proposed policy options:**
Introduction

We believe that an APC funding cap is a blunt instrument that would create more problems than it solves. While the aim of managing costs is understandable, the approach would restrict author choice, exacerbate inequities, and destabilize the publishing ecosystem.

We continue to advocate that the best method for addressing issues of cost in publication is through a vibrant, competitive, and dynamic marketplace with a broad array of publishers and options for authors. A more constructive path would be to support transparency and equitable funding models that preserve both the quality and diversity of scholarly publishing. By collaborating with publishers to foster a wide range of business models and methods of communicating discoveries, NIH could create successful public access policies that minimize onerous and bureaucratic researcher compliance requirements, as well as taxpayer cost.

We believe a financially sustainable, collaborative open science system which engages the publication community can be a boon for research. We will continue to bring scientific discoveries and innovations to the public and push the boundaries of science, medicine, and knowledge.

We strongly urge that further analysis across the industry and government is undertaken before any recommendations are implemented.

We would welcome the opportunity to discuss our comments and proposals in further detail with the NIH. Please reach out to me, Priya Madina, VP external affairs and policy at Taylor & Francis to discuss further: priya.madina@tandf.co.uk

Overall comments

Taylor & Francis (T&F) has closely reviewed the proposed options presented by the NIH. Our central concerns, detailed below, are as follows:

- Our internal benchmarking across the industry yields different numbers than the NIH
- All proposed options will restrict author choice and research impact
- Referenced journals are outside of general NIH grantee publication venues

T&F would question the methodology used to gather average article processing charges (APCs). We conducted a survey across the market in 2025 and, in Medicine and Health, on average Full OA journals have an APC of $2.5k+ and in Hybrid, $3.7k+.

NIH's estimates are also inconsistent with other studies, please see submission from STM for references mentioned in the following paragraphs. When the OSTP investigated average APCs for journals that are likely to be chosen by federally funded researchers to best advance and ensure the impact of their findings, they found average APCs of $3372 for fully open journals and $4824 for Hybrid journals, significantly higher than the data from the Directory of Open Access Journals (DOAJ) used in the RFI calculations . Even the publisher-critical cOAlition S finds higher APCs, with a reported average of $2648 and a median of $2940 .

These costs are real and irrespective of business model or profit status of the entity publishing the journal. For example, the Public Library of Science (PLoS) is a non-profit publisher that only exists to publish open access journals. They have no profit motive nor parent society to support. Their APCs range from $2300 to $6400  and even with these APCs they have generated positive revenue only 5 of the past 9 years . A similar publisher, eLife, charges $3000 for each submitted article (with a 0% rejection rate) and also receives significant outside funded support to remain solvent . Clearly, there is a significant cost associated with the publication of published manuscripts.

It is essential to us that authors retain autonomy in choosing their preferred publication venue. At T&F, our collaborations with NIH-funded authors show a preference for hybrid journals that often have higher APCs. For instance, we observe more submissions to Substance Use & Misuse: https://www.tandfonline.com/journals/isum20, Journal of American College Health: https://www.tandfonline.com/journals/vach20, and our Expert Collection journals. A concern with the current options is that they could limit authors' ability to publish in these journals, thereby restricting the impact and dissemination of their research.

T&F encourages NIH to support author preferences regarding whether to use grant funds or institutional agreements, such as a library's read and publish (R&P) agreement, to cover publication charges. For our authors at institutions with an R&P agreement, they can choose their preferred method. We have added this safeguard to prevent double payments by authors, funders, or institutions.

Further details on our position on open access pricing is available here: https://taylorandfrancis.com/our-policies/open-access-pricing. As we state on our website, we commit to ensuring that every researcher – regardless of geographic location, discipline or personal circumstance has relevant and realistic options available to them to publish their work, so that no researcher is left without a voice, regardless of funding source.

Specific comments

Option 1

We do not support option 1, which would disallow publication costs; this has never been the mandate or intention of the OSTP access memo. Indeed in NIH's own public access policy which came into effect on July 1 2025, APCs for gold open access publications are allowable expenses: "that reasonable costs that are allowable may be requested in the budget for the project as direct or indirect costs." This policy also covers the cost of depositing manuscripts into PubMed Central (PMC).

Disallowing publication costs would hinder American science, slow growth and limit prosperity by reducing available venues and pathways for researchers to share their work and increase its visibility. Publishers play a vital role in the research ecosystem by managing the critical infrastructure that makes research reliable, discoverable, and trustworthy. They coordinate expert peer review, uphold quality through rigorous editorial standards, edit and format manuscripts, improve and enhance metadata, and ensure the veracity of the scholarly record. These services, that work in symbiosis with researchers and their institutions, ensures scholarship is verified, validated, and reaches the widest possible audience. Without publication costs that ensure financial sustainability of the system, these processes of validation and verification are at risk.

Without publishing services, it becomes more challenging to discover trusted content across research disciplines. This is especially the case if the model shifts to one where preprints are deposited into a less curated PMC, rather than establishing a formal, peer reviewed, version of record. While PMC is important for access, it functions as an archive, not a publishing platform with editorial oversight. If research moves directly to PMC without traditional publisher involvement, it becomes increasingly difficult for researchers to discover new developments and identify whether the research is trusted peer reviewed content. This will slow down the discovery process, as researchers will be forced to spend more time assessing the quality of the research and whether it is preliminary findings or a thoroughly vetted publication.

Option 2

An artificially low-price cap risks dividing researchers based on their ability to afford publication in quality journals, undermining both academic freedom and scientific progress. Researchers outside the traditionally well-resourced research institutions could be forced to pay out of pocket to communicate via their preferred outlet due to non-market-based reimbursement rates. T&F strongly believes researchers should be free to communicate their work in the method and journal that best suits their research, and capping reimbursement per article threatens that freedom to publish.

Specific to T&F, the average APC across medicine and health is significantly over $2,600 – this limit would therefore prevent publication in many our titles. The rationale behind this higher APC is due to increased levels of attention and staff time and editorial costs, based on:

- Higher submission rates because of the journal's importance and credibility. The journals in these fields also often have high rejection rates and our APCs therefore cover the cost of processing all content submitted to a journal.

- High level of ethics and integrity checks along with a faster time to approval, as authors expect timely publication and we accordingly must meet author demand.

- Research integrity which is at the heart of everything as also clearly recognised and reflected in the Administration’s Gold Standard for Science.

Option 3

Option 3 is challenging logistically and has potential to add extra cost and complexity to managing peer review. For example, it is unclear an author would know whether a journal pays peer reviewers. They may also choose a different journal that does not pay peer reviewers to save grant funds, rather than

one that is most appropriate for their research. The added bureaucracy would be challenging to track and manage for authors, publishers, and grant managers.

Additionally, it is not clear if NIH would allow publishers to charge for rejected manuscripts after peer-reviewers are used, for example is payment made at submission of an article for publication or at the end once the article has been accepted.

There is ongoing debate about whether paying researchers to review would increase willingness to review while maintaining the integrity of the peer review process. Historically, peer review has been seen as an act of service to the academic community that should not be financially compensated, and research that both we and others working in this space have conducted shows that this is still the majority view today, with many sharing concerns that paying reviewers may lead to a lowering of quality and standards.

Option 4

Option 4 is the most reasonable; however, setting the cap on publishing fees at $20K over the grant's duration could be challenging to assess and implement. It also adds to the administrative workload for researchers, as organizations such as the National Academies and the Council on Governmental Relations (COGR), frequently address these issues in their reports or recommendations. The percentage suggested by NIH might be too low. Many NIH-funded researchers do not regularly include the costs of the immediate public access mandate in their budgets, which underestimates the total future grant funds needed for publication. Additionally, NIH should require researchers to budget appropriately to ensure adequate cost coverage and regularly review reported budgets to get an accurate estimate of publication costs.

Option 5

Option 5 is overly complex. If NIH plans to set a grant amount cap, as proposed in Option 4, researchers should have the freedom to choose how they allocate resources under the cap and not be constrained by non-evidence-based cost setting.

**2. Available evidence related to publication costs and proposed options:**
When calculating prices for APCs, T&F aims to be transparent with our costs and mitigate inequities with our stakeholders. We continue to balance this transparency with market considerations and remain compliant with U.S. antitrust price fixing laws.

**3. Peer review compensation:**
T&F publishes a wide variety of journals, and the rewards and recognition offered differs between them. However, they typically include book discounts, free access to journal content, and/or reviewer certificates.

A small selection of our journals focused on pharmaceutical development pay peer reviewers for accelerated reviews. The service is used primarily for research funded by pharma companies to manage the communication pipeline for drug and therapy development. Often the work that is being conducted by these researchers needs to be delivered in a set timeframe. The service allows for expedited peer review for a fee, as well as an enhanced level of management by our own dedicated in-house expert teams. Reviewers are paid an honorarium to review within a fixed time period. Except for the speed of

publication, all elements of the review are conducted in the same way as a non-fee route. We see similar rejection rates to articles that follow the standard route for these titles and this service does not increase likelihood of publication.

In addition, we also work with several partners to help accelerate peer review across some of our fully open access and hybrid journals where editors are struggling to find an appropriate, qualified peer reviewer for a paper to provide a decision for authors in a timely manner. This is a continuation of a pilot: https://newsroom.taylorandfrancisgroup.com/research-square-peer-review-pilot/ that we announced in 2022. As is standard for this service, peer reviewers receive a small honorarium for reviews that are returned on time. This is paid regardless of whether their report is positive or negative.

**4. Publishing best practices:**
T&F shares NIH's commitment to improving transparency and enhancing the dissemination of knowledge to improve scientific research. T&F encourages NIH to maintain a balanced approach to their policy, so that it supports the sustainability of academic publishing. One component of a balanced approach includes recognizing the investments publishers make towards research integrity, accessibility, and innovative research dissemination methods.

Our APC range is $925 to $5,000. We take the following areas into account when determining APCs and would encourage NIH to adopt a similar approach when considering publication cost.

- Comparable Rates: We examine the APCs of journals within similar subjects, such as those focused on related fields of research, and with comparable impact metrics, including citation crossover and journal rankings.

- Community Impact: The journal's role and reputation within its field are key considerations. High-impact journals often provide significant value to their communities through greater visibility, robust peer review management, and broader dissemination of research, which can be reflected in the associated APCs.

- Available Funding: We assess the typical funding levels in the journal's field, ensuring that the APCs are affordable for authors. This includes considering grants, institutional support, and other funding sources commonly available to researchers in the discipline.

- Journal Costs: The actual costs of running the journal, including editorial services including research integrity checks, production, and platform maintenance, are factored into the pricing. This ensures that APCs cover operational expenses and support the journal's quality and accessibility.

- Retention of Importance: Our goal is to maintain the journal's significance and impact within its discipline. Appropriate pricing ensures that we can continue to deliver value to the research community by attracting high-quality submissions, supporting excellent editorial practices, and investing in initiatives that enhance the journal's reputation and influence.

It should be noted that many customers do not pay the list price APC, benefitting from flexible funding options.

**5. Other Comments:**
T&F shares NIH's commitment to improving transparency and enhancing the dissemination of knowledge to improve scientific research. T&F encourages NIH to maintain a balanced approach to their

policy, so that it supports the sustainability of academic publishing. One component of a balanced approach includes recognizing the investments publishers make towards research integrity, accessibility, and innovative research dissemination methods.

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It should be noted that many customers do not pay the list price APC, benefitting from flexible funding options.

# 751. ASAPbio

**Submit date:** 9/12/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Katherine S. Corker

**Name of Organization:** ASAPbio

**Type of Organization:** Non-profit Research Organization

**Role:** Organizational Official

**1. Proposed policy options:**
NIH seeks to reduce its publishing expenses, while encouraging high quality research, in order to be good stewards of its limited public funding. Certainly, high costs are one important downside of the current research publishing system. Article processing charges (APCs), in particular, prop up a system that encourages a high volume of article production (for those who can afford to pay), with far less corresponding attention to increasing research quality (Butler et al., 2023).

Unfortunately, capping APCs is not likely to meaningfully reduce costs (Haustein et al., 2025), and it will not improve research quality. It may even increase costs as currently inexpensive publishers raise their prices to meet the cap. Importantly, a focus on APCs merely entrenches the current system and delays necessary reforms. We argue that rather than a stopgap APC fix, NIH is better positioned to put its weight behind more meaningful research communication reform. Fortunately, solutions already exist that will both save money and accelerate scientific progress: preprints and open evaluation.

*Open publishing and open evaluation for a more robust publishing ecosystem*

Preprints are research articles published durably and openly on preprint servers like bioRxiv and medRxiv (two of the largest such services in the life sciences). Preprinted articles are free to publish and free to read. They can be made available rapidly, as soon as researchers are ready to share the results of their work. The organizations that maintain the servers have costs to cover to provide their services, but those costs are pennies on the dollar when compared to the cost of APCs (and the cost of traditional publishing more broadly).

Research that is published on preprint servers can also be openly evaluated using a growing variety of services. For instance, PREreview (prereview.org) allows anyone with expertise to provide public (and durable) evaluations of preprints. In another model, overlay journals - run by communities of domain experts - provide open reviews of the latest preprints in their field (see, e.g., Rapid ReviewsInfectious Diseases). Services like these are proving that it is not necessary to rely on gold open access journals to perform important evaluation and vetting functions.

There are substantial benefits for science that come from unbundling the publication and evaluation functions that journals currently serve. Under the traditional publishing model, research is completed and submitted to a journal, where it sits for several months as it undergoes a peer review process. Papers are often rejected (frequently for non-scientific reasons, such as page limits), meaning that a paper might undergo several rounds of several month processes before ultimately being published. Peer evaluations are usually unseen, because reviews of rejected papers are not often shared with anyone

beyond submitting authors. The community can only build on and react to these papers many months or years after their completion.

By contrast, in a preprint-centered system, research is shared openly and in a timely way as soon as researchers have a result that they are ready to communicate. Evaluation can take place in a variety of diverse forms, including via the work of evaluation services but also by commenting and other forms of public feedback. The separation of publishing and evaluation functions allows for efficiencies; new evaluation services do not also have to be concerned with publishing functions and vice versa. Separation also allows for innovation. Improvements to the feedback and evaluation process can be realized when we move beyond the constraints of traditional review-then-publish models that keep research needlessly out of the hands of readers for months or years and then charge a heavy fee for the content to finally be openly available.

*Recommendations for NIH*

We offer two recommendations for NIH to achieve its goals of reigning in expensive publication costs and supporting scientific rigor.

First, we urge NIH to augment its existing policies with additional guidance and encouragement for authors to follow best practices in open research communication. Together with Creative Commons, we recently published a Preprint Policy Framework (ASAPbio, 2025), which spells out recommended policies for funders that want to maximize their return on investment from their grants. Consisting of six components, the framework catalogs funder requirements for grantees to share preprints, retain their copyright, openly license their preprints for maximum reuse potential, time the submission of their preprints prior to any journal submission, acknowledge funders in the preprint, and provide availability statements describing how key research outputs like data and analysis code can be accessed. The biomedical funders Aligning Science Across Parkinson's (ASAP) and the Gates Foundation endorse it as a model framework, and both require their grantees to adhere to these strong policies. Were NIH to do the same, NIH funded research would be strongly situated for a high level of reuse potential and impact.

Second, we urge NIH to direct resources to support an alternative publishing ecosystem with openly published preprints and open evaluation at its center. Existing services are already well-positioned to deliver on the vision that this alternative ecosystem could provide, and they are growing rapidly. bioRxiv, for instance, currently adds about 4,000 new papers each month, while medRxiv adds about 1,200 per month. Together the two services have published over 365,000 papers since their founding (in 2013 and 2019, respectively). In terms of evaluation services, these are also increasing in use. Corker et al. (2024) provides recent information about the growing volume of open evaluation services and platforms. Additional support for these vital community-led initiatives will allow them to scale and reach their full potential to provide a cost-effective and robust alternative to APC-based publishing.

Focusing on improvements to the research communication process via (1) strong policies for NIH grantees and (2) support for preprinting and open evaluation infrastructure stands to better position NIH to achieve its goals to reduce publishing costs and improve research quality. We urge NIH to consider our recommendations and to reconsider its focus on APC caps, which are unlikely to achieve its stated goals.

*References*

ASAPbio. (2025). Preprint policy framework. Retrieved from https://asapbio.org/preprint-policy-framework/

Butler, L. A., Matthias, L., Simard, M. A., Mongeon, P., & Haustein, S. (2023). The oligopoly's shift to open access: How the big five academic publishers profit from article processing charges. Quantitative Science Studies, 4(4), 778-799. https://doi.org/10.1162/qss_a_00272

Corker, K. S., Waltman, L., & Coates, J. A. (2024). Understanding the Publish-Review-Curate (PRC) model of scholarly communication. MetaArXiv. https://doi.org/10.31222/osf.io/h7swt

Haustein, S., Shares, E., Alperin, J. P., Camargo, F., Matthias, L., Céspedes, L., Poitras, C., & Strecker, D. (2025). NIH explores capping APCs: Let's look at the evidence. https://doi.org/10.59350/scholcommlab.5645

**2. Available evidence related to publication costs and proposed options:**
No comment

**3. Peer review compensation:**
No comment

**4. Publishing best practices:**
No comment

**5. Other Comments:**
No comment

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/ASAPbio_NIH_RFI-Response_2025-09.pdf

**Description:** ASAPbio Response to NIH Request for Information on "Maximizing Research Funds by Limiting Allowable Publishing Costs" (NOT-OD-25-138)

# 752. SPIE

**Submit date:** 9/12/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Patrick Franzen

**Name of Organization:** SPIE

**Type of Organization:** Scholarly Publisher/Journal

**Role:** Organizational Official

**1. Proposed policy options:**
SPIE, the international society for optics and photonics, is a nonprofit society that partners with researchers, educators, and industry to advance light-based research and technologies for the betterment of the human condition. As part of this mission, we publish scholarly works including 15 peer-reviewed journals. Our Open Access article processing charges (APCs) for these journals are set at a level that covers the cost of publishing only. However, the costs associated with publishing are rising, particularly due to necessary investments in research integrity tools to combat prevalent publishing fraud. In this environment, it is essential that the NIH policy on allowable publishing costs supports nonprofit publishers who prioritize scientific quality over profit.

We support options 2 and 5 as the most balanced approaches to controlling publishing costs while preserving the integrity and accessibility of scholarly communication.

In principle, Option 2 proposes a sensible cap that would allow most journals to cover their expenses, and it aligns with SPIE's commitment to affordability. However, we believe the proposed cap is too low. It is based on an average derived from the Directory of Open Access Journals (DOAJ), which includes many small, regional journals that artificially deflate the mean. A more realistic cap would be $2,500, which better reflects the actual costs of publishing in reputable, peer-reviewed journals that maintain rigorous editorial standards.

Option 5 offers a reasonable balance by capping both the per-publication cost and the total amount of the grant that can be spent on APCs. This model discourages spending taxpayer funds on journals with exorbitantly high APCs, while still allowing researchers to publish multiple papers from a single award. It supports responsible budgeting without penalizing productivity.

We strongly oppose Option 1, which would disallow all publication costs. This would disproportionately harm researchers who rely on reputable open-access journals and undermine the dissemination of publicly funded research. We are also opposed to Option 4 for similar reasons. Capping total publication costs as a percentage of the award could restrict researchers' ability to publish multiple papers. For example, if a research group is limited to $20,000 in publishing costs, they may only be able to afford one article in a high-cost journal, despite producing many publishable results from the same award. This would discourage dissemination of impactful work and disproportionately affect fields where high-quality publishing is essential.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
SPIE supports the principle of recognizing the value of peer review, but we have concerns about the practical implications of compensating reviewers. As a nonprofit publisher, SPIE maintains low article processing charges (APCs) to ensure accessibility and affordability for authors. These modest fees do not allow us to compensate reviewers without significantly increasing APCs.

While the idea of "upcharging" authors to fund reviewer compensation—particularly when NIH grants earmark funds for this purpose—has merit, it introduces complications. If reviewers are paid to review NIH-funded articles, they may come to expect compensation for all review assignments from that journal. This could lead to reluctance in accepting review requests for articles not supported by NIH funding. Such a shift could exacerbate the existing challenge of recruiting qualified reviewers, particularly for non-NIH-funded research.

**4. Publishing best practices:**
SPIE and other nonprofit publishers are investing in essential tools to uphold the integrity of the scholarly record, including software to detect fraud, plagiarism, and paper mills. These tools are increasingly necessary in an era of mass publication fraud, but they come at a significant cost. Many publishers, including SPIE, are absorbing these expenses without raising APCs, which is becoming increasingly difficult given tight margins and the need to keep publishing affordable for authors.

We propose that NIH provides an additional $500 per article—on top of standard APC caps—for journals that have demonstrably invested in fraud detection and integrity-enhancing technologies. This would incentivize authors to publish in reputable journals that prioritize scientific rigor and transparency, and it would help sustain these critical practices without penalizing publishers or authors financially.

**5. Other Comments:**
SPIE and other nonprofit publishers are investing in essential tools to uphold the integrity of the scholarly record, including software to detect fraud, plagiarism, and paper mills. These tools are increasingly necessary in an era of mass publication fraud, but they come at a significant cost. Many publishers, including SPIE, are absorbing these expenses without raising APCs, which is becoming increasingly difficult given tight margins and the need to keep publishing affordable for authors.

We propose that NIH provides an additional $500 per article—on top of standard APC caps—for journals that have demonstrably invested in fraud detection and integrity-enhancing technologies. This would incentivize authors to publish in reputable journals that prioritize scientific rigor and transparency, and it would help sustain these critical practices without penalizing publishers or authors financially.

# 753. Kathryn Weaver, Emily Dressler, Glenn Lesser

**Submit date:** 9/12/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Kathryn Weaver, Emily Dressler, Glenn Lesser

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
As Multiple PrincipaI Investigators (MPIs) of the Wake Forest NCORP Research Base, we appreciate the opportunity to provide feedback on this important policy. The mission of the Wake Forest NCORP Research Base to conduct cancer research that enhances cancer care delivery and improves patient outcomes. A vital link to participating providers and research professionals, patient participants, and the general public is clear communication through peer-reviewed publication and dissemination of study results. During our last grant cycle, we initiated and coordinated 20 studies and numerous pilot projects that have thus far resulted in 69 manuscripts and 88 published abstracts, several of which were published open access or incurred publication fees. Cumulative fees represent less than 0.5% of the total Research Base UG1 award; this is a vital investment in the visibility, accountability, and reliability of this work. Another benefit of timely publication is our ability to produce lay language summaries to strengthen the accountability of our work for persons with cancer. Therefore, we endorse Option 4 proposed in NOT-OD-25-138. This would give us the most flexibility to manage a large number of publications resulting from our grant. Option 5 would also be acceptable, unless journals increase publication fees beyond the proposed $6,0000 amount. This strategy optimizes our ability to publish in high-quality journals, while frugally stewarding the bulk of the award towards the efficient execution of ongoing aims. A complete restriction on the use of grant funds to support publication costs, as proposed in Option 1, would hamper our ability to disseminate results in a timely manner and in reputable journals. The per publication allowable costs in Options 2 and 3, $2,000 and $3,000, is lower than many high quality journals charge and would hamper our ability to publish findings in high impact journals. We are grateful for the opportunity to provide our perspective on this matter.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 754. N/A

**Submit date:** 9/12/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Other

**1. Proposed policy options:**

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/NIH-RFI-Response.pdf

# 755. Clinical and Translational Science Collaborative of Northern Ohio

**Submit date:** 9/12/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Sue Marasco

**Name of Organization:** Clinical and Translational Science Collaborative of Northern Ohio

**Type of Organization:** Academic Institution

**Role:** Organizational Official

**1. Proposed policy options:**
We support Option 3 of NOT-OD-25-138: Set a limit on allowable costs per publication and allow a higher amount to be paid when peer reviewers are compensated.

**2. Available evidence related to publication costs and proposed options:**
The core values of NCATS in 2025 are in concert with the goals of open access policies. In particular, "transparent communication and open discourse," and "team science and collaboration among different groups" are two values that emphasize the intent behind available and accessible published research findings. Supporting publication practices that uphold peer collaboration is vital to good science.

**3. Peer review compensation:**
Peer review is valuable, and particularly valuable for establishing and mentoring early-career professionals

**4. Publishing best practices:**
Publication costs fund valuable activities supportive of quality science communication including a global reach and adhere to strong editorial standards, including plagiarism screening, article-level metrics, and experienced reviewers.

**5. Other Comments:**
Publication costs fund valuable activities supportive of quality science communication including a global reach and adhere to strong editorial standards, including plagiarism screening, article-level metrics, and experienced reviewers.

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/NIHPublicationCostsCTSCopinion.pdf

**Description:** The CTSC of Northern Ohio opinion on publication costs

# 756. Prof. Ferric Fang

**Submit date:** 9/12/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Prof. Ferric Fang

**Name of Organization:** University of Washington

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I agree that publication costs are excessive. However, any policy change should take into consideration a scientific publishing landscape that includes large for-profit corporations (e.g., Elsevier, Springer-Nature), small non-profit society publishers, and for-profit predatory publishers. I favor option 2 (setting a limit on allowable costs for publication), but feel the $2,000 amount is too low. Rather than basing this on the average APC, I would suggest basing this on the costs of publication for a non-profit society publisher. A wise policy will limit costs, disincentivize publication in for-profit predatory venues, and allow non-profit society publishers to sustain their standards of quality and integrity, which have long been a bedrock of the scientific enterprise.

**2. Available evidence related to publication costs and proposed options:**
I have served as an Editor for various society journals for 25 years, have authored ~300 peer-reviewed articles, and have been an NIH-supported investigator for 38 years. I am the author of articles about the importance and roles of scientific journals (e.g., Casadevall et al. "The changing roles of scientific journals. mBio 2024 Nov 13:15:e0251524).

**3. Peer review compensation:**
I do not favor compensation of peer review. Although I understand the arguments in favor of compensating reviewers for their time, this will increase the financial burden on journals at the same time the new policy is attempting to constrain costs.

**4. Publishing best practices:**
The publisher's role in maintaining research integrity does require resources, and I agree that these should be taken into account in determining publication costs (see for example, Bik et al. Mol Cell Biol 2018 Sep 28:38:e00309-18).

**5. Other Comments:**
The publisher's role in maintaining research integrity does require resources, and I agree that these should be taken into account in determining publication costs (see for example, Bik et al. Mol Cell Biol 2018 Sep 28:38:e00309-18).

# 757. Society Publishers' Coalition (https://www.socpc.org/)

**Submit date:** 9/12/2025

**I am responding to this RFI:** On behalf of an organization

**Name:**

**Name of Organization:** Society Publishers' Coalition (https://www.socpc.org/)

**Type of Organization:** Other

**Type of Organization - Other:** Collective of ~150 nonprofit organisations who publish as part of their mission (https://www.socpc.org/)

**Role:** Organizational Official

**1. Proposed policy options:**
The Society Publishers' Coalition (SocPC) is a group of around 150 like-minded, nonprofit learned societies, community publishers and charities who publish as part of their charitable objectives and who reinvest any surplus from their publishing into the disciplinary communities they serve. SocPC members share the common ambition to see an orderly and sustainable transition to open scholarship and to improve the efficiency of the scholarly communication ecosystem for the benefit of researchers and society at large in a fair and sustainable way.

This feedback is from those members who publish NIH-funded research - the full membership list can be found here: https://www.socpc.org/. Members are either self-published or partner with other nonprofit or commercial publishers to fulfill their mission.

These SocPC members invest heavily in providing only high-quality, discipline-specific publications as well as in open science mechanisms of dissemination. There are significant costs associated with rigorous quality control and curation in publishing and these costs are rising as the challenges of protecting the scholarly record mount. Charges are required to cover these services.

In the absence of realistic alternatives to author-linked charges (such as 'diamond OA'), Option 1 is therefore not feasible, and there are similar challenges with Options 2 – 5 in the limits set. Of the options provided, Option 4 is the most realistic, and provides greater flexibility for researchers. However, as proposed, there is a risk that the proposed limits will effectively restrict researchers to publish in lower-quality – but cheaper – outlets that may not maximize the quality control and visibility that this NIH-funded research should receive.

It is also unclear how these proposals would serve to allow researchers to comply with the NIH Public Access Policy. For example, some subscription or hybrid journals - many published by our members - allow authors to publish at no cost and deposit the Author's Accepted Manuscript (AAM) in PubMed Central. Likewise, the relationship between these proposed routes and Read and Publish/Publish and Read/Transformative Agreements or Subscribe to Open models is unclear.

**2. Available evidence related to publication costs and proposed options:**
As a collective, our Article Processing Charges (APCs) span from $1960 to $7990, and our members are transparent about publication costs where they are able. Many participated in the cOAlition S Journal

Comparison Service and data related to median APCs, including specifically for the Medical and Health Sciences (MHS), can be found here: https://www.coalition-s.org/blog/journal-comparison-service-analysis-of-the-2022-data/ In addition, further breakdowns are available at https://www.embo.org/features/the-cost-of-scientific-publishing/ and https://elifesciences.org/inside-elife/e3e8def1/annual-report-2023-in-review.

Option 1: Disallow all publication costs.

This option would severely restrict author choice in publishing venues to journals that have a free-to-publish option – primarily subscription-based journals and those that are diamond open access. Subscription journals are frequently not compliant with the current NIH Public Access policy requiring immediate deposition of the article in PubMed Central. Even where deposition is allowed, the available version of the article is not the final published version. Providing access to the Version of Record has significant benefits to the reader in terms of accessibility, integrity and avoiding redundancy in the scientific literature.

Option 2: Set a limit on allowable costs per publication.

Any potential limit on costs needs to recognize that the costs of publishing vary considerably across publishers – depending on size, selectivity and additional services provided to authors and readers. Notably, a journal with a low acceptance rate will need to charge a significantly higher APC than one with a high acceptance rate - to recoup costs associated with processing articles ultimately rejected. This is particularly relevant for small publishers that do not have a large portfolio and routes to channel rejected papers to other journals in the same organization. Imposing a limit will likely mean that many smaller independent and/or nonprofit publishers, who do not operate with the same economies of scale as larger publishers, will be unable to recover costs through APCs.

Only one of our members reported an APC lower than the proposed cap of $2000 ($1960 for one of their journals); a cap at this level would therefore be unsustainable for the vast majority of small/society publishers. This may lead to further market consolidation in the hands of larger commercial organizations. Importantly, a charge cap may favor low selectivity journals that add the least value to the scientific process in terms of quality assurance and knowledge enrichment.

Option 3: Set a limit on allowable costs per publication and allow a higher amount to be paid when peer reviewers are compensated.

This is addressed in more detail in Question 3 on peer review compensation.

Option 4: Set a limit on the total amount of an award that can be spent on publication costs, and Option 5: Set a limit on both the per publication cost and the total amount of an award that can be spent on publications.

These options would provide authors with more flexibility than a limit on individual per-publication costs and are in principle more preferable, though may mean that researchers coming towards the end of a grant are disadvantaged as they will already have spent their funds and will be unable to publish their outputs in their journals of choice. This could benefit journals publishing more preliminary work than those requiring a comprehensive, fully developed, research project as it will complete earlier in the funding cycle. The cap of $6000 in Option 5 is insufficient for highly-selective journals that evaluate

many more manuscripts than they publish and which incorporate more thorough quality control and curation services. These cannot recoup their costs without a higher APC for the articles that are accepted for publication, such as those published by EMBO (https://www.embo.org/features/the-cost-of-scientific-publishing/).

In summary, disallowing all publication costs (Option 1) would severely limit author choice and hinder compliance with NIH's Public Access Policy. A flat APC cap (Option 2) is unrealistic given the wide variation in publishing costs, especially for small and selective publishers, and may lead to market consolidation and reduced quality. Options 4 and 5 offer more flexibility but could disadvantage researchers nearing the end of their grants and are insufficient for high-selectivity journals so an increase in the cap is recommended.

**3. Peer review compensation:**
The Coalition for Advancing Research Assessment (CoARA) – of which there are 754 member organizations worldwide – have consulted across stakeholder groups and produced recommendations on recognizing and rewarding peer review: https://zenodo.org/records/15968446. Their position, and one which is supported by SocPC, is that peer review is vital to research endeavor, to developing critical appraisal skills and core to academic life. We suggest that the most effective way of recognizing the valuable contribution of peer reviewers - as a core part of their researcher role - would be through formal recognition by research institutions and/or funding agencies in assessment procedures at all levels. Most journals provide certificates to reviewers that they can include as part of their annual appraisal and so they can also claim Continuing Professional Development (CPD) points.

Monetizing peer review without appropriate measures in place could incentivize superficial or biased assessments that have a negative impact on the quality of science published, as well as dramatically increasing costs. There are several practical considerations that make this proposal unrealistic for the majority of publishers:

- High quality peer review takes several hours; fully compensating this work would be financially unsustainable. Providing even just a modest token amount e.g. $300, would lead to an additional cost of around $600 or $900 (for two or three reviewers) per accepted paper. However, papers that are not accepted after peer review also need to be factored in so this could be far in excess of $1000. The Company of Biologists are currently trialing this at small scale (to incentivize rapid peer review) and more information on costs can be found here: https://www.biorxiv.org/content/10.1101/2025.03.18.644032v1.full.pdf.

- There would need to be appropriate policies and guardrails in place to ensure a) that publishers are passing those additional fees on to reviewers through payments and b) that any such payment does not compromise the quality of peer review. Such processes also incur significant administrative costs.

- The administration of multiple payments in multiple currencies will increase costs, and experience has found that researchers are sometimes reluctant to receive small tokens e.g. author and editor honoraria, due to the tax implications. It would be very difficult for smaller and non-profit publishers to absorb these costs and facilitate payments.

- Given that reviewers would be compensated for papers rejected after peer review, this may create an incentive for publishers to increase the acceptance rate of their journals rather than pay reviewers for

papers that should be rejected - potentially leading to the publication of more poor quality research. It may also incentivize bad actors to manipulate the peer review system for money and the use of AI tools could only facilitate this.

- Providing payment as an incentive for more specialist, in-depth or speedier reviews is a different proposition as this would be in excess of usual academic practice. However, the administrative challenges still remain.

**4. Publishing best practices:**
SocPC members are utilizing commercial tools and services, and some are creating such tools, to screen for research integrity and reproducibility (this includes checks for papermills, duplicate submissions, image manipulation/duplication detection, plagiarism). These services are essential to preserve the quality of the academic literature. These are further supplemented by in-house expert staff to monitor these tools and conduct integrity checks. One of our members estimates that integrity screening costs around $800 per manuscript - including both staffing and software costs.

In addition to this pre-publication research integrity screening, SocPC members also support authors' data deposition to comply with open science best practice e.g. by providing source data repositories, monitoring and encouraging compliance, structured methods platforms and data curation support. There are also additional costs in ensuring accessibility in line with The Americans with Disabilities Act (ADA) e.g. in generating alt text for figures.

Publishers should not be financially disincentivized from providing these vital services that help to ensure the integrity and accessibility of the scientific record. A system that allows for tiered pricing to reflect the type and level of service provided to researchers could therefore be a more realistic model.

**5. Other Comments:**
SocPC members are utilizing commercial tools and services, and some are creating such tools, to screen for research integrity and reproducibility (this includes checks for papermills, duplicate submissions, image manipulation/duplication detection, plagiarism). These services are essential to preserve the quality of the academic literature. These are further supplemented by in-house expert staff to monitor these tools and conduct integrity checks. One of our members estimates that integrity screening costs around $800 per manuscript - including both staffing and software costs.

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Publishers should not be financially disincentivized from providing these vital services that help to ensure the integrity and accessibility of the scientific record. A system that allows for tiered pricing to reflect the type and level of service provided to researchers could therefore be a more realistic model.

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/SocPC_membership_list.docx

**Description:** Membership list of the Society Publishers' Coalition - this response is from those members who publish NIH-funded research

# 758. Austin Waters

**Submit date:** 9/12/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Austin Waters

**Name of Organization:** Dana-Farber Cancer Institute

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
In the context of the new public access policy of immediate public access, most NIH funded research will now need to be published open access requiring investigators to pay high APCs. Therefore if the purpose of the grant funding is also to disseminate our findings there should be no limits on how much can be spend on publication fees.

**2. Available evidence related to publication costs and proposed options:**
The current public access policy requires us as investigators to disseminate our findings through expensive avenues, limiting the amount of grants funds we can spend on publishing would substantially reduce the amount of research disseminated. I am currently a NCI T32 funded postdoctoral fellow. On my current award I cannot afford to publish all of the work I have underway open access and that is at current amounts for publishing. This policy would hurt students and trainees the most who often conduct sub-analyses and sub-studies within NIH funded projects. If the amount spent on publishing were limited there would realistically be no funds for students and trainees to publish open access (again a requirement of the new public access policy)

**3. Peer review compensation:**
Peer reviewers should be compensated through waived APCs for publishing in that journal. Introducing per review compensation introduces ill incentives for participating in peer review. Realistically reviewers should not be reviewing for journals they would never publish in.

**4. Publishing best practices:**
Introducing more costs shouldered by investigators while cutting pay lines and requiring open access will result in less rigorous and innovative science.

**5. Other Comments:**
Introducing more costs shouldered by investigators while cutting pay lines and requiring open access will result in less rigorous and innovative science.

## 759. Siva Kumar Panguluri

**Submit date:** 9/12/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Siva Kumar Panguluri

**Name of Organization:** University of South Florida

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I strongly feel journals should stop imposing publication costs or APC. This became a big business, and journals are charging extremely high charges in the name of open access. There are times (15 years ago) when there were no charges for publication, and journals used to be very high quality. Now with APC, there are many journals with no quality.

Also, no sense in charging PI to publish his/her data after spending thousands and millions of dollars on his/her research. In fact, the data shared by the PI to the scientific community via publications are results from expensive projects.

Therefore, I strongly support NIH to choose Option 5: Set a limit on both the per publication cost and the total amount of an award that can be spent on publications.

Also, all our scientific community and funding agencies should come together to eliminate APC from journals.

**2. Available evidence related to publication costs and proposed options:**
I always publish my work in reputable journals with no charges, unless the NIH chooses the PI to opt for Open access.

**3. Peer review compensation:**
Yes, we should mandate journals that charge APCs to compensate reviewers for their efforts.

**4. Publishing best practices:**
Reviewers should be listed for each accepted publication.

**5. Other Comments:**
Reviewers should be listed for each accepted publication.

# 760. Kathryn Phillips

**Submit date:** 9/12/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Kathryn Phillips

**Name of Organization:** University of California, San Francisco

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
The National Institutes of Health (NIH) is seeking information related to its proposal to limit allowable publication costs to be covered under research grants with the goal of maximizing value to taxpayers while balancing the need for dissemination of scientific findings (1,2). However, we are concerned that several of the options being considered lack sufficient evidence to support their implementation and that they may have unintended and negative consequences. Among these, we would urge NIH to choose the option that is most likely to create benefit rather than harm (Option 4, Set a limit on the total amount of an award that can be spent on publication costs), or better yet, put off a policy change at this time while supporting the necessary evidence generation to inform such a decision. Regardless, we urge NIH to create a plan to monitor and empirically evaluate the impact of whichever option they choose. The revised NIH Public Access Policy now requires manuscripts for NIH-funded research accepted on or after July 1, 2025 to be deposited in PubMed Central upon acceptance, aiding in the availability of NIH-funded research independent of whether it is being published OA or not (3). However, it is critical to keep in mind that any NIH policy change around limiting publication fees will have far-reaching impacts on many researchers and/or projects that are not NIH-funded.

Publication fees comprise a very small share of direct costs in NIH grants—estimated to be less than 1% (4). For this reason, Option 1 (Disallow all publication costs would be unlikely to save substantial federal funds and could jeopardize researchers' ability to publish in their preferred journals, given limited use of waivers and availability of other sources to cover publication fees (5). There are also concerns that limiting publication fees under the remaining options proposed could "backfire," causing compression that incentivizes currently lower-priced journals to raise their publication fees to the new limit as a de facto floor under Option 2 (Set a limit on allowable costs per publication) and Option 5 (Set a limit on both the per publication cost and the total amount of an award that can be spent on publications) (6). Setting limits on publication fees at fixed rates rather than one that adjusts to market trends and inflation would see them degrade in value over time as journals raise them to keep pace with publication costs and/or maintain profit margins. Researchers and institutions could end up footing the bill for the difference between the NIH limit and the actual publication fees, meaning the policy change could have little impact, particularly on prestigious journals that may choose to charge OA fees much higher than average (e.g., Nature family). This policy could have unintended consequences in that only investigators with significant non-NIH funding would be able to publish in these prestigious journals. Payment for peer reviewers among American journals in clinical and health policy are also quite rare so the proposed Option 3 (Set a limit on allowable costs per publication and allow a higher amount to be paid when peer reviewers are compensated) would suppress most fees at the lower level.

Also, rather than making the federal grantmaking process more efficient, limiting publication costs under Options 2 through 5 would create more need for oversight and monitoring of researchers' budgets, not less. This would create more burdens on researchers and NIH, hindering efficiency and likely create little savings as investigators will simply reallocate the additional dollars towards other uses within budgetary limits. We recognize and agree with the concerns noted in the RFI about unreasonably high publication fees at some journals; however, eliminating or limiting publication fees for all NIH-funded research is unlikely to change the practices of those few journals while the ripple effects for the majority of journals and for NIH-funded researchers' flexibility in where they publish could be considerable. It risks creating classes within the research community, between those investigators and institutions that can afford to fill the gap to more expensive journals and those that cannot. As large publishers are best positioned to negotiate transformative agreements that would circumvent NIH caps, these proposals could lead to further market consolidation and cause new problems, as with Plan S (7,8).

1. https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0253129

2. https://www.library.ucsf.edu/about/subscriptions/journals-costs/

3. https://grants.nih.gov/policy-and-compliance/policy-topics/public-access

4. https://www.the-geyser.com/nih-poised-to-regulate-apcs/

5. https://onlinelibrary.wiley.com/doi/full/10.1002/leap.1558

6. https://upstream.force11.org/capping-apcs-may-not-work/

7. https://www.ce-strategy.com/the-brief/capped/

8. https://www.ce-strategy.com/the-brief/end-of-a-bargain/#4

**2. Available evidence related to publication costs and proposed options:**
Hybrid OA journals, those publishing both OA and via a subscription model, tend to have higher publication fees than fully OA journals (9,10). Higher impact journals, like Nature, JAMA, Cell, their network journals, and some medical society journals, charge considerably more. A July 2025 study of 1,117 hybrid and fully OA journals across 29 medical specialties found a median (IQR) for hybrid OA journals of $4,190 ($3,562-4,720) and for fully OA journals of $2,940 ($2,357-3,495) (10). Several European countries and funders have implemented publication fee caps to varying degrees of success.

In health policy specifically, one of the largest private research foundations (Robert Wood Johnson Foundation) requires funded work to be made OA and allows investigators to include publication fees in their grant budgets at a cost of up to $5,000 per article and $20,000 in total (11).

9. https://asistdl.onlinelibrary.wiley.com/doi/full/10.1002/asi.23446

10. https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0320684

11. https://anr.rwjf.org/templates/external/BPG_Standard.pdf

**3. Peer review compensation:**
Paying peer reviewers is an idea that sound simple and good, but there is very limited well-designed empirical evidence on whether it works as intended and very little use of such payments given the many

complexities of developing and implementing such systems in a fair and efficient way. We thus believe that this option is premature, more evidence is needed before basing a significant change in policy around peer review compensation. There are many suggestions for improvements to the peer review system, including reducing redundancy and improving the value of reviews, in addition to many calls for compensation for reviews (12-18). There are also potential drawbacks noted by some, including biased or poorer quality reviewers as compensation becomes an incentivizing force (19,20), although a recent experiment by Critical Care Medicine found no change in review quality and a small increase in speed of reviews (21).

However, peer reviewer compensation is relatively rare (12), with a small-scale global survey (n=354) reporting that 87.5% of respondents had never been compensated for peer reviewing activity and an additional 9.1% saying it happened rarely (<25% of the time) (19). These authors used salary and time spent to estimate an implied peer review cost of $179 for an initial review and $72 for a re-review (12), claiming that they are the first to directly survey researchers to estimate time and wage costs for reviewing. Peer review experiments have used a range of compensation, from $100 up to $250, though these may not reflect real-world conditions (14,22). Rather than direct payment, some have noted in-kind payment for reviewers in terms of tokens for publication fees and other benefits (23,24).

Reviewer compensation may create an incentive for journals to desk reject more papers, particularly if their acceptance rate conditional on getting reviewed is relatively low. This also creates challenges with networks of journals where papers may often be reviewed and rejected at the flagship journal, then get revised and ultimately accepted at a sister journal. Journals will not only need to budget for the increased direct costs, but also the very significant monetary and time costs needed to implement payment systems.

12. https://pubmed.ncbi.nlm.nih.gov/34776003/

13. https://www.thelancet.com/journals/lancet/article/PIIS0140-6736(21)02804-X/fulltext

14. https://pmc.ncbi.nlm.nih.gov/articles/PMC11221348/

15. https://www.tandfonline.com/doi/full/10.1080/08989621.2025.2460497

16. https://www.nature.com/articles/d41586-024-04027-4

17. https://www.pnas.org/doi/10.1073/pnas.2401232121

18. https://www.nature.com/articles/d41586-025-02457-2

19. https://researchintegrityjournal.biomedcentral.com/articles/10.1186/s41073-023-00128-2

20. https://link.springer.com/chapter/10.1007/978-981-97-4060-4_22

21. https://journals.lww.com/ccmjournal/abstract/2025/06000/effect_of_monetary_incentives_on_peer_review.3.aspx

22. https://www.aeaweb.org/articles?id=10.1257/jep.28.3.169

23. https://www.tandfonline.com/doi/full/10.1080/08989621.2025.2450451

24. https://journals.sagepub.com/doi/10.3233/ISU-240003

**4. Publishing best practices:**
None.

**5. Other Comments:**
None.

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/rfi-nih-apc_phillips_signers.pdf

**Description:** Additional signers

## 761. Louisiana State University Health Sciences Center-Shreveport

**Submit date:** 9/12/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Ashley Krukowski

**Name of Organization:** Louisiana State University Health Sciences Center-Shreveport

**Type of Organization:** Academic Institution

**Role:** Organizational Official

**1. Proposed policy options:**
Options 1 and 2 risk exacerbating inequities by shifting costs directly onto investigators, disproportionately harming early-career and under-resourced labs; Option 3 adds administrative complexity favoring large publishers, while Option 5 reintroduces per-article distortions.

Moreover, low per-publication caps risk driving investigators into less rigorous journals, undermining scientific standards and ultimately limiting the impact and reliability of NIH-funded research.

Option 4 offers the most balanced path, aligning fiscal stewardship with scientific dissemination and investigator autonomy.

**2. Available evidence related to publication costs and proposed options:**
N/A

**3. Peer review compensation:**
Peer review is an essential scholarly labor; journals should be expected to compensate reviewers fairly, and NIH may recognize and incentivize this when considering higher publication cost allowances.

**4. Publishing best practices:**
N/A

**5. Other Comments:**
N/A

# 762. Michelle Larsen

**Submit date:** 9/12/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Michelle Larsen

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I endorse Option 2: Set a limit on total allowable costs per publication to $2,000.00 per publication. This would allow for predictable costs for publication and hopefully would steer publishers to make their system more sustainable.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 763. N/A

**Submit date:** 9/12/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 1 is a non-starter. The risk of options 2-5 is that they will incentivize pricing floors. It would be better to fully enforce existing deposit requirement in the NIH Public Access Policy – require all funded researchers to deposit copies of their Author Accepted Manuscripts into PubMed Central (or another agency-approved open repository) immediately upon acceptance, strengthen reuse rights – enhance the NIH Public Access policy to ensure the public has the right to fully reuse these publications to maximize their value, support sustainable open access options – incentivize the use of publication options that do not rely on expensive fees to publishers, including repository deposit of Author Accepted Manuscripts, preprint sharing, early dissemination of data, code, software and other outputs, and use of community-controlled publishing outlets (such as diamond open access) and infrastructure.

**2. Available evidence related to publication costs and proposed options:**
The Gates Foundation has published on this extensively since their policies have evolved. It would make sense to look at their analysis.

**3. Peer review compensation:**
The whole model is flawed, where journals profit by publishing content they don't create that is evaluated by experts they don't compensate. I've never been compensated for peer review, seeing it as a service where I will review ~3x as many papers in a year as I publish, thereby balancing out the effort others do on my behalf through my own effort. Paying peer reviewers would likely have terrible unintended consequences fueled by a profit motive.

**4. Publishing best practices:**

**5. Other Comments:**

## 764. N/A

**Submit date:** 9/12/2025

**I am responding to this RFI:** On behalf of an organization

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Organizational Official

**1. Proposed policy options:**
We do not believe any of the options are workable. See the attached file.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/RFI-Publishing-Costs_Narrative-Response-Option.pdf

## 765. N/A

**Submit date:** 9/12/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Not Applicable

**Role:** Investigator/Researcher

**1. Proposed policy options:**
If I had to choose, I'd choose Option 3.

**2. Available evidence related to publication costs and proposed options:**
Experiential evidence: It has become increasingly difficult to publish without the ability to pay some publication fees.

**3. Peer review compensation:**
I have never been paid for journal peer review and do it a lot. It might make it easier to stomach costs.

**4. Publishing best practices:**
Junior investigators in particular are going to struggle to support publishing fees and will be forced to aim for only certain journals or to just publish less. Publishing less does not align with the goals of NIH research.

**5. Other Comments:**
Junior investigators in particular are going to struggle to support publishing fees and will be forced to aim for only certain journals or to just publish less. Publishing less does not align with the goals of NIH research.

# 766. American Society for Nutrition

**Submit date:** 9/12/2025

**I am responding to this RFI:** On behalf of an organization

**Name:**

**Name of Organization:** American Society for Nutrition

**Type of Organization:** Non-profit Research Organization

**Role:** Organizational Official

**1. Proposed policy options:**
The American Society for Nutrition (ASN) strongly supports open science and believes that publicly funded research should be accessible to everyone. ASN journals ensure high-quality peer review, editorial oversight, and scientific integrity, and ASN is committed to balancing open access with long-term sustainability. ASN's publishing program helps sustain the broader ecosystem of support for the research community through conferences, training, mentoring, and professional development programs.

ASN's Perspective on Option #4

Of the proposed approaches, ASN supports Option #4 as the least harmful path forward. While not without limitations, it gives NIH the flexibility to manage costs without restricting researcher choice. It allows researchers to choose the journals that are best able to reach the target audience for their work.

ASN members have expressed concerns about the affordability of Article Processing Charges (APCs). They also note that the number of articles resulting from a grant can be difficult to predict and may vary considerably depending on the type of research conducted. For example, epidemiological studies often generate a larger number of published articles, relative to the size of the grant, than some other studies.

ASN stresses that none of the proposed options, including Option #4, accurately reflect the true costs of publishing. For example, the European Molecular Biology Organization's (EMBO) has estimated a cost of about $6,400 per paper. In addition, the proposed APC caps in this RFI, at both the article and the grant level, are set below both the 5-year average and median cost to publish in gold open access journals (as identified in the search of the DOAJ database), and in the gold and hybrid-open access journals preferred by researchers (as identified in a search of 1,500 RO1 grants awarded in FY 2025).

If APC caps are set below the real cost of publishing, nonprofit and society publishers like ASN could not sustain their journals. Operating at a loss would threaten the long-term viability of these publications and hinder researchers' ability to share their work and connect with researchers in their field.

Unlike commercial publishers, societies reinvest publication revenue directly into the scientific community. At ASN, these funds support vital activities such as scientific meetings, professional development, mentoring, and training for researchers at all career stages. If publishing revenue no longer covers costs, these programs would be reduced or eliminated --directly harming the very community the policy is meant to support.

Although APC caps are an attractive option, they would not change the direct costs associated with publishing, and they do not guarantee that publishers will lower their APCs as a result. Caps on APCs may limit publication options for researchers at smaller or less well-funded institutions, while those at wealthier institutions could continue to publish in top-tier journals. This imbalance risks reducing fair access to visibility, recognition, and career advancement.

Alternative Option for NIH Consideration

ASN commends the NIH on their recommendation of a hybrid approach that ties APCs to a percentage of the overall grant award. Given the uncertainty inherent in research, ASN also recommends creating a mechanism that would facilitate additional funding of APC funding after results of the research are known. Such an approach would:

- Give researchers flexibility, since some projects produce many papers while others result in fewer, but more complex ones.
- Scale publishing costs to the size of the grant, allowing larger projects to support more publications and smaller projects to fund fewer, but in proportion to their budget.
- Avoid a flat, one-size-fits-all cap, which would put smaller nonprofit publishers at a disadvantage while favoring large commercial publishers.
- Cover the real costs of publishing, including peer review, editorial support, research integrity checks, and post-publication updates, while still encouraging efficiency.

This kind of sliding scale model would strike a better balance between flexibility, fairness, and sustainability, while ensuring NIH-funded research is shared widely and responsibly.

The Real Nature of Publishing Work

Publishing high-quality research carries real and growing costs. The volume of articles coming to publishers is increasing, and the work required to curate, review, and edit each article grows along with it. Publishers are investing in technologies such as AI to help check statistics, detect image manipulation, and screen for plagiarism. However, these tools cannot replace careful human review, especially at this early stage in the adoption and oversight of AI in scientific publishing. The human effort and expertise required to maintain scientific rigor and integrity are essential, and the use of AI tools does not necessarily lower these costs.

Caps on publication costs may also pressure publishers to cut corners on essential quality safeguards, such as peer review, editorial support, research integrity checks, and ongoing curation. These activities are critical to maintaining trust in published nutrition research and should be viewed as necessary investments, not optional extras. Similarly, proposals to pay reviewers only for accepted articles could unintentionally encourage higher acceptance rates, which could compromise the rigor of the review process. Such dynamics risk reducing overall quality and the reliability of the scientific record.

Lower caps would also favor large commercial publishers and predatory journals, who are better able to absorb costs. Smaller nonprofit and society publishers, which provide high-quality, mission-driven services, would struggle to compete. Over time, this could lead to more consolidation in the publishing industry and fewer journal options for researchers.

Finally, APC caps overlook the costs of post-publication work, such as corrections and updates. These activities are critical to maintaining accuracy and trust in scientific research and often take more time and resources than the initial peer review.

Conclusion

For these reasons, ASN believes that Option #4 is the least harmful among the proposed choices. Linking publishing costs to the size of the grant rather than setting a flat cap allows larger projects to support more publications while keeping costs in proportion for smaller projects. Such a model would make use of taxpayer funds wisely, protect author choice, support nonprofit and society publishers, and help maintain the long-term quality and integrity of scientific research.

**2. Available evidence related to publication costs and proposed options:**
ASN recognizes that publishing high-quality research comes with significant costs. Data from organizations such as the European Molecular Biology Organization (EMBO) show that the fees charged per article are often lower than the actual cost of publishing. This means that many journals, including society publishers, would operate at a loss if they relied solely on APCs to cover their expenses.

Capping APCs could unintentionally create a new industry standard. Once a cap is set, APCs below that limit may rise to match the cap, effectively becoming the new norm.

Smaller nonprofit and society publishers, such as ASN, could face additional challenges because publication revenue supports essential activities, including conferences and professional development programs that directly support the research community. APC caps could threaten the sustainability of these programs, making it harder for societies to continue providing these important resources and opportunities to researchers.

Summary

Limits on APCs are meant to lower costs and improve access, but they could also have negative effects. In nutrition science, strict limits could reduce opportunities for researchers to share findings that guide public health, clinical practice, and food and nutrition policy.

ASN supports broad and fair access to research and urges NIH to adopt flexible approaches that reflect the needs of different fields and publishers. Authors should remain free to choose the journal that best serves their science and community. Policies must expand access without lowering quality, creating unfair barriers, or undermining the sustainability of nonprofit societies that play a critical role in advancing nutrition research.

**3. Peer review compensation:**
Peer review is the backbone of scientific publishing and ensures the credibility of nutrition research. ASN believes that introducing payment for reviewers, especially only for accepted articles, could create incentives that compromise review rigor. Nutrition researchers, including experts in areas such as statistics, epidemiology, and clinical practice, already volunteer substantial time and effort to ensure scientific quality. Preserving this culture of voluntary peer review is critical for maintaining trust in published research. NIH policies on publishing costs should recognize and protect the essential role of peer review without introducing financial incentives that could weaken it.

ASN commends ORCID for providing a platform where researchers can receive recognition, validated directly by journals, when a researcher reviews for a journal. ASN's journals seamlessly integrate with ORCID to supply this information to ORCID for all manuscripts where reviewers opt into this. In addition, ASN recognizes all reviewers and exceptionally productive reviewers on an annual basis (https://journals.nutrition.org/top_reviewer_awards). Further industry efforts to recognize researchers' review work could include standardized metrics, not unlike the h-index of authorship.

**4. Publishing best practices:**
Maintaining high-quality nutrition science publishing requires strong safeguards to make sure research is accurate and trustworthy. Publishers must invest in tools such as fraud detection, plagiarism checks, data-sharing systems, and steps to prevent image or text manipulation. Just as important are the contributions of skilled editors and subject matter experts who uphold rigorous scientific standards.

While technology such as AI can help, it cannot replace human expertise and judgment. These practices are essential to protect the integrity of the quality and reliability of published research, and ASN encourages NIH to consider them when deciding if higher publication costs are justified.

**5. Other Comments:**
Maintaining high-quality nutrition science publishing requires strong safeguards to make sure research is accurate and trustworthy. Publishers must invest in tools such as fraud detection, plagiarism checks, data-sharing systems, and steps to prevent image or text manipulation. Just as important are the contributions of skilled editors and subject matter experts who uphold rigorous scientific standards.

While technology such as AI can help, it cannot replace human expertise and judgment. These practices are essential to protect the integrity of the quality and reliability of published research, and ASN encourages NIH to consider them when deciding if higher publication costs are justified.

# 767. American Physiological Society

**Submit date:** 9/12/2025

**I am responding to this RFI:** On behalf of an organization

**Name:**

**Name of Organization:** American Physiological Society

**Type of Organization:** Professional Organization/Association

**Role:** Other

**Role – Other:** Science Policy

**1. Proposed policy options:**
Option 1: Disallowing all publication costs on NIH grants runs counter to the goal of producing gold-standard science. While preprints are a valuable tool for the timely communication of research findings, preprint servers do not offer systematic peer review, copy editing and other safeguards to ensure research integrity and long-term preservation of content. The preprint server for biology, bioRxiv, states in its frequently asked questions that "readers should therefore be aware that articles on bioRxiv have not been finalized by authors, might contain errors, and report information that has not yet been accepted or endorsed in any way by the scientific or medical community." Disallowing all publication costs on NIH grants will disadvantage authors from institutions with fewer resources to help their faculty publish. Some well-resourced investigators may have access to funds for publication, but most do not.

Option 2: Imposing a uniform fee per article is overly restrictive and risks negatively impacting scientific publishing. Publication costs vary widely based on discipline, journal scope, publishing model, volume of content peer reviewed and published, and community needs. APS's cost to publish an article exceeds the amount proposed in this option as well as Option 3. Imposing uniform limits on publication costs will restrict researchers' ability to choose the journals aligned with their work, especially in specialized or interdisciplinary fields like physiology. Physiology is a broad field with many subdisciplines. APS's unique journal program provides channels for authors seeking to share their work with the communities best suited to learn from and build upon their published research.

Limiting publication costs may also drive publishers to prioritize the number of articles published over the quality of the articles. This would disadvantage nonprofit society publishers like APS that are committed to publishing high-quality content rather than publishing high volume.

Establishing a static limit on publication costs without a mechanism for providing increases means that over time inflation will erode society publishers' capacity to innovate and reinvest in their communities.

Option 3: Peer review is a critical and long-standing aspect of professional service for scientists, whether it is review for grant funding or publications. Researchers generously share their time and expertise with the understanding that their own work will, in turn, be thoughtfully reviewed by their colleagues. Reviewers also derive benefits from serving in this capacity, increasing their knowledge of their field, learning about the publication process, gaining recognition among their peers, and creating new opportunities for collaboration and networking.

Compensating peer reviewers, while an area of experimentation for some publishers, is not without the risk of introducing potential bias and conflict of interest and will cause administrative burden. With an average of three reviewers per paper, this approach would require new technology systems to manage numerous new payments and navigate regulatory and currency compliance across global jurisdictions. This would be an unsustainable administrative and financial burden, particularly for smaller publishers.

As proposed, Option 3 does not address how publishers would recoup the cost of peer review of rejected manuscripts. The proposed scope of the request for information specifies that publication costs are only allowable for accepted articles. For journals with both high submission and high rejection rates, this would make fair compensation of peer reviewers especially challenging and could further exacerbate the quality vs. quantity trade-off as referenced above under Option 2.

Option 4: Setting an overall limit on the amount of grant funds that can be used for publication costs could potentially allow the flexibility necessary for authors to select the most appropriate journal option for their research. However, depending on the overall limit, this option may disadvantage highly productive researchers who publish a large volume of articles. NIH should also consider that the frequency of publication may vary between research fields and change over time based on the pace of research findings.

Option 5: Combining per article fee limits and setting an overall cap on the amount of grant funds that may be used for publication costs would carry many of the same concerns raised for Options 2 and 4, in addition to being the most complicated to track and implement.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Peer review is a critical and long-standing aspect of professional service for scientists, whether it is review for grant funding or publications. Researchers generously share their time and expertise with the understanding that their own work will, in turn, be thoughtfully reviewed by their colleagues. Reviewers also derive benefits from serving in this capacity, increasing their knowledge of their field, learning about the publication process, gaining recognition among their peers, and creating new opportunities for collaboration and networking.

Compensating peer reviewers, while an area of experimentation for some publishers, is not without the risk of introducing potential bias and conflict of interest and will cause administrative burden. With an average of three reviewers per paper, this approach would require new technology systems to manage numerous new payments and navigate regulatory and currency compliance across global jurisdictions. This would be an unsustainable administrative and financial burden, particularly for smaller publishers.

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**4. Publishing best practices:**
The White House's May 23, 2025, Executive Order on Restoring Gold Standard Science cites the

importance of reproducibility, rigor and unbiased peer review in restoring trust in the scientific enterprise. APS agrees that these foundational principles are critical to sound science, and they are applied throughout the society's journal program. High-quality scientific publishing requires substantial investment in editorial oversight, peer review and ethics management, content curation, technology infrastructure and long-term preservation.

Peer review

When articles are submitted to APS journals, they undergo a rigorous peer review process led by subject matter experts. APS invests substantially in the infrastructure required to make this an efficient and robust process, including compensating the editors who oversee the peer review of manuscripts. Upon submission of an article to an APS journal, research methods are checked using an external tool that provides an initial measure of rigor and reproducibility. After an article is referred for review, a comprehensive checklist is used by the reviewers to ensure that the research being presented meets standards for rigor and reproducibility. The checklist addresses adherence to requirements for human and animal research; detailed information on the use of cells, antibodies, and other reagents; and standards for presenting data.

Research integrity

Once articles are accepted, they are copyedited and formatted for deposition into repositories as accepted manuscripts. This process is critical for minimizing errors in the published literature. Research published in APS journals also undergoes review for ethical issues to ensure the integrity of the science being published. APS reviews articles for potential ethical issues before publication and is also a key stakeholder in ensuring the post-publication integrity of the scientific record. When concerns about previously published articles are brought to the attention of the Society, APS works with authors and institutions to address and resolve any potential issues. The costs associated with ensuring research integrity are growing over time as technology evolves and new threats to research integrity emerge. Providing these services requires significant investment by APS in technology and human resources.

Innovation

Over the 127 years that APS has served as a community-led scientific publisher, the publishing world has undergone dramatic changes, moving from journals exclusively printed on paper to a digital and online format. APS and other society publishers have invested in developing and implementing the technology necessary to continue publishing high-quality content that serves the needs of the scientific community and the public as those needs evolve. APS, along with many other publishers, have also invested resources in digitizing the historical scientific record. This is only possible when there is a business model available that provides sufficient resources to make these investments.

As detailed above, publishers invest heavily in technology, infrastructure and human resources needed to produce and maintain high-quality scientific literature. Publishing trustworthy high-quality journals costs money. Several of the proposed options would not cover the costs of publication, making it unsustainable for smaller nonprofit U.S. publishers like the APS. Government restrictions on pricing could stifle innovation in publishing models and undermine the financial viability of nonprofit publishers.

**5. Other Comments:**
The White House's May 23, 2025, Executive Order on Restoring Gold Standard Science cites the

importance of reproducibility, rigor and unbiased peer review in restoring trust in the scientific enterprise. APS agrees that these foundational principles are critical to sound science, and they are applied throughout the society's journal program. High-quality scientific publishing requires substantial investment in editorial oversight, peer review and ethics management, content curation, technology infrastructure and long-term preservation.

Peer review

When articles are submitted to APS journals, they undergo a rigorous peer review process led by subject matter experts. APS invests substantially in the infrastructure required to make this an efficient and robust process, including compensating the editors who oversee the peer review of manuscripts. Upon submission of an article to an APS journal, research methods are checked using an external tool that provides an initial measure of rigor and reproducibility. After an article is referred for review, a comprehensive checklist is used by the reviewers to ensure that the research being presented meets standards for rigor and reproducibility. The checklist addresses adherence to requirements for human and animal research; detailed information on the use of cells, antibodies, and other reagents; and standards for presenting data.

Research integrity

Once articles are accepted, they are copyedited and formatted for deposition into repositories as accepted manuscripts. This process is critical for minimizing errors in the published literature. Research published in APS journals also undergoes review for ethical issues to ensure the integrity of the science being published. APS reviews articles for potential ethical issues before publication and is also a key stakeholder in ensuring the post-publication integrity of the scientific record. When concerns about previously published articles are brought to the attention of the Society, APS works with authors and institutions to address and resolve any potential issues. The costs associated with ensuring research integrity are growing over time as technology evolves and new threats to research integrity emerge. Providing these services requires significant investment by APS in technology and human resources.

Innovation

Over the 127 years that APS has served as a community-led scientific publisher, the publishing world has undergone dramatic changes, moving from journals exclusively printed on paper to a digital and online format. APS and other society publishers have invested in developing and implementing the technology necessary to continue publishing high-quality content that serves the needs of the scientific community and the public as those needs evolve. APS, along with many other publishers, have also invested resources in digitizing the historical scientific record. This is only possible when there is a business model available that provides sufficient resources to make these investments.

As detailed above, publishers invest heavily in technology, infrastructure and human resources needed to produce and maintain high-quality scientific literature. Publishing trustworthy high-quality journals costs money. Several of the proposed options would not cover the costs of publication, making it unsustainable for smaller nonprofit U.S. publishers like the APS. Government restrictions on pricing could stifle innovation in publishing models and undermine the financial viability of nonprofit publishers.

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/APS-Response-to-NOT-OD-25-138.pdf

**Description:** Response in the form of a letter from the APS President.

# 768. Boise State University

**Submit date:** 9/12/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Michelle Armstrong

**Name of Organization:** Boise State University

**Type of Organization:** Academic Institution

**Role:** Institutional Information Sciences Professional/Librarian

**1. Proposed policy options:**
With respect to the proposed options, Options 4 (Set a limit on the total amount of an award that can be spent on publication costs) and 5 (Set a limit on both the per publication cost and the total amount of an award that can be spent on publications) do little to curb publisher pricing practices, as they could continue to raise costs, ultimately disadvantaging smaller grants. The per-publication price limit under Option 5 ($6,000.00), in particular, remains unreasonably high especially given the lack of clarity about what such a few actually covers. Options 2 (Set a limit on allowable costs per publication) and 3 (Set a limit on allowable costs per publication and allow a higher amount to be paid when peer reviewers are compensated) appear to create a somewhat more competitive environment for smaller institutions. We have concerns that option 1 (Disallow all publication costs), as proposed, does not adequately address disparities between institutions of different sizes. However, if paired with a requirement for immediate posting in PubMed Central, it could help improve public access.

Overall, we recommend that NIH prioritize elements of Options 2 and 3, with a focus on setting APC limits, while safeguarding smaller grants and less wealthy institutions from disproportionate burdens and providing transparency about what the fees actually support. Additionally, we recommend that any new policy include a review period so NIH can assess outcomes and the impacts on how funded research is disseminated.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Recognizing that peer review is an essential yet undervalued part of the scholarly publishing ecosystem, one option would be to require NIH grantees to participate in peer review as part of their funding obligations. This approach would both broaden the pool of reviewers and recognize peer review as an integral part of the research process.

**4. Publishing best practices:**
If not addressed through other mechanisms, such as data management plans, certain services such as ensuring long-term storage of data or other research outputs may require additional funds. However, when considering the allowability of other publication costs, it is recommended that NIH require publishers to demonstrate transparency and accountability for any charges beyond a baseline APC. Publishers should be expected to provide detailed cost justifications that clearly identify which services necessitate higher fees. Authors and institutions must understand why they are being charged a certain

fee and what services or products are being provided, particularly when the underlying research is supported with taxpayer dollars. Additionally, publishers should guarantee that added costs do not restrict open access or free dissemination pathways. Practices such as blocking repository deposits or charging additional fees for copyright retention should not be permitted. Finally, we recommend publishers should be required to report standardized cost breakdowns to NIH as a condition of APC eligibility. This measure would enable federal oversight, discourage unjustified pricing practices, and ensure that taxpayer funds are used efficiently.

**5. Other Comments:**

If not addressed through other mechanisms, such as data management plans, certain services such as ensuring long-term storage of data or other research outputs may require additional funds. However, when considering the allowability of other publication costs, it is recommended that NIH require publishers to demonstrate transparency and accountability for any charges beyond a baseline APC. Publishers should be expected to provide detailed cost justifications that clearly identify which services necessitate higher fees. Authors and institutions must understand why they are being charged a certain fee and what services or products are being provided, particularly when the underlying research is supported with taxpayer dollars. Additionally, publishers should guarantee that added costs do not restrict open access or free dissemination pathways. Practices such as blocking repository deposits or charging additional fees for copyright retention should not be permitted. Finally, we recommend publishers should be required to report standardized cost breakdowns to NIH as a condition of APC eligibility. This measure would enable federal oversight, discourage unjustified pricing practices, and ensure that taxpayer funds are used efficiently.

# 769. University of Arizona

**Submit date:** 9/12/2025

**I am responding to this RFI:** On behalf of an organization

**Name:**

**Name of Organization:** University of Arizona

**Type of Organization:** Academic Institution

**Role:** Organizational Official

**1. Proposed policy options:**

- Proposed ceilings/caps will turn into floors. In all likelihood, most prestige journals will keep their very high APCs, and many researchers, particularly early career, will not be able to cover the difference between the grant cap and the APC. Journals that are currently charging lower APCs will likely raise their fees to match any cap/max allowed by NIH.

- Caps look to be static. They would need to be revisited often unless they are somehow tied to market indicators (inflation, etc.).

- In addition to allowable caps, NIH should expand its own open access infrastructure (including ingest services). An expanded federally supported infrastructure would more equitably support the research community and result in predictable operational costs rather than publisher-created/inflated per-article fees.

- The NIH already has existing pathways for meeting public sharing requirements, and they should be fully enforced and supported. The NIH could require all funded researchers to deposit copies of their Author Accepted Manuscripts into PMC immediately upon journal acceptance. (This option is already available and exercised, but many researchers are unaware that they hold the rights to their AAMs and that depositing them into PMC/GenBank, etc., meets public access policy sharing requirements.).

- Work that has been conducted under an NIH research project should be eligible for publication support after the grant has ended as many projects continue to generate publishable manuscripts after the official end-date.

- A cap on total amount allowed per grant is the best of several options that may have unintended consequences. It would allow flexibility.

- There is a cost associated with publishing, which should be allowed. Non-profit publishers, including those who are also technical societies, view publishing costs as a necessity for covering required costs to provide a service to their community. For-profit publishing companies will charge what the market can bear. It should be considered that there are very different models in the publishing world.

**2. Available evidence related to publication costs and proposed options:**

Average cost for publication may be skewed by some free options. It is common for new journals to waive publication costs to incentivize submissions. Care should be taken to only use expected publishers article publishing charges when calculating averages.

**3. Peer review compensation:**
Most reviewers review for journals they publish in, as a "payback" of sorts. Rewarding journals that pay reviewers may simply lead to the unintended consequence of "rings" that submit and review each other's submissions.

**4. Publishing best practices:**
- Publishers are already passing down the costs of these additional processes/systems to content subscribers (such as university libraries and hospitals), increasing license costs by 4-7% annually, which is greater than the average national inflation rate.

- All reputable publishers are incurring additional costs for fraud detection and ethics. This will simply be an additional cost, which must be compensated in some way.

**5. Other Comments:**
- Publishers are already passing down the costs of these additional processes/systems to content subscribers (such as university libraries and hospitals), increasing license costs by 4-7% annually, which is greater than the average national inflation rate.

- All reputable publishers are incurring additional costs for fraud detection and ethics. This will simply be an additional cost, which must be compensated in some way.

## 770. Cleveland Clinic

**Submit date:** 9/12/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** blair barnharthinkle

**Name of Organization:** Cleveland Clinic

**Type of Organization:** Other

**Type of Organization - Other:** Hospital system

**Role:** Other

**Role – Other:** Director, Government Relations

**1. Proposed policy options:**
Attached please find our comment letter.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/9_12_2025-NIH-RFI-Publishing-Costs_FINAL.pdf

**Description:** Cleveland Clinic Comment letter

# 771. William Howe

**Submit date:** 9/12/2025

**I am responding to this RFI:** On behalf of myself

**Name:** William Howe

**Name of Organization:** Virginia Tech

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I believe Option 4:  Set a limit on the total amount of an award that can be spent on publication costs, but not a limit per publication, would provide the most flexibility for researchers across publication outlets

**2. Available evidence related to publication costs and proposed options:**
Many publications in leading journals exceed $6,000.  Investigators should not avoid these journals, as they require a  rigorous in their review process that helps insure robustness of reported findings, their replicability, and are invested in explaining the broader importance of the work to taxpayers and non-scientists.

**3. Peer review compensation:**
Peer review is an enormous time commitment, reviewers should be compensated a rate commensurate with this personal investment.

**4. Publishing best practices:**
Fraud detection is needed more now than ever.  Journals will also likely need to staff experts in computer programming, machine learning, and data analysis to appropriately vet the approaches to inference applied to large datasets that are becoming scientific standards.

**5. Other Comments:**
Fraud detection is needed more now than ever.  Journals will also likely need to staff experts in computer programming, machine learning, and data analysis to appropriately vet the approaches to inference applied to large datasets that are becoming scientific standards.

# 772. University of Minnesota Libraries

**Submit date:** 9/12/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Lisa German, Dean

**Name of Organization:** University of Minnesota Libraries

**Type of Organization:** Other

**Type of Organization - Other:** Academic Library

**Role:** Institutional Information Sciences Professional/Librarian

**1. Proposed policy options:**
We recognize the appeal of capping the amounts NIH will cover for APCs; however, after evaluating the options we agree with the statement in the Supplemental Guidance to the 2024 NIH Public Access Policy: Publication Costs (NOT-OD-25-048 https://grants.nih.gov/grants/guide/notice-files/NOT-OD-25-048.html) that "establishing a particular threshold for what is reasonable may lead to inequitable outcomes in specific circumstances."

We are concerned that setting limits could lead to science becoming a "pay to play" field, where publication becomes attainable only for financially well off scientists, rather than for publication of solid science. Although the proposed limits in Options 2, 3, and 5 ($2000 to $6000) are higher than the overall average of DOAJ journals, DOAJ includes many journals that would not be relevant for NIH-funded work, such as journals that publish research on education, history, literature, or linguistics.

As we note in our response to RFI Item 2, the average APC for the DOAJ-listed journals UMN authors have published in was $3363 in 2024. If the NIH limits coverage to $2000 or even $3000, many authors would need to find additional funding or pay out of pocket to continue to publish in many journals that they have identified as appropriate outlets for their NIH-funded work. Even with a higher limit, some APCs will be out of reach.

And even low APCs are still barriers that are "unrelated to merit, and obstruct progress" for many authors. They tilt the playing field and can prevent high quality science from being shared with the audiences who need it (BOAI 20th anniversary statement).

We do acknowledge that in some open access business models, APCs are the only way to cover the costs of publishing. So it is reasonable to pay APCs sometimes. But without knowing the true costs of publishing, there is no clear basis for establishing an allowable cost limit. A 2021 analysis suggests the actual cost of publishing to be around $600 per article (Grossmann, A., & Brembs, B. (2021). Current market rates for scholarly publishing services. F1000Research, 10, 20. https://doi.org/10.12688/f1000research.27468.20). Prior efforts from funders to gain a better understanding of these costs have led to limited insight. For example, although Plan S called for publishers to share the breakdown of their publication costs (see the Plan S Price Transparency Framework https://www.coalition-s.org/price-and-service-transparency-frameworks/), many publishers did not participate (only two of the five largest publishers did: Wiley and Sage) Similarly, Plan S's Journal Comparison Service (https://www.coalition-s.org/journal-comparison-service), which intended to

provide information to libraries and research funders on the costs of open access publishing, had limited success, with only 549 journals participating

Commercial publishers have been particularly resistant to providing detailed costs of publishing. In some cases, they have made it clear that their APC prices are based not on costs, but on what they believe the market will bear. Wiley has stated, “APCs are set according to careful market analysis of the journal’s subject area including the availability of funding for APCs, community support for OA, and the positioning of the journal relative to competitors […] and other titles within the relevant subject community.” (https://web.archive.org/web/20230119161458/https://www.wiley.com/en-us/network/publishing/research-publishing/editors/maximizing-the-transition-to-open-access-your-questions-answered) Taylor & Francis sets "APCs based on funding patterns within the field, as well as benchmarking against APCs on related journals to ensure that rates are realistic for communities” and that “the geography of submissions allows us to price fairly to market.” (https://web.archive.org/web/20221004131122/https://taylorandfrancis.com/our-policies/open-access-pricing/). With prices decoupled from costs, setting limits on publication charges may have unpredictable consequences. Among others, a cap may providing publisher who are otherwise limiting APCs to publication costs, a new justification for increasing their APCs to whatever the set limit is.

We will provide comments for each of the five options NIH identified to Maximizing Research Funds by Limiting Allowable Publishing Costs and four additional options NIH might consider. However, our opinion is that none of the options here are the best route for maximizing public access to science and effective use of taxpayer money. Instead, we propose alternative options for NIH to consider to help create more equitable and sustainable paths to public access. We believe two of these options are possible to implement quickly and will limit unintended consequences. Option A, which encourages NIH to deemphasize journal impact factor associated with publishing in outlets with high APCs during grant proposal review, potentially by redacting journal names or requiring authors to list APC costs alongside each publication in biosketches. Option B, which encourages NIH to limit APC funding only to journals that are fully open access, eliminating the payment of APCs to hybrid journals in which NIH funded articles could be made open access through the Government Use License.

Option 1: Disallow all publication costs.

Disallowing grant funding to be used for any publication costs would align NIH with grant-making organizations such as the Bill and Melinda Gates Foundation, which implemented a new open access policy in 2025. Their policy requires authors to share their work as a preprint on an appropriate, recognized preprint server, such as those listed at https://asapbio.org/preprint-servers.

Disallowing coverage of all publication costs would ensure that NIH research funding is used for conducting research. As is the aim of NIH's goal of maximizing research funds by limiting allowable publishing costs, UMN Libraries support open access models that allow researchers to preserve their funding for direct research activities rather than for publication fees.

There are existing alternatives to APC-based open access. The long-standing Government Use License, and some institutional open access licenses, can be used to make some articles available. "Diamond" open access journals provide a path with no reader- or author-facing fees. The Directory of Open Access Journals includes more than 13,500 journals that have no author fees.

In addition to diamond OA, some journals have had great success with the Subscribe-to-Open model in which institutions continue to subscribe to journals and if a threshold number of subscribers is met, the journal offers free reading access and fee-free publishing for all authors, not just those at institutions who can afford to participate. (https://oad.simmons.edu/oadwiki/Subscribe_to_Open_(S2O)_journals ).

Despite these structures that provide alternatives to APC-oriented open access, there is a strong potential for negative effects if the NIH were to disallow NIH funding to be used for any publication costs. There are some costs to publishing, and without the ability to use some grant funds for publication, some funded research will face significant new barriers to publication and public impact.

Diamond OA has only recently become a major focus of the OA movement. At this time, despite the proliferation of fully OA journals that do not charge APCs, there may still be cases where the best outlet for the research—to reach the most appropriate audience—requires an APC. Per existing guidance (NOT-OD-25-048), NIH encourages authors to consider the "relevance of the journal in communicating findings to advance science and/or improve health outcomes" and the "suitability of the journal's target readership for the dissemination of the content." Sometimes APCs are the only realistic means of funding a fully OA journal.

Option 2: Set a limit on allowable costs per publication.

Option 2 would cap the allowable cost at $2000 per publication. As the RFI notes, this is higher than average APC across all journals in DOAJ. However, it is lower than the average APC for journals published in the US, lower than the estimate based on R01 applications, and lower than the $3363 average APC for DOAJ-listed journals in which UMN authors published.

A cap of $2000 may be reasonable to cover the costs of publishing, but as we note in our response to Item 2, without accurate data from publishers about their costs, we cannot determine if this amount is sufficient.

From our publishing data, we can see that limiting the allowable cost to $2000 would negatively affect NIH-funded University of Minnesota researchers by restricting their publishing options. The average APC of the DOAJ-listed journals in which they published in 2024 was $3363, meaning researchers would face a shortfall, on average, of $1363 to continue to publish in the same DOAJ-listed journals they have previously. Paying out of pocket may be possible for some researchers, but is out of reach for many. This would become more burdensome the more publications that result from their grant, and might limit the availability and impact of research that otherwise would have produced numerous publications.

Option 3: Set a limit on allowable costs per publication and allow a higher amount to be paid when peer reviewers are compensated.

Option 3 incorporates changes in publisher operations with a higher publication cost limit. We have similar concerns about setting a limit for Option 3 as for Option 2.

We appreciate NIH's desire to promote changes in the publishing system that would recognize the direct financial benefits publishers receive from unpaid peer review. A 2021 study estimated that the total amount of time researchers worked to conduct peer review of journal articles was over 100 million hours in one year, with US researchers potentially providing over $1 billion of their time (Aczel, B., Szaszi, B., & Holcombe, A. O. (2021). A billion-dollar donation: estimating the cost of researchers' time

spent on peer review. Research integrity and peer review, 6(1), 1-8). This labor is typically considered to be part of the "service" responsibilities for faculty members; yet publishers, who receive direct benefits, do not contribute to faculty salaries.

It has become increasingly difficult to find qualified peer reviewers who are available and willing to review for journals (For an overview, see Huisman, J., & Smits, J. (2017). Duration and quality of the peer review process: the author's perspective. Scientometrics, 113(1), 633-650). Although providing compensation for peer review work might improve the ability to recruit reviewers, we foresee a number of issues with Option 3.

As noted in Option 2, most publishers have not provided detailed costs of publishing, with some openly stating that their prices are based on what the market will bear, not actual costs. This lack of clarity extends to understanding the cost of managing peer review, which publishers may exploit to maintain their profits. Publishers might increase their APC and justify it by pointing to new requirements for paying for peer review. NIH could counter this by requiring publishers to provide more transparency for their costs versus prices by requiring justification for the rates at which they compensate peer reviewers, but similar past efforts have seen little success. See our discussion in Item 5 for more on the lack of success Plan S had with this.

Additionally, the $3000 figure is based on an assumption that each article requires $1000 of labor from peer reviewers. The estimate of 6 hours of work for each of three peer reviewers per article does not take into account the number of articles that go through peer review but are ultimately rejected or go through multiple rounds of peer review. Acceptance rates vary widely across journals, but Aczel et al. estimated that 45% of articles that go out for peer review are ultimately rejected. Even an OA "megajournal" like PLOS One that aims to publish sound science regardless of the novelty of the findings has an acceptance rate of roughly 30% (https://journals.plos.org/plosone/s/journal-information); higher prestige journals have acceptance rates in the single digits. Since nearly all journal articles go through more than one round of peer review, it is not clear if $1000 is an appropriate amount of compensation per article.

Finally, some editors and researchers have concerns that paying reviewers would have an effect on the quality of their review. One recent study examined whether paying peer reviewers affected the quality of reviews and found no difference in the proportion of articles that were ultimately accepted and that all reviews were rated as helpful by the journal's academic editors (Cotton, C. S., Alam, A., Tosta, S., Buchman, T. G., & Maslove, D. M. (2025). Effect of monetary incentives on peer review acceptance and completion: A quasi-randomized interventional trial. Critical Care Medicine, 10-1097), but this topic has not been studied in depth.

Option 4: Set a limit on the total amount of an award that can be spent on publication costs.

Option 4 puts a limit on the total amount of grant funding that can be spent on publication charges over its lifetime, without any limitation per article.

We see many potential issues with Option 4. The $20,000 or 0.8% amounts are based on averages and as such, many grants could fall extremely below or above this average. The data from FY25 R01 applications showed wide variation in the number of publications expected per the life of the grant and expected costs per publication. For grants with very high numbers of article outputs, $20,000 over the

life of a grant may not be sufficient. And for a smaller grant of less than $250,000, a cap of 0.8% might limit them to publishing only one article, or force them to settle for a less prestigious publication venue.

The estimates of APC and number of articles are based on data from R01 grant applications, but there are many other grant types that are subject to the policy and this estimate may not be sufficient or truly representative of the range of NIH-funded research.

Additionally, basing the estimate off of applications may underestimate actual costs. We often hear from researchers that they have underestimated publication costs because they are not sure of how many publications their grant will result in, where the best outlets will be for their work, or which journals will accept their work.

If NIH pursues this route, it would be useful to consider:

1) Over the last five years, how many articles were published per grant?

2) What has been the difference between the proposed costs of publication and the actual costs once the grant has been executed?

Option 5: Set a limit on both the per publication cost and the total amount of an award that can be spent on publications.

Option 5 combines the limit on total amount of grant award available for publication costs with a limit on per publication costs, but with a higher acceptable APC than options 2 or 3.

Option 5 would provide similar benefits as Option 4, but would have the same drawbacks as previous options, and raises additional concerns.

Although authors would have more options for where to publish without paying out of pocket than Options 1 through 3, the basis for a $6000 limit per publication is unclear. As described above, many APC prices are not based on costs. Without having an understanding of the true costs of publishing an open access article, it is not possible to assess whether $6000 is a reasonable amount.

Setting a high cap would also enable more publishers to increase their APC price and remain under the maximum. Of the journals in DOAJ that charge APCs only 24 have an APC of $6000 or more and over 7700 have an APC less than $6000 (i.e., room to increase their APC and still remain under the NIH limit).

Alternative options

We suggest four additional options for consideration. We believe that Options A and B/B2 provide the most immediate opportunities for NIH to reduce publication spending. Option C will require longer time frames and a different kind of investment from NIH.

Option A: Modify NIH evaluation criteria

This option would be implemented through NIH grant evaluations. Researchers often aim to publish their research in the highest profile journals, specifically those with a high Journal Impact Factor because this metric is often used as a proxy for the quality of the research. However, these journals tend to have very high APCs. For example, Nature's APC is $12,690 and their fully open access Nature Communications has an APC of $6,990; the APC for Cell is $11,400; and the APC for Science Advances, AAAS fully OA journal, is $5450. We would like to note that AAAS allows for compliance with the zero-

embargo NIH policy through the sharing of the AAM, which ties into our Option B/B2 (https://www.science.org/content/page/science-journals-editorial-policies#access-policies ). If NIH were to de-emphasize the weight of the journal title and focus on the quality of the research itself, grantees may be encouraged to publish in journals with lower publication fees that will still reach their intended audience. We suggest one way NIH could do this is by redacting journal names in Biosketches or requiring authors to list the APCs next to journal names, and encouraging reviewers to judge the merit of the research independent from publication venues, or to include the cost of such publications in the evaluation. Challenges would remain, as it is the academic rewards system broadly that encourages authors to publish in these high profile journals, not just their grant funder's policy; however, simply having NIH grant funding is a beneficial metric for many researchers.

Option B: Limit funding for hybrid journal publication costs

Instead of disallowing any publication cost, NIH could limit funding to hybrid access journals, allowing funding to be used only for APCs for fully open access journals.

The Government Use License (2 CFR 200.315) allows authors to make their articles available in PubMed Central without paying a fee. Disallowing hybrid APCs would help emphasize for authors that the APC is not required to comply with NIH's policy and signify to publishers that NIH will not support their extractive business models.

Hybrid journals (i.e., subscription-based journals that offer authors the option to pay a fee to make their individual article open) currently enjoy two revenue streams: subscriptions and APCs. The original purpose of the hybrid option was to provide a gradual path for journals to move to being fully OA. This has not happened in the last 20 years. Aside from a few rare exceptions, hybrid journals have not decreased their subscription prices; these journals "double dip" by taking payments for the same article by charging an APC and subscription costs. (See more at https://www.lib.umn.edu/services/open-access/author-fees)

APCs tend to be higher for hybrid journals, despite the APC being additional income on top of journal subscriptions. There is no reason to believe that hybrid open access publishing is more expensive than publishing in fully OA journals, nor that commercial publishers have higher costs for publishing than others; it is the prices that are set higher. The BOAI 20th Anniversary Recommendations neatly capture the opacity of publisher pricing: "[w]hen the author can publish the same article elsewhere, the justification cannot be that the payment improves the article's quality. Nor does the payment improve the article's quality when its purpose is to pay for a journal's brand, prestige, or metric scores. Those fees don't pay for improved quality, but for the perception of improved quality." (https://www.budapestopenaccessinitiative.org/boai20/).

However, as with other options, there is the chance for unintended consequences. Publishers could decide to change their business model for more journals to switch to fully open access with APCs, and although APCs for fully OA journals have tended to be lower than for hybrid journals, this switch would mean that more authors would be unable to rely on the Government Use License and be required to pay an APC.

Option B2: Require equal treatment of researchers who have NIH funding

Although we have yet to see many journals flipping from hybrid to full OA, we have already seen, since the implementation of the updated NIH Public Access Policy in July, publishers changing their practices to force NIH-funded researchers to pay APCs.

Publishers such as American Association for the Advancement of Science, Emerald, and Sage have policies that allow for immediate deposit of the AAM into PMC, but publishers like Springer Nature have made it clear that they require NIH-funded researchers to pay APCs (https://www.springernature.com/gp/open-science/us-federal-agency-compliance).

Whether Springer Nature and Elsevier's new practices are in line with the current NIH Public Access Policy is already questionable under the Supplemental Guidance: Publication Costs issued in December 2024. The Guidance states that "Costs for publishing services that are charged differentially because an Author Accepted Manuscript is subject to the NIH Public Access Policy or the work is the result of NIH funding are unallowable because charges must be levied impartially on all items published by the journal, whether or not under a federal award (GPS 7.9.1)" (Notice Number NOT-OD-25-048). Publishers may argue that the fee is not specific only to NIH, but we question whether that is true, given that we have only seen this practice since the updated Public Access Policy went into effect.

NIH could choose to implement both a policy that prohibits the use of NIH funding to pay publication costs (APCs) for journals whose publishers charge authors a fee to upload their AAM to PMC. We propose Option B2 as a corollary to B because NIH could apply such a policy for only hybrid journals, or they could also disallow the use of NIH funding for fully open access journals for any publisher that implements a fee for the permission for authors to share either AAM in PMC.

Option C

NIH could invest funding in supporting infrastructure that enables public access to the research that it funds.

Repositories are a time-tested and robust means of enabling public access to research output, independent of publisher policies and practices. Additional funding for PubMed Central could be used to upgrade systems and provide more staff to support grantees and their uploading of published research.

Additionally, rather than paying for the costs of publishing through support of individual publication charges, NIH could investigate opportunities to directly support existing open-source, community-led publishing tools and platforms, and development of new resources in these areas. This would reduce the cost of production for scholarly articles by shifting control away from publishing companies that may have priorities other than cost-effectiveness, and goals that do not align with what is best for the research community.

Research article production costs can include copyediting, creating templates and laying out articles (or for developing automated layout workflows), figure and table development, producing JATS XML, accessibility remediation, and hosting, maintaining and developing journal management systems. A journal’s production capabilities can have an impact on readers’ perception of the quality and credibility of the research itself. Research indicates that scholars expect credible articles to look a certain way—and that when the look and feel of an article does not align with those expectations, their perception of the quality of that research can be affected (Barness, J., & Papaelias, A. (2021). Readable, serious, traditional: Investigating scholarly perceptions of the visual design and reading experiences of academic

journals. She Ji: The Journal of Design, Economics, and Innovation, 7(4), 540-564). While NIH itself focuses on scientific rigor when evaluating journals for inclusion in PubMed Central, some production-related elements are also part of that evaluation.

While commercial publishers can choose to reinvest APC revenue into the development of proprietary production tools and workflows, diamond open-access publishers, and other cost-effective open-access publishers may be less able to invest in maintaining and developing their infrastructure. Instead, they may rely on community-led, open-source tools.

Investing NIH support in open-source community-led publishing infrastructure would align NIH with global efforts for sustainable open access. In our response to Item 5 we discuss Plan S, a plan created by a group of primarily European national funding bodies. Their initial approach towards their goal of reaching 100% open access publishing by 2024 did not succeed. They acknowledged that the APC-based approach they took did not lead to a system of research dissemination that was "responsible, equitable, and sustainable" (https://www.coalition-s.org/blog/five-years-of-plan-s-a-journey-towards-full-and-immediate-open-access/). Efforts have now turned towards supporting diamond OA, through the European Diamond Capacity Hub (https://diamas.org/about). In South America, Redalyc (https://www.openaccessweek.org/theme-profiles/redalyc) and SciELO (https://www.scielo.org/en/about-scielo/program-publication-model-and-scielo-network/) provide successful examples of long-running, non-commercial diamond open access infrastructure. Also, last September, Open Research Europe chose the Open Journal Systems (OJS) from the Public Knowledge Project (PKP) as its underlying platform. This selection came with financial support, which will enable PKP to develop new features. The sponsored development of these new features will not only benefit European researchers and European open access publishers, but also more than 44,000 journals worldwide that use the OJS platform (https://pkp.sfu.ca/2024/12/18/pkp-for-ore/).

NIH could investigate similar opportunities to sponsor the development of production tools for open access publishing. While this option would be unlikely to lower all APCs equally—as previously discussed, some publishers already elect to set APCs based on what they believe the market can support rather than the true cost of production—it could support the sustainability of a robust diamond open access ecosystem, creating new opportunities for low- or no-cost publishing and potentially undercutting market support for high APCs.

**2. Available evidence related to publication costs and proposed options:**
The University of Minnesota (UMN) Libraries strongly supports NIH's aim to maximize the amount of government research funding spent on research processes, while minimizing the amount spent on making research available to researchers and the public. Based on our extensive experience with and research into open access publishing models, we have developed a set of open access (OA) principles and values that clearly align with NIH's goals. There is particularly strong alignment around support for and investment in models that enable researchers to preserve their funding for direct research activities rather than for publication fees; use transparent, fair pricing structures that pay for the cost of scholarly publishing and reasonable service development, helping us meet our obligations to be responsible stewards of budgets; and eliminate the revenue stream of article processing charges (APCs), which are often paid on top of subscriptions.

Below, we explore some data and experiences at the University of Minnesota that provide evidence that fee-per-article open access models, which currently dominate much of the research publishing landscape, do not optimize spending on research activities and processes versus research distribution.

University of Minnesota 2024 publishing data

Of the 8,500+ research and review articles published by UMN researchers in 2024, approximately 25% (roughly 2,200 articles) acknowledged NIH funding. (Just over half of UMN's articles acknowledged funding from any federal source.)

Approximately one-third of NIH-funded UMN researchers have met their public access requirements by publishing in fully open access journals. These journals may require a fee for every article that is published and typically use those fees as the main funding source for the journal (as opposed to hybrid journals in which paying a fee is usually optional, and in which open access fees are often an additional revenue stream on top of subscription fees). The average APC for UMN-authored articles with NIH funding published in fully OA journals listed in DOAJ was $3363, which is significantly higher than the overall average of DOAJ-listed journals as provided in the Request for Information (RFI) ($1,235.51; $2,176.84 for US-based journals) and higher than the proposed limits in NIH's Options 1 through 3.

The majority of UMN-authored NIH-funded articles (65%) published in 2024 were published in hybrid open access journals; these articles would likely be eligible for deposit in PubMed Central (PMC) by relying on the existing Government Use License (2 CFR 200.315). Only approximately 40% (approximately 572 of the total 2200 articles with NIH-funding) of these were published open access, demonstrating that many authors have not been using funding to pay open access fees unless required by a fully OA (non-hybrid) journal. Authors have been in compliance with the NIH public access policies, but have thus far been able to do so without paying per-article open access fees.

The number of UMN-authored articles published OA in hybrid journals in 2024 was higher than in earlier years (e.g., in 2022, 17% of articles that acknowledged NIH funding were published OA in hybrid OA journals) due to participation in so-called 'transformative agreements' (agreements between institutions or consortia and publishers that include subscription access and open access publishing) with publishers. These agreements have proven costly, have had net negative effect on the publishing system, serving as a way for publishers to take in additional income without providing additional services beyond simply making an article open access, and have not induced a "transformation to open access in many journals". These agreements have an uncertain future and cannot not be relied upon for complying with NIH requirements in the future. Additionally, although some "transformative" agreements cover fully OA journals, they primarily focus on hybrid journals, which, again, already have a route to compliance with NIH funding through reliance on the Government Use License. We provide more on the topic of transformative agreements in our response to Item 5.

Green Open Access and Government and Institutional Licenses

"Green open access" is a longstanding route to open access that does not require per-article fees, typically by some party retaining rights to provide access to a published article separately from the copy published in a journal. Originally, green OA involved authors negotiating their publication agreements to retain rights, a process that does not have direct fees attached, but can be challenging and burdensome for individuals. Some publishers responded to earlier NIH public access policies by creating overarching

policies that enabled green OA more efficiently; however, other publishers created similar-sounding policies that made no-fee options much more administratively burdensome than for-fee options, to drive authors toward fee-based options. Many research institutions created local policies that helped reduce burdens on individual researchers by creating an institutional open access license; the University of Minnesota has had such a policy in effect since January 1, 2015. The UMN Libraries strongly support green OA along all these no-fee paths, by encouraging authors to retain rights to their published work, educating authors about how to use the UMN Open Access Policy, and maintaining our institutional repository.

Our Open Access Policy is comparable to the Government Use License: the University retains a non-exclusive license to authors' scholarly articles that enables deposit to non-commercial repositories. The policy does allow authors to request a waiver of the University's license, an option created in anticipation that some publishers would not want to allow the University's license to remain. Some publishers have suggested in recent months that relying on a license like this to provide open access to research is fundamentally incompatible with their publishing function. But in the last 10 years, we have had fewer than twenty-five requests for waivers with more than 50,000 articles published—suggesting it has not seemed to be an issue for publishers in practice.

Article processing charge funds

As publishers guided authors away from green OA options, article processing charge (APC; per-article fees for open access) developed into a more significant research publishing option. However, APC models began to present challenges for researchers with limited access to external funding for publication fees. This can include early-career researchers, researchers in disciplines with less available research funding, and crucially, many researchers with grant funding who continue to publish findings after the lifetime of the grant. Like many organizations and institutions, UMN explored ways to support researchers facing these challenges, through a fund supporting payment of individual APCs. We found that direct support of individual fees was not a particularly effective use of research funds: while it did achieve open access for some articles, it was not scalable or sustainable.

This fund was jointly supported by the Libraries and the Office of the Vice President for Research. At its largest, the fund contained $40,000, but even $40,000 supported a negligible portion of the overall research output of the University. The fund was expended quickly each time it was opened for applications—often in less than a year—despite being available only to authors who had no other funding sources. We added restrictions such as limiting to only fully OA journals and only disbursing $2000 per author annually, but it did not slow the tide of applications, and it did increase the overhead costs (e.g., staff time) of the fund. And even over the few years the fund was operating, ever increasing APC prices (a recent study reported that 89% of more than 5,800 journals increased their APCs between 2019 and 2023, 40% of which increased 19% above inflation) (Butler, L. A., Hare, M., Schönfelder, N., Schares, E., Alperin, J. P., & Haustein, S. (2024). An open dataset of article processing charges from six large scholarly publishers (2019-2023). arXiv preprint arXiv:2406.08356), meant that $2000 covered increasingly smaller portions of the total APC. For high output institutions like UMN, it is simply not possible to pay individual APCs for each article our authors publish.

UMN Libraries Publishing

By contrast to per-article-fee-based open access, the Libraries at the University of Minnesota has found that our library publishing program is a more sustainable way to support open access. In addition to open education resources and open monographs, this program publishes approximately a dozen scholar-led journals—the vast majority of which are diamond open-access journals (i.e., they do not charge author fees and distribute work under open, Creative Commons licenses). One of our journals, INNOVATIONS in pharmacy, is currently included in PubMed Central.

Our yearly Libraries publishing program budget (excluding staff salaries) is approximately equivalent to the cost of just 16 APCs, based on the average APC for DOAJ-listed journals charged to NIH-funded UMN authors. There are certainly costs that are not accounted for in this figure, including staff time, time spent by developers outside of our institution to maintain the open-source infrastructure projects on which our program relies, and the time spent by volunteer editors. However, these costs have not expanded at a rate anywhere that by which APCs have increased, and the Libraries' continued financial support of this program underscores our assessment that diamond open access can be a more cost-effective use of public funds than paying APCs to traditional, for-profit publishers.

**3. Peer review compensation:**
Please see our comments on Option 3 above. To reiterate, it would be difficult to determine the appropriate amount of compensation, to whom it would be paid, and under which conditions reviewers would be paid. Peer review is still an opaque and variable process so it is difficult to estimate the amount of labor.

1) Journals generally do not report on how many reviews an individual article receives.

2) The number of reviewers per article varies, by discipline, by journal, and by article.

3) Estimates of the amount of labor are based on a series of assumptions that introduce a high level of uncertainty. Journals do not ask researchers to report how long they take to provide a thorough review.

4) Acceptance rates vary across journals and disciplines. Some of the highest prestige journals have acceptance rates of less than 10%. The same amount of work is expended to accept or reject an article (and more work is expended on a revision process, which can still result in rejection). Tying APC support to peer reviewer pay may incentivize unpredictable changes in acceptance/rejection rates.

5) For articles that are revised and submitted to the same journal for additional rounds of review, the journal could expect peer reviewers to conduct all of the resubmission cycles for one fee. However, a journal may reject thousands of articles outright and thus receive no APC income for the article.

A process for how reviewers would be paid would be difficult to establish:

1) Would the fees apply only to OA articles for which authors anticipate using NIH funding to pay an APC? For both hybrid and fully OA journals?

2) Would all journals be expected to compensate reviewers, or only those that charge an APC of more than $3,000?

3) Would NIH track price increases to see if journals increase their APCs (perhaps saying they must because they now pay peer reviewers)?

4) Would the payment go directly to the reviewers? Or would it go to their institution?

5) Would the expectation be that the reviewers use the money to pay for additional APCs they may incur?

In practice, for the researcher-author, the connection of payment of an APC is not directly related to the peer review labor they provide. There are relatively few journals that pay peer reviewers directly, but some do offer discounts; for example, IOP Publishing provides a (10%) discount on APCs for authors who have reviewed for their journals (https://publishingsupport.iopscience.iop.org/questions/article-publication-charge-discount-for-reviewers/). However, authors do not necessarily publish in the same journals they review for, so such a discount may not be useful.

Although many publishers have sophisticated systems that would enable them to pay peer reviewers, there are also many journals (often more cost-effective or cost-transparent ones) that would not be able to afford to do this (especially many that are listed in DOAJ, which already charge APCs of less than $1000). And it is highly unlikely that any journal would be able to implement such a system by January 1, 2026.

Finally, there is limited evidence on the effect of paid peer review on the quality of the reviews. We cited one study with positive results in our discussion of Option 3, but there is potential for negative consequences. Consider if a journal paid only reviewers of articles that were accepted (which was not the case in the study). Reviewers might be incentivized to recommend articles be accepted that they might otherwise have rejected.

**4. Publishing best practices:**
We recommend against investing in automated fraud detection capabilities for the following reasons:

1) These tools are often based on generative AI, and usually on a general-purpose language model without narrow subject-specific modulation. General-purpose models are unable to review materials with the level of nuance that experts in a research field can provide. 2) Many fraud-detection tools, AI-based or otherwise, retain copies of any materials they evaluate. This breaks the traditional trust of confidentiality between authors, journals, and peer reviewers. It also creates technical glitches such as an article which was reviewed and rejected by one journal, but retained by a fraud-detection system, getting incorrectly flagged as plagiarism upon (appropriate) submission to another journal. 3) Automated fraud-detection systems have high rates of both false positives and false negatives—they incorrectly flag some materials that should be published, while allowing others through that should have been flagged. They provide a false sense of security and efficacy.

Alternatively NIH could could prioritize support for not-for-profit publishers over commercial publishers. Publishing has become a lucrative industry (e.g., Wiley's projected profit margin for 2025 was 23-24% https://www.publishersweekly.com/pw/by-topic/industry-news/financial-reporting/article/97263-wiley-expects-steady-profit-improvement.html). Butler et al. estimated that the "big five" academic publishers (Wiley, Elsevier, SpringerNature, Taylor & Francis, and Sage) took in over $1 billion in APCs over the three year period 2015 to 2018. This is on top of their existing subscription income. APC prices increased at a rate three times the rate of inflation from 2005 to 2018 and have continued to increase (Khoo, S. Y.-S. (2019). Article Processing Charge Hyperinflation and Price Insensitivity: An Open Access Sequel to the Serials Crisis. LIBER Quarterly, 29(1), 1–18. DOI: http://doi.org/10.18352/lq.10280; Butler, L. A., Hare, M., Schönfelder, N., Schares, E., Alperin, J. P., & Haustein, S. (2024). An open dataset of article processing charges from six large scholarly publishers (2019-2023). arXiv preprint

arXiv:2406.08356.]). We strongly believe that NIH funding should be used to fund research, not for shareholder profits.

As noted in our proposed options in our response to item 1, instead of increasing the allowable cost cap so that publishers can institute new technology, NIH could invest in publication infrastructure that would ultimately reduce costs.

**5. Other Comments:**
We recommend against investing in automated fraud detection capabilities for the following reasons:

1) These tools are often based on generative AI, and usually on a general-purpose language model without narrow subject-specific modulation. General-purpose models are unable to review materials with the level of nuance that experts in a research field can provide. 2) Many fraud-detection tools, AI-based or otherwise, retain copies of any materials they evaluate. This breaks the traditional trust of confidentiality between authors, journals, and peer reviewers. It also creates technical glitches such as an article which was reviewed and rejected by one journal, but retained by a fraud-detection system, getting incorrectly flagged as plagiarism upon (appropriate) submission to another journal. 3) Automated fraud-detection systems have high rates of both false positives and false negatives—they incorrectly flag some materials that should be published, while allowing others through that should have been flagged. They provide a false sense of security and efficacy.

Alternatively NIH could could prioritize support for not-for-profit publishers over commercial publishers. Publishing has become a lucrative industry (e.g., Wiley's projected profit margin for 2025 was 23-24% https://www.publishersweekly.com/pw/by-topic/industry-news/financial-reporting/article/97263-wiley-expects-steady-profit-improvement.html). Butler et al. estimated that the "big five" academic publishers (Wiley, Elsevier, SpringerNature, Taylor & Francis, and Sage) took in over $1 billion in APCs over the three year period 2015 to 2018. This is on top of their existing subscription income. APC prices increased at a rate three times the rate of inflation from 2005 to 2018 and have continued to increase (Khoo, S. Y.-S. (2019). Article Processing Charge Hyperinflation and Price Insensitivity: An Open Access Sequel to the Serials Crisis. LIBER Quarterly, 29(1), 1–18. DOI: http://doi.org/10.18352/lq.10280; Butler, L. A., Hare, M., Schönfelder, N., Schares, E., Alperin, J. P., & Haustein, S. (2024). An open dataset of article processing charges from six large scholarly publishers (2019-2023). arXiv preprint arXiv:2406.08356.]). We strongly believe that NIH funding should be used to fund research, not for shareholder profits.

As noted in our proposed options in our response to item 1, instead of increasing the allowable cost cap so that publishers can institute new technology, NIH could invest in publication infrastructure that would ultimately reduce costs.

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/UMN_Response-to-NOT-OD-25-138-Maximizing-Research-Funds-by-Limiting-Allowable-Publishing-Costs_signed-final.pdf

**Description:** PDF document containing all of the comments entered into the five boxes of the RFI Comment form.

# 773. SPARC

**Submit date:** 9/12/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Corinna Turbes

**Name of Organization:** SPARC

**Type of Organization:** Non-profit Research Organization

**Role:** Other

**Role – Other:** Government Affairs

**1. Proposed policy options:**

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/SPARC-NIH-RFI-Response-APC-Price-Caps-9.2025-1.pdf

**Description:** Attached are comments from SPARC

## 774. Elizabeth Chuang

**Submit date:** 9/12/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Elizabeth Chuang

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I think options 2 or 3 would best achieve this balance, but would need to be tied to action by the NIH to negotiate with publishers about limiting costs. Without such action, journals can continue to increase their fees, forcing investigators to incur additional costs to comply with regulatory requirements.

Option 1 conflicts with NIH's stated priorities of 1) using publications as the primary mechanism for disseminating scientific discoveries to peers and the public and 2) publishing in peer-review journals to ensure the Gold Standard quality, rigor, and credibility of research findings; and with the NIH public access policy which often leads to authors paying publication fees because many publishers tie immediate or automated compliance to open access fees.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

# 775. The Ohio State University

**Submit date:** 9/12/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Anna Biszaha and Maureen Walsh

**Name of Organization:** The Ohio State University

**Type of Organization:** Academic Institution

**Role:** Institutional Information Sciences Professional/Librarian

**1. Proposed policy options:**
We support NIH's goal of maximizing research funds for research activities although we do not believe the proposed options will achieve that goal. The five proposed options shift unallowable costs to authors and universities (many of which are also funded by taxpayers) without addressing the root causes of market-driven inflated publishing fees.

- Shifting unallowable overages in article processing charges (APCs) to authors and universities may disproportionately disadvantage researchers at less well-resourced institutions.

- Instituting caps without addressing the larger market issues could negatively impact author publication venue choice, especially for authors without other sources of publication funding.

- We are concerned that imposing publication cost limits will create significant additional administrative work that effectively undermines the goal of maximizing the use of taxpayer funds to support research. For example, shifting partial payment of APCs to two or more funding sources will create accounting obstacles, while tasking grant support staff with additional cost and compliance monitoring will create further bureaucratic challenges.

Rather than imposing publication cost caps that limit author choice and create administrative burden, we encourage the NIH to explore models that incentivize the use of open access publication options that do not rely on APCs. There are foreseeable ways in which publishers will adapt to price caps that undermine the stated goals of the proposal.

- Price caps could have the unintended consequence of creating a price floor that may raise lower-than-maximum publishing costs to meet the maximum allowable.

- Price caps may also incentivize publishers to increase article volume by lowering editorial standards.

We encourage the NIH to fully enforce its existing deposit requirement for Author Accepted Manuscripts into PubMed Central immediately upon acceptance for public availability upon the Official Date of Publication without embargo.

- We appreciate the NIH stance that paying to publish open access is not a requirement of its Public Access Policy and that a free pathway to compliance can be achieved by depositing the Author Accepted Manuscript into PubMed Central; however, authors are currently encountering obstacles and

barriers from publishers who are charging green open access fees that amount to deposit fees and mandating paid hybrid gold open access for NIH compliance.

- We encourage the NIH to assert the Federal Purpose License to enforce no-charge, no-embargo green open access archiving for policy compliance.

**2. Available evidence related to publication costs and proposed options:**
The DOAJ data used for determining the average global APC and the average for U.S. published journals' APCs is limited to fully open access journals which skews the publishing cost data toward lower average costs.

- Hybrid journals have a higher average APC cost. As noted in the "Updated Report to the U.S. Congress on Financing Mechanisms for Open Access Publishing of Federally Funded Research" (page 10, OSTP, June 2024), which analyzed the costs associated with the top 100 journals for federally funded research, the average APC for those hybrid journals in 2024 was approximately $4,000.

- If researchers are forced by publishers to publish gold open access in hybrid journals to comply with the NIH Public Access Policy, they will likely incur costs over and above the maximum allowable in Option 2 and those higher costs would also negatively affect authors under Options 3-5.

**3. Peer review compensation:**
We appreciate the NIH's desire to improve the peer review system and the transparency of reviews, but we do not believe that peer review compensation would serve to control publishing costs.

- The appropriate recognition of effort involved in peer review is an important issue with many complex and ethical considerations. Due to this complexity, we recommend that it is best addressed separately from a discussion of limiting publication costs.

- Offering a higher allowable cost (Option 3) may encourage more publishers to use a pay model for peer review; however, we caution that without additional guardrails in place, this could lead to unintended consequences and may serve to degrade the peer review process.

**4. Publishing best practices:**
We fully support best practices in publishing, but we do not believe that this discussion can figure into any publication cost cap without first obtaining a more accurate understanding of the true cost of publishing.

- The true cost of the work undertaken to produce articles and journals is a black box, and the prices set for APCs by for-profit publishers are driven by what the market will bear. Without accurate and transparent data on the true cost of publishing to serve as a base, we cannot realistically consider the implications of additional costs from best practice implementation.

**5. Other Comments:**
We fully support best practices in publishing, but we do not believe that this discussion can figure into any publication cost cap without first obtaining a more accurate understanding of the true cost of publishing.

- The true cost of the work undertaken to produce articles and journals is a black box, and the prices set for APCs by for-profit publishers are driven by what the market will bear. Without accurate

and transparent data on the true cost of publishing to serve as a base, we cannot realistically consider the implications of additional costs from best practice implementation.

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/Ohio-State-NIH-RFI-Publishing-Costs-Response-20250912.pdf

**Description:** The Ohio State University's RFI response in letter format

# 776. Won-Min Song

**Submit date:** 9/12/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Won-Min Song

**Name of Organization:** Icahn school of medicine at Mount Sinai

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I think Option 4. is reasonable: Option 4: Set a limit on the total amount of an award that can be spent on publication costs.

**2. Available evidence related to publication costs and proposed options:**
Publications coming from a NIH grant is often higher impact than other grants or funds due to amount of funds and resources. Higher impact journals such as Nature charge you for ~$6,000 per publication, which is the double of the average proposed by NIH's study. Therefore, it is unfair to tailor everything on the average across all journals. Rather, the budget needs to be able to accommodate these discrepancies in APCs and allow room to account for this. I suggest, for R and U grants, they need to be allowed for greater amount of publication costs, let's say, upto $30,000 per grant.

**3. Peer review compensation:**
Peer-reviews are often free-of-charge services we provide to the scientific community. Personally, I think it is right thing for NIH to set certain baseline to compensate the peer-reviewers to provide guidelines for journals and publishers. We actually spend sizable hours to review each paper.

**4. Publishing best practices:**
In addition to the fraud detections, the journals became really insensitive towards finding the right reviewers, and it is really excessive to send out a under-review manuscript to 4-6 reviewers. Quality reviews from 2 expert reviewers should suffice.

**5. Other Comments:**
In addition to the fraud detections, the journals became really insensitive towards finding the right reviewers, and it is really excessive to send out a under-review manuscript to 4-6 reviewers. Quality reviews from 2 expert reviewers should suffice.

# 777. Robert W. Williams

**Submit date:** 9/12/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Robert W. Williams

**Name of Organization:** University of Tennessee

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I support the option that gives researchers the most flexibility in their options for publishing NIH supported research. Option 5 in NOT-OD-25-138:

Set a limit on both the per publication cost and the total amount of an award that can be spent on publications. NIH could limit both the total amount of an award that could be spent on publication costs to the greater of 0.8% of the award's direct costs or $20,000.00 over the life of the award, in addition to limiting the amount per publication to $6,000.00.

I like this option because it seen the most practical and will limit exorbitant charges from Elsevier and Springer series journals.

**2. Available evidence related to publication costs and proposed options:**
The single most important output (deliverable) of NIH funded research are peer-reviewed publications. Without support for this category only the most well endowed scientists and institutions would be able to publish in high profile journals, and this would further suppress US science compared to that of China (which now kicks our butts). For documentation please see the Nature rankings of research output of most major institutions worldwide.

https://www.nature.com/nature-index/research-leaders/2025/

Of the top ten spots on this ranking Chinese institutions already garner 8 spots. The US only one. It is a very sad commentary on the relative decline of American science.

Make American Science Great Again .

**3. Peer review compensation:**
I have never been compensated for peer review over 40 years in neuroscience and genetics. I am becoming less willing to help on this critical task.

But I think we may soon be rescued by large language models that in my opinion provide balance and reasonable reviews of my own papers once they are completed. In fact the reviews I get from Claude Sonnet 4 are superior to reviews from all but the best journals.

**4. Publishing best practices:**
Publication costs should be reduced as AI-driven methods contributes to a greater degree.

**5. Other Comments:**

Publication costs should be reduced as AI-driven methods contributes to a greater degree.

# 778. openRxiv

**Submit date:** 9/12/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Richard Sever

**Name of Organization:** openRxiv

**Type of Organization:** Other

**Type of Organization - Other:** Preprint server

**Role:** Organizational Official

**1. Proposed policy options:**

We suggest that public access to NIH-funded research is best achieved by implementation of Plan U

https://journals.plos.org/plosbiology/article?id=10.1371/journal.pbio.3000273

Further details are provided in the attached response to the RFI.

**2. Available evidence related to publication costs and proposed options:**

Box 1 in this article summarizes publishing costs across multiple different types of peer-reviewed journal with sources provided.

https://journals.plos.org/plosbiology/article?id=10.1371/journal.pbio.3002234

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/RFI-response-openRxiv.pdf

**Description:** Proposal for preprint mandate

# 779. Tim

**Submit date:** 9/12/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Tim

**Name of Organization:** Schedl

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Journal Impact Factor has not been helpful in the publication of government funded research, and thus maximizing the use of taxpayer funds to support research. NIH should not enact policies that reward these journals at the expense of other journals.

High Impact Factor journals: typically have higher article processing charges but do not necessarily deliver a better product; to produce a compelling story for manuscript acceptance, authors become selective in data presentation, which leads to (i) the results and conclusions appearing stronger than they actually are, and (ii) the data that is not presented because it does not fit the story is typically never published, even though it can be of high quality and useful information; negative results are not published. Since publication in high Impact Factor journals has become tied to grant funding, job hiring, promotion and increased salary, there is more incentive for over-hyping the finding and publication fraud.

**2. Available evidence related to publication costs and proposed options:**
NIH should set a limit on allowable cost per publication (Option 2), in the $2,00 - $3,000 range for author processing charges (with future flexibility due to inflation).

Scientific society/community-based publishers (examples include American Society for Cell Biology; PLoS journals) are the foundation of our current scientific knowledge base, publishing rigorous research that meet community standards, and are the class of publications that have the fewest article retractions. Therefore, it is important that this group of publishers continue to publish, which requires author processing charges to keep the operation going.

For profit publishers (examples include Springer Nature, Elsevier) are a major reason for the increase in author processing charges and a number of the journals under these umbrella organizations have the most article retractions.

**3. Peer review compensation:**
NIH should NOT support financial compensation for peer reviewers.

Identifying and obtaining manuscript peer reviews from experts in the field is the most challenging step in scientific publishing. Because manuscript peer review is time consuming, the current system of voluntary peer reviewers selects for individual who have the appropriate expertise and experience for peer review.

Monetary compensation for peer review will result in a significant increase in the number of individuals who lack the appropriate expertise to perform the review, but will do so for the money ("for profit peer reviewers"). There is no mechanism to police the "for profit peer reviewers".

There are two situations where the "for profit peer reviewer" damages the publication system. The first is a positive manuscript review that leads to publication when the article is flawed and should not have been published. While the journal should publish the peer reviews along with the article, allowing the readership community to realize that a peer review was flawed (and embarrassing the journal), there is no mechanism to prevent the "for profit peer reviewer" from being asked and reviewing in the future.

The second is a negative peer review that leads to manuscript rejection. This leads the NIH funded researcher to waste time and effort sending the manuscript elsewhere for review and publication rather than making additional findings, reducing the impact of taxpayer funded research. There is no mechanism to expose such "for profit peer reviewer".

Scientific society/community-based journals are not in a good position to pay peer reviewers as their breakeven margin is lower, and this will result in their need to increase author processing charges to maintain publishing viability.

The for-profit publishers are in a much better position to pay the peer reviewers. Furthermore, they can offer more money than the scientific society/community-based journals (bidding war), resulting in increasing their access to peer reviewer. This will be to the detriment of the survival of the scientific society/community-based journals.

It is true that journals are profiting from the current voluntary peer review (as are funding bodies). But the damage to the peer review process from "for profit peer reviewers" and the damage to the scientific society/community-based journals from reviewer bidding wars outweigh any gain that might come from compensation.

**4. Publishing best practices:**
Reputable journals are already using automated fraud detection. However, as fraud is becoming more difficult to detect (AI image creation) more complex and expensive will likely be required. Additionally, there may need to be new US government laws relating to publication fraud.

**5. Other Comments:**
Reputable journals are already using automated fraud detection. However, as fraud is becoming more difficult to detect (AI image creation) more complex and expensive will likely be required. Additionally, there may need to be new US government laws relating to publication fraud.

# 780. WESLEY C VAN VOORHIS

**Submit date:** 9/12/2025

**I am responding to this RFI:** On behalf of myself

**Name:** WESLEY C VAN VOORHIS

**Name of Organization:** University of Washington

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I should first point out that shifting the costs to the PI or the Academic Institution is a really, really bad idea as they (PIs/Academic Institutions) are already struggling to make ends meet. The whole idea may stifle peer-reviewed publication, which is expensive.

I personally don't like any of the options (suggest status quo), but I somewhat prefer Option 4, which allows max $20,000 or 0.8% budget, which ever is higher. Then you could have one expensive high impact journal article that would still be allowed. Option 2 suggests $2000 per publication, which I think is too low.

**2. Available evidence related to publication costs and proposed options:**
Page charges routinely cost 3000-4000 per article for open access, from my own experience.

**3. Peer review compensation:**
I have never been compensated for Journal Peer Reviewing.

**4. Publishing best practices:**
I don't have any experience in this are

**5. Other Comments:**
I don't have any experience in this are

# 781. Association of Academic Health Sciences Libraries

**Submit date:** 9/12/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Kelsi Brisebois

**Name of Organization:** Association of Academic Health Sciences Libraries

**Type of Organization:** Professional Organization/Association

**Role:** Organizational Official

**1. Proposed policy options:**

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/SIGNED_9.11.2025_JLC_AAHSL_MLA_response_pub_costs.pdf

# 782. Society for Academic Emergency Medicine (SAEM) and American College of Emergency Physicians (ACEP)

**Submit date:** 9/12/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Patrick Maher

**Name of Organization:** Society for Academic Emergency Medicine (SAEM) and American College of Emergency Physicians (ACEP)

**Type of Organization:** Professional Organization/Association

**Role:** Organizational Official

**1. Proposed policy options:**
See attached file.

**2. Available evidence related to publication costs and proposed options:**
See attached file.

**3. Peer review compensation:**
See attached file.

**4. Publishing best practices:**
See attached file.

**5. Other Comments:**
See attached file.

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/NIH-RFI-ACEP-SAEM-Request-for-Information-on-Maximizing-Research-Funds-by-Limiting-Allowable-Publishing-Costs-Final.pdf

**Description:** NIH RFI ACEP SAEM Request for Information on Maximizing Research Funds by Limiting Allowable Publishing Costs

## 783. Paola Galimberti

**Submit date:** 9/13/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Paola Galimberti

**Name of Organization:** University of Milan

**Type of Organization:** Academic Institution

**Role:** Other

**Role – Other:** Open sceince advisor

**1. Proposed policy options:**
Changing or limiting the cost will not change the status of scientific research and the crisis of scientific publishing

**2. Available evidence related to publication costs and proposed options:**
Again, cost is only one of the aspect of scientific publication. In the past year commercial publishers didn't do a good job for science. Scientific publishing requires a profound reform in which publishers play a supporting role rather than one of power and gatekeeping.

**3. Peer review compensation:**
don't agree.  We should publish less and only significative research and it will be simpler to find reviewer. or we must slowly transition from the review then publish model to the publish review curate model

**4. Publishing best practices:**
Scholar led open infrastructures

**5. Other Comments:**
Scholar led open infrastructures

# 784. Colin Evans

**Submit date:** 9/13/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Colin Evans

**Name of Organization:** University of South Carolina

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Set a limit: per publication but allow a higher amount if reviewers are compensated.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Set a limit: per publication but allow a higher amount if reviewers are compensated.

**4. Publishing best practices:**

**5. Other Comments:**

# 785. IDCRC publication committee

**Submit date:** 9/13/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Nadine Rouphael

**Name of Organization:** IDCRC publication committee

**Type of Organization:** Other

**Type of Organization - Other:** NIH funded network

**Role:** Investigator/Researcher

**1. Proposed policy options:**

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/Comments-on-Publication-Costs.docx

## 786. N/A

**Submit date:** 9/14/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
1. Limit the publication costs on the for-profit journals to $2,000 USD per article. 2. Allow non-profit journals (e.g. FASEB's professional society journals) to recoup their costs, but don't place a limit on what NIH will reimburse. 3. Don't reimburse for peer review.

The profit motive has completely corrupted the integrity of scientific publishing. The pressures to publish, increased value on quantity and not quality for those seeking academic promotion, and the proliferation of substandard scientific journals has caused a flood of new papers into the scientific literature. These papers just create "noise" that obscures truly important findings, and if the volume of fraudulent papers appearing every day in PubPeer is any indication, a good fraction cannot be believed at all. My lab has been burned so many times by non-reproducible results that we now take the wasteful step of reconfirming data of others before starting a new project. At the same time, the current dynasty held by the high impact publishing houses (Nature, Science, Cell family journals) pushes scientists to sensationalize their results. None of this good for the scientific enterprise.

Please, NIH, you have the power to help us restore value and rigor to our work!!!!

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Peer reviewers should not be compensated. I have observed absolutely unqualified individuals being recruited as peer reviewers and journal editorial board members by some of the sketchier journals. These individuals happily take on the duties due to the compensation involved.

**4. Publishing best practices:**

**5. Other Comments:**

# 787. Fernando Pardo Manuel de Villena

**Submit date:** 9/14/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Fernando Pardo Manuel de Villena

**Name of Organization:** University of North Carolina at Chapel Hill

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I agree with the NIH in the need of a method to contain publication costs. However, some of the options presented will be harmful to the scientific enterprise and may hamper the ability of the US to be the world leader in biomedical research.

Options 2,4 ad 5 are the best among those proposed. An option not considered but worth including will be a direct negotiation between the granting agencies and publisher such that papers accepeted and be considered the product of a funded award would be prepaid.

Option 1 would be devastating to US research becuase ut would limit the impact of fedearlly funded reserach and cede the role a sworld leaders to other countries

Option 3 is highly problematic. It would not contain costs as much as the oter options and it may set a conflict of interest that will degrade the peer review process

**2. Available evidence related to publication costs and proposed options:**
The policy need to consider the following factors:

Peer reveiwed science is the gold standard

Federally funded reserch results need to be made public and widely available to the entire community asap (as per NIH open source policy)

Having multiple publsihing options is essential to ensure that all valid results are made public.

Paying for peer review will create incentives for misbehaviour.

Limiting the dollars per grant will discourage higher productivity by leading scientits and is essentially a socialistic approach

Publications are widely used as a metric for promotion in US academic institutions

The US should not cede is dominant role as the leader of biomedical research to other countries

**3. Peer review compensation:**
Bad idea. Create coi issues and rewards bad behaviour.

**4. Publishing best practices:**
Fraud detection methods should be encouraged and compensated.

**5. Other Comments:**

Fraud detection methods should be encouraged and compensated.

# 788. Council of Medical Specialty Societies

**Submit date:** 9/14/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Dr. Helen Burstin

**Name of Organization:** Council of Medical Specialty Societies

**Type of Organization:** Professional Organization/Association

**Role:** Organizational Official

**1. Proposed policy options:**
The Council of Medical Specialty Societies (CMSS) appreciates the opportunity to respond to this RFI, NOT-OD-25-138.

CMSS believes it is in researchers', taxpayers', and patients' best interest to ensure that federally funded research undergoes rigorous peer review and is disseminated through high-impact venues that maximize accessibility to the research and clinical communities. By prioritizing the publication of highly vetted science in journals that reach the broadest possible audience of researchers and clinicians, we can accelerate the translation of scientific discoveries into improved patient care and health outcomes. CMSS, representing 55 medical specialty societies encompassing more than 800,000 physician researchers, respectfully opposes federal caps on Article Publication Charges (APCs) for federally funded research. While we share NIH's commitment to maximizing research value, we believe that artificially limiting publication costs could inadvertently restrict access to the rigorous peer review and broad dissemination channels that are essential for translating research into improved patient care.

APCs cover many aspects of research publication and dissemination. The costs involved with running a journal are significant and variable. These costs include submission software, staff time required to facilitate quality control, peer review, editor stipends, copy editing, formatting, online publication, indexing, and publicity to name just a few. In addition, the method used by the NIH to calculate the cost of a published paper does not take into account the fact that many of these costs apply whether the paper was accepted or not (e.g. staff time and submission software that still get expended on rejected papers). Many journals are highly selective, rejecting a high percentage of submissions. As authors do not pay APCs for rejected papers, the cost of publishing a small number of papers must also take into account all the costs of running a journal.

The options offered in the publishing environment allow for maximum author choice, including journals with modest or free access options. It is important that authors be able to choose the best journal for their research based on scope, audience, quality, speed, and other factors, without having to take cost into account. Restricting APCs would limit the reach of important research by limiting the choice of journals available to authors.

**2. Available evidence related to publication costs and proposed options:**
The following article is helpful in documenting the complexities of cost variability in journal publishing:

Hanson MA, Gomez Barreiro P, Crosetto P, et al. The strain on scientific publishing. Qualitative Science Studies 2024:5, 823-843. Available at: https://direct.mit.edu/qss/article/5/4/823/124269/The-strain-on-scientific-publishing; accessed September 5, 2025.

**3. Peer review compensation:**
CMSS member societies have identified the following points for consideration:

1. There is an inherent conflict of interest (COI) that is created when a peer reviewer is paid, and the quality of peer review may suffer. Reviewers who know they can earn money from a peer review may be more likely to accept the invitation and potentially less likely to put significant effort into the work. For supporting evidence and further information, please see the Society for Scholarly Publishing blog post on paying for peer review: https://scholarlykitchen.sspnet.org/2021/06/16/whats-wrong-with-paying-for-peer-review/ (accessed September 11, 2025).

2. The overall cost of compensating reviewers would be prohibitive for most smaller, society-owned journals. Compensation for a large journal could amount to millions of dollars per year. Further, the actual cost of a physician's or researcher's time spent reviewing a paper would be far more than what NIH is suggesting they be paid.

3. There would be tremendous administrative burden involved in issuing these payments, with thousands of reviewers per year for a medium-sized journal.

4. Peer review offers other non-tangible benefits, including professional development, Continuing Medical Education credit, public recognition on community forums, nomination to editorial boards, the opportunity to stay up to date on research in the field, reputation building, and tenure and promotion. Many reviewers have said they review purely because they understand it to be "the right thing to do". As others have reviewed their work before, they should now contribute by reviewing the work of others. This is the unspoken agreement among researchers, and implies payment is neither necessary nor expected.

**4. Publishing best practices:**
CMSS member societies have generated the following list of additional cost-generating aspects to the research publication process. Policymakers are also encouraged to review Kent Anderson's helpful post on the Scholarly Kitchen blog, "Focusing on Value — 102 Things Journal Publishers Do (2018 Update)": https://scholarlykitchen.sspnet.org/2018/02/06/focusing-value-102-things-journal-publishers-2018-update/ (accessed September 5, 2025).

Plagiarism detection

AI generation detection

Image manipulation detection

Copy editing

Typesetting

Quality control

Editor compensation

Staff time

Submission software

Website hosting costs

Press, publicity, SEO, social media

Indexing

Archiving, including PubMed/Medline deposition

ORCID (persistent identifiers to protect against misconduct)

Continuing Medical Education

Ethical safeguarding/retraction costs

Legal oversight

Licensing and copyright

**5. Other Comments:**
CMSS member societies have generated the following list of additional cost-generating aspects to the research publication process. Policymakers are also encouraged to review Kent Anderson's helpful post on the Scholarly Kitchen blog, "Focusing on Value — 102 Things Journal Publishers Do (2018 Update)": https://scholarlykitchen.sspnet.org/2018/02/06/focusing-value-102-things-journal-publishers-2018-update/ (accessed September 5, 2025).

Plagiarism detection

AI generation detection

Image manipulation detection

Copy editing

Typesetting

Quality control

Editor compensation

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Website hosting costs

Press, publicity, SEO, social media

Indexing

Archiving, including PubMed/Medline deposition

ORCID (persistent identifiers to protect against misconduct)

Continuing Medical Education

Ethical safeguarding/retraction costs

Legal oversight

Licensing and copyright

# 789. Society for Leukocyte Biology

**Submit date:** 9/14/2025

**I am responding to this RFI:** On behalf of an organization

**Name:**

**Name of Organization:** Society for Leukocyte Biology

**Type of Organization:** Professional Organization/Association

**Role:** Organizational Official

**1. Proposed policy options:**

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/final-SLB_NIH-Feedback-on-Allowable-Publication-Costs.pdf

## 790. N/A

**Submit date:** 9/14/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I would favor Options 5 over the others - a total cap on publication costs a per publication cap and a total limit on publication costs with the limits suggested in the RFI seeming to be reasonable values. Second options would be Option 3 or 4. I feel strongly that option 1 is not viable because it does not support the ability of researchers to freely disseminate their peer-reviewed findings through open access publications, which are often significantly more than publication fees in subscription only journals but is essential to ensure accessible to all researchers at all types of institutions around the world, as well as the public. Preprints have made research results more broadly accessible, but they still do not represent the final peer-reviewed product and may not be updated by the author after final publication. I believe that having some reasonable caps on publication funding support would be the most fiscally responsible way for the NIH to best facilitate research progress by supporting dissemination via publication.

**2. Available evidence related to publication costs and proposed options:**
Open Access publication fees for a journal I recently published in was $2900. Even though this is still on the mid-low end of costs, I am at a primarily undergraduate institution without much additional funding to be able to cover these costs without NIH support.

**3. Peer review compensation:**
There currently appears to be a shortage of peer reviewers given the number of papers to be reviewed and the time it takes without compensation. Paying peer reviewers as proposed in option 3, I believe, would incentivize researchers to devote the time to this vital endeavor.

**4. Publishing best practices:**

**5. Other Comments:**

# 791. N/A

**Submit date:** 9/14/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
All of the options listed have the potential to impose an financial burden on the investigators. For example, I do not have any other discretionary funds that could be used to pay for publication and have always depended on NIH funding for publication costs. Recently however, we have been able to have reduced fees negotiated through the University library for several reputable journals. This helps and thus if NIH must impose a limit, I think Option 4 or 5 would make the most sense because of course labs with more funding (and thus more personnel) will publish more papers per year.

It also seems that some type of cap, as long as it isn't too low, could be a deterrent towards investigators (again hopefully a minority) using so-called predatory journals that charge very high publication rates and often do not have adequate peer review.

If there is a limit imposed, it will also be important to continue to allow researchers to satisfy open access requirements via PubMed Central deposition of their papers, since most open access options I have seen are greater than $2000 per publication.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
As a professor at a major R01 research university, I have actually never been offered direct compensation for being a reviewer; I have occassionally been offered at the end of year an existing publication, calendar or similar which probably was not an added expense for the journal. I do not feel that researchers should be compensated monetarily. This seems to me that it could cause some people (although hopefully a minority) to review more articles quickly and less diligently, and perhaps outside their area of expertise, in order to earn the compensation. This could contribute to the predatory journal problem.

It is standard for reviewing to count as service in academic settings at least, and it should remain this way.

**4. Publishing best practices:**
Automated fraud detection seems like a good idea to me and would be more cost effective than manual detection by the journal.

As indicated above, I do not think compensating peer reviews is a good idea.

**5. Other Comments:**

Automated fraud detection seems like a good idea to me and would be more cost effective than manual detection by the journal.

As indicated above, I do not think compensating peer reviews is a good idea.

# 792. Frederick Roth

**Submit date:** 9/14/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Frederick Roth

**Name of Organization:**

**Type of Organization:** Not Applicable

**Role:** Member of the Public

**1. Proposed policy options:**
The value of taxpayer-funded research can be enhanced greatly by professional editing, aggregation of high-impact works in each field or (for works with the broadest impact) in high-readership generalist journals, and by professional marketing and distribution of scientific journals.

I therefore am strongly AGAINST option 1. Of the options offered, option 5 seems the most reasonable.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
I believe that peer reviewers should be compensated. A version of Option 5 that raises the per-publication limit, where reviewers are compensated, would make sense.

**4. Publishing best practices:**

**5. Other Comments:**

# 793. David J. States, MD PhD

**Submit date:** 9/14/2025

**I am responding to this RFI:** On behalf of myself

**Name:** David J. States, MD PhD

**Name of Organization:** Aperta Biosciences, Inc.

**Type of Organization:** Healthcare Industry (Biotech/Device/ Pharmaceutical Company)

**Role:** Investigator/Researcher

**1. Proposed policy options:**
The current system of distributing the results of NIH funded research through proprietary journals with exorbitant subscription prices and subscription bundles makes it impossible for many startup companies to access these findings. If we want to see federally funded science translated into innovative commercial products, the system needs to be fundamentally changed. I support a ban on the use of grant funds to pay for publication costs and a ban on the use of indirect costs to pay for institutional journal subscriptions. Science can and is being distributed through open access preprint services with open public commentary. Open preprint servers allow startup companies to see the results of federal funded science and bring it to commercial fruition.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
I do not support paying peer reviewers who are serving proprietary publishers. This is de facto a subsidy of the publishers.

**4. Publishing best practices:**
Release all research findings through open access preprint servers with open public commentary.

**5. Other Comments:**
Release all research findings through open access preprint servers with open public commentary.

# 794. Mark Styczynski

**Submit date:** 9/14/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Mark Styczynski

**Name of Organization:** Georgia Institute of Technology

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
None of these options achieves the stated goal. None of these options is good. It seems inconceivable to me that if the stated goal is to allow the public access to the research they funded, that you would implement something like option 1, or really any of these. If you absolutely HAD to implement one of these ill-advised policies, the best would be option four because it has the most reasonable total dollar amount and leads to the least interference with scientists just trying to do their jobs. But even this could constrain and punish people who are highly productive with their grants and want to support open access for the public.

Critically: you will do nothing but disadvantage smaller and/or public schools with less discretionary funding. This rule would mean little to the Harvards, but would mean a lot to schools without huge endowments and thus very little discretionary funding. That doesn't seem like something that your administration should want to do. The reason this will happen is that I believe it is very unlikely that journals would hear this limit and then adjust their prices accordingly. Especially for the journals already on the higher end of these numbers (and so most likely to be affected by a per-paper limit), they don't care because they know people will pay to publish there. Couple that with the prestige focus of NIH reviews in general (and particularly for renewals) that will drive researchers to continue to publish in those journals so that they can hopefully get their grants renewed, and all you will have done is made life harder for the small guys. I don't even consider my school that "small", but you will still cause us to burn through precious discretionary dollars for something that was a major push by the government to begin with (public access to research).

This appears to be another example of overreach and micromanaging with inherent limits in the understanding of the situation on the ground. It is so hard to imagine that this is an actual problem, and if it is then it is hard to imagine that the proposed solution addresses the problem. It instead provides an unfunded mandate: publish in high-impact journals that may have high APCs, or promote accessibility of science by citizens via open access publishing... but "don't use our money". That is unfair, unnecessary, and sounds a lot like the poor understanding of indirect costs as "wasted money".

**2. Available evidence related to publication costs and proposed options:**
Your research methods seem flawed, just like the flaws in the indirect cost analyses. To an outsider, the stated research may seem reasonable, but DOAJ contains a whole bunch of not-at-all-good, if not predatory, journals that are just trying to churn out as much money as possible with as little effort (and peer review and editing!) as possible. So to use them as a basis for forming a mean, median, etc., is a very poor decision. Poor experimental design leads to poor conclusions. You need someone willing to

take the time to do an analysis using curated journals that your grant reviewers would actually respect and care about, as that is what drives much decision making for many authors.

**3. Peer review compensation:**
Why are you looking to try to influence this model from the outside? What stake does NIH have in this? There is approximately zero justification in the proposal for why this should be valued. This would get a very poor "Impact" score if being reviewed on an NIH study section.

There needs to be a motivation and clear goal, and then one can assess whether this is a worthwhile endeavor. I am not convinced that just dangling money out there will get reviews to actually be good or maybe not even easier to get. This sounds like a bad idea for the NIH to push via purse strings.

**4. Publishing best practices:**
I first reject the idea that compensating peer reviewers is a "best practice". Your question is flawed.

Automated fraud detection is a laudable best practice worth justifying higher costs. So is having effective copy editors, but there is no good way to define that objectively.

**5. Other Comments:**
I first reject the idea that compensating peer reviewers is a "best practice". Your question is flawed.

Automated fraud detection is a laudable best practice worth justifying higher costs. So is having effective copy editors, but there is no good way to define that objectively.

## 795. N/A

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Not Applicable

**Role:** Investigator/Researcher

**1. Proposed policy options:**
To Whom It May Concern,

I am writing in response to the Request for Information (RFI) NOT-OD-25-138, concerning the proposal to limit allowable publication costs for NIH-funded research.

Basing any "appropriate" level of funding for publications on the existing distribution of journal Article Processing Charges (APCs), whether by using the median or mean, is a capitulation to a broken and exploitative system. To do so would be to accept the terms of a parasitic model that has historically taken advantage of public funds. We must not validate the current system; we must dismantle it.

The pathologies of the current academic publishing model, with its exorbitant costs and inherited inequities, cannot be the foundation for reform. Instead of anchoring funding to this flawed system, public funds should be allocated based on real-world, successful, and cost-effective models. We have empirical evidence from initiatives like PeerJ and the operational costs of platforms like arXiv that demonstrate that high-quality publication and dissemination can be achieved at a fraction of the cost demanded by traditional publishers.

Therefore, I propose that public funds be used to cover a barebones publication cost, not determined by the inflated prices of the existing market, but by the demonstrated operational costs of efficient and proven platforms. We must not be meek in our approach to reform. This is an opportunity to explode the status quo and create a more equitable and sustainable system for disseminating publicly funded research. To simply accept the current distribution of APCs is to give up before the fight has even begun.

**2. Available evidence related to publication costs and proposed options:**
PeerJ: $699-899 per author, one-time payment, for the LIFETIME right to publish 1-5 publications per year. https://peerj.com/pricing#apc

**3. Peer review compensation:**
In the current commercial publishing system, where publishers charge significant fees for access to research, the unpaid labor of reviewers and authors is unfairly extracted for private profit. While one could argue for radical reform where reviewers receive a substantial portion of this revenue, such a solution merely props up a broken model. The more fundamental goal should be to build a new system.

The currency of peer review is, and should remain, scientific credit and reputation, not direct monetary payment. The motivation for this foundational academic service is to contribute to the field and enhance one's standing. The current challenge is that this "reputational payment" is informal and poorly tracked.

The NIH is in a unique position to formalize this system of credit by developing a framework for officially accounting for these scholarly contributions. This record of service could then be directly rewarded within the NIH ecosystem, for instance, by factoring it into grant application reviews as a component of a researcher's impact or through score adjustments. This provides a tangible career benefit without commercializing the act of review itself.

This approach requires rethinking the financial model of publishing. The system must become as lean and efficient as possible to justify the use of public funds. Innovations, particularly in AI, can be leveraged to cut operational costs to the bone by automating tasks like copyediting, formatting, and administrative communications.

Crucially, the profit motive can be harnessed to achieve this efficiency, but it must be reformed. Instead of supporting the current model of extractive profit, the system should incentivize innovators to build new, hyper-efficient models for scholarly publication. Profit should be the reward for radical improvements in cost-effectiveness, not a parasitic charge on the scientific enterprise.

Therefore, we urge the NIH to use its funding power to selectively support only those journals that meet stringent efficiency standards and that participate in a formal system of recognizing and rewarding peer reviewers with quantifiable scientific credit. In the current commercialized ecosystem, unpaid peer review is exploited labor. In a reformed, efficient ecosystem, it is a properly valued scholarly contribution. The NIH's primary focus should be on creating the latter.

**4. Publishing best practices:**

**5. Other Comments:**

# 796. The Company of Biologists

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Katherine Brown

**Name of Organization:** The Company of Biologists

**Type of Organization:** Scholarly Publisher/Journal

**Role:** Organizational Official

**1. Proposed policy options:**

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
See uploaded document

**4. Publishing best practices:**

**5. Other Comments:**

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/NIH_RFI-response_COB.docx

**Description:** Response from The Company of Biologists (not-for-profit publisher) specifically to question 3 of the RFI.

# 797. Oxford University Press

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of an organization

**Name:**

**Name of Organization:** Oxford University Press

**Type of Organization:** Scholarly Publisher/Journal

**Role:** Organizational Official

**1. Proposed policy options:**
OUP's preference is for NIH not to cap allowable publishing costs. Caps, by their nature, are arbitrary and they can distort the market, creating perverse incentives including: 1) lowering quality standards (the real, existing costs of high quality publishing cannot be met by the proposed cap) and 2) bad actors pricing up to a cap when unnecessary simply because it is allowable. The journal publishing environment is complex and varied – all journals work to differing standards, take different approaches, invest differently and provide different services. A cap would restrict the ability of journals to provide additional services and quality control. It would also remove the ability of researchers to make a reasoned assessment of which journal is best suited to their needs, provides the best editorial standards to validate and improve their paper, and ultimately delivers the best value for money for them and their research.

With this in mind, our recommendation is not to pursue any of the options. We would recommend instead that NIH assesses the return on investment of publication costs as part of its wider assessment of the efficacy and return on investment of its grants.

However if NIH is to pursue one of the available options in the RFI then our preference is Option 4 – i.e. limiting the total amount of a grant which can be spent on publication costs, but not setting a per-unit limitation on publication costs. This avoids some of the problems described above, while still allowing NIH to control total spend on publication costs.

**2. Available evidence related to publication costs and proposed options:**
We note that in the RFI NIH refers to data from Directory of Open Access Journals (DOAJ) which shows average APCs of $1,235. This number is artificially low. DOAJ only includes fully open access journals, and many of these journals are small, publish few articles a year, and run on a volunteer/open source cost model which is completely different to most more established journals and is not scalable across the publishing landscape.

NIH could correct for this by a) taking a weighted average based on articles published rather than simply taking an average at a journal level, and b) by also including hybrid journals to more accurately reflect the wider journals environment. Doing this would likely provide much higher figures (as NIH's own data from grants quoted in the RFI shows).

OUP's APCs are generally much higher than $1,235, or the $2,000 figure suggested in Option 2, largely ranging from $2k to $5k, depending on the journal. These prices are set with the aim of providing a

sustainable return which allows OUP and the societies we work with to curate and publish high-quality content.

More generally, it is worth noting that APCs are often covered through 'read and publish' or 'transformative' agreements. OUP has more than 80 such agreements, including more than 20 in the US. These agreements between publishers and academic institutions enable researchers to publish OA at no cost to them (or in some cases, at heavily subsidized rates).

**3. Peer review compensation:**
Peer review is a crucial cornerstone of high quality journals publishing. Payment of peer reviewers is unusual in the journals publishing landscape. While conceptually a good idea, it is administratively extremely complex, both for journals/publishers and for peer reviewers and would introduce additional costs and time burdens for all parties. Further, by introducing a financial element to the peer review process, it would increase risks around research integrity in an already very challenging landscape for trust and integrity issues. We would not recommend NIH including this as part of its criteria.

**4. Publishing best practices:**
While we understand the intention behind this suggested provision, we believe it would be unworkable in practice. Journals and Publishers offer dozens of services comparable to fraud detection, and the list of these services expands and changes each year. Additionally, Publishers don't simply offer or not offer these services – taking fraud detection for example, the level and sophistication of these checks can vary significantly across Publishers/journals. It would be very difficult for the NIH to reflect this variety and complexity in an allowable cost structure.

**5. Other Comments:**
While we understand the intention behind this suggested provision, we believe it would be unworkable in practice. Journals and Publishers offer dozens of services comparable to fraud detection, and the list of these services expands and changes each year. Additionally, Publishers don't simply offer or not offer these services – taking fraud detection for example, the level and sophistication of these checks can vary significantly across Publishers/journals. It would be very difficult for the NIH to reflect this variety and complexity in an allowable cost structure.

## 798. N/A

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Options 2 and 3 would disincentivize authors from publishing in high-tier journals (not only the highest tier, but also many society journals whose costs are greater than $2,000) and would disproportionately affect investigators who have less access to discretionary funds to support publishing costs (e.g. those from state universities, junior faculty, etc).

Option 4 seems fine, but unclear why it is important to do this, since it is aligned with most grantees' current practice

Option 5 seems like it would work for most grantees and most publications, but would still introduce unfairness to investigators who want to publish in a very high tier journal but do not have sufficient discretionary funds to support it.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
I support including a mechanism that allows more funding going towards journals that pay peer reviewers

**4. Publishing best practices:**

**5. Other Comments:**

## 799. N/A

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I support a per publication limit but not a limit on the total amount of $ for pubs per grant. The productivity of individual investigators varies greatly and nothing should be done to inhibit data making it to the public through publications. Without peer reviewed publications, there are limited means for reporting the results of tax paper $ (datasets are of various quality, often lack information for general consumption, and may not undergo peer review).

**2. Available evidence related to publication costs and proposed options:**
Please determine the publication # per grant and range.

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

## 800. Kira Gritsman

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Kira Gritsman

**Name of Organization:** Albert Einstein College of Medicine

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I agree with Option 5 - to limit the publication cost to 0.8% of the total award. A more stringent limit on publication costs is directly at odds with the new NIH policy for immediate open access. Many journals still have a 6-month embargo on publications being deposited in PMC, so authors are forced to pay very high open access fees to comply with this NIH policy. Limiting the amount that researchers can pay for each publication would make it impossible to publish in most open access journals.

In addition, limiting publication costs to less than $6000/publication would make it impossible for more junior investigators who don't have huge budgets or investigators from less wealthy institutions to publish in the highest impact journals. These high impact publications would become available only to elite investigators or elite institutions, which would worsen the inequity in science. Unfortunately, most promotion committees and study sections still do not accept preprints to the same degree as publications in high impact journals, so this would significantly impact the chances of promotion or retention of many early stage investigators.

**2. Available evidence related to publication costs and proposed options:**
Some journals charge exorbitant publication fees. For example, Nature's publication fee is over $10,000 with open access. In my experience, publication fees with open access are generally over $4000/publication, even for medium impact journals.

**3. Peer review compensation:**
Peer reviews should be compensated. I agree with the idea of allowing higher publication fees for journals that compensate reviewers.

**4. Publishing best practices:**
Yes, the cost of automated fraud detection capabilities should be taken into account when determining allowed publication costs.

**5. Other Comments:**
Yes, the cost of automated fraud detection capabilities should be taken into account when determining allowed publication costs.

# 801. Tufts University -Junior Faculty

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Lesley Inker

**Name of Organization:** Tufts University -Junior Faculty

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
We greatly appreciate the NIH's request for input on maximizing research funds by limiting allowable publishing cost. We are writing in our roles as NIH funded researchers as well as multi-PI of Tufts University's K12 Programs

We appreciate the challenge. There has been a supra-inflation increase of subscription prices for scholarly journals while the funding for research grants have remained stable, thus limiting the science that can be achieved using federal funds. Thus, the NIH proposals to limit the amount of grant funds allocated to publication costs is appropriate. For this purpose we suggest option 5 .

Dissemination of results is critical to translation of results as well as important for future grant success. We recommend that in addition to the adding in restrictions on grant budgets, we ask the NIH to advocate for lower publication costs for both high as well as lower impact journals, or for maximum costs that can be paid for for work that emanates from NIH funded grants.

From our viewpoint of leaders of the K12 program, we think these high costs are particularly harming development of the next generation of investigators. We suggest specific attention to this group in your advocacy. We suggest fee reductions for students, fellows, post-doctoral students, and junior faculty

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
We do not support compensation for peer review. We hypothesize that for many disciplines this will not improve the quality but just increases the costs

**4. Publishing best practices:**

**5. Other Comments:**

# 802. Daniel Gorelick

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Daniel Gorelick

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

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# 803. Steeve Boulant

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Steeve Boulant

**Name of Organization:** University of Florida

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
While publication costs are excessive and need control, limiting allocated budgets won't solve the underlying problem—it just shifts the burden to researchers. Instead, pressure should be applied directly to publishing houses, questioning their high fees. The NIH could advocate for policymakers to examine these publishers from an anti-trust perspective, addressing monopolistic pricing in academic publishing.

This approach tackles the root cause rather than constraining researchers' ability to disseminate federally-funded work.

**2. Available evidence related to publication costs and proposed options:**
Academic research is evaluated through peer-reviewed publications, most of which require publication fees. Completely disallowing publication costs (option 1) or severely limiting them (options 2-3) would prevent researchers from publishing their work, blocking the primary mechanism for disseminating scientific findings to the public.

Most reputable journals charge fees that exceed these proposed limits to support essential editorial services and peer review. Without adequate publication budgets, researchers would be forced to abandon publication or settle for lower-quality venues, ultimately harming both research quality and public access to scientific knowledge. This defeats the purpose of making research findings publicly available.

**3. Peer review compensation:**
Compensating peer reviewers is a practice that merits serious consideration. Reviewers invest substantial time and expertise in evaluating manuscripts and book chapters, effectively performing much of the essential work in the editorial process without compensation.

However, implementing reviewer payment systems presents significant risks. A primary concern is that reviewers might become selective, choosing to review only for journals that offer payment or prioritizing those with higher compensation rates. This could create an unintended consequence where well-funded journals—typically those with higher author publication charges—gain preferential access to quality reviewers, while journals with limited budgets struggle to secure adequate peer review.

Such a system could ultimately exacerbate existing inequalities in academic publishing, potentially disadvantaging open-access journals, society-based publications, or journals from developing regions that operate on tighter budgets.

**4. Publishing best practices:**

**5. Other Comments:**

# 804. Megan Stanifer

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Megan Stanifer

**Name of Organization:** University of Florida

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Restricting financial support for academic publications will create a significant barrier to research dissemination and institutional competitiveness. With current publication costs averaging $5,000 per article and many high-impact journals charging over $10,000, even modest reductions in funding support will force researchers into an untenable position.

When publication budgets are insufficient, the shortfall must either be absorbed from already-stretched consumables budgets—directly reducing resources available for actual research—or departments must cover these costs, which is financially impossible for most institutions. This creates a cascading effect: reduced publication output leads to decreased research visibility, which in turn weakens grant applications and reduces future funding success.

The result is a counterproductive cycle where cost-cutting measures intended to save money actually undermine the research enterprise by limiting dissemination of findings, reducing institutional competitiveness, and ultimately decreasing the likelihood of securing future research funding. Maintaining adequate publication support is therefore not just an operational necessity but a strategic investment in research success and institutional standing.

**2. Available evidence related to publication costs and proposed options:**
Over the past five years, I have published 55 peer-reviewed papers, with 30 of these requiring me to serve in a corresponding author position and assume financial responsibility for publication fees. This personal experience starkly illustrates the escalating burden of Article Processing Charges (APCs) on individual researchers and their funded projects.

The cost variation across journals has been substantial, ranging from $2,500 for the least expensive manuscript to $11,500 for the most costly publication. While higher-impact journals consistently command premium fees, even lower-impact publications now average close to $4,000 per article. This financial reality became particularly evident during a recent submission, where I was required to acknowledge upfront that publication costs would approach $4,000—effectively making cost a submission criterion alongside scientific merit.

Currently, I request $5,000 annually for publication costs, totaling $25,000 over a standard five-year R01 grant period. However, this allocation covers only 2-5 publications depending on journal selection—far insufficient to support the publication output necessary for grant renewal and continued research competitiveness. Given that successful R01 renewal typically requires demonstrating substantial research productivity through publications, this funding shortfall creates an impossible situation:

researchers must either limit their publication output, compromise on journal selection to reduce costs, or divert funds from essential research activities to cover publication fees.

This experience demonstrates that current publication funding levels are fundamentally misaligned with the realities of modern scientific publishing, particularly in an era where open access publication is increasingly required by funding agencies and institutions.

**3. Peer review compensation:**
The academic peer review system faces a critical sustainability crisis rooted in inadequate compensation for essential scholarly services. As an editor for several journals, I have witnessed firsthand the dramatic deterioration of reviewer participation since the pandemic. What once required contacting a manageable number of potential reviewers now demands reaching out to three times as many scholars to secure adequate review coverage for submitted manuscripts.

This breakdown stems from a fundamental misalignment between the value provided by peer reviewers and their compensation—which remains at zero. Peer reviewers contribute specialized expertise, dedicate hours to thorough manuscript evaluation, and provide detailed feedback that directly shapes the quality of published research. Yet they receive no financial recognition for this essential service, while publishers generate substantial revenue from their unpaid labor.

The compensation inadequacy extends beyond journal peer review to grant evaluation processes. Service on study sections represents one of the most demanding forms of academic service, requiring weeks of preparation to thoroughly review multiple complex proposals, followed by several days of intensive in-person deliberations. The current compensation of $200-300 for attendance days grossly undervalues this commitment, failing to account for the extensive preparation time or the opportunity cost of suspending other professional activities.

**4. Publishing best practices:**
The editorial structure of academic journals significantly influences Article Processing Charges, with journals employing professional editors typically commanding higher APCs than those relying on volunteer academic editors. This cost differential reflects the underlying economic model and operational expenses of different journal types.

Professional Editorial Operations: Journals with permanent, professional editorial staff must factor substantial personnel costs into their publication fees. APCs are designed to cover publishing costs including editorial costs and administration of the peer review system and full-time editorial positions require competitive salaries, benefits, and administrative overhead. These journals often provide enhanced editorial services, including professional copyediting, formatting assistance, and streamlined submission processes, but these services come at a premium cost.

Academic Editor Model: In contrast, journals operating with academic editors who serve on a voluntary or minimally compensated basis can offer lower APCs due to reduced editorial overhead. Academic editors, typically serving part-time while maintaining their primary institutional affiliations, require little to no salary compensation from the journal, allowing publishers to allocate resources primarily to production and platform costs rather than editorial personnel. However, the editors should be more fairly compensated at these are time intensive positions.

**5. Other Comments:**

The editorial structure of academic journals significantly influences Article Processing Charges, with journals employing professional editors typically commanding higher APCs than those relying on volunteer academic editors. This cost differential reflects the underlying economic model and operational expenses of different journal types.

Professional Editorial Operations: Journals with permanent, professional editorial staff must factor substantial personnel costs into their publication fees. APCs are designed to cover publishing costs including editorial costs and administration of the peer review system and full-time editorial positions require competitive salaries, benefits, and administrative overhead. These journals often provide enhanced editorial services, including professional copyediting, formatting assistance, and streamlined submission processes, but these services come at a premium cost.

Academic Editor Model: In contrast, journals operating with academic editors who serve on a voluntary or minimally compensated basis can offer lower APCs due to reduced editorial overhead. Academic editors, typically serving part-time while maintaining their primary institutional affiliations, require little to no salary compensation from the journal, allowing publishers to allocate resources primarily to production and platform costs rather than editorial personnel. However, the editors should be more fairly compensated at these are time intensive positions.

# 805. Association of Research Libraries

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Andrew Pace

**Name of Organization:** Association of Research Libraries

**Type of Organization:** Professional Organization/Association

**Role:** Organizational Official

**1. Proposed policy options:**

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

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# 806. BMJ Group

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Tanya Rice

**Name of Organization:** BMJ Group

**Type of Organization:** Scholarly Publisher/Journal

**Role:** Other

**Role – Other:** Head of Market Intelligence, BMJ Group

**1. Proposed policy options:**
BMJ Group is a leading global healthcare knowledge provider: we share knowledge and expertise to improve health outcomes. At BMJ Group, we prioritise making a tangible impact through our publications, driving meaningful change in health and social care.

For over 185 years, we have published some of the most respected and influential titles in medicine and health. Our values and reputation for excellence in publishing have helped shape the way medical research is conducted, peer reviewed, and shared with the world. We publish 70 journals and collaborate with 24 learned societies on publishing medical research and education.

We are continuously reshaping the way medical research is conducted and communicated, and in 2019, together with Cold Spring Harbour Laboratory and Yale University, we co-founded medRxiv, the first preprint server dedicated to the health sciences. Since its launch, medRxiv has contributed significantly to open science, posting 12,863 preprints in 2024 alone.

BMJ Group is a pioneer of, and strong advocate for, open access (OA). Research in our flagship journal, The BMJ, has always been free to read online, and in 2011 we launched BMJ Open, now one of the world's largest OA medical journals. Today, one-third of our journals are fully OA, with 50% of our total content, and 80% of our research content, published OA – enabling the rapid dissemination of research findings to the widest possible audience and fostering collaboration and progress. In 2024, 6% of BMJ Group's published content was NIH-funded.

BMJ Group has a generous "Green" OA policy, allowing authors to deposit their Author Accepted Manuscript (AAM), with zero embargo, in an institutional repository. Our journals are fully compliant with the updated NIH Public Access Policy, and we continue to deposit NIH-funded authors' AAMs in NIHMS free of charge.

While we are advocates of opening up research, we believe that the proposed caps to publication costs, or the elimination of funding to cover these costs altogether, risk unintended negative consequences for author choice, research quality and integrity, and the overall diversity of the scientific publishing ecosystem. In the medical publishing space, these outcomes could directly impact patient safety by compromising the integrity and impact of the research upon which medical advances depend.

Key risks

1. Reducing author choice: Restricting publishing venues to low- or no-cost options limits an author's ability to reach their desired target audience, thereby potentially limiting the real-world impact of their research. A number of studies evidence the correlation between Article Processing Charge (APC) values and key measures of journal impact, including Impact Factor (1). At BMJ Group, our most selective journals have the highest citation rates but their APCs are also higher, in large part because the payment by accepted authors must also cover the costs of selection and evaluation of articles that are not published. Selectivity helps to identify the most important studies, but is more expensive to achieve.

2. Ecosystem consolidation and existential threat to smaller publishers: Smaller publishers and platforms (particularly learned societies, professional associations, academia-led and not-for-profit initiatives) play a critical role in serving their specific communities with relevant research, targeted content, events and other services. These smaller players, who lack economies of scale and deep pockets to fund large technology investments, are likely to be disproportionately impacted by APC caps and/or abrupt changes to publishing models.

3. Reliance on unproven, potentially unsustainable, publishing infrastructures: While BMJ Group fully supports publishing model diversity and experimentation, complete reliance on grant-funded, non-APC publishing models and infrastructures (such as Diamond OA initiatives) represent a potential publishing sustainability/continuity risk. For example, Knowledge Future's PubPub platform has spoken of its struggle to remain viable after their initial funding period (2), and the medRxiv preprint platform has recently become part of a new non-profit with the explicit aim of creating a more stable organization and reducing reliance on a single funder, founder or stakeholder (3). The indirect costs of publishing are high and often overlooked, and many new start-ups will face the same challenges that the smaller society publishers face once they themselves have become established and are no longer start-up funded.

4. Reduced focus on editorial selectivity/curation and outreach: More selective journals, or those with a higher focus on non-research content (e.g., editorial and clinical educational content) may be forced to modify their business and content models to "balance the books". This could reduce their ability to prioritise research novelty and impact, to provide expert context and real-world application, as well as reducing outreach and dissemination activities. This could limit the curation service that these journals provide for readers.

5. Patient safety risk of increasing public access to (non peer-reviewed) preprints in lieu of peer-reviewed article versions: In addition to driving authors towards alternative and potentially unsustainable research infrastructures, removing or reducing financial support for publication costs may drive more authors towards free-to-publish subscription (rather than pay-to-publish Gold OA) journals, a large proportion of which do not support immediate Green OA deposition. This may result in an increase in papers where the non-peer reviewed versions of manuscripts (in the form of preprints) are the only versions available on an OA basis. We advocate for preprints for speed, however, they do not replace the critical role of the peer-reviewed Author Accepted Manuscript or Version of Record, as peer review is critical to ensure the quality, integrity and safety of medical research outputs.

Assessment of policy options

Of the options laid out by NIH, we believe that option 4 is the least restrictive for authors, giving them a degree of flexibility to choose the most appropriate venues for disseminating their research, and

therefore protecting the diversity, quality and rigour of the scientific publishing ecosystem to some extent.

Table 1 provides a high level evaluation of the options laid out by NIH. Options 2 and 5 are treated together as they share a per-paper cost cap element.

Table 1: BMJ Group's evaluation of NIH's proposed options

Option 1 (disallow all publication costs)

Risk profile: Very high.

- Reliance on preprints for public access (in absence of an associated OA peer reviewed paper) presents patient safety risk.

- Author choice severely restricted, forcing over-reliance on alternative, unvalidated publishing infrastructures. Severe threat to viability of smaller publishers.

- There is currently no business model to ensure the perpetual availability of preprints.

Options 2 and 5 (per-paper cost cap)

Risk profile: High.

- Author choice restricted to lower cost venues, favouring larger or lower quality/predatory publishers and risking the viability of smaller high-quality publishers.

- Cost caps likely to impact journal selectivity for higher-APC journals.

Option 3 (per-paper cost cap plus peer reviewer compensation)

Risk profile: Very high.

- Additional integrity risks (e.g., unintended consequences including peer reviewer mills) and administrative burden associated with peer review payments - representing an additional threat to smaller publishers (see section 3, below).

- Lack of flexibility to tailor the peer reviewer value proposition to specific needs.

Option 4 (per-award spending cap)

Risk profile: Medium to high.

- Although publishing in higher cost and more selective venues is likely to be reduced, this option is the least restrictive for authors, reducing the existential threat to smaller publishers.

In order for the scholarly community to contribute more effectively to the policy development discussion, we urge the NIH to provide more clarity on their overall policy objectives beyond reducing publication costs. It is also imperative to consider how any proposed interventions will avoid the creation of unintended consequences, such as those seen with other recent policy implementations. For example, Plan S (the OA effort by European funders), while spurring progress toward OA, has also contributed to the significant increase in market share of the largest commercial scientific publishers in

recent years (4): in 2023, the 5 largest publishers accounted for 62% of research output, up from 50% in 2014 (5).

**2. Available evidence related to publication costs and proposed options:**

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**3. Peer review compensation:**
BMJ Group peer reviewer benefits and incentivisation

BMJ Group currently provides a range of benefits to peer reviewers, including APC discounts, complementary access to journals, CME (continuing medical education) credits, reviewer certificates and mentorship schemes to develop skills and careers. These initiatives represent a direct, or opportunity, cost to us. For example, OA discounts equate to a monetary value of between $700 and $1,550 per review and complementary journals subscriptions typically equate to a value of $200-$500.

Evidence summary

BMJ Group does not currently support blanket financial compensation of peer reviewers due to a lack of good evidence that this intervention meets reviewer needs or produces the intended outcomes. While some researchers and editors advocate for compensating peer reviewers, others caution that financial incentives could compromise impartiality, entice reviewers to review manuscripts outside of their areas of expertise, lower review quality, erode volunteerism, shift motivation to financial gain, and lead to higher APCs (6-11).

There has also been little empirical evaluation of the role of incentives/rewards in academic peer review for biomedical journals. A 2007 survey of peer reviewers for BMJ Group journals found that most agreed that small financial incentives would have limited effectiveness when time constraints are prohibitive and that non-monetary incentives might encourage reviewers to accept invitations to review. However, reviewers agreed that non-financial incentives (free subscription to journal content, annual acknowledgement on the journal's website, more feedback about the outcome of the submission and quality of the review, and appointment of reviewers to the journal's editorial board) might encourage reviewers to accept requests to review (12).

A Wiley survey of almost 3,000 peer reviewers also showed that feedback and acknowledgement for work as reviewers is valued more than either cash reimbursements or payments in kind (13). Some biomedical journals are beginning to experiment with paying reviewers to try to speed up the reviewer process and attract more reviewers, but results are moderate and long-term results have not yet been assessed. Two recent studies (14, 15) have examined the topic, but neither assessed outcomes such as whether financial incentives encourage more reviewing at the potential expense of quality.

BMJ Group reviewer satisfaction survey: Findings

BMJ Group has conducted an annual peer reviewer satisfaction survey which reveals the evolving motivations of our reviewers from October 2021 to August 2025. Across this period, recognition incentives emerged as the most powerful motivator. The most popular incentive throughout the period was having review details added to an ORCID profile, with its popularity rising to 49% in 2025. Other highly-ranked recognition incentives included inclusion on an annual reviewer list and certificates. While in-kind payments (like free content access, APC discounts, and charitable donations) saw a notable rise,

particularly access to subscription content which increased from 25% in 2021 to 40% in 2025, they did not surpass the popularity of top recognition-based rewards. In contrast, financial compensation has remained one of the less popular options over the five years, with the percentage of responses in favour generally staying below 20%.

Many reviewers also see the task of reviewing as a way to contribute to the scientific community. As one anonymous respondent noted in the same survey, "It is how the system works. For my articles to be peer-reviewed, I also have to serve as a paper reviewer. Besides, it keeps me updated." This view was common among many who responded to our question about additional incentives. Other comments revealed a cautious attitude toward financial rewards, such as one reviewer's concern: "I am against rewarding reviewers because of potential for conflict of interest."

Our findings suggest professional recognition remains important for medical researchers who review for the BMJ Group. We have yet to see a large-scale shift to favouring monetary rewards but will continue to monitor our reviewers to track their evolving attitudes. In order to maintain effective reviewer engagement it's imperative that we, and all publishers, maintain the operational flexibility to adapt our offer to the changing needs of our own specific cohorts of peer reviewers, which may vary by discipline.

See table 2 (Responses to BMJ Group annual reviewer satisfaction survey question: "Which of the following incentives would motivate you to review"?) in the attached document.

Patient and public reviewers

Patient and public reviewers (PPRs) have been a formal part of The BMJ's peer review process since 2014. Patient and public involvement is now being adopted more widely across the business, with several other journals across the BMJ Group portfolio now including patient and public reviewers, including BMJ Open, BMJ Medicine, BMJ Global Health, BMJ Health & Care Informatics, and RMD Open (Rheumatic and Musculoskeletal Diseases). See section 4 for more detail.

As of this year, BMJ Group offers a modest "thank you" payment to patient reviewers for their time, skills and expertise - in line with the National Institute for Health and Care Research (NIHR) guidance for payment of patient and public involvement in research.

However, a recent survey of PPRs for The BMJ (17) found that only 51% said they would be more likely to review if offered a £50 payment. PPR views on remuneration were divergent, with some stating it was unnecessary and others that it was important for reaching those that might otherwise not be reached and to show we value their input. The responses showed the importance of providing flexible, optional incentive choices to accommodate varying individual needs, values and preferences. Beyond remuneration, respondents wanted to feel valued, to get feedback, and to know how their reviews were helpful. While the majority did not have any concerns about the introduction of payment, many expressed concern about the effect on potentially changing reviewers' motivations and having a negative effect on the quality of reviews, the administrative burden of receiving the payments and the associated tax implications, the impact on income from benefits received and a need for evaluating the initiative.

Our finding of divergent PPR views on remuneration echo the diverse opinions in the literature about paying academic peer reviewers. Some PPRs echoed the fears of destroying the altruistic nature of

reviewing while others emphasised the importance of offering payment to help broaden the pool of available reviewers in terms of geography and diversity.

Statistical reviewers

For some subsets of peer review, the value exchange between reviewer and publisher differs. In line with the industry standard, BMJ Group directly compensates statistical reviewers for their professional services as the indirect benefits they receive from undertaking peer review are smaller, and the frequency and length of their reviews is greater.

BMJ Group's role in improving peer review effectiveness

As part of BMJ Group's strategy to take the lead in improving the publishing of science, and being an evidence-based publisher, we continue to conduct and publish numerous studies on peer review, conflicts of interest, authorship, publication ethics and other aspects of the publishing process in collaboration with external researchers. For example, we are currently involved in a research collaboration to explore the impact of incentivisation on peer review speed, quality, acceptance rates and peer reviewer diversity, across a range of incentive types. We suggest that any move towards paying reviewers should be informed by such careful empirical research.

**4. Publishing best practices:**

Value added by a publisher

Continued investment in publishing infrastructure and technology (such as fraud and plagiarism detection, platform development, article metadata improvements, open science workflows) is now fundamental to the modern scholarly communication ecosystem, and contributes significantly to the overall cost base of a publisher.

Publishers add value to the publishing process in myriad other ways, some of which add significant costs to their operations. These may include: paying professional editors or editorial honoraria to MDs (medical doctors), enhanced article triage, enhanced peer review (such as BMJ Group's patient and statistical review processes), article enhancements & media creation (e.g. video abstracts, podcasts, infographics, lay summaries), commentary, marketing & outreach activities, customer support and waiver provision. In addition, BMJ Group adds unique value through its patient involvement activities.

Patient involvement

BMJ Group has worked with patients for over two decades. We strongly believe that integrating meaningful public perspectives into publishing systems and processes is critical to providing evidence that is not just academically rigorous but genuinely useful to those most affected.

Patient/public reviewers have been a formal part of The BMJ's peer review process since 2014. Research papers are reviewed not just by academic experts but also by someone with relevant lived experience. Patients also sit on the journal's editorial board, and our international patient advisory panel helps shape our patient and public partnership strategy.

Patient and public involvement is being adopted more widely across BMJ Group. We now require all submitting authors, across all of our journals, to indicate how they involved patients and the public in

their research in a Patient and Public Involvement statement, holding researchers accountable for their claims of “co-production”.

A note on standardised pricing

As the component parts of the author value proposition vary between publishers, so do their approaches to pricing. Standardising price points, based on a standard service offering across providers, discourages differentiation and innovation, and limits a publisher’s ability to respond to the specific needs of its customer base.

Additionally, making certain technologies a requirement for payment of part of an APC, creates a barrier to entry for smaller publishers who might not be able to invest in those technologies, further exacerbating the industry trend towards consolidation.

**5. Other Comments:**

Value added by a publisher

Continued investment in publishing infrastructure and technology (such as fraud and plagiarism detection, platform development, article metadata improvements, open science workflows) is now fundamental to the modern scholarly communication ecosystem, and contributes significantly to the overall cost base of a publisher.

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**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/NIH-RFI-BMJ-Group-Response.pdf

**Description:** NIH RFI BMJ Group Response

# 807. Zhe Ma

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Zhe Ma

**Name of Organization:** University of Florida

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 4 maybe the best option for me, but I really hope to not put on any limit on publication, as this is the most important step to distribute science.

**2. Available evidence related to publication costs and proposed options:**
Average cost of less than 2000 does not mean everyone is 2000. In fact, this policy will discourage high impact publications, like Nature, Cell, Science or PNAS. This would also cause limitations on journal selection, influence on selecting less impact journal which eventually limit the distribution of scientific findings.

**3. Peer review compensation:**
Peer reviewers compensation is a good policy.

**4. Publishing best practices:**

**5. Other Comments:**

# 808. Duke University

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Elizabeth Blackwood

**Name of Organization:** Duke University

**Type of Organization:** Academic Institution

**Role:** Institutional Information Sciences Professional/Librarian

**1. Proposed policy options:**

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/NIH-RFI-APCs_DukeUniversity.pdf

**Description:** Duke University Response to RFI

# 809. American Society of Clinical Oncology, The Endocrine Society, American Thoracic Society, American Society of Anesthesiologists, American Heart Association, American Academy of Neurology, American Society of Nephrology, American Society of Hematology,

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Angela Cochran

**Name of Organization:** American Society of Clinical Oncology, The Endocrine Society, American Thoracic Society, American Society of Anesthesiologists, American Heart Association, American Academy of Neurology, American Society of Nephrology, American Society of Hematology, Amer

**Type of Organization:** Professional Organization/Association

**Role:** Other

**Role – Other:** Not-for-profit Society Executives

**1. Proposed policy options:**
We, the undersigned US societies, thank the National Institutes of Health (NIH) for the opportunity to provide information in response to the RFI on Maximizing Research Funds by Limiting Allowable Publishing Costs. Collectively, we employ nearly 8,000 staff in the US and represent over 710,000 American members. Some of the most ground-breaking and practice-changing research has been published in our journals.

We respectfully request the opportunity to meet with appropriate decision-makers to discuss our grave concerns about capping Article Processing Charges (APCs). Capping these important yet modest fees will have a profound impact on the ability of our nation’s top medical and research journals to effectively promulgate Gold Standard Science.

We believe we already align with many goals outlined in the NIH's implementation guide for Gold Standard Science. Journals and American societies have worked hand-in-hand with federal agencies and funders on topics such as:

- Reproducibility
- Transparency
- Timely corrections of scientific errors
- Interdisciplinary collaborations
- Unbiased expert peer review
- Public disclosure of potential conflicts
- Public access to research results

- Scientific integrity checks

The NIH clearly appreciates that funded researchers must share their results for the research to yield its full benefits. Communicating research results through journal publication is Gold Standard Science. Our journals, run by expert physicians and scientists, facilitate the goals of Gold Standard Science by:

- Independently evaluating the quality of the science presented
- Providing valuable feedback that ultimately improves the manuscripts
- Publishing the work on our state-of-the-art digital platforms
- Requiring adherence to standards, such as data availability statements and financial disclosures
- Perhaps most importantly, lending the trusted names of our highly-regarded journals to these papers

The services we provide our authors are not without expenses. Yet, according to the background information the NIH provided with the RFI, less than 1% of research funds are used to support the actions we take to enable Gold Standard Science.

Our publications are all American society journals that represent general medicine titles; basic, clinical, and translational research; and specialty and subspecialty titles within these fields. Our publications operate under a variety of business models, including subscription (with green open access options), full open access, and hybrid journals. We have been consistently on record as supporting public access models for federally funded research that can sustain our continued operations. The combination of zero-embargo public access and capped APCs threatens the financial sustainability of journals.

We firmly believe that our society members should be free to publish the results of their work in the journals that are most appropriate. For some papers, it might be a general medicine journal; for others, it might be a basic research or subspecialty journal. Either way, there will naturally be wide variations in publishing models. Some journals, such as leading subscription-based titles, do not charge authors at all, ensuring that publishing decisions are not contingent on an author's ability to pay. Other titles offer open access options, where fees vary. The NIH is limiting the academic freedom of researchers to choose the most appropriate venue for sharing their research results.

We urge the NIH to reconsider implementing caps on article processing fees. There is a significant risk that the financial analysis provided in the RFI is inaccurate because the databases used to determine average and likely costs contain flawed data. For example, the Directory of Open Access Journals (DOAJ) includes many smaller, regional, or institution-run journals for which there is no APC. It is not limited to high-impact or medical journals where submitted papers require additional levels of review. Furthermore, DOAJ only includes fully open access journals, which typically have lower fees than hybrid journals. Most NIH-funded research published open access appears in hybrid journals.

According to the Background section of the RFI, the NIH is assuming an average APC based on what has been included in funding requests to date. These numbers do not take into account the papers published in subscription-supported journals, which sustain operations without charging authors any APCs. The NIH analysis also does not account for the inevitable increase in funded authors needing to pay an APC to ensure compliance with the new zero-embargo public access policy.

A recent analysis concluded that the capped fees proposed in this RFI will not cover APCs for publishing in the journals where NIH-funded researchers most frequently submit their work (https://www.scholcommlab.ca/2025/09/03/nih-apc-caps/). Capping an APC devalues the efforts that societies and our volunteer physicians and scientists put into evaluating and amplifying research papers.

Much of what is outlined in the Gold Standard Science document is already part of the scholarly publishing workflow, particularly for society journals. NIH-funded researchers comprise a core constituency of our membership, and our journals are proud to be routinely chosen as the venue for disseminating NIH-funded research results.

As the NIH is aware, in addition to facilitating timely peer review by our expert editors leading to improvements to the manuscripts, journals staff and editors conduct an intensive integrity review that can include:

- Appropriate trial registration
- Affirmation of the required IRB approvals
- Adherence to CONSORT and other reporting standards
- Plagiarism checks
- Adherence to authorship criteria
- Disclosure of financial relationships and other potential conflicts of interest
- Checking that figures are free of inappropriate manipulation
- Adherence to data sharing requirements

For papers published in our titles, we invest in amplifying the research and putting it in context through podcasts, commentaries, videos, plain language summaries, and graphical abstracts. We also invest in editorial fellowship and career development programs, reduced or no-cost access and APCs for developing countries, and discounts for society members.

The research integrity tools we use require staff, vendors, platforms, and extensive training for staff and editors. The existence of paper mills and now AI-generated papers that include fabricated figures, tables, and data has significantly complicated the research integrity screening process. Yet, these checks are vital to protecting trust in the published scientific record. These are not free tools.

Our expert editors ensure that abstracts, titles, and conclusions accurately represent the results of the research. In addition to content review, the editors facilitate methodological and biostatistical reviews. It is not uncommon for submitted manuscripts to go through more than one review cycle. In fact, it is extremely rare that revisions are not requested, triggering further review.

Non-profit societies have a vested interest in helping authors improve their manuscripts to be the best possible output. We look forward to meeting with you to discuss how this work benefits authors, the research and medical communities, and the patients who are at the center of our missions. Ultimately, the NIH benefits from this work, as does society as a whole.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/Medical-Societies-response-to-RFI-on-APCs.pdf

**Description:** Full contents of Response

# 810. Alzheimer's Association

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Laura Thornhill

**Name of Organization:** Alzheimer's Association

**Type of Organization:** Research Participant/Patient Advocacy Organization

**Role:** Other

**Role – Other:** Director, Regulatory Affairs

**1. Proposed policy options:**

**2. Available evidence related to publication costs and proposed options:**
The Alzheimer's Association and the Alzheimer's Impact Movement (AIM) note a significant discrepancy in NIH's RFI Data Source and underlying rationale. NIH limited its review to the Directory of Open Access Journals (DOAJ) when, in fact, there are several other indexing entities and not all scientific journals that are indexed on Clarivate's Web of Science platform are indexed in the DOAJ.

For NIH's benefit, the differences between DOAJ and Clarivate's Web of Science are as follows:

1. DOAJ only indexes Open Access journals, whereas Clarivate indexes both subscription/hybrid and OA journals.

2. DOAJ includes journals that meet their criteria, which are unrelated to the quality of the articles published in a journal, whereas Clarivate evaluates journals based on their editorial impact (among other things).

3. Clarivate has different indexes for the Social Sciences and the Sciences, whereas DOAJ's list is across all disciplines. The higher the selectivity of a journal, the more expensive the editorial operations are. The more expensive editorial operations are, the higher the article processing charge (APC) has to be. There needs to be differentiation in price based on the quality/impact of a journal, hence the one-price-fits-all approach (and a much lower than current average for high quality, Clarivate-indexed journals) is an artificial construct.

NIH should also include Clarivate's list in determining APC caps, since it is the most comprehensive list that is available to authors and is used by publishers and researchers as the benchmark.

**3. Peer review compensation:**
The Alzheimer's Association and AIM strongly discourage NIH from implementing a policy of paid peer review. Simply put, such a policy will lead to more bias in the manuscript peer review process.

**4. Publishing best practices:**
The Association and AIM disagree with all of the proposals as they would affect the scientific integrity of

publications. The proposals would restrict or remove many of the checks the publishers have in place such as antiplagiarism checks, image manipulation checks, author and affiliation checks, reviewer finder and validation tools, peer review, and open access licensing. These checks ensure that the manuscript, the data, and the authors are authentic and thus maintain the integrity of peer review and follow Committee of Publication Ethics guidelines. Some of the costs of these check tools and the personnel to administer them are covered by APCs, as are the Creative Commons licenses that are required to protect the copyright of every paper that gets published online (open access).

Additionally, these restrictive proposals may create barriers for researchers (particularly early career researchers, students, and post-doctoral candidates) who rely on grant or institutional funding to cover APCs and open access publishing to disseminate their work. Open access publishing is becoming increasingly common within the field; the NIH itself is now requiring any NIH-funded research be published open access. The proposals do not accurately reflect the cost to cover open access publishing and any difference not covered within the caps would fall onto institutions or each individual researcher, including early career researchers, to bear the burden of the cost balance. This may drive down the publishing of scientific research in peer-reviewed publications or force researchers to use non-traditional publishing channels such as non-peer-reviewed preprints. This method can impact the integrity of published manuscripts, as preprints do not require peer review, which is central to maintaining the scientific integrity of the published manuscripts. Furthermore, preprints do not incorporate the established publishing checks for scientific misconduct or fraudulent data in the manuscript and judging the merits of the published research, as these are completely removed from the process. Ultimately, these proposals will stall the timely sharing of knowledge, disrupt the scientific integrity of the research publication process, and slow scientific progress.

**5. Other Comments:**

The Association and AIM disagree with all of the proposals as they would affect the scientific integrity of publications. The proposals would restrict or remove many of the checks the publishers have in place such as antiplagiarism checks, image manipulation checks, author and affiliation checks, reviewer finder and validation tools, peer review, and open access licensing. These checks ensure that the manuscript, the data, and the authors are authentic and thus maintain the integrity of peer review and follow Committee of Publication Ethics guidelines. Some of the costs of these check tools and the personnel to administer them are covered by APCs, as are the Creative Commons licenses that are required to protect the copyright of every paper that gets published online (open access).

Additionally, these restrictive proposals may create barriers for researchers (particularly early career researchers, students, and post-doctoral candidates) who rely on grant or institutional funding to cover APCs and open access publishing to disseminate their work. Open access publishing is becoming increasingly common within the field; the NIH itself is now requiring any NIH-funded research be published open access. The proposals do not accurately reflect the cost to cover open access publishing and any difference not covered within the caps would fall onto institutions or each individual researcher, including early career researchers, to bear the burden of the cost balance. This may drive down the publishing of scientific research in peer-reviewed publications or force researchers to use non-traditional publishing channels such as non-peer-reviewed preprints. This method can impact the integrity of published manuscripts, as preprints do not require peer review, which is central to maintaining the scientific integrity of the published manuscripts. Furthermore, preprints do not incorporate the established publishing checks for scientific misconduct or fraudulent data in the

manuscript and judging the merits of the published research, as these are completely removed from the process. Ultimately, these proposals will stall the timely sharing of knowledge, disrupt the scientific integrity of the research publication process, and slow scientific progress.

# 811. Medical Library Association

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Ryan Harris

**Name of Organization:** Medical Library Association

**Type of Organization:** Professional Organization/Association

**Role:** Institutional Information Sciences Professional/Librarian

**1. Proposed policy options:**

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/RFI-response-on-pub-costs-2025-09.pdf

**Description:** Attached is the comment to the RFI from the MLA/AAHSL Joint Legislative Task Force

# 812. Chiara

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Chiara

**Name of Organization:** Gamberi

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Both option 3 and 6 have merits. I think an option blending them would be best.

Option:

1- Per option 6 as proposed, limiting per publication costs to $6,000 (has realistic market value and can usher in a transition period without the smaller labs having to scramble for cover and try to survive) and topping the expenses on an award also will make people think about what to publish, and consequently improve publication quality.

2- Per option 3, compensating reviewers AND making reviews public will support (verifiable) quality reviewing and increase the fairness of peer-review by giving the credits where credits are due and making the entire process transparent.

Therefore, capping APCs and promoting "fair trade" across the board through economic pressure seems a great way to enable positive change. Saved funds from the publication budget lines will be available for the salaries of those who do research.

**2. Available evidence related to publication costs and proposed options:**
Small laboratories struggle to publish. We were lucky that the visibility of our previous work earned us vouchers that waived APCs completely, but in the long run the system must be fairer.

**3. Peer review compensation:**
I was never compensated for peer review. Therefore, from my standpoint the determination is "no, peer reviewers are not appropriately compensated". Compensation and traceability of the resulting reviews would encourage review quality.

**4. Publishing best practices:**
Fraud detection is important. Plagiarism and image manipulation have increased. Automated detection is great, but (some) humans have had better results. Probably a combination of both would be good. In addition:

Requesting publication of all relevant data and results, antibody specificity controls and raw data in the Supplementary Materials will allow reproducing the results and accelerate detection of fraud and reproducibility problems.

**5. Other Comments:**
Fraud detection is important. Plagiarism and image manipulation have increased. Automated detection

is great, but (some) humans have had better results. Probably a combination of both would be good. In addition:

Requesting publication of all relevant data and results, antibody specificity controls and raw data in the Supplementary Materials will allow reproducing the results and accelerate detection of fraud and reproducibility problems.

# 813. Biophysical Society

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of an organization

**Name:**

**Name of Organization:** Biophysical Society

**Type of Organization:** Professional Organization/Association

**Role:** Organizational Official

**1. Proposed policy options:**

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/BPS-Response-to-NIH-RFI-NOT-OD-25-138.pdf

**Description:** Biophysical Society Response to NIH RFI on Maximizing Research Funds by Limiting Allowable Publishing Costs (Notice No. NOT-OD-25-138)

# 814. Association of College and Research Libraries (ACRL)

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Brianna Marshall

**Name of Organization:** Association of College and Research Libraries (ACRL)

**Type of Organization:** Professional Organization/Association

**Role:** Institutional Information Sciences Professional/Librarian

**1. Proposed policy options:**

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/ALA_ACRL-NIH-Policy-Response_9.15.25-Submitted.pdf

# 815. STM

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Caroline Sutton

**Name of Organization:** STM

**Type of Organization:** Professional Organization/Association

**Role:** Organizational Official

**1. Proposed policy options:**
While STM agrees with the NIH RFI's goal of preserving flexibility and maximizing the use of taxpayer funds, STM cannot endorse price or spending caps: such approaches do not give researchers the flexibility to choose the venue best suited to enable them to promote their research and its impact, preserve funding for research rather than bureaucracy, and enable publishers to invest in quality, research integrity, and promoting the impact of NIH-funded research. One size will not fit all, and the journal that best serves to ensure maximal impact for one piece of funded research may cost more (or less) than the one fit to purpose for another. Exceptions may be necessary to ensure researchers have the maximum opportunity to promote exceptional research.

That said, given the substantive cuts to NIH funding and the concerns expressed by NIH Director Bhattacharya regarding responsible stewardship of American tax dollars, STM recognizes NIH's desire to introduce a policy in this area. STM is open to working with NIH on developing additional evidence on how to implement such a policy, as the available evidence is limited and the scholarly publishing marketplace is dynamic. Although STM is generally against market-distorting price controls, of the options presented, option 4 comes closest to providing flexibility by allowing researchers to choose how to use funding and, if implemented carefully and flexibly, such an approach could ensure continued support for innovations in publishing and the quality and integrity of scholarly communication that drives impact. Critically, however, the overall limit proposed in option 4 is insufficient, as we demonstrate below. In addition, mechanisms, such as exceptions to a cap, would need to be put in place to ensure that researchers can publish as many high-quality, peer-reviewed reports on NIH-funded research as needed to support the maximal impact of that research and best return on investment for the taxpayer. More research is likely needed should even a soft suggestive cap be used as an option.

Price controls and caps have a poor track record throughout history.[Q1.1] Recent examples are riddled with unintended consequences, from the former Soviet Bloc to Venezuela.[Q1.2] Conservative economist Friedrich Hayek noted that price controls mean "the end of the free political order"[Q1.3] and the Heritage Foundation notes that price controls "invariably worsen the very problems they are designed to solve."[Q1.4] Libertarian economist Thomas Sowell notes that a key impact of price controls is to lower quality,[Q1.5] an effect seen with gas price controls as well.[Q1.6] In the opposite direction, Ronald Reagan successfully removed price controls on oil in the 1980s, which led to competition and a reduction in the price of oil and gas.[Q1.7] The bottom line, as the Hoover Institution notes, is that "price controls change the product" and "often lead to favoritism."[Q1.8] In the case of research

communication, the ultimate effect is uncertain but would likely undermine the quality and impact promotion aspects of publishing.

Whilst the proposals made in the NIH RFI are not strictly price controls, as they limit only part of the input, researchers are also reluctant to – or find it difficult to – find their own sources of money for articles that report on NIH-funded research.[Q1.9] The impact is likely the same: quality reductions, product degradation, increased bureaucracy and compliance burdens, and reduced impact and reach for funded research.

The principles that STM can support in a policy to control overall costs would be in line with those articulated by Director Bhattacharya and by President Trump in the Gold Standard Science Executive Order: ensuring that researchers can publish in their outlets of choice, preserving access to publishing for all (rather than a two-tier system), promoting active dialogue and debate in the scientific community; ensuring quality and integrity in the communication of science (including an understanding of uncertainty), and enabling the scientific record to be preserved free of manipulation. Underlying all of these principles is the ability of publishers to invest in a system that achieves these goals. STM would welcome collaborative dialogue following on this RFI process to develop additional evidence and support an approach that manages costs while preserving academic freedom, open scientific debate, and the quality and integrity of the scientific record.

This submission is necessarily limited by competition law, which restricts STM's ability as a trade association to gather and share competitively sensitive information from our members. STM is firmly committed to complying with all applicable competition and antitrust laws, and this document is intended to fully comply with such laws.

Footnotes

[Q1.1] Richeng Piao. “The Paradox of Price Ceilings in Economic History.” RP World: Microeconomics, Markets and Government. Northeastern University, January 22, 2024. https://econ.sites.northeastern.edu/wiki/microeconomics/markets-and-government/the-unintended-consequences-of-price-ceilings-a-historical-overview/

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[Q1.3] Lars Christensen. “Beating the Iron Law of Public Choice: A Reply to Peter Boettke.” The Market Monetarist, July 29, 2013. https://marketmonetarist.com/2013/07/29/beating-the-iron-law-of-public-choice-a-reply-to-peter-boettke.

[Q1.4] Robert E. Moffit. “Why Price Controls on Prescription Drugs Would Harm Seniors.” Heritage Foundation, December 19, 2019. https://www.heritage.org/government-regulation/report/why-price-controls-prescription-drugs-would-harm-seniors.

[Q1.5] LibertyPen, “Thomas Sowell – Price Controls,” YouTube video, 4:15, posted October 31, 2012, https://youtu.be/yuhuKiTw4n8.

[Q1.6] David R. Henderson. “Price Controls: Still a Bad Idea.” Hoover Institution, February 8, 2023. https://www.hoover.org/research/price-controls-still-bad-idea.

[Q1.7] Ronald Reagan. “Radio Address to the Nation on Oil Prices.” The Ronald Reagan Presidential Library & Museum, April 4, 1987. https://www.reaganlibrary.gov/archives/speech/radio-address-nation-oil-prices.

[Q1.8] Henderson. “Price Controls.”

[Q1.9] American Association for the Advancement of Science. Open Access Survey Report: Scientists’ Experiences with Open Access Publication Fees and Licensing. October 2022. https://www.aaas.org/sites/default/files/2022-10/OpenAccessSurveyReport_Oct2022_FINAL.pdf.

**2. Available evidence related to publication costs and proposed options:**
In order to move towards a policy that achieves our shared goal of maximizing the impact of NIH investments in research, STM offers the following discussion and links to evidence that might help in the consideration of the options presented and support further dialogue.

This submission is necessarily limited by competition law, which restricts STM's ability as a trade association to gather and share competitively sensitive information from our members. We have worked to provide publicly accessible information and evidence to contribute to NIH's policymaking deliberations and would welcome additional opportunities to work together to support evidence-gathering consistent with competition law. STM is firmly committed to complying with all applicable competition and antitrust laws, and this document is intended to fully comply with such laws.

*Independent research suggests higher APCs than proposed caps

Much research has been done into what it actually costs to provide high-quality publishing services. Findings consistently exceed the proposed caps. When OSTP investigated average APCs for journals that are likely to be chosen by federally funded researchers to best advance and ensure the impact of their findings, they found average APCs of $3372 for fully open journals and $4824 for Hybrid journals, significantly higher than the data from the Directory of Open Access Journals (DOAJ) used in the RFI calculations.[Q2.1] Even the publisher-critical cOAlition S finds higher APCs, with a reported average of $2648 and a median of $2940.[Q2.2]

Theoretical models find similar results. Analysis of necessary spending for publishing by Research Consulting commissioned for the development of a centralized Open Research Europe estimated that costs per article would actually average  2,403 ($2,818) over 10 years,[Q2.3] although actual costs for the first 18 months of operation were between  3,700 and  5,500 ($4339-$6450).[Q2.4] The model assumes a 50% acceptance rate, but if one were to allow more highly selective journals to improve impact and reach of published articles, as well as to account for the increasing need for integrity checks to address paper mills and other bad actors, the cost would likely be even higher.

These costs are real, regardless of the business model or profit status of the entity publishing the journal. For example, the Public Library of Science (PLoS) is a non-profit publisher that only exists to publish open access journals. They have no profit motive nor parent society to support. Their APCs range from $2300 to $6400,[Q2.5] and even with these APCs they have generated positive revenue only 5 of the past 9 years.[Q2.6] A similar publisher, eLife, charges $3000 for each submitted article (with a 0% rejection rate) and also receives significant outside funded support to remain solvent.[Q2.7]

*The gap between proposed caps and actual costs creates system risks

This independent research helps explain why there is such a significant gap between the proposed caps and current market realities. As noted by research from the ScholCommLab (which is critical of the current publishing system), a $2000 cap would cover APCs for as few as 6% of papers reporting on NIH-funded research that were published in the first half of 2025. 10% of papers would not be able to be published with a $6000 cap.[Q2.8] The authors conclude,

there is a significant gap between what the NIH is proposing as reasonable caps and the substantially higher charges imposed by publishers of journals where NIH-funded authors most frequently publish. This gap is likely even greater than our analysis indicates, since prior to the zero-embargo of the new policy, some authors included in the data had not paid APCs but instead complied by depositing their articles in PubMedCentral at no cost (green OA).

This last point is critical in evaluating any analysis of historic costs of publishing for NIH-funded researchers, as looking at past expenses and proposed budgets will fail to account for the real-world behavior of NIH-funded researchers in the face of the new mandates and a reduction of options for delayed access. More research and time are needed to assess and calculate the actual impact on researchers choices of APC-supported publishing and other models to investigate whether expenses are reasonable. Expenses also need to be considered in the context of the growing use of transformative agreements and other models for open access publishing.[Q2.9]

*Evidence conflicts with calculations presented in the RFI

In the absence of additional research, however, there is additional evidence that could be helpful in improving the calculations presented in the RFI.

The first calculation, based on DOAJ data, excludes journals that do not meet DOAJ s criteria (including many long-standing high-quality hybrid open access journals) and includes many that are unlikely to be useful to advance the impact of NIH-funded research.[Q2.10]

The second analysis, looking at proposed NIH budgets, is more reasonable, but looks at proposed budgets, rather than actual expenditures. Even past expenditures may not reflect actual costs, as publishing fees may be covered by institutional agreements or other arrangements that do not currently end up in direct costs. In a more constrained funding and policy environment, NIH might see more of these expenses budgeted for in direct costs for publishing. This is especially true as NIH eliminates the option of delayed access under its public access policy, which will require researchers to choose open access in those journals that are not able to offer immediate access without payment.

Research also indicates that the cost of publishing in a journal can depend on various factors of investment by the journal. Empirical research suggests that these may fall into bands, or groups of journals with similar characteristics.[Q2.11] While STM does not recommend that NIH add to researcher burden by having researchers audit journals for differentiating characteristics, it is worth noting that hard caps could unintentionally prevent researchers from taking advantage of the differentiation of journals. This particularly puts at risk many US-based scientific societies, as reported in Inside Higher Education.[Q2.12]

*Evidence regarding administrative burden and market distortion

As discussed above, price caps distort a market system, as well as increase researcher burdens. The more complex and numerous grant regulations are, the more costly they are to implement. Such burdens take valuable funding and time away from the research and research communication that a grant is designed to support. Studies estimate that grantors spend more than 10% of their funding on grant administration, and that grantees spend an additional ~9% on administration.[Q2.13] According to data compiled by the Council on Governmental Relations (COGR), in the past decade, there have been 168 new regulatory requirements that impact a university s cost to perform research while potentially increasing faculty burden to address these additional regulations.[Q2.14] A 2018 Federal Demonstration Project (FDP) survey found that researchers spend 44% of their research time on administrative tasks.[Q2.15] The percentage has likely gone up even more due to the increasing regulatory burdens, as outlined in a recent National Academies report, which also makes recommendations for simplifying policies.[Q2.16] If the goal of this policy is to direct more funding to direct research activities, adding to the compliance burden even slightly could significantly overcome any potential saving from what NIH estimates is less than 1% of overall grant funding.

*Evidence regarding percentage-based approaches

An approach that limits the overall percentage of funding for publishing without restricting individual costs, as envisioned in option 4, could potentially provide flexibility for researchers in choosing the outlet that can best advance their research and could enable support for the publishing enterprise without bias. However, such a limit still raises concerns about potential limitations on publishing if the percentage is insufficient or an unusual volume of articles is appropriate to best ensure the impact of the funded research. More research is needed to ensure that any proposed percentage cap is sufficient to enable researchers to fully communicate and share reports of the results of NIH funded research to the greatest effect. Using a simple analysis of public research investments from WIPO[Q2.17] and NCSES[Q2.18], R&D investments that are public and could lead to publishable reports are approximately $800 billion, excluding defense and proprietary business R&D.[Q2.19] The scholarly journals market is worth between $10.8[Q2.20] and $12.65[Q2.21] billion, meaning that investment in publishing represents between 1.3% and 1.6% of publishable R&D investment (this is also consistent with the previously-cited SPARC figures). A figure more in line with these calculations, rather than the 0.8% in the provided estimate, would better ensure researchers have the funding needed to communicate their research. Any flat minimum should also account for an appropriate number of publications, be indexed for inflation, and allow for exceptions to ensure all funded research can be published in a manner that best enables the use and impact of the funded research.

*Peer review compensation

The idea of paying peer reviewers has been actively debated for many years.[Q2.22] There is no debate, however, that paying reviewers will add significant additional costs,[Q2.23] which seems counter to the goals expressed in the RFI. The RFI s calculation of potential costs for paying peer reviewers should be adjusted to account for the fact that journals may use more than three reviewers per submitted article, and there may be anywhere from 2 to 20 articles reviewed for each article published. Using the RFI s proposed payment of $300 per reviewer (which is lower than that proposed by some[Q2.24]) for three reviewers for each submitted article, paying peer reviewers at a highly selective journal could add $18000 or more to the cost of publishing an article.

*Legal authority

Finally, and importantly, STM notes that 2 CFR 200 clearly specifies that APCs are an allowable direct cost[Q2.25] and does not provide any additional authorization for restrictions on payments of these costs, nor other categories of direct costs.[Q2.26] This is consistent with regulations from NIH itself as well as other OMB guidance. If NIH wishes to examine overall spending to ensure the effectiveness and impact of the investment in research, STM would urge a more holistic view of costs rather than focusing on what is only approximately 1% of current budgets (whichever calculation one uses).

Footnotes

[Q2.1] White House Office of Science and Technology Policy (OSTP). Report to the U.S. Congress on Financing Mechanisms for Open Access Publishing of Federally Funded Research. Washington, DC: OSTP, November 2023. https://bidenwhitehouse.archives.gov/wp-content/uploads/2023/11/Open-Access-Publishing-of-Scientific-Research.pdf.

[Q2.2] cOAlition S. Journal Comparison Service: Analysis of the 2022 Data. Blog post, January 9, 2024. https://www.coalition-s.org/blog/journal-comparison-service-analysis-of-the-2022-data/.

[Q2.3] Rob Johnson. Scenario Modelling for Open Research Europe. European Commission, Directorate-General for Research and Innovation. Luxembourg: Publications Office of the European Union, 2023. https://op.europa.eu/en/publication-detail/-/publication/08da357e-926e-11ee-8aa6-01aa75ed71a1/language-en.

[Q2.4] Rob Johnson. Operationalising Open Research Europe as a Collective Publishing Enterprise. European Commission, Directorate-General for Research and Innovation. Luxembourg: Publications Office of the European Union, 2022. https://op.europa.eu/s/z8RB.

[Q2.5] Fees. Public Library of Science. Accessed September 5, 2025. https://plos.org/fees/.

[Q2.6] According to PLoS annual reports and form 990s filed between 2015 and 2023: Public Library of Science (PLOS). Financial Overview. Accessed September 5, 2025. https://plos.org/financial-overview/.

[Q2.7] According to eLife s annual reports and form 990s filed between 2016 and 2023: eLife. Annual Reports. Accessed September 5, 2025. https://elifesciences.org/annual-reports. Analysis indicates that between 28% and 100% of eLife revenue comes from grants, and expenditures exceeded revenue in 3 of the past 8 years.

[Q2.8] Scholarly Communications Lab. Shaking up the Scholarly Publishing Market Why Caps on APCs Could Backfire. Impact of Social Sciences (LSE), September 11 2025. https://blogs.lse.ac.uk/impactofsocialsciences/2025/09/11/shaking-up-the-scholarly-publishing-market-why-caps-on-apcs-could-backfire/.

[Q2.9] Tom Ciavarella and Eleonora Colangelo. The Changing Landscape of Open Access Policies and Transformative Agreements. Science Editor 47, no. 3 (2024). https://www.csescienceeditor.org/article/the-changing-landscape-of-oa-ta/.

[Q2.10] Heather Morrison. Some Limitations of DOAJ Metadata for Research Purposes. Sustaining Knowledge Commons, February 10, 2021. https://sustainingknowledgecommons.org/2021/02/10/some-limitations-of-doaj-metadata-for-research-purposes/.

[Q2.11] Dan Pollock and Heather Staines. Open Access Charges Price Increases Back on Trend. News & Views, Delta Think, March 13, 2025. https://www.deltathink.com/news-views-open-access-charges-price-increases-back-on-trend.

[Q2.12] Kathryn Palmer. Open-Access Expansion Threatens Academic Publishing Industry. Inside Higher Ed, August 29, 2024. https://www.insidehighered.com/news/government/science-research-policy/2024/08/29/open-access-expansion-threatens-academic.

[Q2.13] Eric Katz. We Know Almost Nothing About the Costs of Grant Administration. Government Executive, April 17, 2020. https://www.govexec.com/management/2020/04/we-know-almost-nothing-about-costs-grant-administration/164440.

[Q2.14] Council on Governmental Relations. Changes in Federal Research Requirements: 1991. Updated January 2025. https://www.cogr.edu/changes-federal-research-requirements-1991.

[Q2.15] Federal Demonstration Partnership. Faculty Workload Survey: Primary Report. April 2018. https://thefdp.org/wp-content/uploads/FDP-FWS-2018-Primary-Report.pdf.

[Q2.16] National Academies of Sciences, Engineering, and Medicine. Simplifying Research Regulations and Policies: Optimizing American Science. Washington, DC: The National Academies Press, 2025. https://doi.org/10.17226/29231.

[Q2.17] Davide Bonaglia, Lorena Rivera Le n, and Sacha Wunsch-Vincent. End of Year Edition Against All Odds, Global R&D Has Grown Close to USD 3 Trillion in 2023. WIPO Global Innovation Index Blog, December 18, 2024. https://www.wipo.int/web/global-innovation-index/w/blogs/2024/end-of-year-edition.

[Q2.18] National Science Board. Discovery: R&D Activity and Research Publications, Science & Engineering Indicators. Alexandria, VA: National Science Foundation, 2024. https://ncses.nsf.gov/pubs/nsb20257.

[Q2.19] Figure excludes defense and includes 10% of business R&D. Most business R&D is proprietary (79%), and even the 7% basic and 14% applied generally does not lead to publication, so we categorize half of these two categories as publishable. See Melissa Flagg and Rhys McCormick. The Innovation Lightbulb: Breaking Down Private Sector Research and Development. Center for Strategic and International Studies (CSIS), January 29, 2020. https://www.csis.org/analysis/innovation-lightbulb-breaking-down-private-sector-research-and-development.

[Q2.20] Dan Pollock and Heather Staines. News & Views: Total Value of Scholarly Journals Market. Delta Think, April 16, 2024. https://www.deltathink.com/news-views-total-value-of-scholarly-journals-market.

[Q2.21] Simba Information. Global Scientific & Technical Publishing 2023 2027. STM Publishing News, March 11, 2024. https://www.stm-publishing.com/global-scientific-technical-publishing-2023-2027.

[Q2.22] Tim Vines and Alison Mudditt. What s Wrong with Paying for Peer Review? The Scholarly Kitchen, June 16, 2021. https://scholarlykitchen.sspnet.org/2021/06/16/whats-wrong-with-paying-for-peer-review/.

[Q2.23] Amanda G. LeBlanc, J. D. Barnes, T. J. Saunders, et al. Scientific Sinkhole: Estimating the Cost of Peer Review Based on Survey Data with Snowball Sampling. Research Integrity and Peer Review 8, no. 3 (2023). https://researchintegrityjournal.biomedcentral.com/articles/10.1186/s41073-023-00128-2.

[Q2.24] Jeffrey Brainard. The $450 Question: Should Journals Pay Peer Reviewers? Science, February 26, 2021. https://www.science.org/content/article/450-question-should-journals-pay-peer-reviewers.

[Q2.25] U.S. Government, Code of Federal Regulations, Title 2, 200.461(b), Publication and Printing Costs, revised 2024, https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/section-200.461.

[Q2.26] U.S. Government,? Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, ?2 CFR Part 200, revised 2024, https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200.

**3. Peer review compensation:**
Whether or not compensation for peer reviewers is a good idea is a topic that has been debated widely, including the question of what level of compensation is appropriate.[Q3.1] At the same time, peer reviewers generally report being satisfied with the current system and highlight the intangible benefits of peer review in longitudinal studies.[Q3.2] This system of collegial service and academic responsibility would undoubtedly be changed in unpredictable ways by paying reviewers.

The bureaucratic and administrative burden of setting pay rates, implementing payments, and oversight by funded researchers, their institutions, and NIH itself would be significant. The appropriate level of compensation might be different for a given field, researcher, or community. It is unclear how individual researchers would be able to confirm that a given publisher is paying reviewers appropriately, or how NIH would audit publishers to ensure appropriate payment, or even if NIH has statutory authority to do so. The burdens could especially impact smaller US scientific society publishers and therefore exacerbate publishing inequities for smaller publishers and less-resourced researchers alike.

In addition to the potential costs of direct payments to peer reviewers, other direct and identifiable investments that publishers make to support researchers and enhance the scholarly record could also be considered as inputs that add to the costs of publishing. These payments that publishers make to researchers, vendors, and staff, as well as payments made by other suppliers of services and equipment to NIH funded researchers, are no less important to the research enterprise. However, NIH has not historically audited the input costs of any service or product provider to NIH researchers, and the statutory authority to interfere in the marketplace is unclear. STM urges caution to NIH in going down the path of potentially auditing such suppliers or requiring researchers to do so.

Footnotes

[Q3.1] Zen Faulkes. Making Pay Peer Reviewers More Than a Slogan. KnowledgeWorks Global Ltd (KW Global) Blog, July 22, 2025. https://www.kwglobal.com/blog/pay-peer-reviewers/.

[Q3.2] Springer Nature. Reviewer Satisfaction Results of Peer Reviewer Satisfaction Survey between 2021-2023. Accessed September 5, 2025. https://www.springernature.com/gp/reviewers/reviewer-satisfaction.

**4. Publishing best practices:**
STM cautions against NIH creating a checklist of criteria that need to be audited to enable different levels of funding. The burdens of maintaining a list of publishing best practices and assigning financial value to each seems counter to the goals of NIH to reduce bureaucracy and regulation and to ensure that researchers spend time on research, rather than administrative oversight. Whether individual researchers or NIH itself is responsible for monitoring and review, the effort to do so would likely be more expensive than any potential savings. Any list of best practices would be lengthy and need to be continually adapted and expanded to meet emerging developments in scholarly communication, which would therefore require ongoing monitoring and review by the NIH to remain up to date.

That said, NIH is correct in noting that following best practices requires significant and ongoing investment. Detecting and preventing fraud, monitoring and reviewing the scholarly record, maintaining the record with integrity  these all have notable costs. Many other investments that improve the utility and reach of the articles published in journals are also costly and improve the impact of the research that appears in the pages of journals. If NIH is going to consider specific cost factors, it needs to take a broad view and include both manual and automated activities and both those implemented by humans and by technology.

Ultimately, publishers are accountable for the accuracy, integrity, and maintenance of the permanent scholarly record and take this accountability seriously, investing accordingly. Best practices and standards across a wide range of areas are an important means of safe-guarding systems and processes against bias and/or poor quality, while ensuring the widest possible dissemination and discoverability.

The volume and complexity of best practices that reputable publishers invest in has grown significantly, making it difficult to succinctly list recommended practices and standards. In the area of medical reporting alone, the EQUATOR network lists 676 reporting guidelines for randomised trials, observational studies, systematic reviews, study protocols, diagnostic/prognostic studies, case reports, clinical practice guidelines, qualitive research, animal pre-clinical studies, quality improvement studies, and economic evaluations.[Q4.1] Publishers have oversight of the evaluation of submitted work and whether such best practice guidelines have been followed where relevant, while also responsibly communicating these guidelines and best practices to editors, editorial boards, and authors, and then following through to verify how they are implemented.[Q4.2]

Best practices go beyond reporting guidelines. The prompt suggests an interest in editorial and research integrity practices, which is one of several domains related to best practices and standards. In this area, the best practices and standards defined by COPE, ICMJE, and WAME are critical, and STM and our member organisations regularly collaborate with these entities.[Q4.3] Best practices typically refer to editorial independence and firewalls between editorial and commercial activities, transparent peer review practices and policies, authorship and contribution standards (which now often include disclosure of the use of AI in the preparation of a manuscript), conflicts of interest, research ethics covering both human and animal subjects, research integrity checks and management of reported misconduct, and corrections to the record of self-reported errors.

It is worth noting that STM members report that submissions have grown exponentially year on year.[Q4.4] At the same time, most STM members report an exponential growth in the volume of research integrity issues, including fraudulent identities (authors and peer reviewers), manipulation of data and imaging, paper mills, and an evolving array of challenges.[Q4.5] This has resulted in major

investments in technical systems and human capital to support integrity checks, including collaborative funding and development of the STM Integrity Hub.

This is a rapidly evolving space, and a situation that many have referred to as an integrity arms race due to the increasing sophistication of purposeful fraudulent activities supported by evolving AI. STM members report that their investment in research integrity, particularly staffing, has grown exponentially in recent years.[Q4.6] STM and its members have also invested significantly in technological improvements to research integrity.[Q4.7] STM members agree that in addition to the current technical and human checks that already exist and are being developed, future systems will need to consider a range of trust markers that together build confidence in the author, their institution, the instruments used, the data, and in the reported results.[Q4. 8]

The RFI specifically mention automated fraud detection capabilities. STM would emphasize again that this is an evolving landscape. For instance, STM funded a 2024 report by More Brains on Feasibility of technical solutions for the detection of falsified images in research [Q4.9] that indicates the continual and ongoing nature of investments in this area. Other current efforts target the need for identity verification, inspired by efforts in financial services. These technical systems require agreement across the ecosystem and financial investment by publishers, and as such will take some time to develop and implement.

It is not clear why one would support higher costs for automated activities as opposed to manual or human-based fraud detection and research integrity checks. Our STM Trends 2028 report[Q4.10] and work through the STM Integrity Hub show that the threats we face today - and those emerging on the horizon - demand a coupled approach that combines technological tools with human expertise. These investments support the quality and integrity of the research ecosystem and require continuous development and investment to address evolving challenges.

Beyond best practices related to editorial and integrity checks and policies, the development and implementation of technical standards requires significant investment. These standards may include such things as metadata tagging for machine readability and linking of research outputs, authors, institutions, funders and more, and they are ever evolving. Similarly, standards related to discoverability and interoperability, including such work as deposit of DOIs with Crossref (a solution created and funded by publishers) for seamless linking and indexing, is critical. Maintaining these links and metadata is a significant investment.

Technical standards related to the accessibility of content for the visually impaired is another area of investment by publishers. Publishing technology makes it possible to add accessibility features like tags, captions, and audio descriptions at the time of publication, but it does not come without cost. Some specialized content, especially medical content, is often more complex than straight-forward text (including, e.g., imaging, formulas, or tables) and creates additional challenges for accessibility. Publishers are working to identify gaps in current technology that must be closed to enable a born accessible future. Meanwhile, publishers are coming together to share best practices and tools and STM has collated this for wider dissemination.[Q4.11] While this collaboration enables some efficiencies, each publisher must invest in its own implementation.

Other areas of best practice include work in areas such as continuous improvement, editorial and peer review training, other community support, development of open research standards, policies and

driving adoption of these, development of submission systems that support researchers in complying with funder mandates, and many other areas too numerous to list. While these do not amount to direct payment to peer reviewers, these do represent investments in and commitment to the research community, which creates its own benefits and incentives.

Footnotes

[Q4.1] EQUATOR Network. Reporting Guidelines. EQUATOR Network. Accessed September?6,?2025. https://www.equator-network.org/reporting-guidelines/.

[Q4.2] See, for example, Douglas G. Altman et al. The Revised CONSORT Statement for Reporting Randomized Trials: Explanation and Elaboration. JAMA 283, no. 20 (May 24/31, 2000): 2659 2665. https://jamanetwork.com/journals/jama/fullarticle/2832868 and Duncan A. MacRae. The EQUATOR Network and Research Reporting Guidelines: What Does It Mean for Authors? Expert Insights (Health), Wolters Kluwer, October 31, 2019; updated July 7, 2020. https://www.wolterskluwer.com/en/expert-insights/authors-equator-network.

[Q4.3] A recent example is the July 2025 release of COPE Guidelines on Guest Edited Collections https://publicationethics.org/guidance/guideline/guest-edited-collections.

[Q4.4] Although overall data on submissions is not publicly available, STM understands that submission volumes have been increasing at a much higher rate than publications across the publishing ecosystem. For example, Elsevier reports that submissions tripled in the past decade, while publication volumes have not even doubled. See Elsevier, Open Access, accessed September 8, 2025, https://www.elsevier.com/open-access.

[Q4.5] One example of such a discussion is Sabina Alam. Trends in Research Integrity Concerns and the Evolving Role of the Publisher. Insights: The UKSG Journal 37 (2024): Article 13. September 3, 2024. https://doi.org/10.1629/uksg.663.

[Q4.6] This issue was discussed at length at a Society for Scholarly Publishing webinar on April 17, 2024: Staffing Up for Research Integrity https://ondemand.sspnet.org/Title/e57561df-a949-49d8-8779-5b03a470e28e. See also Baptiste Vend , Anouk Barberousse, and St phanie Ruphy. From 2015 to 2023, Eight Years of Empirical Research on Research Integrity: A Scoping Review. Research Integrity and Peer Review 10, no. 1 (April 30, 2025): 5. https://doi.org/10.1186/s41073-025-00163-1.

[Q4.7] For example, STM Solutions Integrity Hub, which provides distributed solutions to all publishers (not just STM members), was a significant recent investment. STM Solutions. Integrity Hub. Accessed September 12, 2025. https://stm-assoc.org/what-we-do/strategic-areas/research-integrity/integrity-hub/.

[Q4.8] An example in this area is the collaborative initiative United2Act between STM and COPE, which issued a report: United2Act: Trust Markers Group. United2Act: Trust Markers Group, Working Paper (Working Group 4, United2Act). November 2024. https://united2act.org/wp-content/uploads/2024/11/trust-markers-united2act.pdf.

[Q4.9] Phill Jones. Feasibility of Technical Solutions for the Detection of Falsified Images in Research. Report. Zenodo, November 13, 2024. https://doi.org/10.5281/zenodo.14107216.

[Q4.10] STM Future Lab. STM Trends 2028: Reimaging the Human Factor. STM Association, April 16, 2024. https://stm-assoc.org/what-we-do/strategic-areas/standards-technology/stm-trends-2028/.

[Q4.11] STM Association. Accessibility Resources for Academic Publishers. January 30, 2025. Accessed September 8, 2025. https://stm-assoc.org/what-we-do/strategic-areas/social-responsibility/diversity-inclusion/accessibility-resources-for-academic-publishers/.

**5. Other Comments:**

STM cautions against NIH creating a checklist of criteria that need to be audited to enable different levels of funding. The burdens of maintaining a list of publishing best practices and assigning financial value to each seems counter to the goals of NIH to reduce bureaucracy and regulation and to ensure that researchers spend time on research, rather than administrative oversight. Whether individual researchers or NIH itself is responsible for monitoring and review, the effort to do so would likely be more expensive than any potential savings. Any list of best practices would be lengthy and need to be continually adapted and expanded to meet emerging developments in scholarly communication, which would therefore require ongoing monitoring and review by the NIH to remain up to date.

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Ultimately, publishers are accountable for the accuracy, integrity, and maintenance of the permanent scholarly record and take this accountability seriously, investing accordingly. Best practices and standards across a wide range of areas are an important means of safe-guarding systems and processes against bias and/or poor quality, while ensuring the widest possible dissemination and discoverability.

The volume and complexity of best practices that reputable publishers invest in has grown significantly, making it difficult to succinctly list recommended practices and standards. In the area of medical reporting alone, the EQUATOR network lists 676 reporting guidelines for randomised trials, observational studies, systematic reviews, study protocols, diagnostic/prognostic studies, case reports, clinical practice guidelines, qualitive research, animal pre-clinical studies, quality improvement studies, and economic evaluations.[Q4.1] Publishers have oversight of the evaluation of submitted work and whether such best practice guidelines have been followed where relevant, while also responsibly communicating these guidelines and best practices to editors, editorial boards, and authors, and then following through to verify how they are implemented.[Q4.2]

Best practices go beyond reporting guidelines. The prompt suggests an interest in editorial and research integrity practices, which is one of several domains related to best practices and standards. In this area, the best practices and standards defined by COPE, ICMJE, and WAME are critical, and STM and our member organisations regularly collaborate with these entities.[Q4.3] Best practices typically refer to editorial independence and firewalls between editorial and commercial activities, transparent peer review practices and policies, authorship and contribution standards (which now often include disclosure of the use of AI in the preparation of a manuscript), conflicts of interest, research ethics

covering both human and animal subjects, research integrity checks and management of reported misconduct, and corrections to the record of self-reported errors.

It is worth noting that STM members report that submissions have grown exponentially year on year.[Q4.4] At the same time, most STM members report an exponential growth in the volume of research integrity issues, including fraudulent identities (authors and peer reviewers), manipulation of data and imaging, paper mills, and an evolving array of challenges.[Q4.5] This has resulted in major investments in technical systems and human capital to support integrity checks, including collaborative funding and development of the STM Integrity Hub.

This is a rapidly evolving space, and a situation that many have referred to as an integrity arms race due to the increasing sophistication of purposeful fraudulent activities supported by evolving AI. STM members report that their investment in research integrity, particularly staffing, has grown exponentially in recent years.[Q4.6] STM and its members have also invested significantly in technological improvements to research integrity.[Q4.7] STM members agree that in addition to the current technical and human checks that already exist and are being developed, future systems will need to consider a range of trust markers that together build confidence in the author, their institution, the instruments used, the data, and in the reported results.[Q4. 8]

The RFI specifically mention automated fraud detection capabilities. STM would emphasize again that this is an evolving landscape. For instance, STM funded a 2024 report by More Brains on Feasibility of technical solutions for the detection of falsified images in research [Q4.9] that indicates the continual and ongoing nature of investments in this area. Other current efforts target the need for identity verification, inspired by efforts in financial services. These technical systems require agreement across the ecosystem and financial investment by publishers, and as such will take some time to develop and implement.

It is not clear why one would support higher costs for automated activities as opposed to manual or human-based fraud detection and research integrity checks. Our STM Trends 2028 report[Q4.10] and work through the STM Integrity Hub show that the threats we face today - and those emerging on the horizon - demand a coupled approach that combines technological tools with human expertise. These investments support the quality and integrity of the research ecosystem and require continuous development and investment to address evolving challenges.

Beyond best practices related to editorial and integrity checks and policies, the development and implementation of technical standards requires significant investment. These standards may include such things as metadata tagging for machine readability and linking of research outputs, authors, institutions, funders and more, and they are ever evolving. Similarly, standards related to discoverability and interoperability, including such work as deposit of DOIs with Crossref (a solution created and funded by publishers) for seamless linking and indexing, is critical. Maintaining these links and metadata is a significant investment.

Technical standards related to the accessibility of content for the visually impaired is another area of investment by publishers. Publishing technology makes it possible to add accessibility features like tags, captions, and audio descriptions at the time of publication, but it does not come without cost. Some specialized content, especially medical content, is often more complex than straight-forward text (including, e.g., imaging, formulas, or tables) and creates additional challenges for accessibility.

Publishers are working to identify gaps in current technology that must be closed to enable a born accessible future. Meanwhile, publishers are coming together to share best practices and tools and STM has collated this for wider dissemination.[Q4.11] While this collaboration enables some efficiencies, each publisher must invest in its own implementation.

Other areas of best practice include work in areas such as continuous improvement, editorial and peer review training, other community support, development of open research standards, policies and driving adoption of these, development of submission systems that support researchers in complying with funder mandates, and many other areas too numerous to list. While these do not amount to direct payment to peer reviewers, these do represent investments in and commitment to the research community, which creates its own benefits and incentives.

Footnotes

[Q4.1] EQUATOR Network. Reporting Guidelines. EQUATOR Network. Accessed September?6,?2025. https://www.equator-network.org/reporting-guidelines/.

[Q4.2] See, for example, Douglas G. Altman et al. The Revised CONSORT Statement for Reporting Randomized Trials: Explanation and Elaboration. JAMA 283, no. 20 (May 24/31, 2000): 2659 2665. https://jamanetwork.com/journals/jama/fullarticle/2832868 and Duncan A. MacRae. The EQUATOR Network and Research Reporting Guidelines: What Does It Mean for Authors? Expert Insights (Health), Wolters Kluwer, October 31, 2019; updated July 7, 2020. https://www.wolterskluwer.com/en/expert-insights/authors-equator-network.

[Q4.3] A recent example is the July 2025 release of COPE Guidelines on Guest Edited Collections https://publicationethics.org/guidance/guideline/guest-edited-collections.

[Q4.4] Although overall data on submissions is not publicly available, STM understands that submission volumes have been increasing at a much higher rate than publications across the publishing ecosystem. For example, Elsevier reports that submissions tripled in the past decade, while publication volumes have not even doubled. See Elsevier, Open Access, accessed September 8, 2025, https://www.elsevier.com/open-access.

[Q4.5] One example of such a discussion is Sabina Alam. Trends in Research Integrity Concerns and the Evolving Role of the Publisher. Insights: The UKSG Journal 37 (2024): Article 13. September 3, 2024. https://doi.org/10.1629/uksg.663.

[Q4.6] This issue was discussed at length at a Society for Scholarly Publishing webinar on April 17, 2024: Staffing Up for Research Integrity https://ondemand.sspnet.org/Title/e57561df-a949-49d8-8779-5b03a470e28e. See also Baptiste Vend , Anouk Barberousse, and St phanie Ruphy. From 2015 to 2023, Eight Years of Empirical Research on Research Integrity: A Scoping Review. Research Integrity and Peer Review 10, no. 1 (April 30, 2025): 5. https://doi.org/10.1186/s41073-025-00163-1.

[Q4.7] For example, STM Solutions Integrity Hub, which provides distributed solutions to all publishers (not just STM members), was a significant recent investment. STM Solutions. Integrity Hub. Accessed September 12, 2025. https://stm-assoc.org/what-we-do/strategic-areas/research-integrity/integrity-hub/.

[Q4.8] An example in this area is the collaborative initiative United2Act between STM and COPE, which issued a report: United2Act: Trust Markers Group. United2Act: Trust Markers Group, Working Paper (Working Group 4, United2Act). November 2024. https://united2act.org/wp-content/uploads/2024/11/trust-markers-united2act.pdf.

[Q4.9] Phill Jones. Feasibility of Technical Solutions for the Detection of Falsified Images in Research. Report. Zenodo, November 13, 2024. https://doi.org/10.5281/zenodo.14107216.

[Q4.10] STM Future Lab. STM Trends 2028: Reimaging the Human Factor. STM Association, April 16, 2024. https://stm-assoc.org/what-we-do/strategic-areas/standards-technology/stm-trends-2028/.

[Q4.11] STM Association. Accessibility Resources for Academic Publishers. January 30, 2025. Accessed September 8, 2025. https://stm-assoc.org/what-we-do/strategic-areas/social-responsibility/diversity-inclusion/accessibility-resources-for-academic-publishers/.

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/STM-submission-to-NIH-RFI-Allowable-Publishing-Costs-Sept-2025.pdf

**Description:** Full submission from STM includes additional information in introduction and conclusion, as well as full references and links

# 816. Edward Scott

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Edward Scott

**Name of Organization:** University of Florida

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
One of the foundational strengths of the US scientific research is the peer review process. Peer review by definition is subject to human nature both good and bad. Overall, the peer review process for grant funding and paper publication does an excellent job of picking the top half of science and rejecting the weakest science in the bottom half. Well run review panels and paper reviews by respectable journals with professional editorial staffs keeps rigor and reproducibility as high as possible. All human run systems are flawed, but the level of scientific training and knowledge needed to properly judge the merit of research studies is very high. The process can be frustrating, but without equal reporting on failed experiments or bad outcomes, no automated system can replace the collective scientific experience of seasoned and successful scientific peers evaluating each others work. AI can only process data it has and cannot process negative data it does not have (because no one will pay to publish negative results). Unless the system can reworked to support the efforts to report both negative and positive data, human experience in science will need to be paid for. Hence publication costs.

**2. Available evidence related to publication costs and proposed options:**
Publication in the top journals is expensive and takes years of effort to produce a single research paper from the scientists. The review process also takes time for the reviewers and editors. Reviewers do the reviews for free to demonstrate their willingness to support everyone's research publication efforts. Publication fees pay to the editors and the production cost of the Journals. The advent of online publications has reduced publication costs over the years (really held them steady for a decade = a cut by government standards). Just cutting publication cost allowances WITHOUT overhauling the publication system will mean reduction in paper review rigor and degraded over efforts to publish high quality peer reviewed science.

**3. Peer review compensation:**
Paying a nominal fee for paper review would be a nice luxury, but do little to alter the review process. The NIH pays grant reviewers a nominal fee for their time doing reviews. It is a nice gesture, but really does not cover even minimum wage for the time spent to properly review a single grant proposal, let alone 5-10 proposals per meeting. As a member or NIH review panels for over 30 years, I do my utmost to produce a quality and thoughtful review of each grant in the hopes that my own grant submissions will receive an equaly fair and impartial review. Same with paper reviews. As an editor, one quickly learns who provides fair reviews versus injecting their own agendas. I simply do not ask agenda drive folks to review papers in the future.

**4. Publishing best practices:**

Simple plagiarism checks by AI are cheap if not free.  Reliability ?  Still these cheap bulk processing abilities should lower not raise publication costs.

**5. Other Comments:**

Simple plagiarism checks by AI are cheap if not free.  Reliability ?  Still these cheap bulk processing abilities should lower not raise publication costs.

## 817. N/A

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 1 is not feasible. Academic scientists do not typically have other funds from which to pay publication fees.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

# 818. Springer Nature

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Kaia Motter

**Name of Organization:** Springer Nature

**Type of Organization:** Scholarly Publisher/Journal

**Role:** Organizational Official

**1. Proposed policy options:**
We appreciate the opportunity to respond to the National Institutes of Health (NIH) Request for Information on Maximizing Research Funds by Limiting Allowable Publishing Costs (NOT-OD-25-138).

The NIH is the leading government stakeholder in the global medical research ecosystem, and we are committed to providing all NIH-funded researchers with a platform that enables their work to be immediately and publicly accessible, trusted, widely read, and cited. We are a proud publisher of research funded by the NIH. In 2024, 17% of research publications acknowledging NIH funding (NIH articles) were published in Springer Nature journals—#2 amongst all publishers.

During 2024, Springer Nature:

-assessed close to 50,000 article submissions from NIH-funded authors across our portfolio of journals;

-delivered more than 360 million article downloads and HTML page views; and

-enabled approximately 1 million citations to NIH-funded articles published over the last 5 years.

We recognize the need to improve U.S. taxpayer return on investment (ROI). We currently estimate that publication costs represent less than 2% of NIH grants and unlock the value of the other 98-99% to researchers, institutions, industry, and the public—enabling them to build on these results and make better informed decisions about the health and wellbeing of U.S. citizens, as well as drive economic benefits. It has been shown that for every $1 invested, NIH funding delivers $2.56 in economic activity. This is only possible if NIH-funded research is discoverable, trusted, understandable, usable, and reusable. This is the benefit that we and other publishers deliver, and it has been a privilege to support the American research enterprise and serve the American public through this work.

China recognizes this and is now out-investing America. To compete and drive the U.S. economy by reducing publication costs would be a false economy (i.e., short-term savings that ultimately incur greater long-term expense). As explained further down in this section and in the evidence section of our submission, we have provided select examples of how Springer Nature and its journals apply the nine tenets outlined in OSTP's Memorandum for the Heads Executive Departments and Agencies (https://www.whitehouse.gov/wp-content/uploads/2025/03/OSTP-Guidance-for-GSS-June-2025.pdf). This demonstrates how we can better support NIH and help the Agency to efficiently deliver its Leading in Gold Standard Science (GSS) Implementation Plan (https://www.nih.gov/sites/default/files/2025-08/2025-gss.pdf). Using publishers in this way delivers greater value than capping their costs.

The Springer Nature portfolio contains almost 3,000 research journals, all with open access (OA) options. In 2024, we received 3 million submissions and worked with almost 180,000 external academic editors, many of which are paid, in addition to over 700 in-house full-time expert editors and 1.2 million independent peer reviewers worldwide, to publish close to 500,000 research articles—half of which were published OA, enabling immediate free public access.

Maintaining that overall level of selectivity with this volume of submissions requires scalable, technology-assisted mechanisms of quality assurance for the journals we publish. We are committed to providing a variety of high-quality journals, each offering immediate free public access to the final published article—the Version of Record (VoR). The VoR is the definitive, citable version that carries any updates, corrections, or retractions. It is tagged for discoverability by both humans and machines, and held in perpetuity to ensure that when accessed, it is always the most current, reliable, and hyperlinked version.

The transparent pricing of each journal's Article Processing Charge (APC) reflects the true cost of publishing and the value we add. APCs vary across journals because more selective journals require greater investment. For example, Nature and Nature Communications have APCs that range from $6,990 to $12,690 and account for the time, infrastructure, and editorial expertise needed to evaluate a high volume of submissions. 85-95% of these submissions are not accepted but still require rigorous review, which is supported by more than 400 in-house expert editors who also help authors in developing their articles. In contrast, journals like Scientific Reports offer a sustainable APC of $2,690, while still rejecting over 60% of submissions because they are incomplete or flawed in some way.

At a global level, journal publication costs represent just 1–2% (https://www.deltathink.com/news-views-total-value-of-scholarly-journals-market) of total R&D expenditure (estimated at $10–11 billion out of $1–2 trillion). Recent data from PLOS and EMBO further illustrate how publishing costs vary by model and service level. For instance, PLOS APCs range from $1,900 to $6,300, reflecting the costs in each case. In contrast, EMBO Press's APC is $7,990, and they report that nearly 90% of their publishing costs are attributed to staff, production, and technology. Both PLOS and EMBO Press are not-for-profits. This range of APCs enables authors to assess their options, weigh costs and benefits, and choose the journal that best fits their research needs. Transparency in pricing and benefits support strong competition between publishers (both commercial and not-for-profits) and community-led publishing models, ensuring good value for money for researchers and funders alike.

We support NIH's goal to maximize the value of each research grant. However, the value and impact of NIH-funded research can't be fully realized without impactful journals that bring attention and provide access to the latest scientific discovery. Publication and dissemination of research is what delivers a full return on the taxpayer's investment. Without access to the trusted VoR, public impact and trust will be undermined. In general, NIH-funded research meets standards of quality at a level where it can attain global recognition and impact, and researchers need appropriate channels of dissemination to help achieve that. NIH researchers are best positioned to choose the most appropriate journals that reach their target audience and achieve impact. Empowering researchers to make these choices fits with American values and free speech. Researchers require a wide variety of options that will support the sharing of incremental advances or null results, all the way up to paradigm-shifting advances of the highest significance. At Springer Nature, we support a wide portfolio of journals that provide the variety, flexibility, and support that NIH-funded researchers require.

For the most groundbreaking papers, researchers often prefer journals that have a demonstrably greater level of visibility, reach, and impact, such as the Nature-branded journals. The public also benefits when groundbreaking research is made accessible on the right platform. In 2024, on average, each Nature research article was cited more than 50 times and downloaded approximately 35,000 times compared with 2-3 citations and less than 1,000 downloads on average in more typical journals across our portfolio. More broadly, Nature-branded journals, including Nature, the Nature-branded research journals, and Nature Communications (which is fully OA) are, on average, cited 8 times more and downloaded 18 times more than the average journal across our portfolio. This is achieved by our dedicated and expert editorial teams, whose strong relationships with leading scientists enable the review of leading-edge research. Together, they undertake extensive work to ensure that published articles (e.g., unlimited methods sections) and their related information (e.g., open data and code) are thoroughly checked and clearly presented so others can understand, reproduce, and build on the work—while also ensuring that everyone, including the public, can trust the results. This level of editorial investment comes at a significant cost. It is this, together with the high level of selectivity (based on quality, novelty, and impact) of these journals, that significantly drives the total amount of work undertaken for each ultimately published article and the resulting higher publication costs (APCs) in these journals. While all journals ensure the integrity of the work they publish, the Nature-branded journals especially enhance the quality and impact of the research they publish.

Disallowing or capping publication costs would limit NIH authors' use of such journals, reducing the use and benefits of NIH-funded research disproportionately to any savings. This would therefore be counterproductive, undermining the NIH's goal to maximize the value of the research it funds. Caps could then lead to these unintended consequences and end up slowing progress to a more open and reproducible medical research ecosystem.

While the costs of complying with updated public access mandates have increased the expenses associated with open access, publication costs still represent a very small proportion of the NIH grant. In fact, they still account for less than 2%. Disallowing or capping this specific component of the research costs for each award would negatively impact the value of the other 98-99% of award funds by placing constraints on the discoverability, accessibility, and impact of the resultant publications. It would limit funded researcher choice of where to publish, and NIH may inadvertently push authors to choose less effective venues in search of lower publishing fees. It could lead them to publish their research in journals where the VoR is behind a paywall, relying on only the accepted article being publicly accessible, causing them to miss out on the proven advantages (https://www.springernature.com/gp/open-science/journals-books/journals/going-for-gold-reach-and-impact) publishing OA provides in use (+400% v similar paywalled articles), collaboration, and citation (+60% v similar paywalled articles). Again, such constraints would reduce the benefit and impact of NIH-funded research.

The NIH GSS Implementation Plan (https://www.nih.gov/sites/default/files/2025-08/2025-gss.pdf) could be significantly undermined by price or cost caps. Good communication of research acknowledges competing interests and is reproducible, transparent, judicious, collaborative, falsifiable, unbiased, and inclusive of negative results. Publishers' editors and peer reviewers work with authors to ensure all this and resulting articles benefit greatly from the quality assurance and dissemination services that strong and committed publishers like Springer Nature provide. Springer Nature has invested substantially—and continues to invest—to meet the goals of the upcoming NIH GSS Implementation Plan

(https://www.nih.gov/sites/default/files/2025-08/2025-gss.pdf). In 2024 alone, we spent more than $206 million on technology, a significant portion of which supports research integrity, including our growing suite of in-house AI-enabled tools designed to help prevent fraudulent research. The evolving research landscape increasingly requires publishers to make such investments in both technology and expert staff to detect integrity issues, such as AI-generated data. Springer Nature's Research Integrity team has grown from 5 team members a few years ago to more than 70 full-time internal staff today, supported by over 300 external FTEs dedicated to quality control. The introduction of caps would inhibit future investments, unnecessarily putting at risk the quality of NIH-funded published research. For more detail, see pages 20-25 of our Springer Nature Annual Report 2024 (https://annualreport.springernature.com/2024/pdfs/Springer_Nature_Annual_report_24_FULL.pdf); our research integrity page (https://www.springernature.com/gp/advancing-discovery/research-integrity); and our reporting standards (https://www.nature.com/nature-portfolio/editorial-policies/reporting-standards), which cover topics such as availability of data, materials, and computer code, as well as experimental protocols, pre-registration, replication studies, and clinical trials.

The proposed policy options also have negative compliance and associated cost implications. All options can be expected to increase administrative burdens on the NIH, institutions, and researchers by making it harder to find a compliant publication venue with the right aims and scope, as well as increasing the amount of time spent on cost and funding calculations. They also add to the administrative burden of the updated NIH public access mandate by encouraging publication of the VoR behind subscription paywalls. A recent Consensus Study Report (https://nap.nationalacademies.org/catalog/29231/simplifying-research-regulations-and-policies-optimizing-american-science) from the National Academies of Sciences, Engineering, and Medicine highlights Federal Demonstration Partnership (FDP) research demonstrating that "the typical academic researcher in the United States spends over 40 percent of their research time on administrative and regulatory matters rather than on conducting their research." Maximizing the value of each research grant is important and achieving good value for money for any publication costs, but it is equally important to minimize the researcher's administrative and compliance burden to aid their efficiency, which is where much of the other 98-99% of grant costs are spent.

The Code of Federal Regulations § 45 CFR 75.461 (https://www.ecfr.gov/current/title-45/subtitle-A/subchapter-A/part-75/subpart-E/subject-group-ECFR5d90ba314caea08/section-75.461) indicates costs associated with publication are allowable under a federal award, while § 2 CFR 200.461 (https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-E/subject-group-ECFRed1f39f9b3d4e72/section-200.461) states that article processing charges are specifically allowed. In addition, NIH Grants Policy Statement 7.9 (https://grants.nih.gov/grants/policy/nihgps/html5/section_7/7.9_allowability_of_costs_activities.htm) also confirms publication costs are allowed. A proposal to suddenly disallow grantees to recover NIH-mandated costs associated with publication appears to contradict long-standing and established OMB and NIH policy, and would require researchers to pay entirely out of pocket to publish articles that comply with NIH immediate public access requirements.

Stepping back, a "one size fits all" cap prevents these benefits and removes the researcher's flexibility to choose the best way to write up their work for maximum impact. We recommend NIH avoid any policies based on artificial price caps since they might encourage the 'salami slicing' of NIH-funded research articles. In other words, to fit with price caps some researchers could choose to increase the volume of

publications with redundant results that would previously have been combined into one larger, more impactful publication that would exceed the price cap (thereby trading volume for quality/impact). In aggregate this could offset the intended savings, increase costs in other grant cost categories to create multiple articles, increase NIH's own compliance monitoring work and costs, and reduce the impact of NIH research.

Finally, while we believe all the evidence shows that price controls rarely work and often create other problems, researchers are in the best position to understand where publication of their research will ensure maximum impact and benefit relative to the costs of publication. Strong competition between publishers (both commercial and not for profits) and community-led publishing models, is the most effective way to achieve good value for money from journals. However, if NIH is determined to intervene, a better approach would be to encourage publishers to increase transparency around the prices and benefits of different journals. This would help researchers make the best-informed decisions, and such an approach could enhance competition, expand choice, and increase the benefits of NIH-funded research.

Despite our concerns, and given NIH has asked for our response to the options they have presented, below is our response to each—building on the points made previously and including rationale:

Option 1: Disallow all publication costs. This would be a false economy. Short-term APC cost savings will ultimately make it harder and more costly for NIH to achieve its other goals over the longer term. This will likely result in unintended consequences such as higher costs in other grant cost categories and increases in NIH's own compliance monitoring work and costs.

Specifically:

-No flexibility: disallowing publication costs altogether means that NIH grantees have no option at all to pay for the necessary cost of disseminating research from their grant (i.e., any papers reporting their funded research results.)

-Maximizes limits on publishing: without funds to pay for publication costs, researchers will have few publishing choices. Public access via immediate Accepted Manuscript (AM) deposit (Zero Embargo Green) and Preprints do not offer a suitable alternative to the VoR. Publishing the VoR behind paywalls misses out on the proven advantages (https://www.springernature.com/gp/open-science/journals-books/journals/going-for-gold-reach-and-impact) in use (400% higher on average), collaboration, and citation (60% higher on average) that open access provides, reducing the impact that NIH-funded authors are able to make in the scientific community and diminishing the impact of the U.S. taxpayer and NIH investment. Preprints provide a way of sharing early results and expanding author choice, and we support the sharing of preprints, but they are not an alternative to, or replacement for, the trusted peer-reviewed work that results in the publication of the VoR. Publication of the VoR is essential for sustaining trust in science.

-Introduces additional financial burdens: any publication costs for papers resulting from the project would need to come from the researcher's institutional employer or from their own pocket.

-Threatens progress towards open access of the VoR: the massive progress we have all made towards expanding open access to U.S. research, in addition to outputs from global funders (e.g., > 50% of research papers Springer Nature publishes were OA in 2024—see Springer Nature 2024 Open Access

Report (https://stories.springernature.com/oa-report-2024/)—a proportion that will further increase in 2025), would be severely threatened by NIH disallowing reasonable payments to make the results of their research OA. Without adequate alternative sources to cover those publication costs, publisher-provided quality assurance and dissemination functions will be undermined.

-Limits cost recovery for federally mandated publication requirements: the Code of Federal Regulations § 45 CFR 75.461 (https://www.ecfr.gov/current/title-45/subtitle-A/subchapter-A/part-75/subpart-E/subject-group-ECFR5d90ba314caea08/section-75.461) indicates costs associated with publication are allowable under a federal award, while § 2 CFR 200.461 (https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-E/subject-group-ECFRed1f39f9b3d4e72/section-200.461) states that article processing charges are specifically allowed. In addition, NIH Grants Policy Statement 7.9 (https://grants.nih.gov/grants/policy/nihgps/html5/section_7/7.9_allowability_of_costs_activities.htm) also confirms publication costs are allowed. A proposal to suddenly disallow grantees to recover NIH-mandated costs associated with publication appears to contradict long-standing and established OMB and NIH policy and would require researchers to pay entirely out of pocket to publish articles that comply with NIH immediate public access requirements.

-Undermines scientific impact: the value of research is in part in its application and its advancement of other scientific work and knowledge. Without appropriate platforms for the dissemination of scientific knowledge, that vital function would cease.

Option 2: Set a limit on allowable costs per publication. This would be a false economy. Short-term APC cost savings will ultimately make it harder and more costly for NIH to achieve its other goals over the longer term. This option could result in some researchers 'salami slicing' NIH-funded research publications. In other words, to fit with price caps some researchers could choose to increase the volume of publications with redundant results that would previously have been combined into one larger, more impactful publication that would exceed the price cap (thereby trading volume for quality/impact). In aggregate this could offset the intended savings, increase costs in other grant cost categories to create multiple articles, increase NIH's own compliance monitoring work and costs, and reduce the impact of NIH research.

Specifically:

-Little flexibility: capping costs per publication at $2,000 would leave NIH grantees with very limited ability to pay for this small but vital cost of research from their grant for any papers reporting their funded research results.

-Severely limits publishing options: a per publication cap at the $2,000 level would severely impact where and how researchers publish, adversely impacting the value of NIH grant funding via suboptimal research communication and collaboration. A recent analysis (https://www.scholcommlab.ca/2025/09/03/nih-apc-caps/) of NIH-funded research publication trends by ScholCommLab and collaborators shows that "fees for as few as 7% (=162) journals (or 6% of papers) would be fully covered by a $2,000 cap".

-The extra costs are real: our highly selective journals, like the Nature-branded journals portfolio, achieve their exceptional benefits for the research they publish (on average cited 8 times more and downloaded 18 times more than the standard journal across our portfolio) because of our investment in

dedicated and expert editorial teams and their strong relationships with leading scientists able to review leading-edge research. Together, they undertake extensive work to ensure that published articles and their related information (e.g., open data and code) have all been checked and clearly presented so others can reproduce (e.g., by providing unlimited methods sections) and build on their work—while also ensuring that everyone, including the public, can trust the results.

-Reduces the reach and impact of NIH-funded research: a $2,000 cap would force many researchers to publish the VoR behind paywalls, limiting access to their work. As noted previously, OA articles are used approximately 400% more and cited 60% more than paywalled articles. This reduced visibility would hinder collaboration, slow scientific progress, and diminish the return on taxpayer and NIH investment. With many publishers charging above the cap, researchers would face barriers to sharing their work broadly, undermining the value and impact of NIH-funded research.

-Creates additional financial burdens: any publication costs accruing for papers resulting from the project that are above the cap would need to come from the researcher's institutional employer or from their own pocket, while the costs for compliance by researchers, their institutions, and NIH would likely more than offset any savings.

Option 3: Set a limit on allowable costs per publication and allow a higher amount to be paid when peer reviewers are compensated. Similar risks to Option 2, with added complexities due to the behavioral changes of some peer reviewers that these payments could result in—including the potential to undermine unbiased peer review and introduce conflicts of interest through peer-reviewer payments. These risks run counter to key goals of the NIH GSS Implementation Plan (https://www.nih.gov/sites/default/files/2025-08/2025-gss.pdf). Of course, it is a free market with strong competition between publishers (both commercial and not for profits) and community-led publishing models, and all can pursue paid peer review if they see it aiding their authors, their journals, or their readers.

Option 4: Set a limit on the total amount of an award that can be spent on publication costs. Notwithstanding the limitations outlined above and our stated concerns about disallowing or capping publication costs, Option 4 is the simplest, most flexible, and practical of the options proposed. It enables NIH researchers to make the best choice for how and where to publish their work and minimizes compliance costs for all. We would note though, that for this to work for the long term, the grant limits would need to be set at 1.5%+ plus $20,000 minimum, which our analysis and experience tell us would cover most of the varying costs associated with publishing and the $20,000 minimum should be indexed to a standard measure of inflation (CPI).

Specifically:

-Author choice: the award-level cap with two possible options for determining the maximum (% of award or $20,000, whichever is greater) allows researchers more flexibility to determine the number of publications resulting from their grant, as well as select the best publication venue for their work and for engagement with their subject community— leading to a lighter compliance burden for all.

-Collaboration: flexible opportunities for cost sharing (with no APC cap), which enables better institutional, interagency, or international collaboration.

-Real costs: the analyses contributing to the estimates in Option 4 are out of date, which should be addressed in the final policy. First, as the RFI was released prior to the Agency's response (https://www.nih.gov/sites/default/files/2025-08/2025-gss.pdf) to the OSTP's Memorandum for the Heads of Executive Departments and Agencies (https://www.whitehouse.gov/wp-content/uploads/2025/03/OSTP-Guidance-for-GSS-June-2025.pdf) on GSS implementation, the cost analysis does not take into consideration the impact of GSS implementation. GSS will result in an increased volume of publication and deposition of results—and by extension increase publication cost—to accommodate related outputs such as null hypotheses, data, protocols, and registered reports. Second, the analysis is based on FY25 grants, so does not anticipate the additional APC costs associated with the early implementation of the unembargoed public access mandate implemented as of July 1, 2025. Third, the analysis fails to account for the NIH researcher's publication preferences. A recent analysis (https://www.scholcommlab.ca/2025/09/03/nih-apc-caps/) of NIH-funded research publication trends by ScholCommLab and collaborators shows that "fees for a few as 7% (=162) journals (or 6% of papers) would be fully covered by a $2,000 cap". All these factors have led to our conclusion that the 0.8% calculation underestimates the amount of money needed to fairly and consistently cover OA publication fees. Based on global publication costs as a proportion of publishable R&D spend (see section on evidence related to publication costs) and the limitations of the original analyses highlighted above, if Option 4 were to be implemented, we propose an award-level cap of at least 1.5% rather than 0.8% and that the $20,000 be indexed to a standard measure of inflation (CPI).

Option 5: Set a limit on both the per publication cost and the total amount of an award that can be spent on publications. This would undermine the benefits of Option 4 by applying individual article price caps that make it harder and more costly for NIH to achieve its other goals. It would compromise researchers' ability to get the most important research funded by NIH published, accessed, used, and reused as much as possible—potentially increasing the volume of redundant research publications, offsetting intended savings, and increasing costs in other grant cost categories, including NIH's own compliance monitoring work and costs.

Specifically:

-Limited flexibility: the award-level cap with two possible options for determining the maximum (% of award or $20,000, whichever is greater) allows researchers more flexibility (but see comments on Option 4 regarding the % cap level). However, capping costs per publication at $6,000 would undermine the possibility of publishing some of their most important work OA in the most impactful journals with the biggest audiences that will deliver targeted engagement for the NIH-funded research findings.

-Limits publishing options: a per publication cap at the $6,000 level would impact where and how researchers publish some of their most important work and hence severely negatively impact on the value of NIH grant funding via suboptimal research communication and collaboration. Again, research (https://www.scholcommlab.ca/2025/09/03/nih-apc-caps/) from ScholCommLabs illustrates the challenges this would pose for NIH-funded researchers based on their current publication choices. The analysis shows that "a $6,000 cap would not be sufficient to cover the APCs of 10% of papers (=4,908 in 2025 so far) in 104 (=5%) journals". The proposed cap would result in a significant proportion of the most important NIH-funded research papers publishing behind paywalls, missing out on the proven advantages (https://www.springernature.com/gp/open-science/journals-books/journals/going-for-gold-reach-and-impact) publishing OA provides in usage (+400% v similar paywalled articles), collaboration

and citation (+60% v similar paywalled articles), reducing the impact that NIH-funded authors are able to make in the scientific community, and diminishing the impact of U.S. taxpayer and NIH investment.

-Creates additional financial burdens: any publication costs accruing for papers resulting from the project that are above the cap would need to come from the researcher's institutional employer or from their own pocket, while compliance costs for such an option would be significantly higher, offsetting any likely savings.

**2. Available evidence related to publication costs and proposed options:**
At Springer Nature, we have made significant investments to support development and maintenance of the platforms, processes, and people that underpin our journals and those of our partners, such as scientific and academic societies. These investments allow us to make publishing and finding research easier, faster, and overall, a better experience for the research community and the public. In 2024 alone we spent more than $206 million on technology, which includes a substantial portion focused on research integrity support, including our growing suite of in-house AI-enabled tools helping us prevent fraudulent research (see pp20 – 25; Springer Nature Annual Report 2024 (https://annualreport.springernature.com/2024/pdfs/Springer_Nature_Annual_report_24_FULL.pdf)).

At the macro scale, global journal publication costs represent 1-2% (https://www.deltathink.com/news-views-total-value-of-scholarly-journals-market) of global R&D expenditure (total journals cost = $10-11 billion, and global R&D $1-2 trillion depending on definition). At a journal-level, the Invest in Open Infrastructure (IOI) report "The Cost and Price of Public Access to Scholarly Publications: A Synthesis" (https://zenodo.org/records/14013060), brought together previous work on publications costs. Many of the studies cited in this analysis are too dated to be informative, but the PLOS data and EMBO data are more recent. These data clearly show that APCs and underlying publishing costs vary hugely according to the publishing models and services provided (PloS APC range: PloS One - $1,900 to PloS Medicine - $6,300 )—with staff, production/sales/marketing, and technology accounting for the vast majority of the publishing cost base (EMBO: staff costs = 46% of their EUR 4.6 million cost base accrued in publishing 825 articles in 2023; outsourced production, sales and marketing = 30% and digital platforms = 13%). In particular, the more selective the model, the greater the resources and the higher the cost per published paper to sustain it. For example, the APC of Nature, the Nature-branded research journals, and Nature Communications (the Nature-branded journals) reflect the time, investment, and value of producing and publishing research articles in these journals with the support of more than 400 in-house expert editors who assist authors in developing their articles as well as check and quality assure the articles with the input of expert peer-reviewers.

Because these Nature branded journals have a large professional staff who support authors all the way from initial submission to publication, including providing developmental input, the underlying costs associated with each published article are higher than for other journals. These journals receive a high volume of submissions, which require an investment of time to evaluate and select those that meet discipline-specific standards for quality and novelty. This means that the journal staff invest a considerable amount of time and attention to assess papers that are not ultimately accepted for publication. Without this context, an APC of $6,990-$12,690 per published paper could understandably be seen as too high. However, these APCs are a reflection of the scale of the real costs and the resource needed to process and consider the high number of submissions we receive, as well as maintain the

platform infrastructure needed to disseminate the published works while maximizing discovery and impact. Meanwhile, at a “sound science” journal like Scientific Reports, which still rejects >60% of submissions, an APC of $2,690 is sustainable based on its real costs.

Springer Nature and all publishers (commercial, not for profits and community-led publishing models), are responsible for the research they have published, distributing it and making it accessible in perpetuity, even as technology and regulations change. In Springer Nature’s case this goes back to 1843 (Springer) and 1869 (Nature); everything we have published is available online. These costs and many others are all covered by the fees we generate today so that governments and others don’t need to take on such costs.

Springer Nature has invested substantially, and is investing more, to meet the goals of the upcoming NIH GSS Implementation Plan (https://www.nih.gov/sites/default/files/2025-08/2025-gss.pdf). Based on its publishing capabilities and this commitment, Springer Nature is well-positioned to partner with NIH to deliver this plan as an integrated part of its research publishing services. Some select GSS examples are listed below:

Reproducible Research – extended article method sections enable experiments to be replicated, and data availability statements enable other researchers to find and interrogate the experimental outcomes and analyze the resulting data.

Transparency – Journal policies, data-sharing requirements, conflict of interest declarations, and editor identities are all published online to ensure accountability. Transparent peer review (https://group.springernature.com/gp/group/media/press-releases/transparent-peer-review-now-standard-for-nature/27788498) has recently been added, and we also encourage early sharing of results via any suitable preprint server prior to, or in parallel with, submission to our journals. The scale of this commitment is substantial: in 2024, we worked with 1.2 million independent peer reviewers and nearly 180,000 external academic editors, many of which are paid, and well over 700 in-house full-time expert editors to help evaluate over 2.3 million submissions. We also voluntarily regularly publish a Research Integrity report to show the work and outcome of our work in this critical area (see 2024 Research Integrity Report (https://www.springernature.com/gp/advancing-discovery/research-integrity)) an annual Open Access (OA) report to increase transparency around the return on investment of OA publishing. This includes metrics such as downloads per article and broader impact. This report helps researchers and funders make informed decisions and reinforces our commitment to openness and accountability (see 2024 OA Report (https://stories.springernature.com/oa-report-2024/)).

Communicative of Error and Uncertainty – setting out the limits of what conclusions can be drawn from the results is essential in all our articles.

Collaborative and Interdisciplinary – Springer Nature journals provide the ideal platform to showcase, acknowledge, and track NIH collaborations across disciplines while acknowledging each individual author contribution. Bibliometric analysis of the published literature can also support the identification of future collaborators and tools like protocols.io can support pre-publication collaboration.

Skeptical of Its Findings and Assumptions – authors, editors, and peer reviewers work together in our journals to challenge each other, knowing that the results will be published and they will be held accountable by the community for these research articles.

Structured for Falsifiability of Hypotheses – in our journals we publish both hypothesis-generating and hypothesis-driven science. Effective falsifiability requires researchers to design experiments to rigorously test their hypothesis, using mechanisms like controlled experiments and randomized trials. These are all set out transparently in our articles.

Subject to Unbiased Peer Review – while this tenet is primarily geared towards NIH's internal peer review processes, we are also committed to unbiased peer review in our own publications, which complements the work of the Agency. Ensuring we engage reviewers with sufficient expertise (e.g., adding a specialist statistician when needed) and avoiding any conflicts has been strengthened recently by our transparent peer review initiative (https://group.springernature.com/gp/group/media/press-releases/transparent-peer-review-now-standard-for-nature/27788498) and the public sharing of peer-review reports.

Accepting of Negative Results as Positive Outcomes – many of our journals and our preprint server (Research Square) have been publishing negative results and replication studies for many years.

Without Conflicts of Interest (CoI) – while this tenet is largely focused on the grant application process at NIH, we can support further transparency in the publication of NIH-funded research. All articles published in our journals contain verified CoI statements. Our editors are prohibited from handling articles where they have a conflict with the author. Part of selecting peer reviewers is ensuring they have no conflicts. In addition, we require the acknowledgement of research-funding sources to provide further transparency for all.

More generally, at Springer Nature we are well aligned with these nine tenets. Many of them are part of open science initiatives, policies, and services that have been central to our mission (https://www.springernature.com/gp/advancing-discovery/springboard/blog/blogposts-open-research/partnerships-to-gain-trust-and-advance-open-science/18767374) for more than 20 years (see p17; Springer Nature Annual Report 2024 (https://annualreport.springernature.com/2024/pdfs/Springer_Nature_Annual_report_24_FULL.pdf)). We have committed significant resources to improving reproducibility in medical research (https://www.springernature.com/gp/editors/research-integrity) (see Springer Nature Annual Report 2024 (https://annualreport.springernature.com/2024/pdfs/Springer_Nature_Annual_report_24_FULL.pdf) and Reporting standards and availability of data, materials, code and protocols | Nature Portfolio (https://www.nature.com/nature-portfolio/editorial-policies/reporting-standards)). As such, our values and ongoing investments (see p13 and pp20-25; Springer Nature Annual Report 2024 ((https://annualreport.springernature.com/2024/pdfs/Springer_Nature_Annual_report_24_FULL.pdf)) align with key components of the NIH GSS Implementation Plan (https://www.nih.gov/sites/default/files/2025-08/2025-gss.pdf).

**3. Peer review compensation:**
Paying for peer review risks undermining unbiased peer review and creating conflicts of interest, both of which are key goals of the NIH GSS Implementation Plan (https://www.nih.gov/sites/default/files/2025-08/2025-gss.pdf). This is because some researchers could change their judgements or adjust their behavior as they seek more paid review work.

Springer Nature has previously trialed paid peer review arrangements, but they were found to be unsuccessful. Recent Springer Nature surveys (https://www.springernature.com/gp/reviewers/reviewer-satisfaction) indicate most (85%) reviewers rate their experience positively without compensation. There is a need for more recognition of reviewers' work, and we have recently introduced Transparent Peer Review (https://group.springernature.com/gp/group/media/press-releases/transparent-peer-review-now-standard-for-nature/27788498). The publisher assumes significant infrastructural and administrative costs, involving the identification, checking, selection, and management of peer reviewers. These are essential for maintaining quality and integrity of the process and resulting publications. Further investment is currently being made to improve the peer-reviewer experience, reduce the amount of time required of them, and increase recognition of their work to better align with their feedback. Implementing peer review payments has not been requested but would increase costs substantially, especially given the need to also pay for the review of the greater number of articles that are ultimately not accepted, and risk damaging the integrity of the review process.

**4. Publishing best practices:**
Publishers like Springer Nature do more than offer researchers flexibility in where to publish. We also provide and invest in extensive services, infrastructure, publicity, and procedural support that help researchers achieve broad impact for their work. Publishers provide critical quality assurance, dissemination, and archiving services that are fundamental to open science and reproducibility.

Research Integrity and Quality Control: In 2024 alone, we spent more than $206 million on technology, which includes a substantial portion focused on research integrity support, including our growing suite of in-house AI-enabled tools helping us prevent fraudulent research (https://www.springernature.com/gp/advancing-discovery/springboard/blog/blogposts-trust-integrity/harnessing-technology-to-strengthen-research-integrity/27802690) (see also pp20-25 Springer Nature Annual Report 2024 (https://annualreport.springernature.com/2024/pdfs/Springer_Nature_Annual_report_24_FULL.pdf); Reporting standards and availability of data, materials, code and protocols | Nature Portfolio (https://www.nature.com/nature-portfolio/editorial-policies/reporting-standards) and our research integrity page (https://www.springernature.com/gp/advancing-discovery/research-integrity)).

Author service: We understand that publication is a critical component of the author's professional development. To that end, we have invested in editorial and technological services that serve our authors at every stage in their career including tools that support impact and reach (e.g., automated data deposition, preprint integrations, SharedIt (https://www.springernature.com/gp/researchers/sharedit) service, PID integration); submission and transfer services, including a state-of-the-art AI-assisted peer review system (https://www.springernature.com/gp/snapp); and many other tools (e.g., Open Science Assistant, Journal Finder).

People: Our people are at the heart of what we do, and investment in them is every bit as important as the substantial technology investments we make. We employ more than 9,000 people, and in 2024 our personnel costs totaled more than $780 million (see Springer Nature Annual Report 2024 (https://annualreport.springernature.com/2024/pdfs/Springer_Nature_Annual_report_24_FULL.pdf)). These investments are fundamental to the work we do in publishing nearly half a million articles in 2024

and assessing 2.3 million submissions. The 17% of NIH-funded papers we published in 2024 made a substantial contribution to those published articles and we assessed close to 50,000 NIH papers overall. The academic editors that work on most of our journals are also a critical component of the quality assurance process at the heart of our mission. As previously mentioned, we work with almost 180,000 editors (many of them paid) and well over 700 full-time in-house expert editors, who manage the peer review process across almost 3,000 journals. Over 400 of these full-time in-house expert editors are dedicated to the Nature-branded research portfolio, which includes Nature, the Nature-branded research journals, and Nature Communications (a fully OA journal). This is a large investment in developing and supporting the publication of some of the most impactful and groundbreaking research. As previously noted, for these articles, the per article cost and the corresponding APCs are much higher, but this investment at the same time delivers a substantial amount of value to the published researcher, their institution, and the research funder. In 2024, on average, each Nature research article was cited over 50 times and downloaded approximately 35,000 times. This compares with 2-3 citations and less than 1,000 downloads per article on average in non-Nature journals across our portfolio. More broadly, Nature publications, including Nature, the Nature-branded research journals, and Nature Communications (a fully OA journal) are, on average, cited 8 times more and downloaded 18 times more than the average journal across our portfolio.

**5. Other Comments:**
Publishers like Springer Nature do more than offer researchers flexibility in where to publish. We also provide and invest in extensive services, infrastructure, publicity, and procedural support that help researchers achieve broad impact for their work. Publishers provide critical quality assurance, dissemination, and archiving services that are fundamental to open science and reproducibility.

Research Integrity and Quality Control: In 2024 alone, we spent more than $206 million on technology, which includes a substantial portion focused on research integrity support, including our growing suite of in-house AI-enabled tools helping us prevent fraudulent research (https://www.springernature.com/gp/advancing-discovery/springboard/blog/blogposts-trust-integrity/harnessing-technology-to-strengthen-research-integrity/27802690) (see also pp20-25 Springer Nature Annual Report 2024 (https://annualreport.springernature.com/2024/pdfs/Springer_Nature_Annual_report_24_FULL.pdf); Reporting standards and availability of data, materials, code and protocols | Nature Portfolio (https://www.nature.com/nature-portfolio/editorial-policies/reporting-standards) and our research integrity page (https://www.springernature.com/gp/advancing-discovery/research-integrity)).

Author service: We understand that publication is a critical component of the author's professional development. To that end, we have invested in editorial and technological services that serve our authors at every stage in their career including tools that support impact and reach (e.g., automated data deposition, preprint integrations, SharedIt (https://www.springernature.com/gp/researchers/sharedit) service, PID integration); submission and transfer services, including a state-of-the-art AI-assisted peer review system (https://www.springernature.com/gp/snapp); and many other tools (e.g., Open Science Assistant, Journal Finder).

People: Our people are at the heart of what we do, and investment in them is every bit as important as the substantial technology investments we make. We employ more than 9,000 people, and in 2024 our

personnel costs totaled more than $780 million (see Springer Nature Annual Report 2024 (https://annualreport.springernature.com/2024/pdfs/Springer_Nature_Annual_report_24_FULL.pdf)). These investments are fundamental to the work we do in publishing nearly half a million articles in 2024 and assessing 2.3 million submissions. The 17% of NIH-funded papers we published in 2024 made a substantial contribution to those published articles and we assessed close to 50,000 NIH papers overall. The academic editors that work on most of our journals are also a critical component of the quality assurance process at the heart of our mission. As previously mentioned, we work with almost 180,000 editors (many of them paid) and well over 700 full-time in-house expert editors, who manage the peer review process across almost 3,000 journals. Over 400 of these full-time in-house expert editors are dedicated to the Nature-branded research portfolio, which includes Nature, the Nature-branded research journals, and Nature Communications (a fully OA journal). This is a large investment in developing and supporting the publication of some of the most impactful and groundbreaking research. As previously noted, for these articles, the per article cost and the corresponding APCs are much higher, but this investment at the same time delivers a substantial amount of value to the published researcher, their institution, and the research funder. In 2024, on average, each Nature research article was cited over 50 times and downloaded approximately 35,000 times. This compares with 2-3 citations and less than 1,000 downloads per article on average in non-Nature journals across our portfolio. More broadly, Nature publications, including Nature, the Nature-branded research journals, and Nature Communications (a fully OA journal) are, on average, cited 8 times more and downloaded 18 times more than the average journal across our portfolio.

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/SN-Response-to-NIH-NOT-OD-25-138.pdf

# 819. Center for Open Science

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Maryam Zaringhalam

**Name of Organization:** Center for Open Science

**Type of Organization:** Non-profit Research Organization

**Role:** Organizational Official

**1. Proposed policy options:**
We are in strong support of NIH's efforts to maximize free and immediate access to NIH-funded research. We appreciate NIH's attention to financial strains placed on researchers — and indirectly on the taxpayers who fund their research — because of unreasonably high charges to publish. Capping article processing charges (APCs), however, does not address the root cause of why journals have been able to charge such high fees in the first place: the pressure to "publish or perish."

The current research incentive and reward system emphasizes the volume of peer-reviewed publications and the prestige of highly selective journals, as determined by opaque indicators like the journal impact factor (JIF) (https://arxiv.org/abs/1801.08992). This structure allows journals, particularly prestigious ones, to charge authors publishing fees (i.e., APCs) that may not align with the actual production cost for that article (i.e., expenses incurred by publishers to produce, deliver, and maintain an article online). Setting stringent caps will not solve this problem. Well-funded researchers at well-funded institutions can continue to publish in prestigious, expensive journals, while lower-resourced researchers or early stage investigators who may only have one NIH grant will be priced out as their careers suffer.

NIH has an opportunity to drive a paradigm shift away from publications as the primary unit of currency for research communications and towards a more holistic ecosystem for knowledge dissemination and evaluation that promotes the transparency, rigor, and trustworthiness of research results. In doing so, NIH can promote more cost-effective opportunities for researchers to continue sharing their work while maximizing NIH's investments in research. We recommend that any policy proposal that imposes restrictions on publishing is complemented by the following policy considerations and reforms:

1) Rethinking and supporting innovation in research assessment. As the crown jewel of American science, NIH holds great influence in how research is done and how those research practices are rewarded. There are several community-driven efforts underway outlining policy recommendations to shift away from publication-based metrics, including the Declaration on Research Assessment (https://sfdora.org/read/), the Coalition for Advancing Research Assessment (https://coara.org/), and the Roundtable on Aligning Incentives for Open Scholarship (https://www.nationalacademies.org/our-work/roundtable-on-aligning-incentives-for-open-science). NIH has an opportunity to draw on this work as a funder, rethinking its grant application and progress reporting processes to place greater emphasis on research contributions outside of peer-reviewed scholarly papers. NIH already has policies in place to maximize appropriate sharing of data (https://grants.nih.gov/grants/guide/notice-files/NOT-OD-21-013.html) and encourage the use of preprints (https://grants.nih.gov/grants/guide/notice-files/NOT-OD-

17-050.html) to communicate research more quickly. NIH can build on these policies, which increase access to a broader suite of research outputs. As a complement, NIH should support innovations in research assessment, particularly through engagement with the metascience community, to develop, implement, and test a broad range of open and community-developed impact measures. Transparent and meaningful measures of impact will enable NIH, and the research ecosystem more broadly, to appropriately reward the societal impact of increasing public access to research outputs. Development of such metrics aligns neatly with NIH's Strategic Plan for Data Science.

2) Modeling incentive reform to align with open science goals. Relatedly, as a research performing organization, NIH can model incentive reform for other academic institutions by explicitly and publicly communicating how its intramural researchers are evaluated (https://irp.nih.gov/our-research/irp-review-process) to include contributions outside of peer-reviewed publications.

3) Investing in open research infrastructures to enable rapid dissemination of varied research outputs. Traditional publishing practices remain rooted in a print-based legacy that disseminates research results only after the research has taken place. The digital age has enabled researchers to share other research outputs that underlie discovery, including preregistrations, data, code, materials, protocols, preprints, and more. Open research infrastructures, such as the OSF, allow for these research products to be shared and linked, providing a more complete picture of the process underlying discovery while supporting greater research transparency, reproducibility, and rigor. These infrastructures require funding support to develop, manage, and sustain to meet community needs, while tackling new challenges like the rise in fake or AI-generated content. Related more directly to publications, preprint repository and review services offer a cheaper alternative to Hybrid and Gold Open Access models that rely on APCs; further, open-source infrastructures enable further innovations, increasing the potential return on these investments. We recommend NIH increase its investments in these critical infrastructures, as well as provide funding opportunities to build and test new capabilities that enable dissemination and transparent evaluation of research outputs.

4) Promoting innovation in scholarly communication to enable access to and evaluation of research outputs across the research lifecycle. Traditional publishing has failed to leverage the digital advances of the 21st century, which enable rapid and real-time dissemination of various research outputs for community deliberation and evaluation. Peer-reviewed publications are necessarily retrospective and often rely on opaque and slow review processes that impede the pace of scientific discovery. There are now various innovative models in place that leverage new technologies to increase access to research outputs over the course of the research lifecycle. These models decouple and democratize dissemination of research outputs from formal publication processes. One such model is COS's proof-of-concept research and development project, Lifecycle Journal (https://lifecyclejournal.org/). A Diamond Open Access journal, Lifecycle Journal uses a "publish-before-review" model that allows researchers to publish their work before it undergoes evaluation by the community. The platform enables researchers to publish their work as it occurs — from their initial plans through their observed outcomes — and has integrated various review services, ranging from expert to automated methods, to provide multiple independent assessments of the research. NIH should encourage — and invest in — continued experimentation with new forms of scholarly communication, as well as recognize researchers who are early adopters of these models, particularly as they do so with some risk to their reputations and career advancement.

**2. Available evidence related to publication costs and proposed options:**
Defining reasonable costs for publishing peer-reviewed articles is no trivial task and has been the subject of much scholarship as open science policies have emerged over the last decades. The cost for a publisher to produce an article, including costs for sorting, editing, curation, marketing, administration, outreach, and training, is often misaligned with the charges publishers levy on authors. Production costs are generally opaque and vary greatly depending on a variety of factors, including the publisher's size, revenue model, open access business model (e.g., Green, Gold, Hybrid, Diamond/Platinum), organization type, quality assurance processes, reliance on automation, and more. There have been efforts to understand reasonable publication costs, such as work synthesized by a 2024 Invest in Open Infrastructure report (https://zenodo.org/records/14013060), as well as pushes to increase journal pricing transparency, led by cOAlition S. A notable example is EMBO Press's model of financial transparency (https://www.embo.org/features/the-cost-of-scientific-publishing/), breaking down the cost and revenue generated from its high quality and selective journals. In addition, there has been substantial scholarship estimating APCs, including estimating the financial burden of APCs on federally-funded researchers. Notable efforts include a 2023 report from the White House Office of Science & Technology Policy (https://bidenwhitehouse.archives.gov/wp-content/uploads/2023/11/Open-Access-Publishing-of-Scientific-Research.pdf), which estimated average APCs for NIH-funded researchers publishing in fully open access (~$3,500) and hybrid open access journals (~$4,500), and a recent analysis from the ScholCommlab projecting the impact of NIH's proposed caps on the ability of NIH researchers to publish (https://blogs.lse.ac.uk/impactofsocialsciences/2025/09/11/shaking-up-the-scholarly-publishing-market-why-caps-on-apcs-could-backfire/).

A blanket cap on APCs can undermine efforts to push for greater pricing transparency, allowing lower quality journals to charge the maximum allowable cost, while journals with higher per-article production costs may be forced to make compromises and cut corners to compete. In addition, imposing such a cap may stymie innovation in alternative models for information dissemination as the publishing industry standardizes business practices around maximum allowable prices. Instead, NIH can build on its 2017 guidance to the research community around article publishing (https://grants.nih.gov/grants/guide/notice-files/NOT-OD-18-011.html) to include recommendations on pricing transparency to incentivize more publishers to justify how their APCs align with production costs. Nevertheless, pricing transparency cannot counteract pressures to publish in prestigious journals without additional reforms around research evaluation, such as those outlined above.

**3. Peer review compensation:**

**4. Publishing best practices:**
Scholarly publishing relies on peer review to assess credibility of empirical research findings. However, the journal in which results are published should not be the sole indicator of this credibility. Instead, readers should be able to evaluate the evidence that underlies claims made in papers to make more informed assessments for themselves. The Transparency and Openness Promotion (TOP) Guidelines (https://www.cos.io/initiatives/top-guidelines) is a policy framework led by COS that provides a set of recommended practices for journals, as well as research institutions and funders, to increase the verifiability of empirical research claims. These practices include making various research design elements and outputs, like protocols and data, openly available. By opening access to the entire research lifecycle, researchers can better verify that conclusions are sound and more readily build on

previous research. COS is continuing to develop implementation guidance for the TOP Guidelines aimed at various communities, which may be of interest to NIH and the researchers it supports. Implementing and monitoring compliance with various TOP practices may incur added production costs for publishers; COS cannot estimate the extent of these costs and again encourages NIH to incorporate measures to incentivize pricing transparency into any potential policy changes.

**5. Other Comments:**

Scholarly publishing relies on peer review to assess credibility of empirical research findings. However, the journal in which results are published should not be the sole indicator of this credibility. Instead, readers should be able to evaluate the evidence that underlies claims made in papers to make more informed assessments for themselves. The Transparency and Openness Promotion (TOP) Guidelines (https://www.cos.io/initiatives/top-guidelines) is a policy framework led by COS that provides a set of recommended practices for journals, as well as research institutions and funders, to increase the verifiability of empirical research claims. These practices include making various research design elements and outputs, like protocols and data, openly available. By opening access to the entire research lifecycle, researchers can better verify that conclusions are sound and more readily build on previous research. COS is continuing to develop implementation guidance for the TOP Guidelines aimed at various communities, which may be of interest to NIH and the researchers it supports. Implementing and monitoring compliance with various TOP practices may incur added production costs for publishers; COS cannot estimate the extent of these costs and again encourages NIH to incorporate measures to incentivize pricing transparency into any potential policy changes.

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/COS-Response-to-NOT-OD-25-138-Proposal-to-Limit-Allowable-Publishing-Costs.pdf

**Description:** COS Response to NOT-OD-25-138

# 820. Randy Stout

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Randy Stout

**Name of Organization:** New York Institute of Technology

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 2 is the best of the options proposed, in my opinion, because it keeps it simple.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
I think an NIH-administered version of Decentralized Science, Blockchain managed initiatives such as ResearchHub would be the best way to manage and fund compensation for reviewers. There are also fair and manageable ways that the NIH could partner with ResearchHub, or similar, in order to create a subdivision of that DeSci platform for review and publishing that is overseen by the NIH and is where NIH-funded research is encouraged to be published.

Tokens would be granted to reviewers which could then be used towards paying for the reviewer's own manuscript reviews in the future.

This in effect creates a marketplace for scientific publishing and peer review. It would have the advantage of being managed through the blockchain- an important way to provide transparency, compensate reviewers fairly, and to reduce the ability for any positive changes made now to be reversed in the future as the inevitable pushback from publishers and from those people who want to retain/regain opaque control over science publishing to determine what is published and what isn't.

The NIH could purchase ResarchCoins (tokens) and then grant them to externally funded applicants when they are requested in the application budgets.

Because such research-associated tokens would be purchasable by the general public, it would create an avenue for public support for science that individual US tax payers care most about while keeping NIH decisions on grant funding entirely intact within the NIH institute's oversight.

I currently (and never have) owned any tokens associated with ResearchHub or any other DeSci initiatives, so this comment and suggestion is not coming from a financial conflict of interest.

**4. Publishing best practices:**
I think blockchain management and research tokens solve many of the issues regarding fair peer reviewer compensation, data sharing and retention, and the redirection of private funding (through increased value of the research tokens as individuals and institutions invest in them) is an excellent way

to offset any increased costs. Additionally, controlling disbursement of funds for peer review and publishing through a blockchain mechanism might help restore public trust in NIH funded science.

**5. Other Comments:**

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# 821. N/A

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Non-profit Research Organization

**Role:** Investigator/Researcher

**1. Proposed policy options:**
If the NIH is serious about maximizing the use of taxpayer funds for research and doing so in part by minimizing allowable publishing costs within grants, then the NIH should also be making arrangements with publishers to ensure that those who have NIH funded research they would like to publish can afford to do so in appropriate, high impact scientific outlets. Right now, the policy surrounding the demand for immediate public access to publications reporting on NIH-funded research only punishes those with NIH funding who now must scramble to figure out how they are going to pay to ensure their research can be made publicly available immediately (usually the only way to do this is via an expensive multi-thousand dollar open access fee, as most journals have embargoes that prohibit sharing or depositing an article for a generally months-long period of time after acceptance/publication). Right now, NIH-funded researchers such as myself without access to funds to support publishing largely must choose between violating copyright or NIH policy.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
While peer review compensation is great in theory, I would rather big publishers work on coming up with more sustainable publishing models that do not require researchers or institutions to pay large amounts of money to publish in their journals. If I cannot afford to publish my research in certain journals, I certainly am going to think twice about providing my labor to them, even if they were going to pay me. Publishing supports my career advancement much more than providing peer review.

**4. Publishing best practices:**

**5. Other Comments:**

# 822. PLOS

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Jocelyn Quigley

**Name of Organization:** PLOS

**Type of Organization:** Scholarly Publisher/Journal

**Role:** Organizational Official

**1. Proposed policy options:**
We recognize NIH's aim to maximize the value of taxpayer funds and increase the efficiency of research funding. However, the proposed approach of capping or limiting allowable publication costs will not achieve this goal and risks creating unintended consequences. To advance NIH's mission, enabling open science should be at the core of any policy consideration, particularly increased transparency and access to all research outputs.

Article processing charge (APC) caps are not an effective cost control mechanism. A fundamental driver of journal choice is the research assessment system, not author cost sensitivity. The current research assessment and incentive systems rely on numbers: the number of articles published and the Journal Impact Factor (or journal names/'prestige'), contributing to a hypercompetitive environment that rewards quantity and prestige (or falsely equates it with quality). Data, code, protocols and other important outputs are not shared and valued to the same extent as articles, and researchers who make them accessible are by and large not rewarded. To address the fundamental issue, efforts such as Rethinking Researcher Assessment and Incentives at U.S. Academic Institutions should be supported.

Per-unit pricing models, such as APCs, entrench inefficiencies. Models that tie value to "per article" charges restrict flexibility, discourage sharing of diverse outputs (data, code, protocols) and embed the article as the primary research artifact of value. NIH should instead support models that move beyond articles and beyond APCs and reinforce open science.

Imposing caps will likely encourage publishers to set publishing fees at the maximum allowable level, rather than reduce costs. This risks replicating the experience of capped higher education tuition fees in the UK, where nearly all institutions charged the maximum allowable amount. This will further fuel a research "volume business" as publishers continue to push for article growth, increasing profits and exacerbating the existing pressure on researchers to publish. The article growth economy is unhelpful for science, unhelpful for openness and entrenches the article as the primary valuable research artifact.

A better alternative would be to fund institutions and libraries to secure open access publishing services, enabling system-level efficiency and reducing reliance on APCs and APC-driven models. These funds should be considered in tandem with the considerable institution and library spend already allocated to paywalled publication access via subscriptions.

NIH's proposal to limit allowable publishing costs should also be evaluated against the Nelson memo's stated aim to "provide free, immediate (without embargo), and equitable access to research that is federally funded." to avoid unintentionally hindering its aims.

In sum, rather than capping costs at the article level, NIH should encourage research assessment reform and collective funding to support business models that incentivize openness and quality across all outputs. Such approaches more closely reflect the values of transparency, accessibility, and equity that define open science.

**2. Available evidence related to publication costs and proposed options:**
Distribution of research spending. Roughly 80% of scholarly publishing expenditure remains in subscription access; only 20% supports open access fees. Yet that 20% unlocks more than 50% of publications for open availability (DeltaThink). Focusing only on cost management via APCs and associated caps risks pushing research back behind paywalls, raising total costs for taxpayers. While preprinting is proposed as a solution to this uptake remains low and they are not routinely reviewed.

Limitations of preprints without review. PLOS supports preprints because they have the potential to accelerate the dissemination of new research. However, while valuable, preprints are not a substitute for peer-reviewed outputs. These limitations highlight that, without appropriate funding, preprints remove an important element of research validation. PLOS's own experiment shows that preprint review has associated cost and requires funding.

Evidence on open access value. Studies show open access articles are read, downloaded, and cited more. PLOS analysis of French Open Science Monitor data demonstrated an 8.6% citation increase for OA articles, with additional benefits for data, code, and preprint sharing.

NIH's reliance on DOAJ averages for setting APC limits raises important questions. It is not clear whether NIH-funded researchers typically publish in the journals analyzed, whether they meet NIH quality and licensing criteria, or whether they publish at sufficient scale. The approach appears to work backwards from what the average journal in DOAJ charges, rather than reflecting the actual costs of the services NIH seeks to support. Not all DOAJ journals, for example, offer the required CC0 license, and standards vary significantly. Using this as the sole basis for policy may risk undervaluing quality and integrity.

Additional commentary on publication costs and open access economics can be found on the PLOS Blog.

**3. Peer review compensation:**
Peer review is an essential part of the research process, but paying reviewers directly creates unintended consequences and perverse incentives:

Unintended consequences. Compensating reviewers could increase publication costs overall (publishers may pass on costs) and risk lowering quality if reviewers accept assignments outside their expertise to earn payments.

Better alternatives. Recognition of peer review as a core part of research activity is more effective. Reviews should be published (with consent) and credited to reviewers, making them visible in research assessment exercises.

Transparency. Peer review should, where possible, be conducted transparently and shared in line with open science goals. Transparent peer review strengthens accountability and ensures reviewers receive recognition for their contributions. See PLOS' commentary on publishing peer review history.

Evidence. The Publons Global State of Peer Review (2018) shows that recognition and career incentives have a greater impact on efficiency than direct payments.

Training. Investment in peer reviewer training demonstrably improves review quality. NIH support for recognition and training would be a more sustainable policy direction.

Promoting recognition of peer review aligns with the principles of open science: transparency, accountability, and equitable credit for contributions beyond the published article. See PLOS' commentary on peer review recognition.

NIH's calculation ($1,000 extra per article) underestimates the cost of multiple review rounds and undervalues the seniority of many peer reviewers. This calculation risks creating unrealistic expectations and confusion in implementation.

And consideration must be given to the overall costs of publishing which extend beyond peer review. Essential services include research integrity checks, assessment of methodological rigor, editorial oversight, production, dissemination, and long-term archiving. Any cost framework that focuses too narrowly risks overlooking these necessary quality assurance and stewardship functions.

**4. Publishing best practices:**
The NIH's proposed policy risks reinforcing a narrow focus on the article as the sole marker of academic and research value. This undermines the benefits of an open science ecosystem, which recognizes the importance of diverse outputs such as data, code, protocols, and preprints as integral to transparency and progress. In "Rethinking how we publish to support Open Science", we discuss the need to move beyond the article and beyond the APC:

Beyond the article. Ascribing both academic and economic value only at the point of article publication entrenches legacy costs and discourages the sharing of other important outputs. Evidence such as the State of Open Data 2024: Special Report shows that lack of credit remains a primary barrier to wider data sharing.

Alignment with open science. Business models should incentivize sharing the form of output most appropriate to the research, not just the article's Version of Record. PLOS has been moving away from APC-based business models since 2021, including through our project to redefine publishing "Beyond the Article and Beyond the APC." PLOS supports the position that for open science practices to be adopted widely, research outputs must be linked, discoverable, and credited in their own right, not just the article Version of Record.

Benefits of openness. A knowledge-sharing ecosystem based on open science principles increases visibility, collaboration, and efficiency. Studies including an assessment of Springer hybrid journals and data from the French Open Science Monitor demonstrate citation and usage advantages for open access and for practices such as sharing data, code, and preprints.

Incorporating best practices ensures that taxpayer investment supports high-quality, trustworthy, and openly available science across all research outputs, not simply the cheapest or most traditional option. PLOS regularly shares updates on publishing innovations on our blog.

**5. Other Comments:**
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**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/PLOS-response_-NIH-RFI_-Maximising-Research-Funds-by-Limitiing-Allowable-Publishing-Costs.docx.pdf

**Description:** Attached is the formal submission from PLOS in pdf format. This has been provided as the submission form did not accept the direct hyperlinks provided as points of reference and / or evidence. Thank you

# 823. Cambridge University Press

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Monica Westin

**Name of Organization:** Cambridge University Press

**Type of Organization:** Scholarly Publisher/Journal

**Role:** Other

**Role – Other:** Director, Open Policy Development

**1. Proposed policy options:**
Cambridge University Press shares NIH's goal to maximize the return on taxpayer investment while preserving the integrity and impact of gold standard American scientific research.

The Press is a global leader in open access publishing, with a public ambition to become a fully open access journal publisher. We are also embedded and invested in the American research ecosystem and providing American authors routes to Gold OA. In 2024, 68 percent of our new journal research content was published open access, and over 650 US institutions are covered by our open access publishing agreements.

Gold OA plays a critical role in ensuring the best possible return on research investment. Independent meta-research and scientometrics continue to show that publishing articles Gold OA strongly boosts both citations and usage and amplifies impact, increasing the ROI of research spend. Publishing Gold OA also increases the reach of research (see: "Open access research outputs receive more diverse citations | Scientometrics" - https://link.springer.com/article/10.1007/s11192-023-04894-0).

Per-article caps and reimbursements are not the only, nor the most efficient, way to underwrite high-quality dissemination. We are actively growing service-based, annual agreements that cover a portfolio of publication types. This programmatic model shifts funding from variable, per-article charges to predictable, auditable annual fees, reducing administrative burden, improving budget planning for institutions and funders, and creating headroom to invest in quality safeguards and transparent reporting. Within a reasonable allowance for true costs, such agreements enable NIH and universities to manage spend more effectively.

Of the options presented, a transparency-first, sustainable version of Option 4 could potentially create the needed flexibility for researchers to decide how to allocate funds across publishing routes. Implemented carefully, this approach could also grow innovation and the quality investments that drive research impact, represented by the hundreds of billions of dollar value that American scientific research adds to the annual GDP.

To avoid constraining high quality, high value research outputs, Option 4 should include a clear, administratively light exceptions pathway. If NIH were to consider this cap with exemptions model, we recommend monitoring and further study before locking in thresholds, alongside periodic review with

key stakeholders from scientific society and publishing industry leadership, to ensure the publication of gold standard science remains sustainable in this model.

However, the overall award-level limit in Option 4 appears too low relative to the real costs of high-quality publishing venues commonly used by NIH-funded authors. Simply put, a $2,000 per-article ceiling is not viable for most high-quality journals that adhere to robust peer review, robust research-integrity safeguards, and full-service publication workflows that result in the publication of globally impactful, Gold Open Access articles.

The cost gap between proposed caps and actual costs to publish gold standard science via Gold OA publication models represents a major risk that can all to easily translate into a loss of impact, and value, for the best, and most important, American scientific research.

**2. Available evidence related to publication costs and proposed options:**
Independent research suggests typical APCs in the high-quality publication venues NIH authors seek out are often well above $2,000. Combining an evidence-driven per-article cap with exemptions will fit the observed range with less risk and ensure this gold standard science achieves maximum impact and value in publication.

Publishers can support by transparently surfacing journal costs and pricing practices. Cambridge University Press publishes ongoing program-level cost transparency and a transparent pricing policy. These policies reflect the way we responsibly reduce online subscription prices as subscription content falls (avoiding “double-dipping"). We provide worked examples and a cap on the subscription-content adjustment. We believe our approach represents a reasonable, fair, auditable model.

Open research transparent pricing policy for journals - https://www.cambridge.org/core/services/open-research/transparent-pricing-policy-for-journals

Open research journal cost transparency - https://www.cambridge.org/core/services/open-research/journal-cost-transparency

**3. Peer review compensation:**
Cambridge University Press recognizes the burden on peer reviewers and has invested in studying this issue through internal data reviews and collaborations with external partners, building an evidence base to guide targeted interventions. Our research has uncovered that peer review capacity is being outpaced by an exponential increase in submissions due to academic reward and recognition systems that are out of alignment with actual capacity, demanding increases in publication output while not rewarding the review processes that underpin their existence. These systemic pressures on authors have led to, and been compounded by, the proliferation of  paper mills, AI generated manuscripts, and other issues that must be solved at scale.

We caution against line-item mandates that add cost and bureaucracy without addressing the root problem: the sheer volume of submissions creating strain on the peer review system. To solve this core problem at scale requires sustained investment in both human checks and thoughtfully, strategically developed tooling. Creating a new payment regime for reviewers will add material costs across the entire research ecosystem while leaving the root submission volume pressures unresolved.

If NIH explores investing in this issue, rather than direct compensation to peer reviewers, we suggest solutions that focus on system-level investments like tools for integrity checks, identity verification, and training.

At the Press we are making major, ongoing investments in systems and processes to ensure peer review maintains its robustness for the future (see “Publishing best practices” below).

**4. Publishing best practices:**
We appreciate NIH’s recognition that delivering essential publication quality-assurance and integrity services requires significant, ongoing investment by publishers. Safeguarding the scholarly record by preventing fraud, monitoring and reviewing content at scale, and upholding integrity in each step of the publication process, comes with significant costs. At Cambridge University Press, we invest in and design our research integrity and peer review approach carefully, ensuring that our publications are trustworthy and impactful.

We recommend that if NIH ties higher per-article limits to quality signals, that the focus be on requirements that are feasible to measurably attest and minimally burdensome to verify, including:

1. The existence of research-integrity control pathways, built into the submissions process.

2. Publisher cost and pricing transparency: for example, public statements of pricing principles and program-level cost transparency pages (as Cambridge University Press provides).

3. Accessibility, preservation, and interoperability of published articles requirements.

4. Publisher investment in support for open data, and implementation strategies to support author compliance with requirements such as the NIH zero-embargo policy.

**5. Other Comments:**
We appreciate NIH’s recognition that delivering essential publication quality-assurance and integrity services requires significant, ongoing investment by publishers. Safeguarding the scholarly record by preventing fraud, monitoring and reviewing content at scale, and upholding integrity in each step of the publication process, comes with significant costs. At Cambridge University Press, we invest in and design our research integrity and peer review approach carefully, ensuring that our publications are trustworthy and impactful.

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2. Publisher cost and pricing transparency: for example, public statements of pricing principles and program-level cost transparency pages (as Cambridge University Press provides).

3. Accessibility, preservation, and interoperability of published articles requirements.

4. Publisher investment in support for open data, and implementation strategies to support author compliance with requirements such as the NIH zero-embargo policy.

# 824. Emory University

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Jody Bailey

**Name of Organization:** Emory University

**Type of Organization:** Academic Institution

**Role:** Institutional Information Sciences Professional/Librarian

**1. Proposed policy options:**
Data gathered and analyzed by Emory Libraries staff show that from 2019-2023, article processing charge (APC) expenditures at Emory were around $8 million, with approximately 85% of that cost covered by grant funding and the remainder covered by individual researchers' funds and library initiatives (e.g., read and publish agreements).

Option 1 in the RFI, which disallows all publication costs, would shift those costs to our institution and prevent us from supporting core scientific activities (e.g., research support, infrastructure, and training).

Options 2 through 5, which propose various forms of APC price caps, are problematic since price caps often function as pricing signals, not constraints. Publishers would likely converge their pricing upward toward the maximum allowable rate, so those who currently charge less than the proposed price caps would raise their prices, eliminating lower-cost options.

Instead of selecting among the proposed options, NIH should consider these alternatives:

- Continue to emphasize the federal purpose license (45 CFR § 75.322(b), https://www.ecfr.gov/current/title-45/subtitle-A/subchapter-A/part-75/subpart-D/subject-group-ECFR78b08d9c95aad03/section-75.322) as a legal, viable means for researchers to share the accepted manuscript version of their articles, and perhaps state that APCs from publishers whose policies conflict with the license will no longer be allowable costs.

- Continue to invest in open infrastructure, supporting upgrades to and an expansion of PubMed Central.

- Broaden the criteria grant proposal reviewers use to evaluate applications and deemphasize journal impact factors as a proxy for the quality of applicants' research so that researchers are not indirectly pressured to publish in commercial publishers' highest-cost prestige journals.

These approaches promote long-term sustainability and equitable access without compromising researcher autonomy or scholarly quality.

**2. Available evidence related to publication costs and proposed options:**
The RFI cites APC averages from DOAJ and NIH R01 budgets, but these figures do not reflect the full diversity of publishing models or the hidden costs associated with high-fee journals, especially hybrid journals, which are not included in DOAJ. Furthermore, APCs continue to rise unsustainably across fully OA and hybrid journals, as shown in Open Access Charges – Continued Consolidation and Increases

(2024, https://www.deltathink.com/news-views-open-access-charges-continued-consolidation-and-increases-3) from Delta Think, which states that fully OA list prices rose by 9.5%, and hybrid prices by 4.2% from 2023 to 2024.

**3. Peer review compensation:**
While compensating peer reviewers may seem equitable, it introduces complex challenges, such as undermining its integrity, introducing new biases, or exacerbating those that exist now. Instead of direct compensation, NIH should encourage open peer review and transparent editorial practices, which preserve the scholarly ethos of peer review while improving accountability, transparency, and visibility.

**4. Publishing best practices:**
NIH should favor publishing practices that enhance transparency, reproducibility, and integrity, including the following:

- Expansion of the use of persistent identifiers for all entities in the publishing ecosystem, not just authors (e.g., DOIs for articles and datasets, ROR identifiers for research institutions and funders, etc.).
- Open data and code availability aligned with FAIR (findable, accessible, interoperable, and reusable) principles.
- Transparent editorial workflows, including public peer review histories and conflict-of-interest disclosures.
- Use of the Contributor Role Taxonomy (CRediT, https://credit.niso.org/) system to ensure that all contributors to research articles receive fair credit for their work.
- Certification or endorsement of publishers that meet rigorous standards for openness, ethics, and accessibility, similar to the DOAJ Seal or COPE membership.

**5. Other Comments:**
NIH should favor publishing practices that enhance transparency, reproducibility, and integrity, including the following:

- Expansion of the use of persistent identifiers for all entities in the publishing ecosystem, not just authors (e.g., DOIs for articles and datasets, ROR identifiers for research institutions and funders, etc.).
- Open data and code availability aligned with FAIR (findable, accessible, interoperable, and reusable) principles.
- Transparent editorial workflows, including public peer review histories and conflict-of-interest disclosures.
- Use of the Contributor Role Taxonomy (CRediT, https://credit.niso.org/) system to ensure that all contributors to research articles receive fair credit for their work.
- Certification or endorsement of publishers that meet rigorous standards for openness, ethics, and accessibility, similar to the DOAJ Seal or COPE membership.

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**Description:** The attached file is a PDF that contains all the information we entered into the online form.

# 825. MIT Libraries

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Chris Bourg

**Name of Organization:** MIT Libraries

**Type of Organization:** Academic Institution

**Role:** Institutional Information Sciences Professional/Librarian

**1. Proposed policy options:**
Introduction

NIH's grant policy on APC costs will have downstream effects on the scholarly communications ecosystem, affecting researchers, research institutions, and publishers. MIT Libraries pay for subscriptions to access scholarly content, and in the last seven years we've also increasingly paid for agreements that cover publication costs for MIT researchers, many of whom also receive federal funding. (In 2024 (https://facts.mit.edu/research-highlights/), 63% of MIT's research spending came from federal funders.) We do this by carefully balancing current institutional and researcher needs against a desire for a sustainable publishing ecosystem that prioritizes author rights, access, reuse of scholarship, and transparency.

MIT Libraries' guiding principles & NIH's options

MIT Libraries recognizes the dissemination and publication of findings as a defining part of conducting research activities. In 2019, MIT Libraries developed the MIT Framework for Publisher Contracts (https://libraries.mit.edu/scholarly/publishing/framework/), which guides decisions around paying for subscriptions and publishing agreements and has been endorsed by dozens of institutions and library consortia. The Framework focuses on ensuring that intellectual control of scholarly content stays with the authors of that content, and it represents a paradigm shift away from paying for access to intellectual property to paying reasonable and clearly defined costs for the value of publishing services. MIT Libraries staff use the Framework to guide negotiations with publishers.

The Framework aligns with the Guidance for Implementing Gold Standard Science (https://www.whitehouse.gov/wp-content/uploads/2025/03/OSTP-Guidance-for-GSS-June-2025.pdf), which states that, "agencies shall prioritize transparency in scientific research to ensure accountability and public trust." It also aligns with the NIH goal to maximize the value of research grants: One of the Framework's core principles is that we should pay a fair and sustainable price to publishers. And it reflects a shared interest in preserving prior licenses to scholarly content. Like the Government Use License relied on by NIH, MIT authors rely on the MIT Open Access (OA) license to share their work, and one principle of the Framework is that "[n]o author will be required to waive any institutional or funder open access policy to publish in any of the publisher's journals."

Responsible stewardship of federal spending on research and publishing should focus on:

1) Fairly compensating all contributors in the value chain, which in turn requires transparency in compensation models. (See MIT Framework (https://libraries.mit.edu/scholarly/publishing/framework/), "Institutions will pay a fair and sustainable price to publishers for value-added services, based on transparent and cost-based pricing models"; see also Plan S (https://www.coalition-s.org/wp-content/uploads/PlanS_Principles_and_Implementation_310519.pdf), "[OA fees] must be commensurate with the publication services delivered and the structure of such fees must be transparent to inform the market and facilitate the potential standardisation and capping of payments of fees."; see also Open Science Monitoring Principles (https://open-science-monitoring.org/principles/).)

2) Providing public resources for the sustainability of the scholarly communication ecosystem -- e.g., if not through journals, then available to repositories and preprint services -- which is a public good essential for societal advancement. (In addition to the MIT Framework principle quoted above, see A Grand Challenges-Based Research Agenda for Scholarly Communication and Information Science (https://grandchallenges.pubpub.org/pub/final/release/3); Information wants someone else to pay for it: Laws of information economics and scholarly publishing (https://journals.sagepub.com/doi/10.3233/ISU-150775); Interventions in scholarly communication: Design lessons from public health(https://firstmonday.org/ojs/index.php/fm/article/view/12941).)

3) Building in mechanisms for evaluation, learning, and adjustment of a funding policy based on its direct effectiveness and its alignment with the core goals of fair compensation, sustainability, and aligning incentives. (See Interventions in Scholarly Communication, above; see also Evaluating Peer Review at NIH (https://www.science.org/doi/10.1126/science.adi1570).)

4) Helping to realign researcher incentives away from publishing in "prestige" journals and towards a more open, transparent, fair system in which scientific outputs are promptly available to the public. (See Grand Challenges, above; Assessment reform and publishing reform need to go hand in hand (https://www.leidenmadtrics.nl/articles/assessment-reform-and-publishing-reform-need-to-go-hand-in-hand); Saying 'No' to Rankings and Metrics (https://brill.com/display/book/edcoll/9789004459076/BP000016.xml); Assessing scientists for hiring, promotion, and tenure (https://doi.org/10.1371/journal.pbio.2004089).)

NIH Option 1: Disallow all publication costs.

Option 1 expresses skepticism about pay-to-publish open access (OA) models. While skepticism in this financial model is reasonable (see, e.g., Open for Business(https://www.science.org/content/article/pay-publish-model-open-access-pricing-scientists)), it remains true that editing, administering peer review, and distributing scholarly content does cost money, and a blanket prohibition on publication costs may be too blunt an instrument. Moreover, prohibiting article processing charges (APCs) without supporting alternative publication modes fails as a policy to establish the incentives and resources necessary for sustainable public access. Allowing for reasonable compensation for expenses is a necessary part of the scholarly publishing ecosystem, and publication-side costs, if managed sustainably and with fair, transparent pricing, are not inherently wasteful. NIH should focus on ensuring that publication-related costs are reasonable and transparent, for example, through our suggested option described below.

NIH Option 2, 4, and 5: Set a limit on allowable costs per publication, on the total amount of an award that can be spent on publication costs, or a combination of both.

If NIH is going to contribute to publication costs, a cap is a reasonable option, but perhaps should not be the only consideration. A cap based on the expected cost of publishing the article, backed up with transparent accountability for those costs, could be a measure used (see, e.g., Counting the Cost: A Report on APC-Supported Open Access Publishing in a Research Library for an example of calculating cost-based pricing (https://www.iastatedigitalpress.com/jlsc/article/id/12727/)).

As a general rule, however, caps that are not accompanied by transparency requirements risk increasing the overall costs as publishers assume the availability of those funds. A cap that is not contingent on some criteria that incentivizes keeping costs reasonable is therefore unlikely to succeed at the stated goal to "maximize the value of each research grant."

While we believe that an approach based on the percentage of the award allows change over time more flexibly, there remains the same problem that the grant funds are not necessarily tied directly to publishing models that are sustainable and transparent. An amount up to a cap or a percentage that does not meaningfully add value towards the publication is still a waste of public funds. A better approach, as described below, would be to condition contribution to publication costs on publishing in a venue that meets criteria aligned with NIH's goals.

NIH Option 3: Set a limit on allowable costs per publication and allow a higher amount to be paid when peer reviewers are compensated.

Option three identifies an interesting criterion that could be used to assess whether publication costs will be covered. The uncompensated labor of peer reviewers is an important topic, and could be a criterion that NIH uses to determine whether publishing costs are being put towards a sustainable and fair publishing ecosystem. As proposed, this option would, however, require a substantial increase in the transparency of publication and peer review processes, and oversight into accurate use of this criterion has the potential to be administratively burdensome. If that administrative burden could be overcome, then this criterion could be adopted, possibly alongside others, as a contingency affecting the amount of covered publication costs.

MIT Libraries recommendations: no hybrid payments & green OA enforcement

As NIH Director Jay Bhattacharya wrote in July (https://www.nih.gov/about-nih/nih-director/statements/nih-establish-new-policies-allowable-publication-costs): "I am gravely concerned about the overall financial burden placed on the public—who may fund the original research, then pay again to access the resulting data, publications, or commercial products. In effect, taxpayers may bear multiple costs for innovations their contributions helped enable."

If NIH seeks to move the OA publishing market towards reasonable cost-based compensation without excessive payments by the public or double dipping by publishers (see https://www.coalition-s.org/why-hybrid-journals-do-not-lead-to-full-and-immediate-open-access/), we think publication costs should only be covered when payment furthers transparent and sustainable publishing. This also leads to lower costs overall, by tying compensation to production costs.

Specifically, NIH should encourage a dual route to public access policy compliance: If an article will be published in a subscription or "hybrid" journal, public access should be accomplished via use of the Government Use License to deposit the author's accepted manuscript into PubMed Central. If an article will be published in a fully-OA journal, publication costs are permitted.

Public access policy compliance via "green" OA (through deposit of the author's accepted manuscript in an open repository such as PubMed Central) is well established, and many publishers have permitted it for years, both in response to funder policies and institutional OA policies such as MIT's. The vast majority of publishers do not require authors to waive institutional OA policies, demonstrating the viability of this route.

Grant funds should be used only for publication costs in fully OA journals, i.e., journals that do not also charge subscription fees. Administratively, compliance with this criterion is easy to determine via indexing in the Directory of Open Access Journals (DOAJ), which only indexes fully OA journals. Covered costs in such journals could also be capped at a reasonable rate based on estimated reasonable publishing costs and a set amount of overhead. Additional criteria could also be added to ensure funds are used toward a sustainable publishing ecosystem, such as allowing costs (or, allowing uncapped costs) only when a journal meets specified transparency standards, which could be developed specifically for this purpose, or could adopt an existing framework (see, e.g., the Fair Open Access Breakdown of Publication Services and Fees (https://digitalcommons.unl.edu/scholcom/132/)). Such criteria could potentially include provisions for peer review compensation, as discussed above in relation to option 3.

We also strongly recommend that NIH disallow covering costs when publishers prohibit the use of prior licenses (such as the Government Use License or institutional OA policies) in their author contracts. This would remove the incentive to publishers to use the NIH Public Access Policy as a strong-arm tactic for requiring payments from authors instead of allowing green OA compliance.

This option would not affect where authors could publish. Authors who choose to publish in hybrid journals would still be welcome to do so and could use the green OA route for public access policy compliance, but they would not be permitted to use taxpayer money to pay additional costs. This is similar to the criteria used by many academic institutions, including MIT Libraries, in deciding when to cover publication charges. MIT Libraries (until affected by recent budget cuts) administered an OA fund for MIT authors using the criteria of indexing in DOAJ and a fixed cap of $1000 per article.

Conclusion

NIH policy around coverage of publication costs should reflect the ultimate goals of a financially sustainable publishing ecosystem and public access to publicly funded research. As such, NIH should adopt clear criteria that support those goals. We recommend that NIH support two routes to Public Access Policy compliance: 1) For papers published in subscription-only or hybrid journals, require compliance only through the Government Use Policy and do not cover additional publication fees; 2) for papers published in fully-OA journals, cover publication fees to an amount reasonably and transparently related to a sustainable cost of publication.

**2. Available evidence related to publication costs and proposed options:**
Recommended data sources:

Stefanie Haustein, NIH explores capping APCs: Let's look at the evidence, ScholCommLab (Sept. 3, 2025), https://www.scholcommlab.ca/2025/09/03/nih-apc-caps/.

Haustein, S., Schares, E., Alperin, J.P., Camargo, F., Matthias, L., Céspedes, L., Poitras, C., & Strecker, D. (2025). APCs of 2,228 journals where NIH-funded authors published in 2025 (Version v1) [dataset]. Harvard Dataverse. https://doi.org/10.7910/DVN/3XDMNF

Steinhart, G., & Skinner, K. (2024). The Cost and Price of Public Access to Research Data: A Synthesis. Zenodo. https://doi.org/10.5281/zenodo.10729575

**3. Peer review compensation:**
As discussed further in our answer to question 1, we recommend that, if peer reviewer compensation is considered, it should be considered alongside other criteria that support sustainable and transparent public access to research.

**4. Publishing best practices:**
As described further in the response to question 1, NIH should consider whether NIH funds are supporting a sustainable publishing business model when contributing to publishing costs. The NIH should not provide publishing costs for publications that seek to thwart public access by prohibiting authors from using the Government Use License. NIH should also not provide publishing costs for "hybrid" journals; publishing costs for such journals are already covered by subscription payments, and the Government Use License should be used to provide public access.

**5. Other Comments:**
As described further in the response to question 1, NIH should consider whether NIH funds are supporting a sustainable publishing business model when contributing to publishing costs. The NIH should not provide publishing costs for publications that seek to thwart public access by prohibiting authors from using the Government Use License. NIH should also not provide publishing costs for "hybrid" journals; publishing costs for such journals are already covered by subscription payments, and the Government Use License should be used to provide public access.

# 826. Microsoft

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Jordan Gimbel

**Name of Organization:** Microsoft

**Type of Organization:** Other

**Type of Organization - Other:** U.S. Technology Company

**Role:** Other

**Role – Other:** Associate General Counsel, Intellectual Property Group

**1. Proposed policy options:**
Microsoft appreciates the opportunity to provide comments to the National Institutes of Health in its request for information on Maximizing Research Funds by Limiting Allowable Publishing Costs. Please find attached Microsoft's formal response, which addresses the questions outlined in the RFI.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/MSFT-RFI-NOT-OD-25-138-Maximizing-Research-Funds-by-Limiting-Allowable-Publishing-Costs-Response.pdf

**Description:** Microsoft's formal response to the National Institutes of Health (NIH) Request for Information on "Maximizing Research Funds by Limiting Allowable Publishing Costs."

# 827. Roger Chang

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Roger Chang

**Name of Organization:** Albert Einstein College of Medicine

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I support a slightly different option to set a limit on allowable costs of $3,000.00 per publication and require Journals to compensate (~$450-$600) peer reviewers and publicly provide all reviews resulting from the peer-review process of accepted, NIH-funded manuscripts.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Extremely rarely have I been compensated at all for peer review, and often requests to serve as a peer reviewer come to me many at a time. Journals should definitely compensate peer reviewers, but whatever they are likely to offer would not likely even be close to commensurate with the amount of time and effort required to properly review an article. Although I am a salaried employee, if I were to estimate that I work 40 hours per week (I actually work well above 40 hours in a typical week), my rough hourly wage would be ~$75/hour. A proper, in-depth review of a manuscript takes about 4 to 5 hours in my experience with the potential for another 2 to 3 hours for subsequent re-review. By this conservative estimate, I would say that this is worth about $450 to $600 of my time. Proposing ~$50 compensation per article is frankly insulting and might as well be $0. I think that journals should pay by the hour up to a maximum of $600 based on my own experience.

**4. Publishing best practices:**
Use of tools to combat use of AI in generating manuscript text and figures should be considered. Largely/wholly AI-generated manuscripts are already finding their way into the scientific literature, including error/fraud-laden content and artificial bias even when the content is not erroneous. This is very dangerous for the long-term integrity of the scientific record.

**5. Other Comments:**
Use of tools to combat use of AI in generating manuscript text and figures should be considered. Largely/wholly AI-generated manuscripts are already finding their way into the scientific literature, including error/fraud-laden content and artificial bias even when the content is not erroneous. This is very dangerous for the long-term integrity of the scientific record.

## 828. Tyler Alexander Stepke

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Tyler Alexander Stepke

**Name of Organization:** Biosafety Now

**Type of Organization:** Other

**Role:** Organizational Official

**1. Proposed policy options:**
I support Option 1, disallowing all publication costs.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
I support NIH policy to encourage the fair compensation of peer reviewers, but NIH funds should be prohibited from usage on publication costs.

**4. Publishing best practices:**
Automated fraud detection should not justify spending NIH funds on publication costs. NIH should encourage effective fraud detection and fair compensation of peer reviewers without allowing journals to charge for publication costs on taxpayer-funded research.

**5. Other Comments:**
Automated fraud detection should not justify spending NIH funds on publication costs. NIH should encourage effective fraud detection and fair compensation of peer reviewers without allowing journals to charge for publication costs on taxpayer-funded research.

# 829. American Society of Mechanical Engineers (ASME)

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Paul Fakes

**Name of Organization:** American Society of Mechanical Engineers (ASME)

**Type of Organization:** Scholarly Publisher/Journal

**Role:** Organizational Official

**1. Proposed policy options:**

- Researchers should retain the ability to publish in the journals that best serve their scientific community, whether through subscription-based, hybrid open access, or fully open access models.

- Any cost caps, total award limits, or other restrictions must not create a “one-size-fits-all” publishing approach that disadvantages authors at smaller institutions or research fields or favors a particular business or organizational model in publishing.

- Return of a limited embargo period of 12 months could allow for continued support from the subscription model of publishing and should be considered by NIH as a way to leverage non-federal sources of revenue to support the agency’s research dissemination objectives.

**2. Available evidence related to publication costs and proposed options:**

- Despite inflationary cost increases, ASME's maximum Open Access fee of $3000 for Hybrid Journals has been maintained since its establishment by subsidizing any additional expense via subscription revenue. In addition, our newest fully open journal has a reduced fee of $1950, with further discounts for ASME members ($1700), to encourage paper submissions under this new model of publishing.

- ASME also offers a Read & Publish Open Access option to institutions that subscribe to our journals package that further subsidizes the Open Access model through our traditional subscription revenue. With a trend towards removal of the subscription model as an option for publication, Open Access options will likely require additional revenue support from sponsoring agencies.

**3. Peer review compensation:**

**4. Publishing best practices:**

- High-quality peer review, editorial oversight, digital infrastructure, archiving, and indexing all require substantial ongoing investment. Limiting the use of research funds for publication costs without providing alternative mechanisms for cost recovery risks destabilizing nonprofit and society publishers, reducing options in the publishing marketplace.

- A sustainable model must acknowledge the legitimate costs of publication and provide flexibility for different pricing structures across disciplines and journals.

- Direct publishing costs do not reflect the full investment by high-quality, reputable publishers in disseminating Gold Standard Science. This includes investing in continuous process improvements, improved quality-control practices, and improved software and systems. These investments are necessary to address new and ongoing threats and challenges such as Gen AI, fraudulent practices, and cybersecurity needs, including foreign interference.

**5. Other Comments:**

- High-quality peer review, editorial oversight, digital infrastructure, archiving, and indexing all require substantial ongoing investment. Limiting the use of research funds for publication costs without providing alternative mechanisms for cost recovery risks destabilizing nonprofit and society publishers, reducing options in the publishing marketplace.

- A sustainable model must acknowledge the legitimate costs of publication and provide flexibility for different pricing structures across disciplines and journals.

- Direct publishing costs do not reflect the full investment by high-quality, reputable publishers in disseminating Gold Standard Science. This includes investing in continuous process improvements, improved quality-control practices, and improved software and systems. These investments are necessary to address new and ongoing threats and challenges such as Gen AI, fraudulent practices, and cybersecurity needs, including foreign interference.

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/Final-ASME-Response-NIH-NOT-OD-25-138-Sept-15-2025.docx

**Description:** If you have any questions regarding this response, please contact Paul Fakes, Director of ASME Government Relations at fakesp@asme.org.

## 830. Lauren Forrest

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Lauren Forrest

**Name of Organization:** University of Oregon

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
This policy means that researchers' only options for publication are paying for open access publishing. These fees are usually around $2000-$3000 per article. Considering that multiple publications may emerge from a given NIH-funded project, requiring that researchers pay for open access publication is problematic and nonsensical, for several reasons. First, all publications stemming from NIH-funded research are made open access through PubMed after a 12-month embargo period. Making researchers pay to have their articles made available via open access from day one is quite literally wasting taxpayer dollars--it's making us pay for a service that already exists for free.

Second, many publications stemming from NIH-funded work are published months to years after the grant expired. Researchers cannot set aside money in their grant budgets to pay for the open access publication fees because researchers don't have access to grant funds once the grants have expired. Critically, this will create a major barrier for NIH-funded research being published. If researchers don't have other sources of funds to publish, which many do not given the havoc being wreaked on many university budgets right now, they can't publish their work. This lack of publication will not be because the researchers were taking advantage of the budgets, not implementing the projects, not finishing the projects, etc. It will be the fault of implementing a nonsensical policy. This policy seems poised to have the exact opposite effect than what the policy intended.

Third, grant budgets already get stretched pretty thin. Even if researchers make open access publication fees a part of the budget (though see point 2 about this not being feasible), this means that other budget items would need cut, which would mean fewer participants being enrolled, shorter time to support research staff, etc.

Fourth, how will the public benefit from this? How many people have been stymied by PubMed's 12-month embargo period? (My guess: not many.) How many of those people who have been stymied have contacted the study authors to obtain a pre-print of the work? In my experience, many researchers support transparency and even if researchers can't personally share final copies of the manuscripts before the 12-month embargo period, many are willing to share preprints (i.e., the initial version of the paper before peer review).

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

# 831. Elsevier

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Ann Gabriel

**Name of Organization:** Elsevier

**Type of Organization:** Scholarly Publisher/Journal

**Role:** Organizational Official

**1. Proposed policy options:**
We support NIH's objectives to ensure the research outputs it funds are of substantive quality and impact, and to maximize the value of these outputs across the research lifecycle. Ensuring this quality via the publishing process requires continuous investment, particularly in the areas of content integrity, reliability, and reproducibility, to advance science, healthcare and innovation - goals that are more broadly reflected in the Administration's Restoring Gold Standard Science Executive Order. We support the NIH's ambition to lead in Gold Standard Science, outlined in its Implementation Plan [https://www.nih.gov/sites/default/files/2025-08/2025-gss.pdf]. We have launched policies and initiatives spanning many of the nine tenets of Gold Standard Science, including: open data [https://www.elsevier.com/researcher/author/tools-and-resources/research-data/open-data]; open methods including implementing a version of Cell Press' STAR Methods across most of our journals [https://www.cell.com/news-do/star-methods]; and testing new peer review approaches with Results Masked Review [https://www.elsevier.com/connect/results-masked-review-peer-review-without-publication-bias]. We are a signatory of the Center for Open Science (COS) [https://www.cos.io/] Transparency and Openness Promotion (TOP) guidelines, a community initiative aiming to promote transparency, open sharing, and reproducibility [https://www.cos.io/initiatives/top-guidelines]. We would be happy to share further details about these initiatives with the NIH.

Our investments are maintained via sustainable publishing models. For instance, where research is required to be made immediately publicly accessible, we enable this through the gold open access model, funded by Article Publishing Charges (APCs), which provides a sustainable approach to cover publishers' investments and enables us to uphold the integrity and veracity of the scholarly record. We have supported NIH's public access policy for the past twenty years, and we will continue to support NIH's most recent public access policy changes via the gold open access model.

It should be acknowledged that approaches that limit funding for publishing will pose risks to achieving NIH's goals of a trustworthy scholarly record to advance science. Mechanisms such as capping of APCs could cause significant unintended consequences, including market distortions, given price regulation would create interference in an established competitive market, as well as impacts to America's global competitiveness in research, should American researchers not have the requisite funds to publish in the most relevant and impactful journal for their research, compared to their global counterparts. Of the options presented, we thus contend that NIH's proposed Option 4: Set a limit on the total amount of an award that can be spent on publication costs offers a good starting point for further dialogue, given it acknowledges the investments that are necessary to support quality and integrity in publishing.

Importantly, the principle behind this option could positively incentivize researchers to think carefully about the type and calibre of papers they publish, while limiting risks of so-called 'salami slicing' – publishing multiple versions of the same research – to instead encourage a focus on quality and impact when publishing in reputable journals. Relatedly, researchers will be incentivized to reflect carefully upon the most suitable journal for their article, that will offer optimum readership and reach, thereby aligning with NIH's goals for impactful research.

Option 4 also recognizes that publishing is an integral part of the research process, key to achieving research impact and realizing downstream economic benefits, and provides a straightforward way for researchers to calculate and budget for publication costs, alleviating researcher burdens where they are required to make their work freely and immediately available. Furthermore, by ensuring budget is available for publishing, researchers will be able to publish in a trusted journal that secures a permanently-available version of record, such that other researchers can build on this research with confidence.

We would like to explore further with NIH the limit for the maximum funds that would be allowable to allocate towards publication costs. Key to this dialogue is understanding the appropriate level of funding required to support Option 4. We note that the calculations for the proposed options are based on estimates focused on researcher behavior before the NIH public access policy came into effect, and therefore likely underestimate the budget that may be required to support publication. Additionally, other aspects of how the research is conducted may need to be taken into account when calculating a maximum allowable threshold, such as the number of people involved in a project. We respectfully suggest that NIH revisit its calculations to think through various factors which may influence the thresholds for allowable costs. Ideally, NIH would first assess researcher behavior under the new public access policy before finalizing calculations for allowable costs for publication, or at the very least keep thresholds under formal review based on actual researcher need and behavior as the NIH public access policy is implemented. Finally, any stated limit will need to increase annually in line with inflation, and a process for exceptional cases would likely be needed to ensure that surfacing outstanding research with the potential to generate innovation and real-world impact is never hampered.

We welcome the opportunity to discuss further with NIH how Option 4 could be utilized to best achieve our shared goals.

**2. Available evidence related to publication costs and proposed options:**
Below we provide brief assessments of the other options outlined in NIH's Request for Information. In summary, the other options proposed by NIH will not meet NIH's goals for impactful and high-quality research, as particularly blunt instruments such as caps will distort a currently healthy and competitive publishing market, with impacts for American research and its competitive standing on the international stage as a result.

Option 1: Disallow all publication costs

Importantly, such an approach would be inconsistent with NIH's goals to ensure the research arising from its funding achieves quality and impact, and its stated aim to not prevent awardees from publishing in any particular journal. Where researchers would not have funding support for publishing, they may not be able to publish in the journal that would afford their research the greatest readership,

visibility, and impact, which would have implications for the downstream uptake of that research, in America and globally.

Furthermore, there would be regulatory and legal parameters to consider in implementing any such approach, including alignment with the Office of Management and Budget Guidance, and it is not clear that such an action would be feasible or practical.

Finally, while the Request for Information notes that some funders are withdrawing funding for article publishing costs, where alternative models are being pursued e.g., pre-printing with open peer review or publishing article components individually, these tend to see low uptake and have not been shown to scale. Prominent examples include the EU's Open Research Europe [https://open-research-europe.ec.europa.eu/], and Octopus in the UK [https://www.octopus.ac/]. There is also little evidence that not-for-profit alternatives are cheaper than existing APC-based models. For example, a 2024 study commissioned by the European Commission shows that overall costs per publication for not-for-profits such as Open Research Europe will, at least initially, be similar to APC-based approaches [https://op.europa.eu/en/publication-detail/-/publication/08da357e-926e-11ee-8aa6-01aa75ed71a1/language-en/format-PDF/source-297748120].

Option 2: Set a limit on allowable costs per publication, and Option 5: Set a limit on both the per publication cost and the total amount of an award that can be spent on publications.

In free market economics, companies must have the ability to set pricing that makes sense in their individual context; healthy competition helps to regulate pricing, and drives innovation and efficiency. It is widely acknowledged that price regulation creates market distortions and typically leads to unintended consequences. By way of an example, rent controls implemented in major US cities in previous decades have led to issues including poor maintenance of housing given fewer incentives to invest in upkeep, and reduced housing supply due to developer fears of low returns. Similarly, with regard to the academic publishing industry, caps set too low will pressure the industry to cut costs and undermine publishers' ability to continue to make extensive and necessary investments into the scholarly record that ensure high quality and impactful research (see below for more details about these investments).

Additionally, we question whether the calculations for caps are wholly accurate, given they are based on DOAJ data and therefore do not take into account publishing in hybrid journals, which represent a large number of well-established journals, and that the calculations reflect researcher publishing behavior prior to the implementation of NIH's new public access policy. This will have real implications for researchers' ability to publish in their preferred journal.

Option 3: linking allowable costs per publication to peer review compensation and enhanced publisher best practices

Feedback from the research community through various surveys and direct engagements that we have undertaken have highlighted that that there is no consensus view that peer review should be financially compensated; rather, the community sees peer review as part of the researcher role, and acknowledges its contribution to their career development and academic credentials. The community has widely acknowledged that financial incentives would risk biasing the peer review and validation process [https://scholarlykitchen.sspnet.org/2021/06/16/whats-wrong-with-paying-for-peer-review/]. For

example, reviewers may be incentivized to write brief/ rapid reviews in return for payment, rather than focusing on the quality of their review.

Many peer reviews are conducted on papers that are ultimately rejected as a result, and multiple rounds of review and revision are undertaken with a broad range of reviewers. Requiring publishers to pay for peer review could have the unintended consequence of disincentivizing the extent of peer review that takes place, with downstream implications for the quality and veracity of the scholarly record.

Additionally, it is unclear how and who would confirm or validate the review compensation status, given the majority of peer review continues to be single/ double anonymized. Even if this were possible, it would place substantial burdens on the author/ publisher to confirm review compensation status.

Unless and until there is a consensus view on this topic and the above practical concerns could be satisfactorily addressed, we respectfully caution NIH from pursuing approaches which link allowable costs to peer review compensation. Further commentary on Option 3 is provided in the section on peer review compensation.

Underlining the above points on the RFI options on allowable costs is the fact that publishers are heavily and continuously investing in publishing processes that support integrity and reproducibility in the scholarly record. These investments support NIH's goals to fund high-quality and impactful research. Below we provide an overview of the nature of publishing costs and investments.

Research output continues to grow exponentially year on year, yet we maintain a commitment to quality and integrity in the outputs that we publish. Article submissions to Elsevier have tripled in the past decade, and increased by 600,000 submissions in just the last year; we received a total of 3.5 million submissions in 2024. Consistent with our focus on quality, we published only around one-fifth of the submissions we received (720,000 in 2024). We do this by investing substantially and at scale to screen and assess each submission. Our publication costs and investments are therefore often focused on research that ultimately does not go on to be published, to safeguard the integrity of the scholarly record. As a result, articles in our journals account for over 17% of global research output but 29% of global citations, and have a field-weighted citation impact 41% higher than the world average. In support of this, we work with and provide honoraria for 36,000 expert editors, with whom we connect 1.7 million reviewers, providing tools and systems to manage and organize the editorial and peer review process. All of these factors must be considered when understanding the parameters of 'publication costs'.

An additional and growing area of investment is in developing systematic approaches to address integrity issues, spanning detection of duplication, plagiarism and image manipulation; challenges that have been exacerbated by the widespread use of Generative AI. We develop tools to screen submissions for plagiarism, fabrication, and falsified images and data, and examine more than 100 data points indicative of potential integrity and ethics misconduct across all stages of the publication process, with new data points added regularly. Furthermore, we support industry-wide approaches by contributing our expertise, and our tools directly, for example through the STM Integrity Hub [https://stm-assoc.org/what-we-do/strategic-areas/research-integrity/integrity-hub/], a pan-publisher service developed collectively by the STM Association [https://stm-assoc.org/] publisher members, that enables publishers to detect manuscripts that violate research integrity standards.

Our investments also enable us to innovate to support the publication and discoverability of research in perpetuity. We invest in AI to enhance published content and its findability, for example, to complete metadata which allows insights to be extracted from articles more accurately. Other innovations enhance the dissemination and discoverability of research; the global scientific community accessed over 1.8 billion articles across our journal platforms in the past year.

As above, our substantial investments are only possible when underpinned by sustainable publishing models, such as the gold open access publishing model which enables immediate access to research via charging an APC per article. Our pricing policy [https://www.elsevier.com/about/policies-and-standards/pricing#1-publishing-charges] outlines the range of factors considered when setting APCs; additionally each journal offers different service levels such as acceptance rates, editorial structures and levels of staff involvement, marketing support and more, which are reflected in varying APCs. Authors value having a range of options and flexibility on where to publish.

Finally, we price our APCs transparently and on the basis of quality, as explained in our pricing policy [https://www.elsevier.com/about/policies-and-standards/pricing], and display our APCs as part of our APC price list [https://www.elsevier.com/books-and-journals/journal-pricing/apc-pricelist] and on journal homepages. We are committed to pricing lower than other publishers for equivalent quality. We follow this pricing principle even though our commitment to quality, evident in the above data, means we must invest resources to assess many more articles than we eventually publish.

Further details and examples of our investments are covered under the section on publishing best practices, below.

**3. Peer review compensation:**
Further to our points made above, here we provide additional detail about publishers' activities to support peer reviewers.

Outside of monetary compensation, many publishers including Elsevier provide compensation via benefits in kind, such as complimentary access to our paid for tools and services, including 30 days' complimentary access to Scopus and ScienceDirect. We have developed a Reviewer Hub which provides reviewers with a means of showcasing their efforts and receiving credit for their work, and which can support career progression, for example. Additionally, the platform offers discounts for several Elsevier services, including Elsevier's WebShop, which offers professional English language editing, translation and illustration services for researchers preparing their articles, and the Elsevier Book Store.

**4. Publishing best practices:**
Further to our points made above regarding publication costs and investments, below we provide additional examples to illustrate the substantial investments we make to develop and maintain the version of record of a scientific article, ensuring the integrity, discoverability, accessibility and preservation of research in perpetuity.

As stated above, a particular area of investment focus for publishers such as Elsevier is in technology and human expertise to safeguard quality and integrity, to address emerging and increasing challenges in misinformation, disinformation and misuse of Generative AI. To offer some tangible evidence by way of illustration: More than 100 data points indicating potential integrity and ethics misconduct are examined across all stages of the publication process, and new data points are added regularly as

behaviors change. 100% of papers flagged by our tools for potential integrity and ethics concerns are investigated by in-house experts. And those in-house experts have grown exponentially; our integrity team, which in 2020 consisted of just two people, now comprises more than 120 staff.

Added to this are our long-standing and ongoing investments in rigorous, multi-layered work to develop and maintain the version of record of a scientific article. By way of examples, these include the following investments:

Supporting and providing honoraria to 36,000 expert editors, with continuous healthy turnover to ensure new ideas and influences are sought; and expansion, such that each year we recruit and train 18,000 new editors and editorial board members who uphold the quality of the scholarly record. These editors operate under strict editorial independence; we align with the Committee on Publishing Ethics' position on Editorial independence [https://publicationethics.org/guidance/cope-position/editorial-independence], and stand on the side of neutral unbiased information on science and health, free from corporate influence.

Connecting these editors with 1.7 million reviewers and providing tools and systems to manage and organize the editorial and peer review process; a bedrock of scholarly communication that underpins the quality of the scientific record. For example, we have developed a reviewer recommender tool to evaluate the suitability and expertise of millions of potential peer reviewers and ensure that scientists with potentially different perspectives will also assess articles.

Maintaining the scientific record, overseeing updates and corrections to the record, including ethical investigations wherever necessary, and committing to permanent availability and preservation of the scholarly record in at least three places, working in partnership with third-party organizations as well as maintaining our own digital archive. More information is available in our digital archive policy [https://www.elsevier.com/about/policies-and-standards/digital-archive].

**5. Other Comments:**

Further to our points made above regarding publication costs and investments, below we provide additional examples to illustrate the substantial investments we make to develop and maintain the version of record of a scientific article, ensuring the integrity, discoverability, accessibility and preservation of research in perpetuity.

As stated above, a particular area of investment focus for publishers such as Elsevier is in technology and human expertise to safeguard quality and integrity, to address emerging and increasing challenges in misinformation, disinformation and misuse of Generative AI. To offer some tangible evidence by way of illustration: More than 100 data points indicating potential integrity and ethics misconduct are examined across all stages of the publication process, and new data points are added regularly as behaviors change. 100% of papers flagged by our tools for potential integrity and ethics concerns are investigated by in-house experts. And those in-house experts have grown exponentially; our integrity team, which in 2020 consisted of just two people, now comprises more than 120 staff.

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**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/Elsevier-Response-to-Request-for-Information-on-the-National-Institutes-of-Health-on-Maximizing-Research-Funds-by-Limiting-Allowable-Publishing-Costs.pdf

**Description:** Elsevier Response to Request for Information on the National Institutes of Health on Maximizing Research Funds by Limiting Allowable Publishing Costs

# 832. Shashwatee Bagchi

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Shashwatee Bagchi

**Name of Organization:** Washington University School of Medicine in St. Louis

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Of the options listed in the RFI, Option 4: Set a limit on the total amount of an award that can be spent on publication costs seems the most reasonable one to me.

However, I think the best option is not have limits on publication costs at all.

**2. Available evidence related to publication costs and proposed options:**
Publication costs have skyrocketed in recent years for several reasons, including (but not limited to)explosion of open access journals, NIH requirement for publication, sharing and dissemination of NIH-supported data through publicly available journals, and perceived need to check for and mitigate fraud and plagiarism. The vast majority of journals charge noticeably higher (at times exorbitantly higher) prices for open access, and especially for publication without embargoes. Limiting publication costs to investigators will impact early stage investigators most adversely, as well as investigators from institutions without substantial available discretionary funds. Therefore, it will result in stifling innovation and progress by limiting the diversity of investigators , which ultimately leads to inefficiency of research dollars spent, not maximizing use of taxpayer funds. The suggestion that research progress is most efficient when conducted in smaller number of research institutions is misguided, in my humble opinion, despite my membership in one of the higher NIH-funded research institutions.

One interesting suggestion came from this opinion price: Lederman MM, Greenspan NS. The Biomedical Publications Industry Must Change to Better Serve the Needs of Science and Scientists. Pathog Immun. 2025 Mar 31;10(2):69-73. doi: 10.20411/pai.v10i2.819. PMID: 40265152; PMCID: PMC12011323.

**3. Peer review compensation:**
transparency and standardization of compensation process across journals: criteria used to select compensated reviewers, who is paid, how much paid?

evaluation of peer reviews and transparency of that evaluation process

**4. Publishing best practices:**
as above- stage of investigator, number of other grants an investigator holds, institution research infrastructure and available discretionary funds. It is not only the journals' costs for publications that should be considered.

manuscript type and considering the types of associated data being processed for publication

number of compensated staff- editors and others- engaged in the publication process

**5. Other Comments:**

as above- stage of investigator, number of other grants an investigator holds, institution research infrastructure and available discretionary funds. It is not only the journals' costs for publications that should be considered.

manuscript type and considering the types of associated data being processed for publication

number of compensated staff- editors and others- engaged in the publication process

# 833. City of Hope

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** John D. Carpten

**Name of Organization:** City of Hope

**Type of Organization:** Non-profit Research Organization

**Role:** Other

**Role – Other:** Chief Scientific Officer and Cancer Center Director

**1. Proposed policy options:**
Faculty at our institution reported potentially significant or high negative impact if NIH limits or disallows publication costs, reporting that they may find it difficult to find alternative funding sources for publishing. Among the proposed options suggested by NIH, our faculty gravitated toward option 4 (top choice) or option 5, which both limit the total amount of an award that can be spent on publication costs. They preferred option 4 and emphasized the need for flexibility in how much they could spend per publication. They also noted that option 4 may be the only option that provides sufficient funds to cover one publication. It was also suggested that a total cap of $20,000 would be too low, and NIH should consider a higher total cap. For option 5, some faculty were concerned that it may encourage journals to increase fees toward the specified cap. The majority of faculty at our institution publish in journals with publication fees of $4,000 or more. A $2,000 limit per publication was thus considered unreasonable given that this would limit their ability to publish in top oncology journals. However, some noted that NIH dollars may be spent more productively in other categories when less expensive publishing options are available, such as publishing in society journals that may waive publication costs for members in good standing. Overall, faculty noted that publishing research results is an important part of the conduct of science and should receive commensurate, appropriate support on the grant budget. By setting a low limit for publication fees, NIH would therefore negatively affect the impact of its funding and benefit to taxpayers, as some PIs would publish in lower-impact journals because of lack of funds.

**2. Available evidence related to publication costs and proposed options:**
NIH should consider the disparate impact of limiting publication costs. For high-impact journals, which often have higher publication costs, PIs who have access to institutional and/or discretionary funds (e.g., who are senior and/or at well-funded institutions) will likely have access to funds to cover costs not covered by NIH and will be able to pay whatever the journal charges. However, those at less-well-resourced institutions or who are junior could be negatively affected by a limit per publication, because they may not have funds to make up the difference and may not be able to publish in some high-impact journals. This could be detrimental to the tenure and promotion outcomes for junior faculty and disadvantage the next generation of scientists. Given the potentially disparate impact of limiting publication costs, NIH could consider allowing a higher per publication or greater percentage of the budget allowed for total publication costs for ESIs than for senior investigators.

Faculty at our institution were generally skeptical that the policy would increase the value of pre-prints, citing the continued value of peer-reviewed publications in the scientific process.

**3. Peer review compensation:**
Option 3 allowing additional funds for journals that compensate peer reviews did not resonate with our faculty, who felt they would need to know more about how journal eligibility will be assessed and how researchers would track this. Some expressed that this policy is best handled by journals internally, while also noting that compensating peer reviewers would be valuable because this is important work.

**4. Publishing best practices:**
Faculty at our institution were generally skeptical that limiting publication costs in grants would by itself curb unreasonably high journal fees, as the scientific community, grant peer reviewers, and faculty promotion committees will continue to produce high demand for high-impact journals. In addition, they acknowledged that journals are under financial pressure, and it may not be feasible for them to lower publication fees, even if there is an NIH cap on fees. However, they generally supported direct negotiation between NIH and publishers to lower fees and standardize other best practices such as peer-review compensation, fraud detection, and citation promotion. A direct approach to communication with journals by NIH may be more effective than limiting grant award funds. Our faculty also noted that journals may charge higher fees to cover the cost of making content open access, a necessary component of awardee compliance with the NIH public access policy. Thus, limiting publication costs could negatively affect awardees' ability to comply with the public access policy and limit dissemination of important research results to taxpayers.

**5. Other Comments:**
Faculty at our institution were generally skeptical that limiting publication costs in grants would by itself curb unreasonably high journal fees, as the scientific community, grant peer reviewers, and faculty promotion committees will continue to produce high demand for high-impact journals. In addition, they acknowledged that journals are under financial pressure, and it may not be feasible for them to lower publication fees, even if there is an NIH cap on fees. However, they generally supported direct negotiation between NIH and publishers to lower fees and standardize other best practices such as peer-review compensation, fraud detection, and citation promotion. A direct approach to communication with journals by NIH may be more effective than limiting grant award funds. Our faculty also noted that journals may charge higher fees to cover the cost of making content open access, a necessary component of awardee compliance with the NIH public access policy. Thus, limiting publication costs could negatively affect awardees' ability to comply with the public access policy and limit dissemination of important research results to taxpayers.

## 834. N/A

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
We believe that the proposed policy options, while aiming to balance flexibility and fiscal responsibility, conflict with NIH's own priorities. NIH emphasizes the importance of publications as the primary vehicle for disseminating scientific discoveries with rigor and credibility through peer-reviewed journals. However, the current proposal to limit publication costs shifts the financial burden to individual investigators and institutions, rather than addressing the fundamental issue: journals charging high publication fees, especially for open access compliance. A more effective option would be for NIH to actively negotiate with publishers to control publication costs or set clear policies to not cover fees from journals that do not align with reasonable cost structures. This approach better aligns with NIH's goals by ensuring quality publication dissemination while protecting taxpayer funds.

**2. Available evidence related to publication costs and proposed options:**
There is substantial publicly available evidence showing that publication fees, especially in open access and high-impact journals, are a significant and growing expense for researchers and institutions. These fees can range widely, often reaching thousands of dollars per article, driven by publishers' business models rather than actual costs. Studies indicate that fees have increased faster than inflation and are not always transparently justified by the services provided. Therefore, placing cost limits on investigators without addressing journal pricing risks undermining the quality and accessibility of scientific communication. Evidence supports strategies such as collective negotiation by funding agencies or institutions with publishers as more sustainable long-term solutions.

**3. Peer review compensation:**
When considering peer review compensation, NIH should evaluate factors such as the time commitment, expertise level required, and the value peer reviewers add to the scientific process. Compensation should be fair and reflect these contributions, but it should also consider the broader academic ecosystem where peer review is traditionally considered part of scholarly service. Additionally, incentives beyond monetary payment—such as recognition programs, career advancement credits, or access to resources—may complement financial compensation and encourage high-quality peer review without dramatically increasing publication costs.

**4. Publishing best practices:**
Increased publishing costs may result from incorporating best practices like automated fraud detection, plagiarism checks, and enhanced editorial oversight, which contribute to maintaining research integrity and quality. NIH should consider these factors in evaluating allowable per-publication costs. However, these costs should be transparent and proportionate to actual benefits. NIH might also encourage the

development and adoption of cost-effective technological solutions and collaborative platforms that maintain publishing standards without inflating fees excessively.

**5. Other Comments:**

Increased publishing costs may result from incorporating best practices like automated fraud detection, plagiarism checks, and enhanced editorial oversight, which contribute to maintaining research integrity and quality. NIH should consider these factors in evaluating allowable per-publication costs. However, these costs should be transparent and proportionate to actual benefits. NIH might also encourage the development and adoption of cost-effective technological solutions and collaborative platforms that maintain publishing standards without inflating fees excessively.

# 835. Jonathan Backer

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Jonathan Backer

**Name of Organization:** Albert Einstein College of Medicine

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I disagree with proposals to limit publishing costs.

**2. Available evidence related to publication costs and proposed options:**
This proposal conflicts with NIH's stated priorities of 1) using publications as the primary mechanism for disseminating scientific discoveries to peers and the public and 2) publishing in peer-review journals to ensure the Gold Standard quality, rigor, and credibility of research findings; and with the NIH public access policy which often leads to authors paying publication fees because many publishers tie immediate or automated compliance to open access fees.

Setting these publication cost limits puts the onus on investigators rather than addressing the root cause, which is journals charging fees for publications.

Setting limits will shift the burden of covering the cost of publications to individual investigators and to institutions, which lack the funds to cover these costs.

An alternative strategy would be for the NIH to negotiate with publishers about limiting costs of publication or the NIH will not cover any costs for publishing in those journals.

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

# 836. West Virginia University Libraries

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Karen Diaz

**Name of Organization:** West Virginia University Libraries

**Type of Organization:** Academic Institution

**Role:** Institutional Information Sciences Professional/Librarian

**1. Proposed policy options:**
As a member of the SPARC non-profit advocacy organization, I would like to note our Libraries support for the statement SPARC submitted regarding NIH options indicating that NONE of the options in the call for comments will serve the intended purpose of maximizing research funds by limiting allowable publishing costs.

I am particularly concerned with option 1 which will shift costs without reducing them. Researchers still need to publish for career advancement and universities may be forced to create or expand publication funds to support faculty research dissemination.

A few years ago, our library system provided an Open Access Author Fund to promote and encourage our authors to make their research available openly. We had to discontinue that fund due to budget cuts which have only continued since we removed that fund. I see no future in which we will have capacity to restore such funding. Additionally, I know that some of our colleges have provided subvention funds to their faculty, but they have also had multiple budget cuts making such funding only more difficult. In a sense, our colleges would be put in a position of charging higher tuition to undergraduate students to recoup costs such as this. This would be an unfair demand for families already challenged with high tuition costs.

I defer to the arguments made by SPARC challenging the remaining options, based on their extensive research on how other countries have attempted to manage this problem. I will also say that supporting underwriting of for-profit publishers, who undoubtedly provide important services, but who answer to shareholders and not taxpayers, will always require them to maximize their profits.

Instead, I support SPARC's recommendations to:

1. Fully enforce existing deposit requirements in the NIH public access policy

2. Strengthen reuse rights – both for authors and the public by outlining a rights retention strategy

3. Support sustainable open access publishing options – that are community driven and do not rely on expensive fees to publishers. Our library is investing our limited dollars in sustainable community-controlled solutions to digital publishing and digital platforms as we are able. Given the public's appetite for information but at a low cost, we see no other sustainable solution.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

# 837. Seemay Chou

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Seemay Chou

**Name of Organization:** Arcadia Science, Astera Institute, The Navigation Fund

**Type of Organization:** Other

**Type of Organization - Other:** For- and non-profit science organizations

**Role:** Other

**Role – Other:** Co-founder and Principal Funder

**1. Proposed policy options:**
I strongly support Option 1: Disallow all publication costs.

This recommendation is based on extensive experience implementing journal-free research funding models across multiple scientific organizations I have co-founded, including a research organization (Arcadia Science) and two grant-giving organizations (Astera Institute and The Navigation Fund).

Across these entities, I help deploy $50-100M of our philanthropic funds for scientific research and metascience experimentation each year. Through the work of these entities, we consistently find that eliminating journal-based publication activities and costs 1) substantially redirects time and resources to research activities, 2) accelerates scientific communication, feedback, and collaboration through open platforms, and 3) improves the quality and innovation of strategic planning by funded scientists.

As such, we have established a policy across all of our organizations that strictly prohibits any funds or time from being spent towards the outdated journal-based framework of publishing. Not only do we prohibit paying journal fees, but we also do not support work that ultimately ends up in journals. Instead, we require rapid open dissemination of results throughout the research cycle, such that they can be openly reviewed to impact rigor and strategy in real-time. In conjunction with this policy, we have extended our funding budget to support efforts that enable researchers to adopt and test new publication strategies that our policy requires.

Given the clear benefits and broader impacts of journal-independent publishing strategies, I strongly support the NIH's application of a similar requirement for taxpayer-funded research. Scientists at all stages across our funded organizations have embraced this approach without the significant career consequences many fear. To the contrary, our researchers share with us that our strict policy is liberating, as it provides them with the cover to fully step outside of an outdated framework and think differently about their research and publishing practices. Junior researchers express that they fear being "left behind" if they remain in academia, where they are pressured to publish and advance through the closed and slow-paced journal framework. Finally, we have found that our open science requirements have become a draw rather than a deterrent for top talent, with job and grant applicants consistently remarking on this.

**2. Available evidence related to publication costs and proposed options:**
Our multi-organizational efforts reveal several categories of inefficiency in the current system:

1. Direct Financial Costs: Global scientific publishing costs range from $10-25 billion annually, primarily funded through research grants. From the funder's perspective, this can cost at least 10-20% of a typical grant we award, considering article processing fees, researcher time spent on journal-specific processes, and lag periods resulting from journal delays. Aggregated across public and private funders, these inefficiently used funds could support thousands of additional postdoctoral positions or core facilities.

2. Time Costs: Scientists spend millions of collective hours annually on journal submissions, reformatting manuscripts, and responding to editorial requirements that do not improve scientific quality. This is likely a significant underestimation of time spent on journal articles, given their low reproducibility rate, which leads to immeasurable delays, compounding errors, and missed opportunities.

3. Access Barriers: A significant portion of the global scientific community and non-academic community cannot afford publication fees, creating systematic exclusion from scientific discourse.

4. Innovation Barrier: Journal articles tend to favor simpler narratives and positive outcomes. This significantly diminishes how innovative scientists can be in the design of their research projects, as aiming for prestigious journal articles has become integral to their career and funding success.

Given that we deploy research funds with a strict policy, we can and would be happy to share more quantitative and qualitative analyses on how prohibiting journal-based publishing changes our portfolio’s return-on-investment for scientific impact.

**3. Peer review compensation:**
Compensating reviewers within the current journal system would exacerbate, rather than resolve, its inherent flaws. The fundamental problem lies not in the absence of payment but in the structural limitations of journal-based peer review: its opacity, the narrow expertise of a small number of reviewers evaluating increasingly interdisciplinary work, and the static nature of assessments that do not evolve as new evidence emerges or findings are validated in practice.

Instead, resources should be allocated to modern, open, and transparent evaluation systems that leverage technology to aggregate and update assessments continuously. Automated tools, machine learning methods, and broad community input can synthesize feedback from multiple sources and adapt as knowledge advances. Evidence from open review platforms and disciplines such as computer science and mathematics demonstrates that public evaluation accelerates and strengthens quality control, and agencies like the NIH should lead by redirecting journal funds toward these next-generation mechanisms.

**4. Publishing best practices:**
Best practices for scientific publishing should fundamentally align with FAIR principles (Findable, Accessible, Interoperable, and Reusable) while leveraging emerging technologies to create a more dynamic and responsive communication ecosystem. Organizations and funders, including ours, are already piloting alternative models of scientific communication that deliver faster, more transparent, and more collaborative outcomes through open, post-publication peer review.

These models will only achieve their full impact with broad participation and stable support. The NIH is uniquely positioned to drive this transformation towards enabling best practices by taking two concrete actions:

(1) Withhold funds from insufficient solutions. By capping or eliminating journal publishing subsidies, NIH can generate the critical demand for better practices. Removing default funding for legacy, paywalled platforms forces the market to shift toward models that are open, efficient, and aligned with the mission of publicly funded science. To test new models, we need a diverse group of users (scientists). This is only possible to do in earnest and at scale when there is real demand for best practice publishing outside of journals.

(2) Fund and scale proven alternatives. NIH can invest in new infrastructure and platforms backed by clear data from implementation and iteration showing that they improve transparency, speed, and rigor. This includes supporting repositories and tools that make research outputs Findable, Accessible, Interoperable, and Reusable (FAIR), and leveraging emerging technologies (AI, machine learning, dynamic publishing formats) to build a responsive communication system. While we and other non-profit funders are able to support experimentation and exploration for this work, we ultimately need a long-term partner, such as the NIH, to support stable infrastructure for scholarly work when workable solutions emerge.

Together, these actions would both enable and accelerate the adoption of best practices, which also diverts more resources towards training rather than gaming publishing metrics. By pairing the withdrawal of funding from outdated models with active investment in demonstrably better ones, NIH can help establish a publishing ecosystem that is transparent, scalable, and future-proof. By working in coordination with the broader open science ecosystem to explore solutions, tax-payer funds may also be used more efficiently to target only the most effective, proven strategies that are derisked through private, philanthropic funding sources. Below are some examples from our own work that could inform such initiatives.

Evidence from Our Own Experiments:

Our organizations have directly experimented with and funded alternative publishing strategies and platforms. A few examples are listed below.

- Arcadia Science: Publishes exclusively outside of journals via an open-source platform, enabling rapid “nano” publications and open commentary. Outcomes include increased experimental creativity, faster peer feedback (days rather than months), greater internal and external collaboration, and informative negative results. These attributes all help accelerate our research cycle.

- The Diffuse Initiative: A $5 million seed project funded by Astera Institute to develop new methods and tools for analyzing protein dynamics through X-ray diffuse scattering. All participating groups follow a journal-independent publishing policy. We have observed a stronger focus on methodological utility over journal placement, rapid data sharing and reuse within two months of launch, improved morale among early-career researchers, and enhanced team coordination.

- Astera Residency Program: Each year, the program funds 5–10 research residents who also abide by an open-science program. In addition to the benefits above, we see increased field-building activities that

do not fit traditional journal articles, faster feedback on rigor and utility, and greater willingness to take risks in research direction.

These case studies show that alternative models already deliver tangible benefits at smaller scales. With NIH partnership and investment, such models could become a durable part of the scientific publishing landscape—advancing transparency, efficiency, and innovation for the entire research community.

**5. Other Comments:**
Best practices for scientific publishing should fundamentally align with FAIR principles (Findable, Accessible, Interoperable, and Reusable) while leveraging emerging technologies to create a more dynamic and responsive communication ecosystem. Organizations and funders, including ours, are already piloting alternative models of scientific communication that deliver faster, more transparent, and more collaborative outcomes through open, post-publication peer review.

These models will only achieve their full impact with broad participation and stable support. The NIH is uniquely positioned to drive this transformation towards enabling best practices by taking two concrete actions:

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- Astera Residency Program: Each year, the program funds 5–10 research residents who also abide by an open-science program. In addition to the benefits above, we see increased field-building activities that do not fit traditional journal articles, faster feedback on rigor and utility, and greater willingness to take risks in research direction.

These case studies show that alternative models already deliver tangible benefits at smaller scales. With NIH partnership and investment, such models could become a durable part of the scientific publishing landscape—advancing transparency, efficiency, and innovation for the entire research community.

# 838. Association of American Publishers

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** J. Carl Maxwell

**Name of Organization:** Association of American Publishers

**Type of Organization:** Professional Organization/Association

**Role:** Other

**Role – Other:** Senior Vice President of Public Policy

**1. Proposed policy options:**
AAP believes the proposed options would limit author choice in publication outfits, while potentially forcing authors to pay out of pocket to publish articles which meet NIH's public access requirements. Rather than capping publication costs and limiting outlets for authors to communicate their research results, NIH should move away from one-size-fits-all public access policies and allow authors to delay deposit of accepted manuscripts so they can find publishing outlets that facilitate subscription supported open access. NIH should also allow authors to cover the cost of immediate public access publication from grant funds.

In order to boost American's confidence in Gold Standard Science and biomedical research, increasing integrity and quality checks and partnering with publisher's should be an agency priority.

AAP has attached detailed comments.

**2. Available evidence related to publication costs and proposed options:**
AAP has submitted a number of detailed comments on the suggested options in our attached manuscript, but notes that OSTP in a report to Congress in November of 2023 established APC costs by agency that appear to be much higher than currently proposed cost caps.

**3. Peer review compensation:**
AAP believes NIH should explore how to support peer review from an NIH institutional perspective. For example, NIH could explore rewarding grant application submissions from researchers who are active and accomplished peer reviewers, as well as developing programs to train peer reviewers and support peer reivewers in their activities. Publishers would welcome an opportunity to work with NIH on innovative ways to support and boost peer and editorial review. Additional comments attached.

**4. Publishing best practices:**
NIH should explore supporting all aspects of integrity improvement, not just automation. Human peer and editorial review are central pillars of the scientific method. NIH should support publishers and researchers in boosting integrity and quality across the research ecosystem.

Please see attached comments.

**5. Other Comments:**
NIH should explore supporting all aspects of integrity improvement, not just automation. Human peer

and editorial review are central pillars of the scientific method. NIH should support publishers and researchers in boosting integrity and quality across the research ecosystem.

Please see attached comments.

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/AssocAmerPublisher_NIH_NOT-OD-25-138.pdf

**Description:** Attached please find a detailed response to NIH's Request for Information on Maximizing Research Funds by Limiting Allowable Publishing Costs by the Association of American Publishers

# 839. Society for Psychophysiological Research

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Karen Quigley

**Name of Organization:** Society for Psychophysiological Research

**Type of Organization:** Non-profit Research Organization

**Role:** Organizational Official

**1. Proposed policy options:**
In the attached letter, we provide more context. In brief, in Germany, Project DEAL (https://en.wikipedia.org/wiki/Project_DEAL) is a negotiated a set of country-wide Transformative Agreements with the largest scientific publishers (Wiley, Springer Nature, Elsevier). This could serve as a model to be emulated in the United States and we encourage the US administration to consider such a possibility. If the US government were to negotiate a set of US-wide Transformative Agreements similar to Project DEAL with the largest scientific publishers, it would have the added benefit of leveling the playing field for scientists at all institutions (both small and large, well-resourced or less so), a key goal of the current US administration. There would be many details to be worked out, but this proposal has the potential for several advantages to the scientific community in the US and is a way in which negotiations at the highest levels of the government would directly benefit the dissemination of scientific findings to the US public.

**2. Available evidence related to publication costs and proposed options:**
See attached letter for relevant information.

**3. Peer review compensation:**
The option that includes paying reviewers for peer review very likely would result in unintended consequences with substantial additional costs. For reference, most top-tier journals do not pay for peer reviews, instead viewing peer review as a professional responsibility that is shared across a community of scholars. Thus, scientists collectively share the burden of peer review. Reviewing an excellent, novel paper means that the peer reviewer sees interesting new work earliest, and those reviewers also help make that work even better by providing actionable suggestions to the authors. The Option 3 proposal indicates that only reviews of ultimately accepted manuscripts would lead to reviewers being paid, creating a potential perverse incentive to accept more manuscripts. In addition, there would be considerable additional administrative oversight required to handle paying reviewers, making the already very difficult (and underpaid) work of Editors and Associate Editors even more difficult. For these reasons, we are not in favor of Option 3. See the attached letter.

**4. Publishing best practices:**
See attached letter.

**5. Other Comments:**
See attached letter.

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/SPR-Response-to-NIH-Dissemination-Costs-Notice_Sept2025_FINAL-1.pdf

**Description:** Letter describing a suggested new option to ensure Open Access to scientific papers

# 840. Gates Foundation

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Ashley Farlye

**Name of Organization:** Gates Foundation

**Type of Organization:** Other

**Type of Organization - Other:** Private Research Foundation

**Role:** Other

**Role – Other:** Funder

**1. Proposed policy options:**
The Gates Foundation recommends Option 1 as the most pragmatic and actionable policy to balance the need for broad, equitable dissemination of research results with the responsible stewardship of taxpayer funds.

Option 1 achieves this balance by:

-Curbing excessive APC spending, much of which supports journal prestige and branding rather than critical publishing services.

-Sending a clear market signal that unsustainable APC inflation will no longer be supported through public funding.

Creating space for reinvestment in alternative, equitable publishing models, such as non-APC-based journals (Subscribe 2 Open, Diamond Open Access), preprints, and community-led infrastructures.

There are significant challenges and risks associated with implementing price caps. They would impose a high administrative burden on NIH, publishers, and institutions, while also creating the risk that article processing charges (APCs) pricing converges upward toward the cap. Rather than reducing costs, this could normalize higher prices and perpetuate existing inequities in the publishing system, particularly for researchers and institutions with fewer resources. Options 2 through 5 introduce layers of complexity that would require a great deal of additional time, oversight, and administrative energy to manage effectively across the full NIH portfolio of funded publications. Ensuring fairness, consistency, and compliance on such a large scale would not only strain internal resources but also risk slowing progress toward the broader goal of advancing equitable open access.

The foundation introduced its refreshed Open Access policy in January 2025, discontinuing APC payments for all publications. Our experience is that Option 1 is a necessary first step in the pursuit of a more open and equitable publishing ecosystem that prioritizes research integrity over publisher profit. It halts the most egregious forms of overspending while giving funders the opportunity to explore long-term structural reforms. NIH should build on current infrastructure, leverage the Federal Purpose License, and require immediate sharing of the author accepted-manuscript.

Equally important to maintain forward momentum is ensuring grantees have practical and sustainable compliance options that align with their existing workflows and workloads. At the foundation, we've prioritized preprints and accepted manuscript sharing as effective ways to make funded research immediately available at no author-facing cost under an open license – ready for reuse and reproduction.

After just eight months of implementation, the foundation's renewed policy has proven both effective and sustainable. Grantees have continued publishing at their usual volume, achieved full compliance with the open access requirements, and actively adopted preprinting as part of their workflow. As a result, the foundation is on track to reduce APC spending by 50% in 2025 compared to 2024—clear evidence that the policy delivers cost savings without diminishing research output or access.

**2. Available evidence related to publication costs and proposed options:**
Efforts to determine or enforce "reasonable" APCs have largely failed. Initiatives across the globe have underscored the structural opacity of scholarly publishing economics:

Key Initiatives and Data Sources:

-Plan S Price Transparency Frameworks & Journal Comparison Service https://www.coalition-s.org/price-and-service-transparency-frameworks/

-ESAC's Common Understanding on APCs https://esac-initiative.org/common-understanding-on-apcs/?utm_source=chatgpt.com

-OASPA Guidelines on Equity in APC Models https://zenodo.org/records/14261488

-How Equitable Is It? https://www.coalition-s.org/wp-content/uploads/2024/09/HowEquitableIsIt_Framework_criteria_definitions.pdf

-Pricing framework to foster global equity in scholarly publishing https://www.coalition-s.org/pricing-framework-to-foster-global-equity-in-scholarly-publishing/

Publisher Transparency Efforts:

-PLOS: Price Transparency Report 2024 https://theplosblog.plos.org/2025/02/plos-price-transparency-update-2024/

-F1000: APC Disclosure https://f1000research.com/for-authors/article-processing-charges

-Ubiquity Press: APC Cost Breakdown https://blog.ubiquitypress.com/new-u-ubiquity-press-apc-breakdown-8a5372952e72

Notable Reports & Studies:

-A Decade of Open Access Policy at the Gates Foundation
https://insights.uksg.org/articles/10.1629/uksg.690

-Policy opportunities: Economics of academic publishing https://gatesopenresearch.org/documents/7-59

-A Review of OA Policy Options for Development Research Funders https://www.inasp.info/open-access-policy-options-paper

-AAAS Survey on Difficulties Paying APCs https://www.stm-publishing.com/aaas-survey-many-researchers-face-difficulties-paying-open-access-fees/

-ALLEA: "It Matters How We Open Knowledge" https://allea.org/it-matters-how-we-open-knowledge-allea-statement-on-equity-in-open-access/

-Research Outputs as Testimony & APCs as Testimonial Injustice in the Global South https://crl.acrl.org/index.php/crl/article/view/25978/33917

-Article processing charges are stalling the progress of African researchers: a call for urgent reforms https://gh.bmj.com/content/5/9/e003650

-Open access in low-income countries — open letter on equity https://www.nature.com/articles/d41586-022-01414-7

These sources consistently show that APCs:

-Favor well-funded researchers.

-Reinforce perverse incentives that value journal prestige over knowledge dissemination.

-Are insufficiently transparent and continue to rise year-over-year without clear justification.

**3. Peer review compensation:**
NIH's consideration of compensating peer reviewers is timely, but several foundational questions must be resolved before any payment model can be meaningfully evaluated.

Structural Challenges:

-Peer review is overloaded, yet there is no comprehensive data on reviewer demographics, workload, or distribution of burden.

-Current practices often fall short of rigor, fairness, and transparency.

-AI-assisted peer review and workflow automation hold promise for alleviating pressure on reviewers and should be tested before introducing financial incentives.

On Reviewer Compensation:

-Without strong safeguards, paying reviewers risks shifting additional costs to authors or funders, unless publishers are explicitly prohibited from passing costs downstream.

-Peer review has long been considered a scholarly contribution supported by institutions—a community service, not a commercial transaction.

-If compensation were pursued, it would require a well-defined governance structure to answer critical questions: Who qualifies as a paid reviewer? Who provides the funds? How is review quality evaluated and enforced?

Broader Considerations

Before setting APC caps and expecting journals to allocate funds for reviewer payment, NIH must first address these unresolved issues. While some new research suggests reviewer payment models can be designed effectively, the risks of escalating publishing costs are substantial. Shifting resources in this direction could undermine the sustainability of open access. A more promising path would be to strengthen society-led, nonprofit, and diamond journal models, which emphasize quality and equity while keeping costs down.

**4. Publishing best practices:**
We urge NIH to evaluate any increases in publication prices against clear, measurable benchmarks of publishing quality and integrity. Higher prices should only be justified when publishers demonstrate meaningful investments that directly improve the reliability, accessibility, and transparency of the scientific record.

Examples of such benchmarks include:

-Adoption of fraud detection and AI-based screening tools to identify image manipulation, plagiarism, and other forms of misconduct before publication.

-Transparent peer review practices that make reviewer reports, editorial decisions, and revision histories openly available.

-Mandatory data availability statements and enforcement of policies requiring underlying datasets to be shared in trusted repositories.

-Rigorous editorial and corrections workflows to ensure that errors, retractions, and updates are managed swiftly and transparently.

-Integration of preprints and published versions into trusted repositories such as PubMed Central, ensuring long-term discoverability and reducing barriers to access.

Importantly, publishers must not be allowed to invoke “technology adoption” as a blanket rationale for higher costs without providing transparency into what tools are being implemented, how they are applied, and what measurable benefits they provide to authors, reviewers, and readers. Investments in advanced technologies should be amortized across many articles and multiple years, rather than treated as a per-article surcharge.

Absent clear benchmarks and accountability, higher publication costs risk reinforcing existing inefficiencies and inequities in the publishing ecosystem rather than addressing them. NIH has the opportunity to insist that costs reflect genuine improvements in publishing practices—improvements that protect research integrity, advance open science, and deliver real value to the research community.

**5. Other Comments:**
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**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/NIH-RFI_-Information-on-Maximizing-Research-Funds-by-Limiting-Allowable-Publishing-Costs.pdf

**Description:** Formatted and fully linked PDF of the Gates Foundation response

# 841. Yale University

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Michael Crair

**Name of Organization:** Yale University

**Type of Organization:** Academic Institution

**Role:** Organizational Official

**1. Proposed policy options:**
We recognize that capping publication costs will enable the NIH to maximize use of federal research funds and to promote transparency and cost-effectiveness in the dissemination of research. However, we have significant concerns about each of the proposed options mentioned in the recent NIH RFI. Capping publication costs, whether total or per journal article, will prevent researchers from publishing their work in top tier journals that often have high article processing charges (APCs), and still be able to comply with the NIH zero embargo public access policy. This will likely be especially challenging for researchers at smaller institutions as well as those that often do not have complementary non-federal sources of funding. In addition, university presses, scientific society publishers, and other not-for-profit publishers will be significantly impacted by limits on publication costs, driving continued acquisition of smaller and/or not-for-profit publishers by large commercial companies. We urge the NIH to consider the potential unintended consequences of these proposed policies and to prioritize sustainability and the long-term integrity of scientific communication when creating the final policy.

While our preference would be for the NIH to forego formal limits on publication costs, our preferred option of the 5 presented by the NIH is the cap based on a percentage of total direct costs. This model provides much-needed flexibility across fields and project types. It also accommodates the very real variation in APCs, particularly for higher-quality or open-access journals. While the NIH proposes to limit publication costs to 0.8% of direct costs (or $20,000, whichever is greater), based on researcher feedback, we encourage a higher percentage as well as consideration for the type and level of award. There is a vast difference between smaller awards and large multimillion dollar grants with respect to the number of projects and people being supported, and the anticipated number of papers produced.

This approach:

- Avoids, to some extent, penalizing larger, more data-intensive projects that may yield more publications although a distinction should be made based on level and type of award.
- Reduces the incentive for publishers to converge on a fixed per-article floor price.
- Better reflects actual publication costs and will be easier to adapt over time as the publishing landscape evolves.

**2. Available evidence related to publication costs and proposed options:**
Fixed publication cost caps—such as $2,000 or $3,000 (if reviewers are paid) per publication—are too

low and will have detrimental effects on publishing practices and scientific progress. These proposals fail to reflect current APC trends. Yale data show that for the journals in which NIH-funded research is published, over 90% of APCs exceed $2,000.

These caps:

- Will prevent NIH-funded researchers from publishing in top-tier journals, especially those with higher APCs due to high rejection rates or full open-access models.
- Will disproportionately disadvantage early-career researchers and those at less-resourced institutions who cannot subsidize publication costs from other sources.
- May encourage publication in marginal or even potentially 'predatory' journals as these generally have lower APCs.

A 'one size fits all' cap on APCs is not realistic in today's scientific publishing environment. The costs are highly variable, depending on discipline as well as whether the journal is fully open access (OA) or hybrid (subscription with an OA option). Hybrid journals oftentimes have higher APCs than fully OA journals. It appears that NIH did not consider hybrid journal APCs in their analysis as DOAJ does not include those titles. In addition, journals published by society publishers and not-for-profit organizations may have different fee structures than those published by large commercial companies. Several levels of APC caps could potentially be implemented, distinguishing society/not-for-profit publishers and commercials, as well as fully OA and hybrid journals, but that induces an additional level of complexity and yet more administrative burden for researchers.

We are concerned that certain cost caps will:

- Fail to account for inflation, will rapidly become outdated, and will ultimately limit access to scientific research.
- Accelerate consolidation of smaller and society publishers into larger commercial publishers, further reducing diversity in the publishing ecosystem.
- Undermine society journals, which often use publication revenues to support training, education, and international collaboration.
- Disincentivize transparency in publishing costs.

**3. Peer review compensation:**

We are concerned about compensation for peer review, not a common practice in top-tier journals, and the tie-in to APC caps. Paying reviewers has complicated tax implications and there are myriad international employment rules. There is also a potential for reviewers with financial motivations and non-expert reviews. A better way to acknowledge the hard work of peer reviewers is with 'in kind' compensation such as reduced APCs, various book discounts, and, for society journals, discounts on meeting registration fees.

**4. Publishing best practices:**

**5. Other Comments:**

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/To-NIH-re-allowable-pub-costs-09-15-2025.pdf

**Description:** Letter to NIH Office of Science Policy regarding proposed limits on allowable publication costs.

# 842. Juan Sepulveda

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Juan Sepulveda

**Name of Organization:** Albert Einstein College of Medicine

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
As a PhD candidate nearing the publication of their thesis research and in a lab with limited funds, I advocate for the NIH to negotiate with publishers about limiting costs of publication while leaning on option 3 of the proposal. This is because the NIH should encourage publishers to pay their reviewers to incentivize higher scrutiny from the reviewers. At the same time, publication costs should be lowered to allow newer research groups or groups with low funds to publish high-level research still. This proposed arrangement would ensure the scientific community will have a more accessible avenue for sharing their knowldge while maintaining scrutiny.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
The peer review process is vital for responsible research and should be treated as labor to be compensated. As such, peer reviewers should be compensated with the socially acceptable payment. This way, reviewers will be encouraged to spend more time with articles.

**4. Publishing best practices:**

**5. Other Comments:**

# 843. Peter Rogan

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Peter Rogan

**Name of Organization:** University of Western Ontario

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 2: Set a limit on allowable costs per publication. NIH could limit allowable direct costs to $2,000.00 per publication, including APCs and other fees.

**2. Available evidence related to publication costs and proposed options:**
I have published 48 articles as open access, with most of these being covered by open access fees. Publishers game the system in order to achieve PubMed citation. The pattern that NEW publishers of open access use (whether or not they have an established journal) is to seek out individuals like myself, offer them a peer reviewed opportunity with no fees in order to acheive citations sufficient to be included in PubMed, and then require future authors to pay fees. I have experienced this at least 10 times. By limiting the maximum they can charge, then those publishers who are highly profit motivated are less likely to game the system.

**3. Peer review compensation:**
I've never been compensated for peer review. It takes time and effort, but I view this a my contribution to a system where anyone can publish so long as the work is worth publishing. The pollution in the system needs to be removed (agressive for profit publishers, AI written articles, plagiarism, and the incentives for these things etc.) before compensation becomes the norm.

**4. Publishing best practices:**
See my answer to question 3.

**5. Other Comments:**
See my answer to question 3.

# 844. S

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of myself

**Name:** S

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
The NIH should pursue avenues to directly decrease the cost of publication, rather than impede our ability to publish and hope that the cost comes down in response. (Can there be a regulated upper cap on what a journal can charge for publication?) As it stands, the proposed options will drastically reduce the communication of research results, which will tremendously deflate the return on investment of the initial grant funding. No researcher ever wants to spend money on publication; the goals of individual research groups are aligned with the NIH here (continue publishing new research, while spending less on the publication of results). I've never heard of a researcher wantonly wasting money by throwing it at journals; if this happens, I believe it is rare. Researchers will invest more to try and publish in a higher tier journal, but this mechanism, while flawed, is important to stratify the impact of different works of research so the more general community can effectively focus their attention. Perhaps journal prices will be "driven down" by this method, but also, it makes it more likely for research from rich labs (with external funding) to get published, at the expense of a journal being able to select from a wide field for the best research papers. The consequences to the scientific field while things settle will be tremendous, now and in the future as we try to separate out good research from "pay to publish" papers.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

# 845. Federation of Associations in Behavioral & Brain Sciences (FABBS)

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Juliane Baron

**Name of Organization:** Federation of Associations in Behavioral & Brain Sciences (FABBS)

**Type of Organization:** Professional Organization/Association

**Role:** Other

**Role – Other:** Executive Director

**1. Proposed policy options:**
FABBS does not believe that any of the five options presented here would adequately achieve the goal of balancing flexibility in providing research results with maximizing the use of taxpayer funds to support research.

We firmly reject Option 1—disallowing all publication costs—especially given NIH's new public access policy and the increased costs to the researcher of open access publishing compared to traditional publishing models. Further, such a policy would be especially detrimental to non-profit journals, such as those owned by scientific societies, which have the added benefits of robust peer review and access to a specialized, expert audience. These societies reinvest any profits made into training programs, conferences, and other critical disciplinary functions.

Instead, we see potential in some combination of the remaining options, but not as they are currently presented. We encourage NIH to consider additional factors when developing a new policy.

FABBS questions the processes for determining allowable cost caps, both on cost per publication and/or total award amount that can be spent on publication costs. In this notice, NIH generally relies on averages to determine reasonable limits, e.g., the $2,000 per publication cap in Option 2 is between the average global APC and the average requested in budgets. However, this

approach fails to take into account well-known variations in publishing costs, particularly across fields. For example, APCs in STEM journals tend to be higher, on average, than those in social sciences and humanities journals, and there is still substantial variation within the STEM category (e.g., Klebel & Ross-Hellauer, 2023). Therefore, any averages (or medians) used to determine a cost cap may end up being too small for some disciplines and too large for others.

FABBS encourages NIH to undertake a more thorough analysis of APCs and budget requests, as well as consider publishing costs and how they vary across disciplines. The Directory of Open Access Journals (DOAJ) allows users to search journals by subject matter. Further, we suggest that NIH work closely with the stakeholder community—including researchers, publishers, and funders—to agree upon a process for determining appropriate or reasonable caps, rather than making this decision unilaterally. It may be that a single cap, whether to cost per publication or total award amount spent on publications, is not feasible given variation across APCs and other publication costs.

NIH should also keep in mind that while APCs are generally charged for accepted papers only, they also support the administrative and security procedures required for papers that are reviewed but eventually rejected (e.g., for fraud detection, peer review).

**2. Available evidence related to publication costs and proposed options:**
As possible, FABBS encourages NIH to dive more deeply into the "behind the scenes" costs of publishing, including the costs for fraud detection, managing peer review processes, copy editing, submission software platforms, archiving, and coding. A "reasonable" cost limit should be informed by the actual costs of publishing an article, especially for non-profit publishers.

Additionally, before carving out a higher allocation for publishers who pay peer reviewers, we suggest that NIH review the literature on whether paid reviewers perform better (e.g., in terms of time spent, review quality, etc.) than unpaid reviewers. As preliminary evidence suggests that there are benefits to paying reviewers (e.g., Else, 2025), how much they should be paid is another empirical question in need of an answer.

**3. Peer review compensation:**
These decisions require a better understanding of which journals already pay peer reviewers, how much they pay, whether such journals are concentrated in certain fields, what reviewers think they should be paid, and so on. The NIH notice suggests that reviewers be paid at a level equivalent to the average hourly wage for medical scientists and biochemists/biophysicists as reported by the U.S. Bureau of Labor Statistics—about $50.00. However, there is significant variation in researchers' hourly wages depending on their field—for example, in 2023-24, computer scientists and engineers made thousands of dollars more than biomedical scientists (Johnson & Fuesting, 2025)—which could lead to variation in how much peer reviewers are compensated and thus how high total publication costs might be. It is also possible that peer reviewers may not expect to be paid at the same rate as for their normal job. A survey of publishers and reviewers to establish current practices and expectations is key to establishing appropriate guidelines for compensation.

FABBS strongly encourages NIH to consider the differences between non-profit and for-profit publishers in their approaches to peer review. For example, journals owned by scientific societies may not have the funds to pay reviewers, but nevertheless offer authors robust peer review from dedicated experts.

**4. Publishing best practices:**
FABBS encourages NIH to consider whether a journal or publisher engages in additional dissemination/implementation and engagement efforts, as making research accessible to the public goes beyond simply making the article available for free (i.e., beyond open access). For example, some publishers provide authors with resources for promoting their article to the general public. A publisher/journal might also offer authors opportunities to write non-academic articles or participate in webinars targeting the general public.

**5. Other Comments:**
FABBS encourages NIH to consider whether a journal or publisher engages in additional dissemination/implementation and engagement efforts, as making research accessible to the public goes beyond simply making the article available for free (i.e., beyond open access). For example, some publishers provide authors with resources for promoting their article to the general public. A

publisher/journal might also offer authors opportunities to write non-academic articles or participate in webinars targeting the general public.

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/FABBS-Responds-to-NIH-RFI-on-APCs_09.15.2025-NOT-OD-25-138.pdf

**Description:** FABBS Responds to NIH RFI on APCs_09.15.2025 [NOT-OD-25-138]

## 846. American Dental Association

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Robert Burns

**Name of Organization:** American Dental Association

**Type of Organization:** Professional Organization/Association

**Role:** Other

**Role – Other:** Advocacy

**1. Proposed policy options:**
Please see the attached comments.

**2. Available evidence related to publication costs and proposed options:**
Please see the attached comments.

**3. Peer review compensation:**
Please see the attached comments.

**4. Publishing best practices:**
Please see the attached comments.

**5. Other Comments:**
Please see the attached comments.

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/250915_NIH_publishing_caps_sig.pdf

**Description:** The American Dental Association submits the attached comments regarding the NIH proposal to limit the allowable expenses for NIH grantees to have their research published in peer-reviewed journals.

# 847. Bryce Nickels

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Bryce Nickels

**Name of Organization:** Rutgers University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I strongly support "Option 1: Disallow all publication costs" in order to best achieve the goal of maximizing the use of taxpayer funds to support research.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

# 848. Association of American Medical Colleges (AAMC), Association of American Universities (AAU), Association of Public and Land-grant Universities (APLU), COGR

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Heather Pierce

**Name of Organization:** Association of American Medical Colleges (AAMC), Association of American Universities (AAU), Association of Public and Land-grant Universities (APLU), COGR

**Type of Organization:** Professional Organization/Association

**Role:** Organizational Official

**1. Proposed policy options:**
On behalf of Association of American Medical Colleges (AAMC), Association of American Universities (AAU), Association of Public and Land-grant Universities (APLU), and

COGR, we appreciate the opportunity to provide feedback to the National Institutes of Health (NIH) on the agency's plan to address concerns with rising publication costs by limiting the allowability of these costs in NIH awards (NOT-OD-25-138). Please see the attached letter, in which our organizations provide an assessment of the policy options proposed by NIH and some considerations for potential unintended consequences of limiting allowable publication costs.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/Joint-Comments-on-NIH-Publication-Limits-9-15-2025_AAMC_AAU_APLU_COGR.pdf

**Description:** Joint Comments from AAMC, AAU, APLU, and COGR on NIH's Request for Information on Maximizing Research Funds by Limiting Allowable Publishing Costs (NOT-OD-25-138)

# 849. Rockefeller University Press

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Susan King

**Name of Organization:** Rockefeller University Press

**Type of Organization:** Scholarly Publisher/Journal

**Role:** Other

**Role – Other:** Executive Director

**1. Proposed policy options:**
Price caps risk further consolidation of scientific, technical, and medical publishing, restricting authors' choices of where to publish their work.

The Directory of Open Access Journals excludes hybrid journals and thus does not reflect the full and wide spectrum of APCs that authors pay, including the $6000 gold APC to publish in Journal of Cell Biology and Journal of Experimental Medicine.

See https://rupress.org/pages/publication-fees-and-choices for license terms and APCs for all 5 journals published by Rockefeller University Press.

The 1,500+ R01 grants that informed the analysis were submitted before the announced implementation of the 2024 NIH Public Access Policy. Awardees may have underestimated costs.

**2. Available evidence related to publication costs and proposed options:**
At Rockefeller University Press, editorial decisions on research manuscripts are made through collaborative consultation between in-house professional scientific editors and research-active academic editors. We strive to provide exceptional service, offering rigorous and fair peer review, high-quality production, and maintenance of data integrity.

**3. Peer review compensation:**
The time and expertise that peer reviewers contribute to manuscripts that are not accepted would need to be accounted for.

The estimated monetary value of the time US-based reviewers spent on reviews was over 1.5 billion USD in 2020. https://researchintegrityjournal.biomedcentral.com/articles/10.1186/s41073-021-00118-2

Paying reviewers could result in perverse and damaging incentives to an academic reward system that already has plenty of perverse and damaging incentives
https://scholarlykitchen.sspnet.org/2021/06/16/whats-wrong-with-paying-for-peer-review/

Rockefeller University Press (RUP) is committed to limiting the time spent in peer review and reducing the burden placed on reviewers.

- For authors who wish to do so, we allow submission of previous reviewer comments from another journal.

- Authors of technically sound m/s declined for publication in Journal of Cell Biology, Journal of Experimental Medicine, Journal of General Physiology, and Journal of Human Immunity for reasons of novelty receive a commitment for peer review/publication in Life Science Alliance.

- RUP journals participate in Review Commons and a transfer network with other not-for-profit cell biology journals

- RUP journals facilitate the transfer of peer reviewer comments from our journals to any other journal upon request.

**4. Publishing best practices:**
The cost of maintaining data integrity has increased since Journal of Cell Biology pioneered image screening in 2002. Our team of image screeners now also uses powerful commercial software that allows comparison of images in a manuscript with published articles across other journals.

Rockefeller University Press deploys AI-based tools to address issues of research integrity, to analyze rigor and reproducibility of reported methodology, checks for duplicate submission and plagiarism, and multiple tools to check for evidence of paper mills.

**5. Other Comments:**
The cost of maintaining data integrity has increased since Journal of Cell Biology pioneered image screening in 2002. Our team of image screeners now also uses powerful commercial software that allows comparison of images in a manuscript with published articles across other journals.

Rockefeller University Press deploys AI-based tools to address issues of research integrity, to analyze rigor and reproducibility of reported methodology, checks for duplicate submission and plagiarism, and multiple tools to check for evidence of paper mills.

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/RUP-response-to-RFI.pdf

**Description:** Included in the attachment are the responses that were posted to the 5 questions on the comment form, with links to Rockefeller University Press and other.

# 850. American Society of Pharmacology and Experimental Therapeutics

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Carter Alleman

**Name of Organization:** American Society of Pharmacology and Experimental Therapeutics

**Type of Organization:** Professional Organization/Association

**Role:** Other

**Role – Other:** Staff

**1. Proposed policy options:**
Option 1: Disallow All Publication Costs

Proposal: Prevent NIH grant funds from being used for any publication costs.

Option 1 will have profound negative consequences. By disallowing all publication costs, NIH-funded investigators would be forced either to pay APCs out-of-pocket or to seek institutional subsidies. Both approaches disproportionately disadvantage researchers at smaller institutions, which lack the robust library budgets or central publishing funds that larger universities maintain.

Disallowing APCs entirely would likely lead to a two-tiered publishing system: well-funded investigators would continue to publish in established journals, while under-resourced researchers would either be excluded from high-visibility venues or pushed toward low-cost, potentially predatory publishers. This would deepen inequities in the scientific workforce and erode trust in the literature.

Small society publishers would be especially harmed. Removing NIH support would cut off a major source of sustainable revenue, jeopardizing journals that focus on specific areas of basic science where commercial publishers see little profit.

Option 2: Cap Allowable Costs at $2,000 per Article

Proposal: Limit allowable publication costs to $2,000 per article.

While the proposed $2,000 cap reflects the global median APC, such a ceiling oversimplifies a highly variable market. APCs range from under $1,000 at some society-run journals to over $10,000 at certain high-impact titles. The average does not reflect the diversity of costs across disciplines.

Certain fields often require extensive supplemental materials, high-resolution imaging, or complex data hosting. APCs in these fields often exceed $2,000 due to higher production and hosting requirements. A strict $2,000 cap would force researchers either to forgo reputable journals or to divert personal or institutional funds creating a tiered system.

For small societies, many APCs fall in the $2,500–$3,500 range, reflecting rising costs of maintaining submission systems, plagiarism detection, and XML/PubMed formatting. A $2,000 cap would place them below cost recovery, forcing price reductions that threaten journal survival. This risks further

consolidating publishing in the hands of large commercial publishers, who can cross-subsidize across hundreds of titles.

Option 3: Raise Cap to $3,000 if Peer Reviewers Are Compensated

Proposal: Allow APCs up to $3,000 if journals compensate peer reviewers and publish reviews.

ASPET appreciates NIH for recognizing the value of peer review and transparency. However, conditioning APC reimbursement on reviewer compensation creates unintended barriers.

Most small society journals operate through volunteer peer review, often seen as a professional obligation. Introducing compensation would increase costs dramatically and require new administrative infrastructure to track hours, payments, and disclosures. This new unfunded mandate for small societies would force many to cease operations.

This option favors large commercial publishers who are already experimenting with reviewer payments. Yet, higher APCs at these journals would become “allowable,” while small nonprofit journals unable to compensate reviewers would remain capped at $2,000. This bifurcated policy inadvertently disadvantages community-driven publishing. Paying reviewers may not necessarily improve quality. Volunteer peer review, when well-managed, remains a cornerstone of scholarly communication. Mandating compensation risks eroding the ethos of professional service that sustains the system.

Option 4: Cap Total Publication Costs per Award at 0.8% or $20,000

Proposal: Limit cumulative publication costs per award to 0.8% of direct costs, or $20,000, whichever is greater.

ASPET appreciates seeing more flexibility than per-paper caps, recognizing that research outputs vary by project. This option still creates challenges. For small awards, such as R21 or exploratory mechanisms, 0.8% translates into a few thousand dollars—insufficient for even two papers. Meanwhile, large center grants could absorb costs more easily.

Such proportional caps may exacerbate disparities between established investigators with large awards and early-career researchers with smaller grants. Smaller labs may be forced to ration publications or seek lower-cost outlets, undermining visibility and career advancement.

For publishers, this policy introduces uncertainty. If total caps reduce the number of allowable papers, societies may see reduced submission volume, harming their sustainability. Over time, this could reduce the diversity of available journals.

Option 5: Combine Per-Article Cap of $6,000 with Overall Cap

Proposal: Cap costs at $6,000 per paper, within an overall award cap of 0.8% or $20,000.

ASPET recognizes the flexibility that the NIH has put into this option, however this option still creates a favorable option to large commercial publishers and creates a marketplace for consolidation. By setting a cap to $6,000, NIH is effectively putting a floor and ceiling in place that will place smaller society publishers at a severe disadvantage. The result could be reduced submissions, financial instability, and eventual closure of smaller venues.

**2. Available evidence related to publication costs and proposed options:**
For Option 3:

- The Value of Peer Review: A Report Commissioned by the American Society of Hematology

For Option 2, Option 3, Option 4, Option 5

- The Directory of Open Access Journals is "a unique and extensive index of diverse open access journals from around the world, driven by a growing community, and is committed to ensuring quality content is freely available online for everyone." The database does not include hybrid journals which allow authors to choose the option that best serves their needs, whether open access or paywalled. The underlying assertion on the price averages does not take into account these journals and skews the proposals strictly towards one avenue of publication.
- Capping APCs may backfire on the NIH, Christopher Steven Marcum, July 22, 2025.
- Scientific integrity challenges and paper mills

**3. Peer review compensation:**
ASPET believes that the NIH should avoid creating policy in this unsettled area. ASPET welcomes NIH to be a partner in the discussion on peer reviewer compensation, however it should not force compensation on the field without furthering the conversation. Peer reviewed articles are the gold standard in scientific publishing and NIH should be weary of any unintentional influence or conflict of interests where the scientific community is still wrestling with this conversation.

**4. Publishing best practices:**
Beyond the aforementioned automated fraud detection capabilities, there are other best practices journals use that contribute to higher publishing costs. Some of the journals are members of organizations that help set standards and best practices such as Committee on Public Ethics or adopt standards developed by the National Information Standards Organization. Journals add value by adding metadata and tagging which allows greater searchability. And there is the human element including ethics reviews and analysis of what fraud was discovered by the automated fraud detector or by other reviewers. Small society journals strive to publish in a manner that sometimes eclipses that of large commercial publishers which adds value and cost to the published article.

**5. Other Comments:**
Beyond the aforementioned automated fraud detection capabilities, there are other best practices journals use that contribute to higher publishing costs. Some of the journals are members of organizations that help set standards and best practices such as Committee on Public Ethics or adopt standards developed by the National Information Standards Organization. Journals add value by adding metadata and tagging which allows greater searchability. And there is the human element including ethics reviews and analysis of what fraud was discovered by the automated fraud detector or by other reviewers. Small society journals strive to publish in a manner that sometimes eclipses that of large commercial publishers which adds value and cost to the published article.

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/NIH-RFI-Maximizing-Research-Funds.9.15.2025.pdf

**Description:** ASPET Comment Letter

## 851. arXiv

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Stephanie Orphan

**Name of Organization:** arXiv

**Type of Organization:** Other

**Type of Organization - Other:** Preprint server

**Role:** Organizational Official

**1. Proposed policy options:**
We suggest that public access to NIH-funded research is best achieved by requiring researchers to share their articles as preprints.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/arXiv-response-to-NIH-RFI-Google-Docs.pdf

**Description:** arXiv response to NOT-OD-25-138

# 852. PRIM&R

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Ivy R Tillman, EdD, CIP

**Name of Organization:** PRIM&R

**Type of Organization:** Non-profit Research Organization

**Role:** Other

**1. Proposed policy options:**

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/Comment-for-RFI-Publication-Costs-9.15.25.pdf

**Description:** Please find PRIM&R's comment attached

# 853. Philip C Trackman

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Philip C Trackman

**Name of Organization:** ADA Forsyth Institute

**Type of Organization:** Non-profit Research Organization

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 3 is impractical for the following reasons:

1. Journals in the biomedical realm do not compensate reviewers.

2. When writing grants, PIs do not necessarily know in which journal they will publish, and should not be restricted to those that pay reviewers.

3. Increased costs to journals that if forced to pay for reviews, will increase the cost to grantees because publication costs will increase for the publisher. To recoup these costs, publication costs to grantees will increase.

Option 5 seems to be the most logical way to try to limit excessively high charges by publishers and accommodates the needs of PIs. However, a limit of 0.8% of an award per publication is at odds with a publication cost bill of $3,000 which is typical for higher-end journals. This limit is insufficient for someone with a $250,000/year award, since the limit would translate to $2,000 for one paper, while the actual charge is $3,000. Thus, less than one paper per year would be supported by this funding model. A 1.5% limit per year would seem more realistic.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
Journals in the biomedical realm do not compensate reviewers. In my more than 35 years of research, I have never been compensated by a Journal or anyone else for peer review activities.

**4. Publishing best practices:**

**5. Other Comments:**

# 854. Aligning Science Across Parkinson's

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Robert Thibault

**Name of Organization:** Aligning Science Across Parkinson's

**Type of Organization:** Other

**Type of Organization - Other:** Research Funding Initiative

**Role:** Organizational Official

**1. Proposed policy options:**
The NIH should require preprints. This policy can make research results available at no cost to the funder and no cost to researchers while simultaneously fast-tracking the sharing of knowledge.

**2. Available evidence related to publication costs and proposed options:**
The Aligning Science Across Parkinson's (ASAP) Collaborative Research Network requires that their grantees post preprints. 98% of ASAP-funded journal articles are posted as preprints, a median of 8 months before publication in a journal (interquartile range 5 to 11 months).

ASAP has a collection of 420 preprints posted since 2021. These preprints have been viewed almost 1 million times, cited over 1250 times, and came at no cost to the authors, the readers, or the funder. From our experience, it is relatively straightforward to implement this policy at scale and to achieve high levels of compliance through systematic monitoring.

**3. Peer review compensation:**
Our primary recommendation is that NIH require preprints – which we feel is an essential first step before enacting additional policies. If NIH decides to move forward with compensating peer reviewers, we recommend that NIH require the peer review reports to be publicly available with persistent identifiers. Without this transparency, we won't know what we're paying for and whether the service justifies the cost.

**4. Publishing best practices:**
The current publication system bundles (i) access to a public good (NIH-funded research findings) with (ii) privately organized services (e.g., review, curation), under a single APC fee. This bundling distorts the market, where private actors profit from publicly funded research, taxpayers bear unnecessary costs, and access to research outputs is gatekept. Only after access to public research findings is unbundled from other publishing services can a fair price emerge for each service. Thus, our foremost recommendation is that the NIH require preprints.

**5. Other Comments:**
The current publication system bundles (i) access to a public good (NIH-funded research findings) with (ii) privately organized services (e.g., review, curation), under a single APC fee. This bundling distorts the market, where private actors profit from publicly funded research, taxpayers bear unnecessary costs, and access to research outputs is gatekept. Only after access to public research findings is unbundled

from other publishing services can a fair price emerge for each service. Thus, our foremost recommendation is that the NIH require preprints.

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/ASAP_Response_to_NIH_NOT-OD-25-138.pdf

**Description:** The attached PDF contains our full response to the RFI alongside supporting evidence. Our response to the five specific questions in this RFI are drawn from the content of this PDF.

## 855. N/A

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Option 1: Disallow all publication costs. NIH could no longer support publication costs through any funding mechanism. Some private funders have disallowed costs for peer-reviewed publications as they seek to place increased value on preprints.

* Option 1 Comment: Pre-prints are not peer-reviewed. This would disincentivize scientific review as a whole, because now it is a proved product but also there are no funds to pay for publication. This is not acceptable.

Option 2: Set a limit on allowable costs per publication. NIH could limit allowable direct costs to $2,000.00 per publication.

*Option 2 Comment: This is an ok approach, however, that APC value is not representative of some of the more influential journals (Impact Factor 5+), which only have open access as their only option, which we have found to be $3500-$7000 for the past 4 years in publishing our work. Thus, as per most people requesting funds, they are actually giving reasonable rates to begin with as listed in the RFI $3,225.92 to $3,647.47 and the reasonable average 0.8% of their total requested direct costs for publication costs.

If option 2 ends up being the option of choice, it would be more important to factor in average requested in budgets (approximately $2,600.00-3,100.00), and close to the average for U.S. published journals' APCs ($2,177.00). It would also have to be flexible to adapt to cost increases each year rather than be "locked in".

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

# 856. N/A

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Institutional Information Sciences Professional/Librarian

**1. Proposed policy options:**
NIH's goal of maximizing research funds for core research activities is commendable. Allocating resources toward publication costs can detract from the funding available for conducting the research itself, making it essential to prioritize expenditures that directly advance scientific discovery. However, the options that are proposed in the RFI will not achieve NIH's intended objectives. This is because the proposed options do not address the fundamental problem, which is the unsustainable publishing costs, such as Article Process Charges (APCs), as they divert funding from scientific research to publisher profits.

Option 1: Disallow all publication costs. NIH could no longer support publication costs through any funding mechanism. Some private funders have disallowed costs for peer-reviewed publications as they seek to place increased value on preprints.

This option, as laid out does not even allow the use of NIH funds to pay the costs of true open access (gold) journals. It should still be possible to allow the use of NIH funds to pay APCs for gold open access journals, as the researchers need to pay these costs to publish in the journal, regardless of funding. Having the ability to pay the funds through the grants is paramount, as otherwise the costs will shift to the universities.

In addition, this option, as laid out, also allows the publisher to charge APCs to make the article open access, when the journal is subscription-based. When the journal is subscription-based, the universities are already paying to have access to the content in the journal. This means that publishers are already getting payment for these articles from universities. As a result of the revised NIH PAP, many publishers are charging researchers an APC to make a subscription-based article openly accessible upon acceptance in PubMed Central, even when the final peer-reviewed manuscript (not the publisher's PDF) will be submitted. Right now, these are not allowable costs with NIH, so the burden shifts to the researcher to find another way to get funding from the university to cover the costs. As the university is likely already paying a subscription fee for the journal, the publisher has already received funds from the University.

It should be clarified with publishers that when an article is funded by the NIH, the researcher is allowed to post the final peer-reviewed manuscript in PMC at no cost. Researchers should also be reminded to inform the publisher that they need to comply with the policy, and part of that is informing the publisher when submitting the article to the journal that they need to make the final manuscript available in PMC upon acceptance, in accordance with their NIH funding requirements. If the publisher does not want to comply with this, they should be upfront with their researchers, instead of hitting the

researchers with heavy fees once the article is accepted. If the researcher really wants to publish their article in the journal, they are going to need to pay this ransom fee. If the researcher does not have the funds to comply, they will need to find an alternative journal to publish their article in. The alternative journal may not have the right readership, which means the article may have less impact. Resubmitting an article to a different journal that may not have an APC charge will slow the process of ensuring the article is ultimately accessible to the public, and the journal may not be of the same quality.

The bottom line of option 1 is that it shifts the costs to universities (who are already paying subscription fees for subscription-based journals), and it does nothing to reduce the fee. It continues to divert funds away from scientific activities and requires additional funds to come from the Universities, which they do not have, creating unsustainable publishing costs, and results in increased publisher profits. Publishers are not: doing the research, writing the articles, conducting the peer review, or, in many cases, doing much to edit the articles. That work is done by researchers and peer reviewers. Publishers, by charging additional APCs, are biting the hand that feeds them for their own profits.

Options 2-5 implement price caps on APCs, which will likely create pricing floors, and ultimately increase costs and lead to market power concentration. Options 2 -5 could ultimately impede the dissemination of research findings. The more productive researchers are when conducting their grant (they are publishing more articles), the more funds they would need to cover the cost of publishing. This could be a disincentive to publish articles to disseminate knowledge, as paying for APCs could be a deterrent from publication productivity, particularly if the university does not have additional funds to pay the APCs.

There is also likely an expectation that university libraries will obtain Read and Publish agreements with the publishers. It was clear in negotiations with publishers at our institution that publishers are trying to argue that Read and Publish agreements are the solution. However, they are not. The more articles that are published using Read and Publish agreements, the more an institution will need to pay to have these agreements. Read and Publish agreements are not allowing the researchers to publish their articles for free. The institutions must pay for these agreements and most academic libraries and their institutions DO NOT have the funds to pay for APCs. Read and Publish agreements are not a viable path to open access. It is unsustainable for our academic library if the demand to cover APCs through Read and Publish contracts increases. There is no increase in funds to the library to cover these costs and our institution already has financial challenges.

Options 2 to 5 could also create inequity, where those at institutions who can pay (in the minority) do, and those at institutions who cannot pay may potentially decrease their publications and thus decrease their research dissemination, and ultimately, the impact of the grant is decreased. Being less productive could ultimately affect future grant applications, as those institutions that could afford to pay the APCs will ultimately have more publications, and may ultimately be viewed more favorably.

In the end, none of the options from 1 to 5 tackle the fundamental problem: the urgent need for funding models that are sustainable and centered on research, placing scientific progress above publisher profits.

Instead of reinforcing ongoing payments to publishers through fee-based models, NIH should prioritize lower-cost compliance pathways within its existing Public Access Policy. At the same time, it should invest in expanding open access infrastructure that benefits the research community through predictable, scalable operational costs—rather than arbitrary per-article charges. NIH should fully

enforce the existing deposit requirement – Mandate that all NIH-funded researchers deposit their Author Accepted Manuscripts into PubMed Central immediately upon acceptance. It should also strengthen reuse rights which will enhance the NIH Public Access Policy by guaranteeing the public's right to fully reuse these publications, maximizing their impact. Finally, it should support sustainable open access options which will incentivize the use of publication options that do not rely on expensive fees to publishers, including repository deposit of Author Accepted Manuscripts.

**2. Available evidence related to publication costs and proposed options:**
Paying additional fees to comply with the NIH PAP is completely unsustainable, with many academic institutions already struggling to pay for their current journal subscriptions. If grant funds were allowed to be used to make the manuscripts openly accessible in PMC, then a significant amount of grant funds could be unnecessarily used on publishing, rather than directly on conducting the research. While it is agreed that grant funds should not be used to make an article openly accessible in subscription-based journals, publishers should also not be allowed to charge researchers an APC to comply with the policy. Since the new policy went into effect, several researchers have reached out to me for my support in my role as the scholarly communication librarians in my library. The researchers have run into issues with their journal publishers when seeking to comply with the NIH PAP. Several publishers have been insistent that without a 12-month embargo for posting the final peer-reviewed manuscript in PMC, the researcher would need to pay the APC. The charges are not insignificant. The APC charge is often $3000, but some APCs are over $12,000. These are not funds that most Universities and /or departments and colleges have on hand. Publisher fee requirements for NIH compliance will create great inequities for those in departments or institutions that are unable to pay and will make compliance a great challenge. In doing a very cursory search for NIH funded publications at my institution through Scopus, it appears 804 of those articles were NIH funded. Even with limit on the cost per APC of $2000, our university would pay an additional $1,608,000 to the publishers to comply with the NIH PAP.

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

# 857. University of North Carolina at Chapel Hill

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Penny Gordon-Larsen

**Name of Organization:** University of North Carolina at Chapel Hill

**Type of Organization:** Academic Institution

**Role:** Organizational Official

**1. Proposed policy options:**

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/2025.09.15-Institutional-Response.pdf

# 858. American Educational Research Association

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Tabbye M. Chavous, PhD

**Name of Organization:** American Educational Research Association

**Type of Organization:** Professional Organization/Association

**Role:** Organizational Official

**1. Proposed policy options:**
AERA opposes option 1 to disallow the use of NIH funding for publication costs altogether. NIH has endorsed and has taken many steps to implement the White House Office of Science and Technology Policy (OSTP) memorandum, "Ensuring Free, Immediate, and Equitable Access to Federally Funded Research," including updating its public access policy. It would go against the spirit of NIH's commitment to making NIH-funded research publicly available upon publication to disallow grant funds to be used to disseminate research results.

The other 4 options may have unintended consequences on the dissemination of research findings in journal articles through placing a cap on the amount of funds allocated per publication or per grant. Option 2 to implement a $2,000 per article cap would require those who have accepted articles for nearly all AERA journals to allocate non-NIH funds to make up the difference for making their articles publicly available. Researchers from institutions with fewer resources would be disproportionately disadvantaged in opportunities to publish and disseminate high quality research. Option 3 may have the opposite effect of raising article processing fees through an incentive structure for peer review compensation that would result in a significant budget increase for scientific societies that publish journals.

Options 4 and 5 have the likelihood of capping the total number of publications resulting from a grant, limiting the return on investment of the grants through dissemination and use of knowledge for positive impact. Across all fields of science, research faculty are incentivized to publish high quality articles in peer reviewed journals to advance their careers, including accessing future grants. The cap would likely have further disproportionate impacts on graduate students and early career scholars for whom high publication productivity in academic journals directly influences future job/career prospects and advancement opportunities.

**2. Available evidence related to publication costs and proposed options:**
AERA currently charges the following article processing fees per article for its journals upon acceptance. These fees are on the lower end of what scientific societies charge and do not cover all of the costs associated with journal publishing. With the exception of AERA Open, AERA journals are not open access and authors of accepted articles would need to pay a fee to make their articles publicly available.

- AERA Open (open access journal): $1,000 (standard), $400 member rate, $100 member graduate student rate, $500 non-member graduate student rate
- American Educational Research Journal: $2,500

- Educational Evaluation and Policy Analysis: $2,500
- Educational Researcher: $2,500
- Journal of Educational and Behavioral Statistics: $2,500
- Review of Educational Research: $2,500
- Review of Research in Education: $2,500

**3. Peer review compensation:**
As NIH continues to gather data to make an informed decision on policies governing the use of grant funding for publication costs, we encourage NIH to include the number of peer reviewers for journals as a data point. While three reviews are the standard for initial AERA journal article submissions, typically an accepted journal article is reviewed by 5-8 peer reviewers across multiple rounds of review. Accounting for the number of articles that are reviewed by peer reviewers, the multiplied cost over time would represent a significant portion of a non-profit association's budget. These costs would also be allocated toward peer review of submissions that are accepted along with those that are rejected and where authors are encouraged to revise and resubmit. Ultimately, without a data point for what costs would be borne by publishers and scientific societies, instituting an incentive for compensating peer reviewers may have the opposite effect of raising article processing fees.

For interdisciplinary societies such as AERA that publish journal articles that are the result of other federal and non-federal funding sources, peer review compensation would also need to be inclusive of articles beyond those resulting from NIH funding. NIH should incorporate estimated peer review compensation costs for all journal submissions in its analysis, not solely ones that are results of NIH funding.

**4. Publishing best practices:**
We have appreciated the attention to the use of artificial intelligence (AI) and NIH's policies governing the use of AI in the submission and review of NIH grant proposals. As publishers and scientific societies grapple with the impact of AI on journal article submissions, reviews, and related costs, we would also urge NIH to incorporate evolving policies on the use of AI in the production and review of NIH-funded research.

In addition, NIH should account for the production and infrastructure costs that support the review of article submissions and the production of accepted articles to understand their roles in how article processing fees may be developed. These costs also include additional dissemination/implementation and engagement efforts, as making research accessible to the public goes beyond simply making the article available for free (i.e., beyond open access). For example, AERA promotes timely research through press releases and webinars, among additional communication activities.

**5. Other Comments:**
We have appreciated the attention to the use of artificial intelligence (AI) and NIH's policies governing the use of AI in the submission and review of NIH grant proposals. As publishers and scientific societies grapple with the impact of AI on journal article submissions, reviews, and related costs, we would also

urge NIH to incorporate evolving policies on the use of AI in the production and review of NIH-funded research.

In addition, NIH should account for the production and infrastructure costs that support the review of article submissions and the production of accepted articles to understand their roles in how article processing fees may be developed. These costs also include additional dissemination/implementation and engagement efforts, as making research accessible to the public goes beyond simply making the article available for free (i.e., beyond open access). For example, AERA promotes timely research through press releases and webinars, among additional communication activities.

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/AERA-Comments-on-NIH-RFI-on-Allowable-Publication-Costs-FINAL.pdf

## 859. Eric Rubenstein

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Eric Rubenstein

**Name of Organization:** Ball State University

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I support limiting allowable publication costs so long as there are low- or no-cost avenues for dissemination that NIH explicitly deems meritorious.

Publication costs can be very high and detract from my group's ability to conduct research due to diverted funds. However, as a modest-sized research program, there are not many, if any, available budget-friendly outlets for my group that provide a venue for open-access dissemination that will demonstrate productivity for future grant applications (to my knowledge). NIH should invest time and effort in identifying or creating low-cost venues for NIH-funded researchers to disseminate their data across a range of scope of project.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
I am happy to give my time to NIH grant review because the mission of the organization is to support scientific endeavors for the benefit of Americans' health (and not simply profit).

Peer reviewers for publications are not adequately compensated. I am frustrated by unpaid peer review for journals whose mission is to make money - I am the customer and the unpaid labor for a significant portion of their enterprise.

**4. Publishing best practices:**

**5. Other Comments:**

# 860. American Geriatrics Society

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Anna Kim

**Name of Organization:** American Geriatrics Society

**Type of Organization:** Other

**Type of Organization - Other:** Non-profit Organization

**Role:** Other

**Role – Other:** Membership society of geriatrics healthcare professionals

**1. Proposed policy options:**
The American Geriatrics Society (AGS) greatly appreciates the opportunity to respond to the National Institutes of Health (NIH) Request for Information on Maximizing Research Funds by Limiting Allowable Publishing Costs. The mission of AGS, a not-for-profit organization, is to improve the health, independence, and quality of life of all older adults. Our 6,000+ members include geriatricians, geriatrics nurse practitioners, social workers, family practitioners, physician associates, pharmacists, and internists who are pioneers in serious illness care for older individuals, with a focus on championing interprofessional teams, eliciting personal care goals, and treating older people as whole persons. AGS advocates for public policy that promotes the health and independence of older Americans, with the goal of improving health, quality of life, and healthcare systems serving us all as we age.

The AGS publishes the Journal of the American Geriatrics Society (JAGS) as a hybrid journal which derives income from subscriptions, transformative agreements negotiated by our publishing partner Wiley, and fees paid to publish articles open access. We believe that dissemination of research through scientific publication is a fundamental component of research and are concerned that the NIH is proposing policies that cap costs of publication — which currently account for less than 1% of direct costs in NIH grants (https://www.the-geyser.com/nih-poised-to-regulate-apcs/) — without considering that communication about research is a fundamental element of conducting research. As a journal, JAGS publishes research, policy, education, and other articles that are focused on improving clinical care for all of us as we age. Since January 2024, AGS has published 335 articles related to investigations conducted with NIH funding accounting for 37% and 34% of all published JAGS articles in 2024 and 2025, respectively. Although we do not track specific Institutes, we are confident that the majority of NIH papers published in JAGS were supported by grants from the National Institute on Aging (NIA).

With its special focus on disseminating research that advances the health and well-being of older adults, JAGS is an important part of a broader ecosystem of high-quality, peer-reviewed journals that provide an essential service to the American public because of the rigor with which the editors approach peer review of articles. The robust peer review of submissions that JAGS and other journals provide means that we are publishing gold standard science that contributes to improving healthcare for all of us as we age. Publication of research findings is a critical component of the research enterprise and NIH benefits from the contributions that journals make to disseminating the knowledge gained from the scientific

investigations that it supports. We believe that our collective ability to advance the most promising innovations benefits from JAGS and other journals' robust peer review. This peer review validates scientific findings by providing an independent expert assessment of data and its relevance to clinical care. Further, peer-reviewed journals provide an important service to investigators with their careful attention to the clarity of communication about findings with a particular focus on ensuring that these are not overstated.

We encourage NIH to consider the potential negative impacts of the approaches it has proposed on the ecosystem for sharing and then building on the care of older adults. Examples of such impacts include:

- Lessening of Visibility for NIH Science: There is emerging research that open access articles generally have higher citations than articles with restricted access, and high Altmetric scores (which includes lay press and social media citations) (DOI:10.7717/peerj.4375; DOI:10.1016/j.ijpsycho.2021.03.006). Placing caps on publication costs could be particularly harmful to Early-Stage Investigators (ESI) who are trying to make a name for themselves by making their research as broadly accessibly and disseminated as possible.

- Decreased Publication of Data on Special Populations: The science that is funded by NIH produces rich datasets and initial publications are focused on the primary endpoints of the research. Simply put, it is impossible to cover the rich data that is produced in a single article; therefore, it is critically important that NIH ensures that it provides sufficient support for multiple articles to be published. This is particularly important for research involving special populations, including older adults. The NIH is mandated by the Public Health Service Act to ensure women and minority populations are enrolled in studies—including subpopulations of the underrepresented groups (42 USC. § 289a-2) — and requires NIH-funded studies to report on the sex/gender and racial/ethnic composition of the study population (https://grants.nih.gov/policy-and-compliance/policy-topics/inclusion/women-and-minorities). Furthermore, the Inclusion Across the Lifespan policy ensures that individuals of all ages, including older adults, are included in clinical research and requires that participants' ages are collected in progress reports (https://grants.nih.gov/policy-and-compliance/policy-topics/inclusion/lifespan). We are concerned that the proposals NIH is considering will ultimately result in research supported by public funds not being reported to the public as there will be insufficient funds to support reporting of all data from all studies. Unfortunately, when evidence is not shared, we miss opportunities to learn from and build upon prior work in ways that lead to optimization of health and resilience and avoid suffering.

- Early- and Mid-Stage Investigators: NIH has identified nurturing and supporting the next generation of investigators as a high priority for the Institutes. We encourage NIH to consider how policies it puts into place that limit costs of publication would impact early- and mid-stage investigators. Unlike more senior investigators, early- and mid-career scientists would not be able to support publication costs using other sources of funding. Further, publication is a significant part of how someone advances in their scientific career and limitations on funding and/or capping the number of articles could have an unintended negative impact on ESI as it could limit their ability to publish their research. NIH runs the risk of further exacerbating the already existing gap between under-resourced institutions and well-resourced institutions in the scientific ecosystem. This would be contrary to the NIH emphasis on ensuring that it is distributing funds in a way that broadens the distribution of its funding to include a broader swath of institutions.

- Scientific Ecosystem and Importance of Publishing: Advancing and building knowledge requires a robust infrastructure for sharing what we have learned with other investigators and the public. This allows the scientific community to learn from others; sparks new ideas for avenues of inquiry; creates opportunities for collaboration; and advances science that supports all of us to live healthier lives. The existing worldwide network of peer-reviewed journals is critical to ensuring that we are investing in science that builds upon prior work and that has been vetted and enhanced by the high-quality peer-review process that we foster.

- Publication Costs: In addition to the typical publication costs that one might think of related to journal publishing (e.g., editing, author support, printing, maintenance of a website), together with our publishing partners, we have invested in: robust editorial support, strengthening editorial oversight, new technology that supports robust peer review, research integrity, data management, and greater accessibility for our journal through a focus on online delivery, data management, archiving, editorial support to authors, and career development for the next generation of journal editors. Those investments that have come as journal royalties are shrinking. In summary, there is a cost to publishing and we encourage NIH to consider how the policies it is proposing will impact this vital network for disseminating and supporting federally funded research.

- Clinical Practice Guidelines and Recommendations: The NIH plays a critical role in the delivery and improvement of health care in the United States and around the world. NIH funding supports scientific innovation that improves health outcomes across the United States, including clinical trials and the development of new treatment techniques and therapies. AGS has the most experience with the NIA which, through its intramural and extramural programs (DOI:10.1111/jgs.18837; DOI:10.1111/(ISSN)1532-5415.NIA-50th-Anniversary), has informed our understanding of the complex interplay of many factors across our lifespan that together are the drivers of age and age-related diseases. Further, NIA has advanced multiprofessional collaborations that have improved the health and well-being of all of us as we age and impacted how we care for older people across settings. None of these advances would have been possible without publication in the robust network of peer-reviewed scientific journals that serve as both a way to validate scientific findings (through peer review) and disseminate those findings. Specifically, guidelines and recommendations produced by AGS and other societies, rely on publication of research in peer-reviewed scientific literature for the evidence base that informs our creation of clinical recommendations that are focused on improving our collective health and well-being as we age. The evidence being produced by NIH-funded researchers is helping to reduce declines in function and susceptibility to disease or frailty and delaying the onset of costly age-related diseases. As the United States population rapidly ages, access to innovative and appropriate care techniques for medically complex older adults informed by robust evidence is imperative to maintaining health and quality of life for all of us as we age. That access comes via publication of research, and we are concerned that limitations on publication costs will mean that important findings from NIH-funded research will not be published.

As with any ecosystem, there are unintended consequences that can come about when changes are made to one element of the system without consideration of the impact of those changes across the ecosystem. In this instance, we believe that the options the NIH is considering have the potential to weaken our collective capacity to communicate about science in a way that drives science forward and maintains the United States as the premier driver of innovation, discovery, and gold standard science.

**2. Available evidence related to publication costs and proposed options:**
AGS recognizes that journal publishing is in a period of seismic change as the revenue that supports publication of scientific journals shifts from revenue that is derived primarily from the consumers of journals (e.g., libraries, individuals) to revenue that is derived primarily from authors through payment of open access fees. At the same time, the advent of transformative agreements has created innovative partnerships between universities and major publishers that have included waiving of fees for authors to publish in journals covered by these agreements with immediate open access for the published articles from faculty at those institutions. We encourage the NIH to delay implementation of any of its proposed policies and take the time to consider how it can accelerate transformative agreements through its funding. Specifically, NIH should explore and consider incentives and transformative agreements that would further spur innovation without endangering the viability of the publishing infrastructure that is critical to disseminating the findings of NIH research. NIH is uniquely positioned to lead discussions of how best to advance its priority of ensuring JAGS and other journals provide peer review of research findings, a critical step in ensuring that the science that is published is truly gold standard science and will lead to improvements in clinical care for all of us as we age.

AGS is a not-for-profit organization, and our mission is to improve the health, well-being, and quality of life for all of us as we age. In 2024 and 2025 to date, AGS has published 930 articles in JAGS. Revenue from JAGS is critical to our efforts to advance this mission with approximately 90% of our AGS budget going to support our programs. Here, we highlight two of our strategic priorities that reflect our commitment to disseminating research, including research funded by NIH:

1. Expanding the geriatrics knowledge base by disseminating basic, clinical, and health services research focused on the health of all older people.

2. Creating awareness about the ways geriatrics can support older people remaining active, independent, and engaged in our communities.

Expanding the Geriatrics Knowledge Base: An unintended consequence of limitations on supporting publication costs is that journals and societies like JAGS and AGS may no longer have the financial means to support the contributions we make to supporting dissemination of NIH work to the public and the pipeline of ESI coming into the field. One example of how societies support NIH at no cost to the NIH is a recent issue of JAGS celebrating the many achievements of NIA (https://agsjournals.onlinelibrary.wiley.com/doi/toc/10.1111/(ISSN)1532-5415.NIA-50th-Anniversary). Another is AGS' support for annual publication of an abstract supplement focused on research presented at the AGS Annual Scientific Meeting. Typically, NIA-supported researchers account for 20% of abstract presentations at our meeting and their abstracts are published in a supplement to JAGS. The supplement is an important way in which we disseminate NIA-funded research that is being presented at our meeting more widely.

Supporting Early Stage Investigators and Creating Public Awareness: AGS, like many specialty societies, has established the AGS Health in Aging Foundation (HiAF, https://www.healthinaging.org/) with the goal of disseminating geriatrics knowledge to the public. The HiAF supports trainees and geriatrics health professionals to present their research at the AGS Annual Scientific Meeting. Presenters supported through the Foundation include Beeson Scholars, Medical Student Training in Aging Research (MSTAR) students, and Grants for Early Medical/Surgical Specialists' Transition to Aging Research (GEMSSTAR) scholars. HiAF support means that they can disseminate their NIA-funded research to AGS

meeting attendees and AGS members via the JAGS abstract supplement (discussed above). In addition, HealthinAging.org, the HiAF public education portal, provides older adults and caregivers with up-to-date information on health and aging as well as access to a network of geriatrics healthcare professionals.

A second unintended consequence of limitations on publication costs for NIH investigators is the potential loss of programs that support investigators and that are offered by medical, nursing, and other health professional societies. A few examples of the types of programs that AGS offers that benefit and support the next generation of investigators, include:

- Tideswell Emerging Leaders in Aging Program: In partnership with Tideswell at the University of California San Francisco (UCSF) and the Association of Directors of Geriatrics Academic Programs (ADGAP) on a National Leadership Development Program, the program is designed for emerging leaders in the field of aging. We recognize that, to meet the current and future needs of our society, we require skilled, dedicated, and passionate leaders who are prepared to lead tidal change in aging. Together, we have designed a hands-on, practical program for emerging leaders in aging. We have focused on augmenting and leveraging existing leadership skills relevant to clinical, research, policy, and education. Ideal candidates will be those seeking to transform the field and lead the next generation of health professionals in improving care for older adults. Participants will have an opportunity to perfect their abilities in strategic planning, self-management, influential communication, and results-based management.

- Leadership and Life Skills Curriculum: Available exclusively to AGS Fellows-in-Training and Early Career Professional members, this program is a virtual course designed to help develop a broad range of practical leadership and life skills to help advance careers, teams, and organizations. The online curriculum provides a broad range of practical leadership, life, and career-related knowledge and skills to fellows and early career health professionals. Through a supportive online learning community of faculty and fellows from programs across the country, participants complete a leadership self-analysis, understand and practice teaching skills, build a set of tools to combat burnout, practice effective communication and negotiation skills, learn and apply emotional intelligence, and more.

- JAGS Junior Reviewer Program: This 2-year program is for early-stage faculty (Instructor, Assistant Professor) who devote at least 25% effort to research and/or education in an aging-related field, to participate in the journal review process. The program is designed to meet 3 objectives: 1) bring new, fresh voices into the JAGS review process; 2) train high quality reviewers; and 3) build a community of aging scholars.

- Virtual Mentor Match Program: Launched in 2020, the program serves the needs of mentees while making it as easy as possible for mentors to participate as well. Available 24/7 via the AGS Member Forum, the mentoring program helps ESI to identify a mentor based on goals, needs, and preferences. The program was developed with flexibility in mind, allowing for mentors and mentees to specify the type of mentor relationship they wish to have (whether a one-time consultation, a longitudinal relationship, or something in between) as well as the ability to opt into and out of the program as needs arise.

- Junior Faculty Research Career Development Special Interest Group (SIG): To facilitate and foster research career development for junior faculty members, fellows, and students, the SIG discusses

research interests, academic career development, career choices, job opportunities, and a range of other topics pertinent to junior faculty development.

- AGS Special Interest Groups: SIGs are grassroots, member-led communities focused on specific areas and topics of interest regarding care for all of us as we age. They provide a forum for members to network, discuss common concerns, share successes, and identify potential collaborations.

We are concerned that the proposed limitations on publications will mean that we will need to cut back or eliminate these and other programs due to shortfalls in revenue, diminishing the support that is provided to ESI who are just embarking on their careers and who are a part of the pipeline that NIH seeks to nurture.

We are also concerned that setting fixed fee limitations on publications rather than one that adjust to inflation and other market trends would see them degrade in value over time as journals raise access fees to keep pace with publication costs and, not-for-profits like AGS, seek to ensure that we are generating sufficient revenue to support other activities that advance our scientific knowledge. We are concerned that, over time, researchers and institutions could end up bearing the cost for the difference between the NIH limit and the actual publication fees, meaning the policy change could have little impact on reducing the overall cost of disseminating research.

The considerations we raise here provide examples of ways in which societies and journals support NIH and the investigators that it funds at no cost to NIH. We are able to do so because of the revenue that we generate from our programs and products, including our journals. We urge NIH to factor into its analysis how reductions in funding might result in a corresponding reduction in the very programs that support the pipeline of ESI and the dissemination of research.

**3. Peer review compensation:**
We are deeply concerned about unintended consequences of incentivizing monetary compensation for peer review, particularly for ESI. Currently, monetary compensation for peer reviewers is relatively rare (DOI:10.1016/S0140-6736(21)02804-X). In a recent experiment, Critical Care Medicine found no change in review quality and a slight increase in speed of reviews (DOI:10.1097/CCM.0000000000006637), suggesting that paying peer reviewers does not have a sufficient return on investment for journals seeking to improve how they support authors.

More importantly, serving as a peer reviewer is an integral part of ESI training as they learn how to review and critique evidence and how to convey their critiques succinctly to authors from more senior peer reviewers and editors at journals. Further, they gain important collaboration skills from journal senior editors. In many ways, serving as a journal peer reviewer is an important step in the ESI journey, preparing them to serve as members of study sections, councils, and to take on increasingly responsible roles as they move to be independently funded investigators. Our concern would be that implementing incentives for paid peer review will lessen opportunities for ESI as journals will look for people with more experience in serving as peer reviewers in order to accomplish the twin goals of improving quality and speeding up review. NIH should consider all aspects of how peer review, serving on study sections, and other forms of service help ESI to advance in their careers before implementing any policy that is inclusive of a focus on incentivizing paid peer review.

**4. Publishing best practices:**

**5. Other Comments:**

## 861. N/A

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
An alternative strategy would be for the NIH to negotiate with publishers about limiting costs of publication or the NIH will not cover any costs for publishing in those journals.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

# 862. Rapid Science

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Kristen Ratan

**Name of Organization:** Rapid Science

**Type of Organization:** Non-profit Research Organization

**Role:** Organizational Official

**1. Proposed policy options:**
Rapid Science is writing in response to the NIH NOT-OD-25-138 Request for Information on Maximizing Research Funds by Limiting Allowable Publishing Costs (RFI). Rapid Science, founded in 2013 to accelerate the pace and accuracy of scientific discovery through open, equitable and collaborative practices, and its family of associated projects support the NIH's efforts to lower costs for scholarly publishing. In addition to this letter, we have submitted our responses to the specific questions in the RFI using the online comment form.

As a 501(c)(3) fiscal sponsor, Rapid Science connects and strategizes with organizations offering real-world solutions that transform vision to policies and practices, including Incentivizing Collaborative Open Research (ICOR) and Strategies for Open Science (Stratos).

We believe that the first option, disallow all publication costs, provided in the RFI is really the only viable way to achieve an ecosystem shift. The current paradigm that incentivizes journal publishing has proven to be costly, opaque, and lacking in innovation. It has created a static, incomplete record of science that is frequently not accessible.

Neither the current slow and expensive publishing process nor the article as an endpoint reflect the dynamic, iterative, and data-rich nature of science. We are paying ever increasing prices for a product that gets less and less useful in the digital era. Articles frequently do not even contain links to underline data and other supporting materials and often have to remove metadata and reduce figure fidelity or image quality to fit the work into the print paradigm that has persisted for more than 25 years since journals went online.

The National Academies Strategic Plan, released in 2024, calls for reform: "There is growing awareness that current promotion and tenure decisions are far too focused on publications in high-profile journals. Other essential contributions to the research enterprise such as mentoring, promoting diversity, communicating with the public, improving the research process, or striving to elevate public trust in science are either not recognized or insufficiently rewarded."

While the challenges posed by the current system are well understood, the open science and publishing reform movements have not yet provided an alternative for research sharing that is more efficient and data-complete. The logical choice is a preprint that includes underlying data and other research outputs needed to reproduce the work. And additionally an ecosystem in which AI validation and human peer review of many types can flourish.

Repurposing a fraction of the funds used to pay for APCs today could evolve data sharing, preprinting, and independent peer review, resulting in a new faster and more efficient ecosystem that makes all research outputs available earlier and more broadly. Rapid Science, ICOR, Stratos, and our affiliated projects propose standing up this preprint-based alternative and investing in and incentivizing open-first, born-with-integrity workflows and tools that capture research as it is being conducted and credit researchers for sharing early and often.

We believe it is only through convergence of ideas and collective action that we will achieve a true shift away from an expensive, print based system towards a dynamic paradigm that will accelerate the benefits of our collective investment in science.

With this in mind, we suggest that NIH take the following actions:

1. Mandate preprints with underlying data and other outputs as the primary method of sharing research prior to or instead of journal publishing

2. Do not pay for APCs

3. Credit data-complete preprints and preprint reviewing in grant decisions and research assessment

Thank you for the opportunity to respond.

Best wishes,

Kristen Ratan

Kristen Ratan

Executive Director, Rapid Science

CEO, Stratos

CoFounder, ICOR

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/Rapid-Science_ICOR-response-to-NIH-RFI-.pdf

**Description:** Letter

# 863. Open Research Funders Group

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Emily Ford

**Name of Organization:** Open Research Funders Group

**Type of Organization:** Non-profit Research Organization

**Role:** Organizational Official

**1. Proposed policy options:**
One of the most impactful ways to widely share research and maximize taxpayer dollars would be to require immediate deposit of preprints, rather than using taxpayer dollars to fund article processing charges.

There already exists infrastructure for preprint deposit, and preprint repositories that meet NIH standards have already been identified in the NIH Preprint Pilot project. The research community already accepts preprints as a mechanism to share knowledge, and the adoption of preprint deposit continues to grow.

Please see the attached letter for more information.

**2. Available evidence related to publication costs and proposed options:**
Article processing charges have not been effectively used to speed up knowledge sharing, and further entrench a publishing system that is broken. APCs have become a profit model for publishers rather than openly returning that financial investment on a broad scale to the public, and publishers may take advantage of allowable costs to invent new costs or charges.

Some points of evidence:

- Plan S's ambitious goal to realize universal open access to publications by 2021 did not materialize.

- APC costs are soaring. In 6 years the estimated cost to federal agencies increased by roughly $100 billion. Updated Report to the U.S. Congress on Financing Mechanisms for Open Access Publishing of Federally Funded Research (June 2024)

- APCs are a profit model for publishers. The oligopoly's shift to open access: How the big five academic publishers profit from article processing charges. Butler, L. et. al (2023)

- Austrian Research Foundation instituted price caps on standalone publications and has since lifted those caps. Moreover, findings show that three publishers - Elsevier, Springer Nature, and Wiley-Blackwell, "...alone account for 56 % of all costs spent by the FWF as part of the Peer-reviewed Publications programme between the years 2013 and 2018." In this sense it shows that it is not a responsible use of grant funding to bankroll commercial publishers. The FWF's Open Access Policy of the last 15 Years - Developments and Outlook. Rieck, K (2019).

- Capping APCs May Backfire on NIH. Marcum, C. S. (2025).

- There are a number of private philanthropic funders that already require or strongly recommend preprint deposit: Alex's Lemonade Stand, Gates Foundation, Aligning Science Across Parkinson's, Chan Zuckerberg Institute, Simons, Howard Hughes Medical Institute, Arnold Ventures, Michael J. Fox Foundation, Gordon and Betty Moore Foundation, Templeton World Charity Foundation. For an example of some funders' preprint requirements please see the Preprint Policy Framework. Preprint Policy Framework (ASAPbio, Creative Commons, 2025)

- A recent report by International Network for Advancing Science and Policy (INASP) estimated the cumulative APC costs for 21 global development funders to be between $74 million and $81 million total. Moreover, the report concludes, "The amounts invested by research funders in open access publication are not translating into all their funded research outputs being immediately available to everyone. There is potential for this money to be reinvested in open, sustainable, and equitable publishing models for the future." Alice Chadwick El-Ali et al., A Review of Open Access Policy Options for Development Research Funders | INASP (INASP, 2025), https://www.inasp.info/open-access-policy-options-paper.

Please see the attached letter for more information.

**3. Peer review compensation:**
The traditional publishing system is broken, and paying for peer review will not fix the broken system. As such, a new system for scientific outputs should be open and de-coupled from evaluation and publication processes.

Instead of investing taxpayer dollars into peer review, NIH should consider investing in existing infrastructures that allow for the scientific sharing system to become unbundled from publication processes. In addition to preprints, openly available data, code, tangible materials, and other scholarly outputs can be made available and readily accessible using machine readable metadata that can track the record of versions, and associate data with its analysis. Moreover, machine readable metadata can allow for further transparency of funding if persistent identifiers for awards and awarding agencies are instituted.

**4. Publishing best practices:**
As previously noted, the publication system should be decoupled from the sharing of scientific outputs. However, there are a number of other innovations that would be enabled should NIH institute mandatory deposit of preprints, and would, on the whole, be less costly than article processing charges and reviewer compensation. For example, investment in community-governed infrastructure that allows for the easeful discovery of scientific outputs (e.g. DataCite, CrossRef) will have a greater ROI than focusing on APCs and reviewer compensation. Furthermore, using widely accepted persistent identifiers in governmental infrastructures that are easily parsed by technologies (e.g. DOIs, ORCIDids, RORids, machine-readable licenses) increases the likelihood of broader dissemination.

Rather than using taxpayer dollars to invest in article processing charges, investments in open infrastructures at the systems level opens the door for further innovations for machine readability and machine learning.

Please see attached letter for more details.

**5. Other Comments:**
As previously noted, the publication system should be decoupled from the sharing of scientific outputs. However, there are a number of other innovations that would be enabled should NIH institute mandatory deposit of preprints, and would, on the whole, be less costly than article processing charges and reviewer compensation. For example, investment in community-governed infrastructure that allows for the easeful discovery of scientific outputs (e.g. DataCite, CrossRef) will have a greater ROI than focusing on APCs and reviewer compensation. Furthermore, using widely accepted persistent identifiers in governmental infrastructures that are easily parsed by technologies (e.g. DOIs, ORCIDids, RORids, machine-readable licenses) increases the likelihood of broader dissemination.

Rather than using taxpayer dollars to invest in article processing charges, investments in open infrastructures at the systems level opens the door for further innovations for machine readability and machine learning.

Please see attached letter for more details.

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/ORFG-RFI-Reponse-NIH-Allowable-Costs.pdf

**Description:** ORFG Allowable Costs RFI Response letter from signed funders

# 864. American Chemical Society

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** James S. Milne, Ph.D.

**Name of Organization:** American Chemical Society

**Type of Organization:** Other

**Type of Organization - Other:** U.S. Scholarly Society

**Role:** Other

**Role – Other:** President, Publications Division

**1. Proposed policy options:**
A diverse, financially sustainable, and robust publishing system which provides authors with broad choice is the most effective way to balance flexibility in providing articles and other publications that report research findings with maximizing the use of taxpayer funds to support research and control costs. Cost structures are very different for different organizations – medicine, physical sciences, social sciences, and humanities – and for different types of journals based on selectivity, services, technology, and other features. Inflexible cost caps are, thus, likely to drive existing industry trends toward publisher consolidation and volume-based models which compromise integrity, quality, and author choice – in addition to stifling innovation and undermining U.S. leadership in biomedical research.

The flaws of cost caps and the ways they could easily result in unintended and harmful outcomes have been raised by many commenters on the RFI. Many are articulated in this article by Christopher Marcum (see https://upstream.force11.org/capping-apcs-may-not-work/), one of the policymakers behind the drafting and implementation of the Nelson Memo (see https://bidenwhitehouse.archives.gov/wp-content/uploads/2022/08/08-2022-OSTP-Public-Access-Memo.pdf). The top five may be summarized as follows:

1) “[Price] caps may establish a floor-effect whereby lower-cost journals will just move to the cap since the incentive to have lower fees has been artificially manipulated by reducing market competition.” Because price caps often become price floors, every APC set below the cap may well rise to what could be perceived as a new industry standard. Marcum notes that the incentive which caps create for this outcome was “the primary reason caps were not introduced by NIH, or other federal agencies, in the past.”

2) “Quality control may suffer.” As may also be a researcher’s freedom to choose the best outlet for publication of their findings. NIH’s figures show that researchers, who know best what outlet is most suited to share their findings, estimated APCs far in excess of those in the proposed caps. In addition, the proposed caps are far below a more representative calculated cost per paper offered by EMBO (European Molecular Biology Organization) of around $6,400 (see https://www.embo.org/features/the-cost-of-scientific-publishing/), meaning that many journals would be required to publish NIH-funded papers at a financial loss.

The loss of funds in this context means depleted resources available for publications to ensure the quality and integrity of the scientific record. This will directly result in erosion of public trust in science and a dampening effect on innovation, job growth, and scientific progress. It will also increase the likelihood that important publication outlets will cease operations due to lack of funds, creating new barriers to access and equity in publication opportunities. Smaller and not-for-profit publishers, including those associated with learned societies, are most likely to be at risk from this practice that could easily result in increased market consolidation. This, in turn, is likely to reduce author choice and market competition, stifling innovation and undermining equity in publication opportunities, especially for early career researchers. We recommend that NIH avoid creating these outcomes by ensuring that all its grantees have the funding support necessary to enable their research and choose the publishing option that best suits their needs.

3) "It may create a new Matthew Effect" i.e., researchers at better-funded institutions who are able to supplement their grants to pay APCs in journals with prices above the proposed caps will have more freedom to pursue the best outlets for their work. Researchers at lower-funded institutions could well have to settle for a more limited choice of low-cost and low-service journals – and therefore receive less career advancement and reward. NIH-funded labs and projects could become a less attractive choice for graduate students and postdocs looking to build their publication record to help future employment. Those most likely harmed in this scenario include early career researchers or those from less well funded institutions because they, or their institutions, don't have the financial resources to cover the difference between the NIH cap and the APC. This would not only create further barriers for the disenfranchised to get recognition but also decrease the impact of funders' investments to the detriment of scientific progress, innovation, economic prosperity, and ultimately the American people.

4) "Caps are static, the economy is dynamic." Unless any proposed caps are tied to a relevant publishing industry market indicator of cost, if such can be identified, any cap will likely decline in real terms as costs continue to rise. As Marcum observed "In the not so distance future, static caps will be effectively obsolete and unsustainable."

5) "Federated policies are inefficient. By acting on caps without coordinating with other federal agencies, the NIH is adding confusion to an already complicated system." Marcum observes that "Previous public access policies were developed in concert with NSF, NASA, DOE, DOD, IMLS, and other agencies so that the government could act with one voice and minimize burden of having different funding rules for different agencies." Our view is that all stakeholders in the research and scholarly publishing ecosystem should make best efforts to decrease confusion and the administrative burden on researchers. The proposed caps will have the opposite effect.

**2. Available evidence related to publication costs and proposed options:**

The proposed caps are based on an exclusionary analysis of open access only journals, overlooking the APC requests of NIH grantees which averaged between $3,225 to $3,647; the findings from the November 2023 OSTP Report to the U.S. Congress on Financing Mechanisms for Open Access Publishing of Federally Funded Research that reported the average hybrid OA journal fee paid by NIH researchers was $4,824; and the calculated cost per paper offered by EMBO (European Molecular Biology Organization) of around $6,400 (see https://www.embo.org/features/the-cost-of-scientific-publishing/).

An independent study of over 2,200 journals by ScholCommLab (see https://www.scholcommlab.ca/2025/09/03/nih-apc-caps/) found the following:

- "…current publishing practices result in NIH funded research published primarily in journals with fees far above the lowest of the proposed caps and in some cases even above the highest…"
- APCs for a few as 7% of journals or 6% of papers would be fully covered by a $2,000 cap. A $3,000 cap would only cover 25% of journals and 21% of papers acknowledging NIH funding.
- The average APC of all journals with at least 5 NIH-funded papers in 2025 analyzed is $3,878, with hybrid journals charging on average $4,425, and
- "…one conclusion [is] unmistakably clear: there is a significant gap between what the NIH is proposing as reasonable caps and the substantially higher charges imposed by publishers of journals where NIH-funded authors most frequently publish. This gap is likely even greater than our analysis indicates…"

In addition, we draw attention to 2 CFR Part 200 Subpart E – Cost Principles (see https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-E), which state that a cost should be allowable under a federal assistance award if it is allowable, allocable, and reasonable. In particular we note 2 CFR 200.461 (see https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-E/subject-group-ECFRed1f39f9b3d4e72/section-200.461), which clearly states that APCs are an allowable cost in direct contrast to the first option proposed in the RFI. The caps proposed by NIH ignore this bedrock principle of federal assistance and are not grounded in the realities of the publishing process.

**3. Peer review compensation:**

The question of whether peer reviewers should be compensated is a longstanding one in scholarly publishing. Because doing so would result in higher system costs to create, for example, a new infrastructure to handle hundreds of thousands of micropayments for both published and rejected manuscripts, as well as those that need re-review, (ACS journals alone conducted over 410,000 reviews in 2024 and will likely conduct more than 460,000 in 2025) at a time when the opposite is wanted, and potentially have severely damaging effects on the integrity of the peer review process itself, a process essential to producing Gold Standard Science (see https://www.whitehouse.gov/presidential-actions/2025/05/restoring-gold-standard-science/), this proposal should be evaluated by all stakeholders based on a careful review of its positive and negative consequences. A review of those consequences, and their impact on the integrity and quality of the scholarly record, can found in this article (see https://scholarlykitchen.sspnet.org/2021/06/16/whats-wrong-with-paying-for-peer-review/) by Tim Vines, Founder and CEO of DataSeer, and Alison Mudditt, CEO at the Public Library of Science, titled What's Wrong with Paying for Peer Review? Examples from the article include the emergence of "review factories" along the lines of paper mills to siphon funds away from good faith actors; prioritizing speed over quality to maximize the number of payments, and the introduction of editorial bias to ensure repeat business. The authors found that "bringing money into a system built on trust and altruism will be highly corrosive: motivation will shift from professional duty to maximizing profit, and a whole new class of ethical infractions and conflicts of interest arrives." What this means is that both the short and

long-term financial viability of the system, and its ability to deliver trustworthy findings that drive scientific and economic progress, support federal decision making, and foster public trust in science is the larger issue against which the question of peer review payments must be weighed.

There is no suggestion that the RFI has undertaken the process needed here, and we strongly recommend that a thorough, open review be conducted before further recommendations or decisions are made that will have far reaching and possibly deeply unwanted outcomes.

**4. Publishing best practices:**

The May 23, 2025, Executive Order Restoring Gold Standard Science expressed the Administration's commitment "to ensure that federally funded research is transparent, rigorous, and impactful, and that Federal decisions are informed by the most credible, reliable, and impartial scientific evidence available." ACS shares this commitment.

One constant in the communication of research findings, regardless of the field of endeavor, is that rigorously vetted publications are essential to support productive scientific discourse, federal decision making, and public trust in science. Researchers and policy makers must be able to rely on the integrity of the scientific publications that inform their decisions. The public, in turn, must be able to feel confident that practitioners' and policymakers' scientific and technical decisions are grounded in accurate information. Organizations like ACS are deeply committed to supporting this integrity and trust in science by building and maintaining infrastructure that enables the widespread production and communication of validated and reliable reports on research findings – findings that researchers and policy makers, as well as industry and other partners rely on to inform the decisions and investments that fuel U.S. innovation, economic prosperity, and the nation's strategic interests.

Among other things, this involves creating scientific journals and staffing editorial boards with experts that read and evaluate thousands of submitted manuscripts for quality and relevance. ACS spends significant resources to ensure the integrity of journal articles by verifying author identity and compliance with OFAC mandates, verifying content integrity, educating authors regarding open access initiatives (including those of NIH), assessing articles for ethical considerations, managing and underscoring authors' potential conflicts of interest, and conducting plagiarism, ghost and gift authorship checks to combat paper mills, image manipulation, and the use of artificial intelligence tools like ChatGPT in inappropriate ways.

Our investments in support of scientific communication do not end when a peer reviewed article is published. We update articles for correction and addenda, update links, and conduct ongoing plagiarism and copyright protection to safeguard the integrity of the work and ensure articles are not modified or pirated in misleading and harmful ways. Upholding the version of record and providing the clarity necessary to easily distinguish between the version of record and earlier, less reliable versions of an article, is a key principle of scientific integrity. In order to build trust in science, readers must be able to easily identify and discover trusted peer reviewed content. To facilitate this process, we assign digital identifiers, provide metadata, conduct search engine optimization, track citations and other important metrics, and submit articles to abstracting, indexing, and discovery services. These valuable services support scientific integrity by pointing readers to the highest quality scientific publications and data.

At a time when concerns around misinformation — including on critical issues of science and medicine — have become a national priority, there is an urgent need for stakeholders that support scientific integrity to work together and uphold the role of objective, trusted information in a democratic society. Therefore, it is essential that federal policies related to publications ensure that scientists and publishers can continue producing and disseminating the trusted, peer reviewed version of record of scientific articles by providing sufficient funding for the work needed to support investments in publishing research findings in high-quality journals that uphold scientific integrity.

Because cost structures, and therefore APCs, are very different for different organizations – medicine, physical sciences, social sciences, and humanities – and for different types of journals based on selectivity, services, technology, and other features, we recommend that NIH allow researchers the freedom to decide how best to use funds to not only conduct research but also to determine the outlet that will provide the greatest impact, and therefore the greatest value in the most efficient manner, for their research findings by placing them directly in front of the audience most likely to build on their progress.

**5. Other Comments:**

The May 23, 2025, Executive Order Restoring Gold Standard Science expressed the Administration's commitment "to ensure that federally funded research is transparent, rigorous, and impactful, and that Federal decisions are informed by the most credible, reliable, and impartial scientific evidence available." ACS shares this commitment.

One constant in the communication of research findings, regardless of the field of endeavor, is that rigorously vetted publications are essential to support productive scientific discourse, federal decision making, and public trust in science. Researchers and policy makers must be able to rely on the integrity of the scientific publications that inform their decisions. The public, in turn, must be able to feel confident that practitioners' and policymakers' scientific and technical decisions are grounded in accurate information. Organizations like ACS are deeply committed to supporting this integrity and trust in science by building and maintaining infrastructure that enables the widespread production and communication of validated and reliable reports on research findings – findings that researchers and policy makers, as well as industry and other partners rely on to inform the decisions and investments that fuel U.S. innovation, economic prosperity, and the nation's strategic interests.

Among other things, this involves creating scientific journals and staffing editorial boards with experts that read and evaluate thousands of submitted manuscripts for quality and relevance. ACS spends significant resources to ensure the integrity of journal articles by verifying author identity and compliance with OFAC mandates, verifying content integrity, educating authors regarding open access initiatives (including those of NIH), assessing articles for ethical considerations, managing and underscoring authors' potential conflicts of interest, and conducting plagiarism, ghost and gift authorship checks to combat paper mills, image manipulation, and the use of artificial intelligence tools like ChatGPT in inappropriate ways.

Our investments in support of scientific communication do not end when a peer reviewed article is published. We update articles for correction and addenda, update links, and conduct ongoing plagiarism and copyright protection to safeguard the integrity of the work and ensure articles are not modified or

pirated in misleading and harmful ways. Upholding the version of record and providing the clarity necessary to easily distinguish between the version of record and earlier, less reliable versions of an article, is a key principle of scientific integrity. In order to build trust in science, readers must be able to easily identify and discover trusted peer reviewed content. To facilitate this process, we assign digital identifiers, provide metadata, conduct search engine optimization, track citations and other important metrics, and submit articles to abstracting, indexing, and discovery services. These valuable services support scientific integrity by pointing readers to the highest quality scientific publications and data.

At a time when concerns around misinformation — including on critical issues of science and medicine — have become a national priority, there is an urgent need for stakeholders that support scientific integrity to work together and uphold the role of objective, trusted information in a democratic society. Therefore, it is essential that federal policies related to publications ensure that scientists and publishers can continue producing and disseminating the trusted, peer reviewed version of record of scientific articles by providing sufficient funding for the work needed to support investments in publishing research findings in high-quality journals that uphold scientific integrity.

Because cost structures, and therefore APCs, are very different for different organizations – medicine, physical sciences, social sciences, and humanities – and for different types of journals based on selectivity, services, technology, and other features, we recommend that NIH allow researchers the freedom to decide how best to use funds to not only conduct research but also to determine the outlet that will provide the greatest impact, and therefore the greatest value in the most efficient manner, for their research findings by placing them directly in front of the audience most likely to build on their progress.

# 865. Invest in Open Infrastructure

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Dr. Katherine Skinner

**Name of Organization:** Invest in Open Infrastructure

**Type of Organization:** Non-profit Research Organization

**Role:** Investigator/Researcher

**1. Proposed policy options:**

We commend the NIH for its leadership in ensuring publicly funded research is freely and rapidly accessible. Since its first public access policy in 2005, NIH has consistently advanced transparency, reproducibility, and the public value of research.

Invest in Open Infrastructure (IOI) works globally with academic institutions, infrastructure providers, publishers, and funders to strengthen the systems that enable open research. Our experience, including our 2023-2025 NSF-funded "Reasonable Costs" study on the costs of public access to research, resoundingly shows that investments made in shared, open infrastructure that make research outputs maximally available to the public, offer a higher return on taxpayer dollars than payments made towards rising article processing charges (APCs).

We respectfully recommend that NIH prioritize direct investment—centrally and/or through allowable costs—in existing open infrastructure to disseminate research outputs. This includes repositories that support "green" open access, preprint servers, open data platforms, and "diamond" open access publishers that operate without APCs. These models are proven, widely used, and more cost-effective than channeling funds into APC-based publishing systems.

There are precedents for this approach, as documented in IOI's NSF-funded study on "Reasonable Costs" [1]. As one example, in a Costing Case Study conducted by the Digital Endangered Languages and Musics Archiving Network (DELAMAN), the authors propose that grantors set aside 8% of direct costs to an archive that will host the data of a funded project [2]. A similar percentage-based allowance could ensure NIH-funded outputs are preserved and openly disseminated through repositories and community-led infrastructure, while containing overall costs.

By shifting investment from escalating APCs to shared infrastructure, NIH can maximize the impact of every taxpayer dollar, accelerate knowledge dissemination and use, and strengthen the integrity and sustainability of the open research ecosystem.

[1] https://zenodo.org/records/10729575

[2] https://scholarworks.alaska.edu/handle/11122/6928

**2. Available evidence related to publication costs and proposed options:**

The operational complexity of administering the current APC-driven system results in inefficiencies and

hidden costs for both research performing organizations and the NIH. Research institutions, for example, bear significant hidden costs related to negotiating and managing publisher agreements (such as read-and-publish agreements) and individual APC payments. In IOI's 2023-2025 NSF-funded "Reasonable Costs" study, we found that research institutions, including liberal arts colleges, R1 and R2 universities, and research laboratories, struggled to estimate the magnitude of hidden and direct costs related to meeting future public access requirements due to a lack of price transparency and the complexity each institution faces in managing hundreds of distinct publisher agreements, some through consortial environments. Our project produced a model "cost calculator" that aimed to assist with such estimations; in our pilots with major institutions, we found that the cost calculator still required a level of clarity and consistency in local accounting and invoicing practices that is effectively and structurally hindered and undermined by publishing agreement practices.

Consider a case study illustrating this complexity: An NIH-funded researcher tries to publish in Journal A. They hit a paywall with an article processing charge and a note saying, "Your institution may have a discount, contact your librarian." The librarian chases down a licensing specialist, confirms whether the contract covers this particular journal, checks fine print about eligible article types, determines if a special discount code is needed, and finally logs the transaction in a tracking system so the institution doesn't exceed its quota in the next contract negotiation. What looks like a simple discount turns into a chain of emails, checks, and compliance steps—an invisible burden on institutional staff and resources, and a convoluted and hard-to-trace financial trail. These costs don't show up clearly in publisher invoices, but they are real costs, and they add up. If NIH is serious about efficient, equitable public access, it has to account for the true cost of managing increasingly complex arrangements.

In an analysis of published research resulting from NIH-funded studies, Haustein et al. (2025) found that the lowest of the proposed caps ($2,000) would not cover APCs in the majority of cases and that some APCs already exceed even the highest of the proposed caps [1]. Specifically, the $2,000 cap would only fully cover 6 percent of papers the authors identified in their study. APC prices have been rising for decades [2], outpacing inflation, as have large, conglomerate publisher revenues [3], in part owing to their shift to APCs over subscriptions [4]. Most publishers have offered little transparency about what APC fees cover and how they relate to actual costs of publishing. Given these trends, we respectfully contend that the proposed caps would not incentivize publishers to lower their APCs, and would instead leave researchers and academic institutions scrambling to fill gaps through other sources, further straining limited research and library budgets. Researchers unable to make up the difference between the allowable costs and actual APC (which could run more than $6,000 per article according to Haustein et al.) could be forced to choose less prestigious outlets, limiting author choice and potentially damaging the visibility of high-impact research.

[1] https://www.scholcommlab.ca/2025/09/03/nih-apc-caps/

[2] https://www.deltathink.com/news-views-open-access-charges-price-increases-back-on-trend

[3] See, for example, Elsevier's record profits in 2025 https://www.researchprofessionalnews.com/rr-news-world-2025-2-elsevier-parent-company-reports-10-rise-in-profit-to-3-2bn/

[4] https://doi.org/10.1162/qss_a_00272

One key step in this process is achieving greater pricing transparency. We encourage the NIH and other agencies to submit APC data to the OpenAPC project [5] in order to improve global reporting on APC costs.

[5] https://www.openapc.net/

**3. Peer review compensation:**
Peer review has been operated by publishers (both for and non-profit), usually as a volunteer contribution from academic researchers that comes with no monetary compensation and that lacks transparency. This expected volunteerism becomes especially problematic when publishing organizations, who rely on the volunteer-based peer reviewers' work to inform their own selection and editing of research works, yield significant profits from these published works without reinvesting back into the research ecosystem, reviewers, or supporting infrastructure.

We are inspired by open infrastructure models for more equitable peer review such as initiatives led by PREreview [1] and PeerCommunityIn [2].

[1] https://prereview.org/

[2] https://peercommunityin.org/

**4. Publishing best practices:**
The traditional scholarly publishing system does not sufficiently serve NIH's interest in rapid, transparent, and cost-effective public access to research results or the acceleration of scientific discovery. Encouraging the use of (and directly supporting) trusted preprint and open data repositories and other open infrastructures aligns with the NIH's goals and decouples the specific goals of public access from the distinct processes of formal publication and evaluation.

At IOI, we have reviewed hundreds of open infrastructure solutions as part of our development of Infra Finder (https://infrafinder.investinopen.org). These include robust and varied tools that enhance the potential for discovery and reuse; support research integrity by facilitating transparent review; accelerate progress by rapidly disseminating results; and link diverse outputs such as preprints, data, and code. These tools were developed to address gaps and dissatisfaction with traditional publishing. They use open standards, machine-readable metadata, persistent identifiers, and other technologies that advance the goals of public access. We see investment in improving and connecting these systems as a key to increasing the impact of NIH-funded research. Choosing open infrastructure for this work means that efforts made to improve one system will be magnified as others interoperate with and build off of its capabilities.

**5. Other Comments:**
The traditional scholarly publishing system does not sufficiently serve NIH's interest in rapid, transparent, and cost-effective public access to research results or the acceleration of scientific discovery. Encouraging the use of (and directly supporting) trusted preprint and open data repositories and other open infrastructures aligns with the NIH's goals and decouples the specific goals of public access from the distinct processes of formal publication and evaluation.

At IOI, we have reviewed hundreds of open infrastructure solutions as part of our development of Infra Finder (https://infrafinder.investinopen.org). These include robust and varied tools that enhance the potential for discovery and reuse; support research integrity by facilitating transparent review; accelerate progress by rapidly disseminating results; and link diverse outputs such as preprints, data, and code. These tools were developed to address gaps and dissatisfaction with traditional publishing. They use open standards, machine-readable metadata, persistent identifiers, and other technologies that advance the goals of public access. We see investment in improving and connecting these systems as a key to increasing the impact of NIH-funded research. Choosing open infrastructure for this work means that efforts made to improve one system will be magnified as others interoperate with and build off of its capabilities.

# 866. Medical College of Wisconsin

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Jon Goodell, Director, Libraries

**Name of Organization:** Medical College of Wisconsin

**Type of Organization:** Academic Institution

**Role:** Institutional Information Sciences Professional/Librarian

**1. Proposed policy options:**

1. The option, or other option not considered here, that best achieves the goal of balancing flexibility in providing research results with maximizing the use of taxpayer funds to support research: MCW recommends Option 2: Set a limit on allowable costs per publication with a proposed limit of $2,000 per article.

**2. Available evidence related to publication costs and proposed options:**

2. Any evidence (either from your own work or other publicly available sources) that can be publicly shared that addresses the considerations of one or more of the options: Most article publication charges fall below this level at the Medical College of Wisconsin.

**3. Peer review compensation:**

**4. Publishing best practices:**

4. In addition to compensating peer reviewers, other kinds of publishing best practices that NIH should consider as factors in determining the potential allowability of a higher per publication cost, such as use of automated fraud detection capabilities: NIH should require that researchers request grant funding support only for articles published in journals already approved by the NIH Literature Selection Technical Review Committee, ensuring that funds support high-quality, PubMed-indexed publications.(https://www.nlm.nih.gov/medline/medline_about_lstrc.html). NIH should periodically study the impact of changes on scholarly communication quality and impact signals (article retractions, citations, etc.).

**5. Other Comments:**

4. In addition to compensating peer reviewers, other kinds of publishing best practices that NIH should consider as factors in determining the potential allowability of a higher per publication cost, such as use of automated fraud detection capabilities: NIH should require that researchers request grant funding support only for articles published in journals already approved by the NIH Literature Selection Technical Review Committee, ensuring that funds support high-quality, PubMed-indexed publications.(https://www.nlm.nih.gov/medline/medline_about_lstrc.html). NIH should periodically study the impact of changes on scholarly communication quality and impact signals (article retractions, citations, etc.).

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/NIH-RFI-on-Allowable-Publishing-Costs.docx

## 867. N/A

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Anything that entirely eliminates publication support is a non-starter. If this were implemented, there would be disproportionate impact on early career researchers, who are often some of the most creative and inventive researchers, from being able to publish in the most highly read journals. If the NIH is true to its word in wanting to quickly disseminate Gold Standard science, by functionally cutting off this option to early career researchers the NIH would be acting in direct opposition to its own stated interests.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
I have never heard of peer reviewers being compensated at all, so I don't think there will be much data to even find about this.

**4. Publishing best practices:**
If you want to mandate this for journals that receive money from direct costs from grants, but at the same time you want to limit costs of publication, again, you are acting against your own interests. Maintaing such software systems that will also require human validation of the results will have costs.

**5. Other Comments:**
If you want to mandate this for journals that receive money from direct costs from grants, but at the same time you want to limit costs of publication, again, you are acting against your own interests. Maintaing such software systems that will also require human validation of the results will have costs.

# 868. American Association for Dental, Oral, and Craniofacial Research

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Christopher H. Fox, DMD, DMSc

**Name of Organization:** American Association for Dental, Oral, and Craniofacial Research

**Type of Organization:** Professional Organization/Association

**Role:** Organizational Official

**1. Proposed policy options:**
Many factors enter into investigators' decisions of which journal to submit a manuscript to, including, but not limited to, journal quality and reputation, journal aims and scope, target readership, journal frequency, journal turnaround time, funder mandates, and publication costs. AADOCR believes investigators should have the freedom to submit to the journal that will best advance their research and the field.

Although not presented as an option in the RFI, research funds can best be maximized by NIH-funded authors depositing the author-accepted manuscript version directly to PubMed Central. This fulfills the NIH Public Access Policy and provides the public with access to the author-accepted version at no or minimal additional cost to the American taxpayer. The final published version would be available to institutional and individual subscribers of that journal.

If immediate public access of the final published version is still needed, setting an arbitrary cap on allowable Article Processing Charges (APCs)—particularly one significantly below the prevailing rates charged by reputable and high impact journals—could have serious unintended consequences for the research ecosystem, and could unintentionally harm the very goals it aims to support—namely the broad and equitable dissemination of high-quality, publicly funded research.

AADOCR recommends that NIH consider implementing a tiered or flexible APC cap that reflects differences across disciplines, publishing models (e.g., nonprofit vs. for-profit, open access-only vs. hybrid), and whether the institution has a transformative agreement with publishers that shifts funding from subscriptions to open access publishing for affiliated authors. A one-size-fits-all APC cap may restrict access to reputable journals and create new barriers to publication for NIH-funded researchers, especially early-career scientists who lack publication budgets. Any APC cap should be informed by real-world publishing costs and adjusted for discipline-specific needs.

**2. Available evidence related to publication costs and proposed options:**
Based on an AADOCR analysis of APC costs for immediate access journals to provide immediate access (either gold or green open access) in the "Dentistry, Oral Surgery and Medicine" category, the average APC cost for journals with a Journal Impact Factor (JIF) in the top 50 percent was $3,584 in 2024—well above the limit on allowable direct costs ($2,000 per publication) being considered under Options 2 and 3 in the RFI.

According to DeltaThink, which conducts one of the most comprehensive reviews of open access pricing through its annual survey of APCs of major publishers covering over 20,000 titles going back to 2016,

fully open access APC prices rose about 9.5% year-over-year heading into 2024 with maximum fees approaching $8,900.

APCs vary widely across journals and disciplines reflecting differences in publisher pricing models as well as operational costs, services offered, and economies of scale. A flat, across-the-board cap on APCs risks penalizing smaller, nonprofit journals that don't have the financial resources of larger publishers but nonetheless provide a platform for disseminating high-quality, reputable research.

**3. Peer review compensation:**
While AADOCR strongly supports the recognition of peer reviewers, we urge NIH to reject policies that would impose new, unfunded mandates on publishers to compensate peer reviewers. Such an approach is financially unsustainable, especially for smaller journals that already operate with limited resources, such as nonprofit or university-affiliated publications, and contradictory to NIH's stated goal of maximizing research funds.

Compensating peer reviewers financially would represent a significant shift from the long-standing academic norm of reciprocal review—a model that has allowed the scientific publishing ecosystem to function sustainably for decades. Introducing payment for reviewers would undermine the current collaborative system in which researchers contribute their time with the understanding that others will do the same for them.

**4. Publishing best practices:**
Investing in best practices are critical to maintaining the integrity and accessibility of scientific research. For example, automated fraud/plagiarism, image detection tools, flagging statistical errors and inconsistencies, compliance with reporting guidelines and software to guard against unethical use of AI in publishing are increasingly standard safeguards against misconduct. Similarly, data and code verification services play a vital role in ensuring the reproducibility of published findings, a central element of the Administration's goal of "Restoring Gold Standard Science".

Discoverability and compliance with public access mandates also contribute to publishing costs. Enhancements to accessibility and alignment with federal open access requirements demand technical infrastructure and staff expertise. Long-term digital preservation services ensure that the scholarly record remains stable and accessible in the future.

We urge NIH to recognize the value of these practices as essential components of a publishing system that promotes Gold Standard Science and fosters public trust in research.

**5. Other Comments:**
Investing in best practices are critical to maintaining the integrity and accessibility of scientific research. For example, automated fraud/plagiarism, image detection tools, flagging statistical errors and inconsistencies, compliance with reporting guidelines and software to guard against unethical use of AI in publishing are increasingly standard safeguards against misconduct. Similarly, data and code verification services play a vital role in ensuring the reproducibility of published findings, a central element of the Administration's goal of "Restoring Gold Standard Science".

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infrastructure and staff expertise. Long-term digital preservation services ensure that the scholarly record remains stable and accessible in the future.

We urge NIH to recognize the value of these practices as essential components of a publishing system that promotes Gold Standard Science and fosters public trust in research.

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/AADOCR-Comment-Letter_NIH-RFI-Publication-Costs_09.15.25.pdf

**Description:** Response to Request for Information on “Maximizing Research Funds by Limiting Allowable Publishing Costs” [Notice Number: NOT-OD-25-1380004]

## 869. AIAA

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Ryan Cooperman

**Name of Organization:** AIAA

**Type of Organization:** Professional Organization/Association

**Role:** Organizational Official

**1. Proposed policy options:**
See attached letter.

**2. Available evidence related to publication costs and proposed options:**
See attached letter.

**3. Peer review compensation:**
See attached letter.

**4. Publishing best practices:**
See attached letter.

**5. Other Comments:**
See attached letter.

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/Request-for-Information-on-Maximizing-Research-Funds-by-Limiting-Allowable-Publishing-Costs.pdf

**Description:** AIAA response to the RFI.

# 870. Big Ten Academic Alliance

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** On Behalf of the Undersigned Libraries of the Big Ten Academic Alliance Claire Stewart, Juanita J and Robert E Simpson Dean of Libraries and University Librarian, University of Illinois Urbana-Champaign Diane Dallis-Comentale, Dean of IU Libraries, Indian

**Name of Organization:** Big Ten Academic Alliance

**Type of Organization:** Other

**Type of Organization - Other:** Consortium of academic institutions

**Role:** Organizational Official

**1. Proposed policy options:**
The research libraries of the Big Ten Academic Alliance are strong advocates for a sustainable and open ecosystem of publication. Collectively, our institutions' more than 75,000 faculty, staff and researchers are supported by over $19 billion in research expenditures, and our institutions have invested significantly in our capacity to further the research mission by advancing public knowledge through open publishing. Together, we produce roughly 15% of the research publications in the United States.

As partners with the NIH in our shared commitment to a strong and innovative American research enterprise and to ensuring broad public access to research outputs, we, the undersigned libraries of the Big Ten Academic Alliance, support the goals outlined in this request. We applaud the NIH for requiring all funded researchers to deposit copies of their Author Accepted Manuscripts (AAMs) immediately upon acceptance and strongly support the robust enforcement of this policy.

While we agree that journals with high publishing fees reduce the funds available for conducting research and place an undue burden on American taxpayers, we believe that none of the options proposed in this RFI will effectively achieve our shared goals. Instead, the NIH should ensure that authors can fully utilize the Federal Purpose License (FPL) to make their articles publicly available, and prioritize the development of a sustainable research publishing ecosystem prioritizing public access and community-driven infrastructure.

Currently, most publishers' standard author agreements require authors to embargo their AAM, preventing the public's timely access to these research materials. Additionally, publishers such as the American Chemical Society (ACS), are requiring new, upfront article development charges for authors who wish to deposit their AAM without embargo. These publisher models undermine the NIH public access policy and FPL, and we encourage the NIH to take steps to support authors' use of the FPL without interference while continuing to have the freedom to select their publisher of choice.

Any solution to the problem of unreasonably high publishing fees and their associated burden on the American public must be based on the understanding that article processing charges (APCs) do not reflect the actual costs of publishing, but rather what the market will bear. Authors are constrained by a system that rewards prestige publishing and is exploited by monopolistic profit-driven publishers. The options proposed in this RFI that limit payments to publishers will shift costs to other areas of the

taxpayer-funded research enterprise, and will likely create a higher "floor" for APCs rather than limiting costs. The NIH can shift this dynamic by: 1) incentivizing publication options that do not rely on expensive fees, including preprints, AAM deposit, and diamond open access publishing and 2) expanding open access infrastructure in order to introduce greater choice into the publishing marketplace.

**2. Available evidence related to publication costs and proposed options:**
The evidence is clear: We cannot trust that Article Processing Charges (APCs) are based on the actual costs of publishing.

- In 2023, the editorial team of NeuroImage resigned in protest of Elsevier's refusal to lower the APC from $3,450. Elsevier claimed the fee covered editorial and peer-review services, copyediting, typesetting, archiving, indexing, marketing, and administrative costs, and was lower than that of comparable journals in the field. In response, the editorial team partnered with MIT Press to launch Imaging Neuroscience, maintaining the same scope, quality, and editorial leadership. The APC for Imaging Neuroscience is $1,600—less than half the fee charged by Elsevier.

- The wide variation in subscription prices and APCs across disciplines demonstrates that pricing is not a straightforward calculation based on peer-review and production costs. APCs for hybrid journals are often higher than for fully open access journals, even though the latter bear the full cost of publication.

- APCs for journals where NIH-funded authors publish range from $60 to $12,690 (https://doi.org/10.7910/DVN/3XDMNF). This disparity underscores the disconnect between proposed NIH caps and the actual costs of publishing.

Among the unintended consequences of the options proposed in the RFI is the potential erosion of research quality. Price controls can lead to market distortions and costly enforcement. In scholarly publishing, caps on APCs may incentivize publishers to increase article volume by lowering editorial standards. Evidence from JAMA (https://doi.org/10.1001/jama.2023.3212) and Christos Petrou in The Scholarly Kitchen (2023) (https://perma.cc/7GRD-HN2R) highlights the rapid growth of such journals and the concerns surrounding their quality. Fee-based publishing is ultimately not the most effective path to maximizing public access to research.

**3. Peer review compensation:**
We support innovation and experimentation related to compensation for peer review activities to address challenges in this labor market. However, the proposals outlined by the NIH in this RFI do not address the cost control goals of this effort and would likely result in unintended consequences. Many peer reviewers are faculty at research institutions that pay salaries meant to include peer review activities. Thus payment for peer review could unnecessarily raise costs.

**4. Publishing best practices:**
Profit-driven publishers can, and do, find any rationale for increasing publishing fees. Without accurate and transparent data on the true costs of publishing, we should not look for explanations for increasing fees beyond meeting shareholder expectations.

The NIH should be particularly cautious about any automated or AI-based fraud detection, peer-review, summarization, et cetera, system as justifications for higher publication costs. The primary intended value of these tools is to reduce costs. For example, improved AI-fraud detection mechanisms for publication review should limit the number of articles in need of peer review and editing support, and

therefore reduce editorial vetting, peer review, and production labor. If the NIH is interested in a measure to base increased compensation to publishers with more manuscripts to review, perhaps trustworthy journal rejection rates are a more useful metric.

**5. Other Comments:**
Profit-driven publishers can, and do, find any rationale for increasing publishing fees. Without accurate and transparent data on the true costs of publishing, we should not look for explanations for increasing fees beyond meeting shareholder expectations.

The NIH should be particularly cautious about any automated or AI-based fraud detection, peer-review, summarization, et cetera, system as justifications for higher publication costs. The primary intended value of these tools is to reduce costs. For example, improved AI-fraud detection mechanisms for publication review should limit the number of articles in need of peer review and editing support, and therefore reduce editorial vetting, peer review, and production labor. If the NIH is interested in a measure to base increased compensation to publishers with more manuscripts to review, perhaps trustworthy journal rejection rates are a more useful metric.

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/2025Sep15-BTAA-Libraries-Coordinated-Response-to-NIH-RFI-on-APCs.pdf

**Description:** 2025 September 15 BTAA Libraries Coordinated Response to NIH RFI Notice Number: NOT-OD-25-138

# 871. Infectious Diseases Society and HIV Medicine Association

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Sara Hoopchuk

**Name of Organization:** Infectious Diseases Society and HIV Medicine Association

**Type of Organization:** Professional Organization/Association

**Role:** Organizational Official

**1. Proposed policy options:**

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/NIH-Publication-Fees-RFI-IDSA-HIVMA-Letter-Final-.pdf

**Description:** Please find IDSA and HIVMA's answers to the RFI questions, and our members experiences with this issue in the PDF attached.

# 872. Frontiers

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Julia Kostova

**Name of Organization:** Frontiers

**Type of Organization:** Scholarly Publisher/Journal

**Role:** Organizational Official

**1. Proposed policy options:**
*** Please see the attached PDF for our full response, including data, graphs, and references.***

**2. Available evidence related to publication costs and proposed options:**
***Please see the attached PDF for our full response, including data, graphs, and references.***

**3. Peer review compensation:**
***Please see the attached PDF for our full response, including data, graphs, and references. ***

**4. Publishing best practices:**
***Please see the attached PDF for our full response, including data, graphs, and references.***

**5. Other Comments:**
***Please see the attached PDF for our full response, including data, graphs, and references.***

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/Frontiers-response-to-NIH-Request-for-Information-on-capping-publication-costs.pdf

# 873. Society for Research in Child Development (SRCD)

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Juan Romero-Casillas

**Name of Organization:** Society for Research in Child Development (SRCD)

**Type of Organization:** Professional Organization/Association

**Role:** Organizational Official

**1. Proposed policy options:**

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/SRCD-Response-RE_-Maximizing-Research-Funds-by-Limiting-Allowable-Publishing-Costs-.pdf

# 874. University of Washington Department of Biostatistics Genetic Analysis Center

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Matthew Conomos

**Name of Organization:** University of Washington Department of Biostatistics Genetic Analysis Center

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Among the five proposed policy options, we contend Option 4 would be most effective in giving investigators maximum flexibility to choose the publication strategies and venues that make the most sense for their work while also ensuring responsible stewardship of funds. With a cap on the total amount allowable across all publications, investigators could choose to allocate their funds toward a small number of more expensive publications (e.g. open access fees in higher impact journals), or they could distribute their funds across more publications in journals with lower fees.

In contrast, Option 1 could create or exacerbate existing inequities in which investigators can publish, in what journals, and with what level of access for the research community and the public. Investigators with access to money beyond their grant funds that could be used to cover publication fees (e.g. departmental discretionary accounts) would be able to publish in their journals of choice and would be able to cover the higher fees journals typically require for open access. In contrast, those with limited or no access to such funds would effectively be barred from publishing in journals with higher publication fees, or could be forced to publish in either lower impact journals or with articles behind pay-walls (i.e. not open access). This could exacerbate inequities, in which scientists from less wealthy institutions are less effective at disseminating their work, regardless of its quality. As a further consequence, this approach could push investigators without additional funds to rely solely on free preprint services to distribute non-peer reviewed scientific results. The peer review process is an essential part of the research pipeline to ensure the quality of scientific papers, and creating a financial barrier to it by prohibiting grant funds from supporting it could undermine this process.

We are concerned that Options 2, 3 and 5, each of which set a limit on the allowable cost per publication, would restrict which journals researchers can publish in or force them to publish articles behind a pay-wall rather than open access (which typically has higher fees). For example, setting the per-article cap as the median value essentially halves the set of journals available to researchers, and would, quite frequently, preclude publishing work in journals that would be the best venues for it. Furthermore, a single cap across all NIH grants does not account for different average APCs by subfield. Similar to the discussion above of Option 1, this could create a two-tiered system, where researchers with access to additional funds can publish in certain journals, while others effectively can not. Although we prefer per-award caps, if the NIH were to adopt one of these options, the per-publication cost limit should be set high enough so that it is rare for excellent science to be unpublishable in excellent journals.

We also note that Options 2-5 all may lead to increased cost to manage, track, and report publication fees allocated to grants, as grant managers and/or NIH will need to track whether the APCs have exceeded the caps. Tracking fees per publication (Options 2, 3, and 5) would likely require extra effort and scrutiny beyond tracking the total fees (Option 4), which is something PIs and grant managers already should be doing to keep publication fees within their proposed grant budget. The extra effort (both time and money) spent to implement per publication tracking would likely offset some of the savings desired in implementing such limits.

**2. Available evidence related to publication costs and proposed options:**
In our experience, and based on published analyses (PMID:24406983, https://doi.org/10.1002/asi.24487), a typical R01 leads to 4-14 publications. While amenable to study, the published literature seems to be sparse and somewhat outdated.

For a specific example, we consider the American Journal of Human Genetics (AJHG), a high quality journal in our field in which we have published many times (PMIDs: 40628271, 39561770, 40513563, 37541186, 39809269, 34087167, 34582791, 36055210, 27018471, 26748516, 26748518). The standard fee to publish behind AJHG's pay-wall ranges from $550-875 dollars depending on the article type (see https://www.cell.com/ajhg/authors), while the standard fee to publish open-access is $5,150 (see https://www.cell.com/open-access). This illustrates where a per-publication fee limit (Options 2, 3, and 5) would force some investigators to publish behind the pay-wall, making their research less accessible to the research community. Further, Option 1 would prevent some investigators from being able to publish in this journal at all, even behind the pay-wall.

**3. Peer review compensation:**
When conducted well, the classical role of peer reviewing, ensuring that work has survived detailed scrutiny from experts in the field, adds essential value to the publication process. But as well as this scrutiny, the peer review process performs a larger but lesser-known role where papers can be "desk-rejected" without detailed review. This occurs when e.g. the work is clearly erroneous, is redundant given the known literature, would be incomprehensible to reviewers, or simply makes an insufficient advance and is not of interest to the journal's audience. At top journals, the majority of submissions will be desk-rejected, by either an Editor or Assistant Editor.

Both the editorial and detailed scrutiny roles typically count towards "service", a criteria that universities typically assess when promoting faculty. Performing detailed scrutiny also benefits the reviewers, who gain early exposure to new ideas and approaches, hearing first about new technologies and results - so the process is not entirely altruistic.

Payment for editorial duties is more common than payment for the experts who provide detailed scrutiny of the papers. But payment for those experts does occur; for example in statistical review of biomedical research, where biostatisticians scrutinize just the statistical aspects of a paper. Here, both the need for expertise where it is scarce and the (typical) absence of the reviewer's exposure to new ideas in their field motivate the need to use payment when soliciting reviewers. (Somewhat similarly, all NIH grant reviewers are paid, encouraging busy experts to take the time to perform detailed reviews.) Payments are modest: per paper, reviewers may receive a few tens of dollars, in some cases slightly more. Given the time required to review a paper, reviewers are receiving well below what they could earn per hour by instead doing e.g. independent consulting - so there is still an element of service involved, and it is unlikely that reviews are being done just for the money.

Factors to consider are therefore:

- Does the journal pay its editors/assistant editors?

- Without payment, will the journal be unable to attract reviewers with sufficient expertise?

- Per Editor/Assistant Editor, how many papers are being received and what proportion of them are desk-rejected? (These numbers should provide an estimate of the hours per week editorial teams are spending on their duties)

- Does the amount paid to reviewers act as sufficient incentive, while acknowledging (where relevant) the professional benefits that come from acting as a reviewer?

**4. Publishing best practices:**
In addition to the compensation of reviewers (interpreting this as the solicited individuals who provide detailed scrutiny of individual manuscripts, often over multiple rounds of revisions) the compensation of Editors and Assistant Editors should be considered. In top journals both are time-intensive and often arduous roles, which draw on not only domain-specific expertise but the capacity to find and cajole reviewers. While recent advances (e.g. Google Scholar) can help, neither role can reliably be automated, so payment provides a useful incentive for researchers to take on this role.

However, some low rank journals do not reliably perform this service - essentially accepting anything that can be printed, with perfunctory review at best. The proportion of papers rejected, and particularly the proportion that are desk-rejected, should provide a useful (if imperfect) way to identify journals that are not serving their fields well in this respect; absolute numbers of papers handled will also be relevant. Rather than paying weak journals for handling papers to which they add little benefit, such papers could simply be posted on free pre-print sites such as arXiv.

Journal performance and quality can be expected to change over time. To avoid top journals becoming complacent, and to encourage journals to improve their quality - particularly in fast-developing research areas - occasional audits of reviewing performance would be helpful. Journals typically publish annual updates on their rates of acceptance, and time to review/acceptance/rejection, but the workload per Editor/Assistant Editor and the quality of the reviews provided is much less well-known.

**5. Other Comments:**
In addition to the compensation of reviewers (interpreting this as the solicited individuals who provide detailed scrutiny of individual manuscripts, often over multiple rounds of revisions) the compensation of Editors and Assistant Editors should be considered. In top journals both are time-intensive and often arduous roles, which draw on not only domain-specific expertise but the capacity to find and cajole reviewers. While recent advances (e.g. Google Scholar) can help, neither role can reliably be automated, so payment provides a useful incentive for researchers to take on this role.

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Rather than paying weak journals for handling papers to which they add little benefit, such papers could simply be posted on free pre-print sites such as arXiv.

Journal performance and quality can be expected to change over time. To avoid top journals becoming complacent, and to encourage journals to improve their quality - particularly in fast-developing research areas - occasional audits of reviewing performance would be helpful. Journals typically publish annual updates on their rates of acceptance, and time to review/acceptance/rejection, but the workload per Editor/Assistant Editor and the quality of the reviews provided is much less well-known.

# 875. Entomological Society of America

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Josh Lancette

**Name of Organization:** Entomological Society of America

**Type of Organization:** Professional Organization/Association

**Role:** Organizational Official

**1. Proposed policy options:**

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/ESA-response-NIH-RFI.pdf

**Description:** Letter from ESA responding to the RFI

# 876. Women's Health Issues

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Liz Borkowski

**Name of Organization:** Women's Health Issues

**Type of Organization:** Scholarly Publisher/Journal

**Role:** Other

**Role – Other:** Journal Editors

**1. Proposed policy options:**

**2. Available evidence related to publication costs and proposed options:**
Please see the attached comments from editors of Women's Health Issues (a peer-reviewed journal published by Elsevier).

**3. Peer review compensation:**

**4. Publishing best practices:**
Please see the attached comments from editors of Women's Health Issues (a peer-reviewed journal published by Elsevier).

**5. Other Comments:**
Please see the attached comments from editors of Women's Health Issues (a peer-reviewed journal published by Elsevier).

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/WHI-comment-on-NOT-OD-25-138.pdf

# 877. University of Pittsburgh

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Tobias Rodriguez

**Name of Organization:** University of Pittsburgh

**Type of Organization:** Academic Institution

**Role:** Organizational Official

**1. Proposed policy options:**

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/NIH-NOT-OD-25-138-Publishing-Costs-FINAL.pdf

**Description:** Response to RFI on Maximizing Research Funds by Limiting Allowable Publishing Costs (Notice Number: NOT-OD-25-138)

# 878. Wolters Kluwer Health

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Sarah Becker Carrera

**Name of Organization:** Wolters Kluwer Health

**Type of Organization:** Scholarly Publisher/Journal

**Role:** Organizational Official

**1. Proposed policy options:**
This is addressed in the "Other Comments" section (Question 5), or please refer to appended letter.

**2. Available evidence related to publication costs and proposed options:**
This is addressed in the "Other Comments" section (Question 5), or please refer to appended letter.

**3. Peer review compensation:**

**4. Publishing best practices:**
This is addressed in the "Other Comments" section (Question 5), or please refer to appended letter.

**5. Other Comments:**
This is addressed in the "Other Comments" section (Question 5), or please refer to appended letter.

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/NIH-RFI-Response_Wolters-Kluwer-Health-9.15.2025.pdf

## 879. N/A

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of an organization

**Name:**

**Name of Organization:**

**Type of Organization:** Other

**Role:** Other

**1. Proposed policy options:**

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/RFI-09-15-25.pdf

# 880. Andrea Wirth

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Andrea Wirth

**Name of Organization:**

**Type of Organization:** Not Applicable

**Role:** Institutional Information Sciences Professional/Librarian

**1. Proposed policy options:**
Option 1. While there are many issues with the APC payment model of open access, I do not think eliminating them from grant proposals is a good idea. I don't think they should be encouraged either. I think grant applicants hopefully take into consideration APCs as they would any other expense of conducting and communicating research. Include them when they are necessary and avoid them when they are not. Improved outreach about the existing allowances in the NIH public access policy (and the use of manuscripts to support the policy) should help.

Option 2. While I appreciate the focus on solely open access journals in the RFI data, the data seems to conflate different reasons for charging APCs. Publishers whose journals are fully open access and journals growing their profits by adding on the option to publish open access, should not be considered together. In many cases institutions, including the federal government, are already paying for subscriptions to "hybrid" journals. Fully open access publishers of high quality journals may be operating solely via APCs.

Option 3.

I think the odd focus on peer review compensation is not necessary in this RFI. Finding peer reviewers is a challenge, but it doesn't make sense that NIH would embed this particular expense into the grant proposal process in the way offered. It is also unclear to me how this would work when at the point of grant proposal, authors can estimate costs of publishing, based on desired journals, but two years later when their articles are accepted, the target journal may have changed, the policies of the original journal may have changed, etc.

Generally speaking, I think a limit per APC is problematic and whatever is "set" by NIH will become the cost for all journals that receive papers based on NIH funding.

Option 4 & 5.

Again, the data seems incomplete and it is difficult to respond to these without more complete information. What about the data from the "hybrid" journals and their publishers - both what they charge in regard to "averages?" and also regarding whether hybrid publishers or OA publishers have historically been the recipients of APC payments from NIH grant funding? The subtext in the RFI seems to be researchers publishing in fully OA journals based on the DOAJ analysis, yet we know, for better or worse, many funded authors are encountering the open access option when they publish in subscription-based journals.

**2. Available evidence related to publication costs and proposed options:**
The government should ensure that funded authors have the right to make their work available in the form of a final, peer reviewed, manuscript, publicly accessible as part of the existing NIH processes for PMC.

**3. Peer review compensation:**
Consideration for paying peer reviewers is an issue but I do not think the NIH should be the clearinghouse for this discussion as different subdisciplines, publishers, and journals will have different ideas about addressing these challenges.

**4. Publishing best practices:**
COPE, DOAJ, OASPA, and WAME have already created an excellent guiding document on this topic. Please start with that. https://doaj.org/apply/transparency/

**5. Other Comments:**
COPE, DOAJ, OASPA, and WAME have already created an excellent guiding document on this topic. Please start with that. https://doaj.org/apply/transparency/

# 881. Wiley

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** John Wiley & Sons

**Name of Organization:** Wiley

**Type of Organization:** Scholarly Publisher/Journal

**Role:** Organizational Official

**1. Proposed policy options:**
Wiley's story begins in 1807, when Charles Wiley opened a small print shop on Reade Street in New York City. In our young republic's era of invention, the shop became a conduit for pioneering American ideas, first through literature and then through technical, medical, and scientific works. After the Civil War, William Halsted Wiley—an engineer and U.S. Representative—oriented the family company toward the applied sciences that powered American industrial growth by putting practical, reliable knowledge into the hands of engineers, physicians, and educators. As higher education expanded after World War II, Wiley scaled with it, supplying the cutting-edge texts and journals that trained clinicians and researchers across the country to lead the next generation of scientific, medical, and technological innovators. When scholarship moved online, Wiley again modernized – first to digitized journals and reference works, and more recently to integrated platforms that combine submission, screening, peer review, and permanent curation and preservation of the Version of Record.

Today, our nearly 4,000 U.S. employees are working continuously to improve the infrastructure of U.S. science so that Americans can trust and rely on the public record of science that they funded, particularly as artificial intelligence both accelerates discovery and creates new risks. When Americans use AI to research, for example, a family member's cancer diagnosis and possible treatments, they want and deserve to know that the AI model is trained on the kind of gold standard content that Wiley and its society partners enable. We are also proud to say that over the years we have not only published the work of 292 U.S. Nobel Prize winners in areas like chemistry, physics, medicine, and economics, but also the work of American scientists and scholars at a huge range of institutions across the U.S. – Liberty University, Alabama A&M University, Howard University, Kentucky State University, Mississippi Valley State University, Texas A&M University, Baylor University, Southern Methodist University, Tennessee State University, and many more. Moreover, Wiley's portfolio features numerous authors—including NIH Director Dr. Jay Bhattacharya, who has published at least 20 times in Wiley and Wiley-affiliated scientific society journals—from a broad swath of fields who introduce important new perspectives into those fields. All of this attests to Wiley's longstanding tradition of and commitment to editorial openness in service of bringing the best science by the brightest minds, wherever their labs happen to be in the U.S. and however "unconventional" their groundbreaking ideas might initially seem.

Our story is therefore directly related to the goal NIH aims to achieve: maximizing taxpayers' ROI in federally funded research while maintaining the credibility, accessibility, and pace of dissemination on which public benefit depends. For more than 200 years, Wiley has met the demands of the market and continuously upgraded its systems to help unlock the $2.56 in economic return from every $1 invested

by NIH that we are witnessing today ($95 billion in total economic activity). Maximizing these returns for the American people requires substantial ongoing investment in expert editorial labor and peer review management, increasingly sophisticated integrity screening that goes beyond plagiarism and image checks, AI and research provenance checks, useable formats, high quality metadata, persistent identifiers, long-term archiving, and cybersecurity. Publishers such as Wiley have also taken on the considerable job of investing in mechanisms and infrastructure to ensure effective, efficient, and comprehensive compliance with funder policies, including capturing and cross-referencing funder information and timely depositing articles in federal repositories on behalf of busy authors and their institutions. In other words, at all stages we invest in author and reviewer support and discovery services so that federally funded research is reliable, reusable, and easy to find for all Americans. In 2024, NIH-funded papers published by Wiley garnered over 10,000 social media mentions and 1,500 news items worldwide.

We appreciate NIH's interest in considering improvements to the scientific ecosystem to bring greater clarity, predictability, and trust to the publication process while preserving the safeguards that propel American research and global scientific leadership. Indeed, we share NIH's view that existing systems should strive to continuously adapt in response to evolving realities and compelling, empirically grounded policy rationales. When evaluating NIH's proposed options in this context, Option 4, a cap on total allowable publication expenditures at 0.8 percent of direct costs or $20,000 per award (whichever is greater), would offer the more balanced approach. Compared to the other proposed options, it may provide somewhat more predictable fiscal parameters while allowing grantees the flexibility to choose the appropriate, high-integrity publication venues that they prefer. However, without substantially more detail about how NIH arrived at this figure, such as whether or not NIH assessed the differing costs for publications in different fields and the typical number of articles published per grant, it is unclear that this number would be sufficient to ensure it does not inhibit quality publishing activity or slow the pace at which gold standard NIH-funded results reach researchers, patients, and practitioners. We further caution that this option would need to include safeguards and periodic reviews to ensure that it accounts for, among other things, inflation, the rising costs associated with developing and deploying the ever-more sophisticated mechanisms needed to maintain research integrity, and the appropriate balance between costly new compliance burdens and the overall taxpayer ROI. Experience with the No Surprises Act is instructive: a cost-containing arbitration mechanism generated over 1.5 million disputes (70x more than expected) and pushed administrative spending above $1 billion by late 2024. What was intended as a cost-control mechanism has, in practice, inflated prices and increased administrative waste, illustrating how well-intentioned caps or benchmarks can lead to higher costs and reduced efficiency.

To mitigate these risks and maximize ROI for the American people, we urge NIH to consider the following principles in the development of any final policy:

• Maintain Rigorous Review: Enable researchers to publish in venues that maintain rigorous editorial and peer review standards, in line with the Office of Science and Technology Policy's Gold Standard Science tenets, including reproducibility, transparency, and unbiased review, as well as the permanence of the Version of Record (VoR), which is the only version that is guaranteed to be checked for accuracy, corrected, and curated by experts – making it the most reliable and citable source. Publishers maintain the VoR, apply corrections and retractions as needed, ensuring it remains stable, traceable, and authoritative over time.

• Enable a Multiplicity of Publication Models: Account for the fact that costs vary based on discipline, methodology, and the integrity-focused services required for certain research outputs.

• Allow Flexibility at the Grant Level: Avoid rigid per-article caps that could limit author choice or discourage adoption of best practices that involve additional operational investment.

• Beware of the "Ceiling into Floor" Effect: Consider that caps could inadvertently create a floor-effect, reducing competitive pricing in the market. Any policy that introduces an APC cap may inadvertently result in these APCs increasing. This was a key reason NIH and other agencies historically have avoided such measures.

• Account for Economic Change: Recognize that caps are static, while the economy is dynamic. Without indexing to relevant market indicators, such as inflation, a cap could lose value as industry costs rise, making it obsolete and unsustainable over time.

We appreciate the efforts by NIH and welcome the opportunity to work together to develop a policy solution that is representative of our collective efforts and one that the American people can be proud of.

**2. Available evidence related to publication costs and proposed options:**
We strongly caution against disallowing publication costs and a per publication cap as NIH awards routinely generate multiple publications of varying type, length, and complexity. For example, a 2022 study tracked 4451 grants that generated a total of 55,053 publications over two decades. When a single award can produce such a breadth of outputs, a fixed cap on allowable publishing costs could, in some cases, limit the dissemination of scientific discovery and further undermine U.S. global scientific leadership. In 2022, the United States was surpassed by China in its share of global scientific publications, with China's output increasing to 27 percent and the U.S. declining to 14 percent. Last year, China's AI research publication output matched the total combined output of the U.S., UK, and European Union and now commands more than 40% of global citation attention. At a moment when America's global position in scientific leadership is already under pressure, there is no room to risk constraining publication output without careful consideration to ensure policies strengthen, rather than weaken, U.S. research competitiveness.

The proposed limits to per publication costs in Options 2, 3, and 5 also fail to acknowledge that different journals incur a wide range of different costs in the delivery of the services they provide and fail to account for legitimate variation across disciplines. Just as a construction budget hinges on design, materials, and scope, NIH grants and publisher APCs likewise scale with the work and services required. A policy which prevents or unreasonably restricts the use of NIH funds to support publication expenses risks significantly undermining the progress made in the transition to public access, potentially driving renewed reliance on subscription-based models.

Too restrictive of an approach would also undermine the White House's Gold Standard Science efforts. For publishers and journals, sustainable investments in editorial oversight, digital infrastructure, and more are required to implement Gold Standard Science. Here are the ways in which publishers and journals already invest in and support the tenets of Gold Standard Science:

1. Reproducible: Editorial processes enforce standardized protocols, require comprehensive methodological documentation, validate statistical methods, and ensure appropriate controls before publication, helping to remove barriers that could limit replication and reproducibility.

2. Transparent: Publication workflows require detailed reporting of methods, data availability statements, conflict of interest disclosures, and adherence to standardized metadata formats, supporting public trust and interoperability.

3. Communicative of Error and Uncertainty: Peer review and editorial oversight ensure limitations, error margins, and uncertainties are clearly stated using standardized language and visualizations, preventing overstatement of results.

4. Collaborative and Interdisciplinary: Journals create platforms where research from multiple disciplines is integrated, and where reviewer pools ensure that complex, cross-sectoral challenges are addressed with the breadth they require.

5. Skeptical of its Findings and Assumptions: Rigorous, independent peer review processes and editorial standards actively challenge conclusions, require sensitivity analyses, and identify potential biases before research enters the public domain.

6. Structured for Falsifiability of Hypotheses: Editorial requirements for hypothesis clarity, measurable outcomes, pre-registration (where applicable), and transparent null result reporting enable meaningful empirical testing and rejection of unsupported claims.

7. Subject to Unbiased Peer Review: Reviewer selection protocols, double-blind review where appropriate, and conflict-of-interest safeguards ensure impartial, expert evaluation of all federally funded research before dissemination.

8. Accepting Negative Results as Positive Outcomes: Publication policies and dedicated sections for null results ensure valuable knowledge from negative findings is preserved and accessible, avoiding wasteful duplication of research efforts.

9. Without Conflicts of Interest: Mandatory disclosure and management of financial, institutional, or personal relationships help preserve objectivity, supported by independent editorial decision-making structures.

We encourage NIH to consider these activities as integral to maintaining a robust American research ecosystem. Moreover, partnerships with American scientific societies are central to this mission. These societies convene researchers, faculty, and students at universities, regional state schools, community college across the United States. They connect researchers with practitioners who rely on accurate and permanent literature in clinical and public-health settings, as well as with private industries that need trustworthy research to continuously innovate, create jobs, and keep the American economy in the global lead. Revenues from society publishing are reinvested in scholarships, mentoring, disciplinary and professional standards development, and early-career training that ensure that the nation's scientific workforce is equipped with cutting-edge information and discoveries. In this regard, publishing is a mechanism by which taxpayer investments are translated into lasting public benefit.

By NIH's own calculation, publishing accounts for less than 1% of overall grant spending. Wiley is not aware of NIH instituting comparable caps on other research inputs like centrifuges, microscopes,

freezers, sophisticated weighing systems, buffers and enzymes, or biological materials. Nor, to our knowledge, is NIH questioning the profit margins of the manufacturers of such inputs. Approaching publishing in isolation, rather than as an essential part of the entire research ecosystem, risks creating unintended consequences. If publishers, including journals, are forced to operate with insufficient resources, the infrastructure that ensures reliable research will erode. Over time, such erosion would threaten the very foundation of Gold Standard Science and diminish the trust that the public and policymakers rightfully expect to place in federally funded research.

**3. Peer review compensation:**
Peer review is a cornerstone of scholarly publishing, ensuring that the Version of Record reflects research of the highest quality and integrity. It serves as a critical safeguard for scientific validity, providing independent assessment of a manuscript's methodology, data interpretation, and overall contribution to the field. Through this process, errors can be identified, claims substantiated, and findings evaluated in the broader context of existing literature. Introducing direct payments for peer review would materially alter this system, increasing the costs associated with publishing, placing an additional financial burden on publishers, including American learned societies, that already invest heavily in the salaries of professional staff and technology infrastructure (e.g., tracking systems, database tools) required to administer peer review — including selecting and coordinating reviewers, following up on reports, and maintaining accurate records.

Publishers invest millions of dollars each year to sustain the peer review process. For example, the Public Library of Science (PLOS) is a nonprofit publisher founded in 2000 that advances open science through a portfolio of open-access journals, including PLOS ONE and PLOS Biology, spanning research across science, technology, and medicine. At PLOS alone, managing peer review has been estimated to cost roughly $2.4 million each year, a figure that covers only direct expenses and does not factor in management requirements or essential overhead such as office space, finance, and human resources. These investments include maintaining reviewer management systems, providing stipends for journal editors, and supporting professional staff who coordinate reviews. Peer review is therefore not cost-free, and adding direct reviewer payments would exacerbate these expenses, reducing the ability to deliver vital initiatives and shifting resources away from critical research activities. To provide additional, even starker perspective: a publisher that receives, say, 500,000 submissions per year, assigns two reviewers for each submission (not counting multiple rounds of revisions), and pays each reviewer $50 would somehow have to absorb $50,000,000 in costs have to absorb $50,000,000 in costs.

Paid peer review could also create perverse incentives that prioritize speed or volume over rigor, introduce conflicts of interest, open the door to peer review fabrication and manipulation at scale, and erode the perception of reviewer independence that underpins trust in the process. Surveys consistently show that the vast majority of reviewers are motivated by contributing to their field, improving the quality of scholarship, or receiving recognition. In a survey conducted by Publons, 40.8% of peer reviewers cite reviewing as "part of my job," 35.1% as "doing my fair share," and 32.9% as "ensuring research integrity," compared with only 28% who expressed interest in financial rewards. Introducing payments would risk undermining these intrinsic motivations and would add significant new costs for publishers. Moreover, these dynamics risk creating a system where community-run and society journals could face disproportionate challenges in attracting peer reviewers. While it may be worth cautiously testing new models, paying reviewers could create unintended consequences and divert resources from this essential work. Given the costs and responsibilities involved between the preprint stage and the

final, enduring record, we believe a measured, a lighter touch may be the most appropriate path for now.

We commend NIH for recognizing the central role of peer review in advancing the scientific enterprise and seeking to improve upon the existing system. In alignment with the principles outlined in the Office of Science and Technology Policy's Guidance on Implementing Gold Standard Science, rigorous peer review contributes directly to reproducibility, unbiased evaluation, and the long-term trustworthiness of the scientific record. It also supports the public interest by helping ensure that research supported by taxpayer funds meets the highest possible standards before it is disseminated. We welcome opportunities to collaborate with NIH and other stakeholders on exploring innovative approaches and data-driven pilot projects aimed at strengthening research integrity, enhancing transparency, and improving quality across the research publication ecosystem in the most efficient and cost-effective way.

**4. Publishing best practices:**
Safeguarding integrity requires technology and human judgment working together. On the technology side, modern platforms can verify funding declarations and license terms, check for textual overlap and image irregularities, and flag statistical anomalies at submission, often within minutes so editors can triage risk early. On the human side, editors and reviewers apply disciplinary context that automation cannot, especially in selective journals where high rejection rates mean resources are devoted to rigorously evaluating manuscripts. In 2025, Wiley is on track to process more than 1.25 million submissions, and our costs cover the rigorous evaluation of all articles, including those that do not become published. Each manuscript that enters our system requires significant human resources, often 15 to 30 or more touchpoints involving in-house PhD-level editors, peer reviewers, and subject-matter experts.

These processes prevent errors before publication, limit downstream correction, and support reproducibility. They also ensure that negative or null results are preserved when appropriate to reduce duplication and blind spots and improve the efficiency of future research. For patients and families, these practices provide a permanent, citable record clinicians and advocates can trust. For educators and students, they ensure methods and data are described with enough clarity to be taught, replicated, and built upon in classrooms and laboratories across institutions with different resource levels. For policymakers and industry, they provide assurance that the record used to make decisions that affect health, safety, and the economy is accurate and stable.

In the last 12 months alone, we have invested $12M in the development of the submission, screening, and peer review components of our Research Exchange platform, mobilizing over 450 colleagues, many of whom are here in the US. Ongoing investment in these tools enables us to identify potential ethical or reproducibility concerns early in the editorial process by detecting text similarity, identifying irregularities or manipulations in images, and flagging statistical inconsistencies. Such capabilities are essential in the current environment, where generative AI can rapidly generate large volumes of content that may appear credible but contain inaccuracies, fabricated data, or misattributed sources. That's why we invested in initiatives like the STM Integrity Hub, which leverages shared data, best practices, and technological innovation across publishers to detect fraudulent "paper-mill" activity that seeks to exploit the scholarly publishing process.

To date, Wiley has 25 integrity tools fully integrated in our proprietary electronic publishing platform. Of these, 23 were developed exclusively by us. These systems are complemented by human review to ensure that any corrective or preventive actions are taken with precision and fairness. As technology continues to evolve with unprecedented speed, the level of investment required to safeguard research integrity will only intensify in the years ahead. At the same time, the publishing landscape is rapidly evolving toward AI integration, requiring publishers, funders, and institutions to collaborate on clear guidelines, standards, and guardrails for responsible AI use across scholarly disciplines. Meeting this future will demand increased investment in both technology, infrastructure, and human expertise, ensuring that AI's potential to improve peer review, research discovery, and knowledge synthesis is balanced against the need to maintain research integrity, editorial independence, and public trust. Wiley is deeply engaged in shared industry initiatives that not only enhance efficiency but also generate a multiplier effect, delivering outcomes that amplify the collective impact of investment and collaboration across the research ecosystem. We stand ready to work with the NIH and the broader U.S. Government to explore opportunities for further public-private cooperation.

**5. Other Comments:**

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**Description:** Wiley Response to NIH Request for Information on Maximizing Research Funds

# 882. EMBO

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Bernd Pulverer

**Name of Organization:** EMBO

**Type of Organization:** Non-profit Research Organization

**Role:** Other

**Role – Other:** Head of Scientific Publications

**1. Proposed policy options:**
EMBO (https://www.embo.org) is a major non-profit intergovernmental scientific organization with a global membership and reach. Currently, EMBO has 195 elected associate members from the biosciences community in the USA. EMBO supports all the bioscience- and biomedical research topics which are also funded by the NIH. EMBO also owns and publishes four high quality scientific journals serving the life sciences, The EMBO Journal, EMBO reports, EMBO Molecular Medicine and Molecular Systems Biology (https://www.embopress.org). A fifth journal, Life Science Alliance, is co-owned and co-published with two USA based non-profit research organizations, The Rockefeller University Press and Cold Spring Harbor Laboratory Press. 237 research papers by USA based scientists listed as corresponding authors, many of them NIH funded, were published in these journals in 2024. All of these journals are fully Open Access and fulfil the NIH Public Access Policy. Journal costs are solely covered by article processing charges (APCs) that range from $3,975 (Life Science Alliance) to $7,990 for the other four. EMBO press charges are stratified down from this maximum (applicable to USA researchers) in 5 charge bands according to GDP and research funding criteria. Moreover, any author unable to pay these charges receives a partial or full waiver, so that effectively not a single author is excluded from publishing in an EMBO Press journal based on financial considerations.

EMBO also runs a free peer review service, Review Commons (https://www.reviewcommons.org), a major open science initiative and we have been strong proponents of preprint posting in the biosciences. EMBO Press journals require source data posting with all research papers and provide a free platform and curation pipeline to this end. Beyond a highly respected selection and peer review process, the journals also offer a best-in-class screening process for research integrity. The costs at EMBO Press are published annually to allow transparent assessment of the value of the journals to the research enterprise (see https://www.embo.org/features/the-cost-of-scientific-publishing/ ).

EMBO has been a vocal proponent of Open Access and beyond that Open Science. As a non-profit research organization, EMBO shares the NIH's concern about excessive profit margins at some for-profit publishers and in particular the emergent market dominance of others, which are substantially driven by distorted research assessment systems. We welcome this consultation on publication charges and financial models as some of these developments are inconsistent with an optimally efficient research enterprise.

However, great care should be taken to protect and indeed to support services which add substantially to the scientific process, while curtailing those which do not add value. We do not believe this is achieved by applying charge caps based on the calculation of average existing charges paid by NIH fundees. This could be seen as analogous to applying charge caps to infrastructure or other research expenses – such costs should certainly be justified, but application of a charge cap would not be consistent with supporting world leading research. It should be of no surprise that some the highest quality and value-added publishing services are also among the more expensive ones, even if the journals are not-for-profit, as the case for EMBO Press. Indeed, none of the five proposed options would cover either the charges or the costs of any of the EMBO owned journals. We are concerned that NIH funded authors would either be forced to access funds out of their research budgets or other financial resources in order to publish in the EMBO scientific publications, or to face being excluded from these journals. To meet the proposed charge caps, would mean EMBO Press would have to lower its quality standards to a level that is not aligned with the EMBO core value of excellence, which is a value shared by the NIH since its foundation.

Of the options provided, Option 4 is the only one which would potentially allow NIH supported scientists to remain aligned with EMBO Press journal open access publication model. However, in its current form, the proposed limits of Option 4 will effectively encourage researchers to publish in lower-quality journal which charge less, and which therefore are unable to provide selection, quality control, curation, content enrichment and visibility which NIH reseachers rightly demand for their best research findings.

It will also be important to ensure the proposal would not prevent researchers from complying effectively with the NIH Public Access Policy as well as the White House Office of Science and Technology Policy (OSTP) Open Science policy directive.

As an alternative to the current options, EMBO would propose that the NIH define a formally auditable list of criteria that it expects journals to meet in order to allow unlimited funds for publication. The evidence for these criteria would have to be provided by each journal with numerical evidence. We suggest that list may include not only open access, but also open science criteria such as the provision of raw or source data to all figures in a research paper and detailed methods/protocols as well as curation and quality control services to screen for data mirepresentation and other research integrity issues in order to enhance the reproducibility of the literature. This should include FAIR data standards and all atributes outlined in the excellent NIH Public Access Policy, which EMBO press fully supports.

This would allow selection of those journals which demonstrably add value to the scientific process, and therefore increase the return on investment for the US taxpayed by rendering the research they invested in maximally accessible, discoverable and reproducible).

Option 1: Disallow all publication costs.

This option would discourage or diallow publication most highly slelective, high quality Open Access journals beyond those supported by so called ‘diamond OA’ or ‘Subscribe-to-Open’ model, which are very few in the absence of clear financial support for either of these model. Alternatively, it would drive authors back to subcription based journals, although most would not currently comply with the NIH Public Access policy of immediate OA posting on publication. Another option might be to only post preprints, which would remove all peer review, quality control and content curation/enrichement provided by scientific journals. In the biosciences, the effect would be to reduce the reliability of

scientific dissemination. Question 3 below suggests the NIH value peer review and we agree with this assessment.

EMBO Press journals would not be covered by this option.

Option 2: Set a limit on allowable costs per publication.

As outined above, we do not believe charge caps based on the calculation of average existing charges paid by NIH fundees are a constructive mechanism for supporting high quality biomedical research. It should be of no surprise that some the highest quality and value-added publishing services are also among the more expensive ones, even if the journals are not-for-profit, as the case for EMBO Press. Indeed, none of the four proposed options would cover either the charges or the costs of any of the EMBO owned journals. We are concerned that NIH funded authors would either be forced to access funds out of their research budgets or other financial resources in order to publish in the quality publications which demonstrably add value to the scientific process, or to face being excluded from these journals.

To meet the proposed charge cap of $2000, would mean EMBO Press would have to lower its quality standards to a level that is not aligned with the EMBO core value of excellence, which is a value shared by the NIH since its foundation. This is not feasible and at this charge level only journals with acceptance rates above 40% or those which add very limited editorial, curation or quality controls steps would be eligible. This would further favour commercial publishers which can lower charges strategically and based on scalability. At this level of charge free preprint posting might represent better value.

Option 3: Set a limit on allowable costs per publication and allow a higher amount to be paid when peer reviewers are compensated.

We applaud the focus on referee support. Also see answers above and below. For EMBO Press journals, which are not-for-profit and run at cost, this compensation would simply add $900 to the current APC charges. See below for alternatives to compensates referees efectively.

Option 4: Set a limit on the total amount of an award that can be spent on publication costs

These options would provide authors with more flexibility than a limit on individual per-publication costs and are in principle more preferable, though may mean that researchers coming towards the end of a grant are disadvantaged as they will already have spent their funds and will be unable to publish their outputs in their journals of choice. This could benefit journals publishing more preliminary work than those requiring a comprehensive, fully developed, research project as it will complete earlier in the funding cycle. The cap of $6000 in Option 5 is insufficient for highly-selective journals that evaluate many more manuscripts than they publish and which incorporate more thorough quality control and curation services. These cannot recoup their costs without a higher APC for the articles that are accepted for publication, such as those published by EMBO (https://www.embo.org/features/the-cost-of-scientific-publishing/).

Option 5: Set a limit on both the per publication cost and the total amount of an award that can be spent on publications.

This is a variation of Option 4 and the same comments apply, although it provides less flexibility than option 4 and is therefore less constructive in our view.

**2. Available evidence related to publication costs and proposed options:**
Please review EMBO press annual Open Access publishing financial breakdown: see https://www.embo.org/features/the-cost-of-scientific-publishing/. 2024 number will be released shortly.

Please also consider relevant discussion on the topic of supporting effective open access and open science serives which optimally support the community:

Pulverer B. EMBO rep (2023) 24: e57638; https://doi.org/10.15252/embr.202357638

Pulverer B. EMBO Rep (2024) 25: 927 – 929 https://doi.org/10.1038/s44319-024-00105-w

**3. Peer review compensation:**
The proposed payment of referees to $300 is an interesting, but largely token, gesture to valorize the crucial process of peer review. Note that payment of hourly rates would require a far higher payment as biosciences peer review take in excess of 5 hours/referee report. Importantly, even $300 would add to the current costs of publishing. For EMBO Press journals this compensation would add $900 to the current APC charges.

Instead, EMBO Press strongly supports the notion that peer review is a formal part of the scientififc process. As such, it should be included in the academic work of NIH funded researchers as part of their salaried work. However, this requires that peer review is valrized by including it effectively in research asssessment.

The Coalition for Advancing Research Assessment (CoARA) – of which there are 754 member organizations worldwide – have consulted across stakeholder groups and produced recommendations on recognizing and rewarding peer review to address this important goal: https://zenodo.org/records/15968446. We belive this is a forward looking solution to the important question of peer review quality and compensation for referees.

**4. Publishing best practices:**
As outlined above, we advocate the enhance the traditional publication of narrative driven research papers with open science proactices. This includes the obligatory sharing of structured, curated data underlying the figures and thus the claims made.

It also includes the deposition of structure methods sections and protocols. Bith aspects are essential for sharing reproducible science and require hand on selection, quality control and curation steps which are in addition to classical peer review. EMBO press, for example, is developing source data deposition platforms, source data quality control screening tools and data-directed peer review mechanisms. All these crucial developments will add costs to the process.

Any reduction in publication charges will serve to discourage such developments. In our view there are few other entities developing effective alternatives as quality journals harbour extensive expertise that aid in the development of these future tool and policies. The extra costs would be generted mannifold if 1) the reproducibility and integrity of the scientific record were to be even slightly elevated; 2) if publication in ‘low value added’ journals would be curtailed (the charges may appear low, but the vlumes are vast).

**5. Other Comments:**

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# 883. Galter Health Sciences Library and Learning Center, Northwestern University Feinberg School of Medicine

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Kristi Holmes

**Name of Organization:** Galter Health Sciences Library and Learning Center, Northwestern University Feinberg School of Medicine

**Type of Organization:** Academic Institution

**Role:** Institutional Information Sciences Professional/Librarian

**1. Proposed policy options:**

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/Galter-Library-Response-to-NIH-RFI-On-Allowable-Publication.pdf

**Description:** Galter Library Response to NIH Request for Information: Maximizing Research Funds by Limiting Allowable Publishing Costs

## 884. Marian L Neuhouser

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Marian L Neuhouser

**Name of Organization:** Fred Hutchinson Cancer Center

**Type of Organization:** Non-profit Research Organization

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Please continue to allow publications costs as part of NIH grant budgets. We are required to be good stewards and to publish findings from the work, but publications are not free. We cannot publish without some costs being allowed.

**2. Available evidence related to publication costs and proposed options:**
It would be OK to allow a total dollar amount limit per award but the papers will not be published and thus accessible to the public if we do not have funds for publications.

**3. Peer review compensation:**
Peer reviewers should not be compensated

**4. Publishing best practices:**
Fraud detection and duplicate submission software is actually very helpful and important to maintain the rigor of publications

**5. Other Comments:**
Fraud detection and duplicate submission software is actually very helpful and important to maintain the rigor of publications

## 885. The University of Texas at Austin

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Mark Featherston

**Name of Organization:** The University of Texas at Austin

**Type of Organization:** Academic Institution

**Role:** Organizational Official

**1. Proposed policy options:**
Please see attached letter

**2. Available evidence related to publication costs and proposed options:**
Please see attached letter

**3. Peer review compensation:**
Please see attached letter

**4. Publishing best practices:**
Please see attached letter

**5. Other Comments:**
Please see attached letter

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/UT-Austin-Response-Letter-NIH-RFI-NOT-OD-25-138_Submitted-2025.09.15.pdf

**Description:** UT Austin Response to NIH RFI on Maximizing Research Funds by Limiting Allowable Publishing Costs

# 886. The University of Chicago

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Erin J. Adams

**Name of Organization:** The University of Chicago

**Type of Organization:** Academic Institution

**Role:** Organizational Official

**1. Proposed policy options:**

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/UChicago_SPARC_NIH_Letter_2025_EJA75.pdf

# 887. University of California system

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Agnes

**Name of Organization:** University of California system

**Type of Organization:** Academic Institution

**Role:** Organizational Official

**1. Proposed policy options:**
UC appreciates NIH's effort to lay out multiple approaches to curbing high publication costs. However, we are concerned that caps on publication costs will unintentionally narrow author choice in where to publish and shift unreimbursed costs onto researchers without meaningfully exerting downward pressure on prices.

Rather than imposing caps on or prohibiting publication costs, NIH could negotiate with publishers to curb prices while preserving author choice. Recognizing that individual authors lack leverage to negotiate publication costs manuscript by manuscript, NIH, working with other federal funders, could negotiate and publicly post Article Processing Charge (APC) price lists with caps on annual increases for federally funded authors. With these schedules in place, NIH could either (a) pay the pre negotiated APCs directly to publishers or (b) instruct grantees to budget those amounts as allowable direct costs. Both pathways simplify payments, reduce administrative burden, and create predictable, transparent pricing that is likely to yield savings and prevent cost shifting to researchers. This approach also avoids the pitfall of setting an APC cap without negotiation, which could inadvertently raise the floor of APCs by incentivizing publishers who currently charge below the cap to increase their fees up to the maximum allowed by NIH.

**2. Available evidence related to publication costs and proposed options:**
As a system, UC has worked extensively through publisher negotiations to both control costs and expand open access. In 2024, UC's open access agreements with publishers generated a cost avoidance of $6.6 million for the university and its authors, compared to what we would have paid under traditional subscription-based agreements. Our experience shows that transparency in pricing and clear financial guardrails that protect authors and publishers can help bend the publishing cost curve while ensuring broad and open dissemination of research outputs. We encourage NIH to consider federal-level negotiations and cross-agency coordination as essential tools in this effort.

**3. Peer review compensation:**
UC shares NIH's interest in improving the quality, transparency, and timeliness of peer review. However, linking higher allowable costs to direct reviewer compensation (Option 3) presents risks that merit careful consideration of strategies to mitigate those risks. Paying reviewers, while appealing in principle, could distort incentives by encouraging acceptance of out of scope assignments, add administrative complexity, and divert limited research funds without clear evidence of quality gains. If NIH wishes to

pilot this approach, we recommend doing so narrowly with strong safeguards, including transparent review policies; conflict of interest and expertise matching requirements; and rigorous evaluation of outcomes, before considering broader adoption or embedding compensation as a general justification for higher allowable charges.

**4. Publishing best practices:**

**5. Other Comments:**

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/UC-Comments-on-NIH-Publishing-Costs_9.15.25.pdf

# 888. AAAS/Science

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Meagan G Phelan

**Name of Organization:** AAAS/Science

**Type of Organization:** Scholarly Publisher/Journal

**Role:** Organizational Official

**1. Proposed policy options:**
This is a short response to immediately and directly respond to this question. Please see our fuller letter, attached, for full context.

AAAS commends the NIH for considering the consequences that utilizing journals with high APCs may have. Of the options it presented in its Request for Information, and if forced to choose, we would select option 4 as the best short-term strategy for the way it balances concerns about cost, which we share, with flexibility to choose a journal the author deems best (ideally one focused on quality). In the long term, however, AAAS encourages NIH to work actively with publishers to incentivize exploration of non-APC-based approaches to making peer-reviewed work publicly available – or to revisit existing ones, like green open access – all the while prioritizing quality-focused outputs that bolster Gold Standard Science. AAAS recommends that the NIH APC policy supports American publishers, when aligned with quality and cost goals, to help ensure that publishers informed by American standards of scientific excellence continue to be arbiters of quality in the global landscape.

**2. Available evidence related to publication costs and proposed options:**
AAAS publishes the Science family of journals, which are open to the public without embargo using green open access models for five of our journals and a gold open access model for one. This means that for most of the journals, authors do not pay to make a peer-reviewed version of their paper freely available; they can freely deposit it in a public repository. AAAS has supported green open access for more than two decades.

At AAAS, our decades-long experience as a U.S.-based non-profit publisher continues to reveal the impact that rigorous scientific peer review, critical quality checks, and thoughtful dissemination of findings hold – for authors and for the public. Thorough review conducted by professional editors in collaboration with deeply committed peer reviewers helps authors improve their work, which maximizes its long-term impact. It requires data as a condition of publication, which supports replication and guards against publication of studies for which the findings cannot be reproduced. The intentional communication of new work to the public by publishers committed to accuracy emboldens researchers to articulate limitations, which builds trust. Visibility enabled by publishers with strong ties to their disciplinary communities helps research be seen by prospective scientific collaborators who can spur innovation and enhance the taxpayer return. Publishers committed to quality in these efforts are an integral part of the process by which Gold Standard Science is achieved – and by which taxpayer's original investments are multiplied.

Not all publishers are created equal. Fortunately, many publishers – including here in the United States, and especially non-profit society publishers – are committed to rigor and quality. However, expanding public access requirements in recent decades also have sparked a business model shift resulting in some publishers now being focused on quantity of content rather than its underlying quality. Indeed, in models that charge lower APCs, quantity of articles is particularly critical for sustaining revenue. Every article is a unit of revenue with the attendant incentives.

A focus on quantity in scientific publishing has created problems that are becoming increasingly high-profile. For example, it has emboldened predatory publishers who cut corners in quality checks, often unbeknownst to authors. (In some cases where editors have been asked to adopt a quantity-first approach – accepting more and lower quality papers than they normally would – editors have resigned from their posts in protest or been fired if they wouldn't comply.) The focus on quantity in scientific publishing also has enabled researchers who seek to have a publication online quickly, at the expense of rigor, to publish in so-called "papermill" rings. And as more papers are published via papermills and predatory publishers, the peer review system – a cornerstone of integrity in publishing – has been further strained.

We should not sacrifice quality or trust in the pursuit of public access. As such, it is crucial to sustain and improve the approaches that have served the scientific enterprise and the public for decades, while rooting out the undiluted focus on volume, which is at odds with Gold Standard Science.

One approach for achieving this is to openly recognize publishers committed to principles like rigorous peer review, technical checks, and post-publication accountability. Publishers committed to quality are a crucial component of the scientific ecosystem. Their costs are growing with time as they perform peer review and evaluate features of papers that signal a study's underlying rigor. All Science journal papers, for example, include details about the source of funding, author contributions, competing interests, and availability of data and materials. Technical checks for such elements require time and follow-up by the publisher. And they are done in addition to Science journals' thorough peer review, which helps strengthen research, transforming it  to be richer in functional insight and more accessible, among other useful outcomes.

As a criterion to publish, AAAS requires authors in each of our journals to make their data publicly accessible. Science's leadership in open data – a cornerstone of replication – has recently created new costs too, including related to ensuring all data needed to replicate a given study is available in a useable form in perpetuity. What's more, in Science's experience, authors depositing data tend to be familiar with field-specific data repositories. Where these don't exist, data deposition is harder. AAAS has initiated a partnership with Dryad, a general data repository, to ensure data the scientific community requires to verify, replicate, and reanalyze new research is openly available, no matter the discipline. This partnership is another example of the costs associated with high-quality journal publishing and a distinguishing feature of a publisher's commitment to quality and reproducibility.

AAAS, as a publisher, also is committed to oversight of the final version of a study (the version of record), which we believe is essential not only to maintain the quality and accuracy of scientific research but also to advance subsequent work. Only the final version of a manuscript overseen by a publisher committed to maintaining the accuracy of the scientific record can be counted on to be corrected, retracted, or otherwise updated with clear notation for the global scientific research community. This, too, takes investment in resources over decades.

Science is further committed to holding authors accountable to communicating to the public about mistakes or even fraud, where they are relevant. As our Editor-in-Chief said recently in a sentiment reposted on the White House website, “it is possible to support science and hold it accountable at the same time.”

The Science journals’ approach to publishing further invests in communicating peer-reviewed science to reporters, leading to news stories on the peer-reviewed version of a study from myriad media outlets – itself a form of public access. We also are committed to answering concerns the public raises about the scientific process, engaging our authors in such efforts.

Of course, scientific progress depends not just on individual publications by individual publishers, but on the accumulation of evidence from multiple sources committed to quality. NIH’s role in elevating publishers committed to rigorous peer review and thoughtful dissemination could aid scientific progress.

**3. Peer review compensation:**
We agree with the comments provided in response to this RFI by STM (the International Association of Scientific, Technical, and Medical Publishers), as follows. “Whether or not compensation for peer reviewers is a good idea is a topic that has been debated widely, including the question of what level of compensation is appropriate. At the same time, peer reviewers generally report being satisfied with the current system and highlight the intangible benefits of peer review in longitudinal studies. This system of collegial service and academic responsibility would undoubtedly be changed in unpredictable ways by paying reviewers.

The bureaucratic and administrative burden of setting pay rates, implementing payments, and oversight by funded researchers, their institutions, and NIH itself would be significant. The appropriate level of compensation might be different for a given field, researcher, or community. It is unclear how individual researchers would be able to confirm that a given publisher is paying reviewers appropriately, or how NIH would audit publishers to ensure appropriate payment, or even if NIH has statutory authority to do so. The burdens could especially impact smaller, US society, publishers and therefore exacerbate publishing inequities for smaller publishers and less-resourced researchers alike.

In addition to the potential costs of direct payments to peer reviewers, other direct and identifiable investments that publishers make to support researchers and enhance the scholarly record could also be considered as inputs that add to the costs of publishing. These payments that publishers make to researchers, vendors, and staff, as well as payments made by other suppliers of services and equipment to NIH funded researchers, are no less important to the research enterprise. However, NIH has not historically audited the input costs of any service or product provider to NIH researchers, and the statutory authority to interfere in the marketplace is unclear. STM urges caution to NIH in going down the path of potentially auditing such suppliers or requiring researchers to do so.”

**4. Publishing best practices:**
Additional factors NIH should consider in determining the allowability of a higher per publication cost relate to how publishers operate in the following areas:

- Pre-publication quality checks, including as related to reference relevance, conflict of interest for authors, image integrity, and dataset availability for data needed to replicate a given work.

- Handling of special issues (or guest-edited collections), increasingly seen as a tactic of predatory journals. Recently, the Committee on Publication Ethics – the non-profit organization that promotes integrity in scholarly publishing – put forward new guidance for handling of special issues, in recognition of the potential for unethical behaviors, such as citation cartels, inappropriate commissioning practices, and peer review fraud, as part of special issue production.

- Communication of new work to the media and the public, including where public interest and concern are strongest (an example of a recent related effort done by the Science Press Package team at AAAS is outlined here, "When "Opposite" Scientific Findings Collide").

- Updates to papers post-publication, including Editorial Expressions of Concern, Corrections, and Retractions.

- Transparency to the public about research integrity-related changes to papers (some publishers are working to support authors in talking about such updates with the press and the public. See "Breaking the silence," a February 2025 Science Editorial.)

**5. Other Comments:**
Additional factors NIH should consider in determining the allowability of a higher per publication cost relate to how publishers operate in the following areas:

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**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/AAAS-Response-to-NIH-RFI_Allowable-Publishing-Costs_2025.pdf

**Description:** AAAS Response to RFI on the NIH Plan to Maximize Research Funds by Limiting Allowable Publishing Costs

## 889. N/A

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of an organization

**Name:**

**Name of Organization:**

**Type of Organization:** Scholarly Publisher/Journal

**Role:** Organizational Official

**1. Proposed policy options:**
Of the proposed solutions, "Option 5: Set a limit on both the per publication cost and the total amount of an award that can be spent on publications" provides the most flexibility. This option provides researchers with the greatest flexibility while maintaining a desired federal cap on article processing charges (APCs). Under this option, authors would have the flexibility to submit their articles to the most appropriate journal, whether that journal has a greater reputation or a hybrid open access (OA) policy. Journals with greater prestige or a hybrid policy tend to have higher APCs, and so authors would have greater control over the number of publications resulting from a specific research grant as well as the target audience for their findings.

Another option would be revert to optional publication in an open access or closed access journal, with 12-month embargo for articles deposited into PubMedCentral (unless made publicly available upon publication). For those who choose to publish in a closed access journal, the mandate should be that they provide an open access companion piece that translates and distills the science into practical application. While science and data should still reside with the journal, which the companion piece should reference in its opening pages and reference section, the companion piece would be written in an accessible way so the layperson can utilize it. If publishers want to publish these articles in conjunction with the science, the companion pieces would have to be published as open access pieces under the limits proposed by NIH.

**2. Available evidence related to publication costs and proposed options:**
The allowable direct cost of $2000 is well below reasonable costs for the average US journal and should be raised to between $3,000 and $3,500 per article.

The first analysis that NIH used to determine the average APC ("$2,176.84") comes from a biased source. This amount is based on data from the Directory of Open Access Journals (DOAJ), which primarily contains foreign (non-US) journals and is limited to self-reporting by journals that choose to subscribe to DOAJ. The link that was provided in the NIH memo directs the user to a search definition for 3,328 journals, all published by commercial publishers (https://doaj.org/search/journals?source=%7B%22query%22%3A%7B%22bool%22%3A%7B%22must%22%3A%5B%7B%22terms%22%3A%7B%22bibjson.publisher.name.exact%22%3A%5B%22Elsevier%22%2C%22Wiley%22%2C%22MDPI%20AG%22%2C%22BMC%22%2C%22Taylor%20%26%20Francis%20Group%22%2C%22Wolters%20Kluwer%20Medknow%20Publications%22%2C%22Frontiers%20Media%20S.A.%22%2C%22SAGE%20Publishing%22%2C%22SpringerOpen%22%2C%22Oxford%20University%20Press%22%2C%22Nature%20Portfolio%22%2C%22Springer%22%5D%7D%7D%5D%7D%7D%2C%22size%22%3A

%22200%22%2C%22sort%22%3A%5B%7B%22created_date%22%3A%7B%22order%22%3A%22desc%22%7D%7D%5D%2C%22track_total_hits%22%3Atrue%7D). Moreover, this exact amount was also reported in an article appearing in MDPI, which calls into question the reliability of the NIH analysis.

The second NIH analysis is probably closer to the actual industry average within the United States because it comes from actual moneys requested. The average APC found there was an average of "$3,225.92 to $3,647.47" with an NIH estimated average cost requested per publication between "$2,565.07 to $3,104.06." Thus, "the average requested in budgets (approximately $2,600.00-3,100.00)" would seem more appropriate to use when determine a fair allowable cost for US-based researchers.

However, even the second analysis is somewhat incomplete. To reach a better understanding of the average APCs for a US-based journal would require research into the average publishing costs of journals per article.

As an example, we performed our own brief analysis using data from the major publisher Elsevier, with an online listing of more than 3000 journals and which was included in your initial analysis. The average APC per journal was $3151. This listing included subsidized journals (n=5; mean APC=$923), OA only journals (n=880; mean APC=$2253), and hybrid journals (mix of subscription and OA; n=1851; mean APC=$3639). Nearly two thirds of journals (1851/2783 or 66.5%) were hybrid, indicating that authors face much larger average APCs ($3639) when submitting to these journals.

*Source: Elsevier article publishing charge price list. Available at: https://legacyfileshare.elsevier.com/promis_misc/article-publishing-charge.pdf. Accessed August 6, 2025.

**Note: A total of 219 journals were excluded from this analysis because no prices were listed. The stated reasons for no price listing were "(a) The article publishing charge is waived for a new open access journal, OR (b) The article publishing charge is sponsored by third party, OR (c) Journal owner invoices authors directly."

This analysis comes from readily available data from a major publisher and is therefore limited. These findings do not reflect the costs faced by small independent publishers such as associations and other non-profit entities, who may only publish a single or a few small journals. In addition, this was an analysis of data from a single publisher. Other publishers may have different APCs. For example. Wiley shows an average APC of $2137 for OA-only journals (n=567 journals) and $3782 for hybrid journals (n=1279 journals).

**3. Peer review compensation:**

Peer reviewers should not be compensated. Doing so would raise publisher expenses and further increase the amount charged for open access and/or subscriptions. Peer review is conducted as a service component and is used to support tenure and promotion requests. Further, research teams that submit articles for consideration should be prepared to serve as peer reviewers for that journal. If their article goes through peer review, they are asking that 3 individuals volunteer their time to review and comment on their paper; they research team should be prepared to provide the same to other authors.

**4. Publishing best practices:**

When considering the potential allowability for APCs, NIH should also consider that many journals do not adhere to an OA-only model. Indeed, the majority follow a hybrid model, for which the cost to

publish an article is higher. If the industry continues to move toward an OA model in general, we can expect the APCs to increase because smaller, independent journals are going to see higher per-article costs than those of larger publishers.

In addition, journals are currently determining best practices for the use of AI and the associated costs of identifying AI-generated material. AI detection tools for fraud and plagiarism will likely be services with costs that publishers absorb. In addition, publishers will need to invest in processes to ensure data integrity, image integrity, and resource integrity. As AI advances, the costs to detect and ensure quality, evidence-based science are likely to rise in tandem.

**5. Other Comments:**

When considering the potential allowability for APCs, NIH should also consider that many journals do not adhere to an OA-only model. Indeed, the majority follow a hybrid model, for which the cost to publish an article is higher. If the industry continues to move toward an OA model in general, we can expect the APCs to increase because smaller, independent journals are going to see higher per-article costs than those of larger publishers.

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## 890. Gerontological Society of America

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Thomas Miles

**Name of Organization:** Gerontological Society of America

**Type of Organization:** Non-profit Research Organization

**Role:** Other

**Role – Other:** Director of Policy

**1. Proposed policy options:**

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

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**Description:** Comment letter

## 891. Alicia D'Souza

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Alicia D'Souza

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I vote for Option 1. No costs for publishing journals. This is highway robbery of tax payer dollars. Also pre-printing should be mandatory for taxpayer funded work and the NIH should take steps to ensure open access of datasets generated using taxpayer dollers

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**
Dataset open access!

**5. Other Comments:**
Dataset open access!

# 892. OpenSci.Foundation, Plan P

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Gunther Eysenbach

**Name of Organization:** OpenSci.Foundation, Plan P

**Type of Organization:** Non-profit Research Organization

**Role:** Organizational Official

**1. Proposed policy options:**
We propose Plan P as an option that best achieves the goal of balancing flexibility in providing research results with maximizing the use of taxpayer funds to support research.

The OpenSci Foundation (OpenSci.foundation) is an independent, not-for-profit organization established to reengineer scholarly communication. Our mission is to fund and steward open infrastructure, tools, and initiatives that empower researchers, communities, and institutions to shape a more equitable, efficient, and transparent knowledge ecosystem.

Plan P (https://planp.science) was originally suggested by a full open access publisher, JMIR Publications (https://zenodo.org/records/5786370) but is now a cross-publisher strategic initiative supported and administered by the OpenSci Foundation, established to re-engineer the infrastructure of scholarly publishing for greater openness, efficiency, and public value.

Plan P oversees the development of the OpenSci Ecosystem; a modular suite of open tools and services designed to make publishing faster, fairer, and more transparent. This includes coordinated oversight of its governance, funding, and membership programs, helping to ensure that community values, sustainability, and innovation remain central to how science is communicated.

The OpenSci Ecosystem includes services for open peer review, identity verification, research curation, and dynamic publishing - all aligned with Plan P's core mission of a progressive, pragmatic and pluralistic re-engineering of scholarly communication.

Plan P will be governed and sustained by an alliance of researchers, funders, institutions, and publishers who believe the future of scholarly publishing should be open by design and equitable by default. Uniquely, Plan P is not designed to destroy or uproot the current journal ecosystem but to achieve a system where preprints are first peer-reviewed and then curated in existing journals of participating publishers who agree to fair publication costs of no more than US$ 3000 per publication, of which libraries should also contribute a fair share because it is also the institution that benefits from publishing activities through an increase in reputation.

We invite NIH to do a pilot where NIH pays annual membership to Plan P - either a single NIH membership or per grant(ee); all grantees onboard via OpenSci ID.

Implementation Path

2026 Launch: NIH pays annual membership to Plan P - either a single NIH membership or per grant(ee); all grantees onboard via OpenSci ID.

Requirement: All NIH-funded research must be posted as preprints on PubMed Central from where it will be ingested into The Ark, where it will be openly reviewed by verified experts in the relevant research community.

Review obligation: Each grant-supported researcher completes at least two reviews annually or accumulates enough karma points through other activities such as editing to allow for their preprints to be peer-reviewed by peers.

Journal publication: Initially cap to $3000 per article, restricted to participating full OA DOAJ journals. As publisher uptake in The Ark increases, limit to journals listed in the OpenSci Exchange, increase cap in line with inflation. 25% redistributed to reviewer communities for reviewer incentives.

Evaluation: NIH tracks costs, time-to-dissemination, number/quality of reviews, reviewer compensation, and integrity outcomes.

The OpenSci Ecosystem

The Ark is the flagship platform of the OpenSci Ecosystem (built by technology from CERN), providing a home for communities to review, rate, and endorse preprints collated from a variety of preprint servers. Authors can submit their work directly to The Ark, via publisher submission systems, or request review of preprints already posted on other servers. Communities decide whether to take on reviews, with members contributing structured, open peer reviews that include ratings of significance, strength of evidence, and readability. Reviews and recommendations inform curators, who may endorse the work on behalf of the community. Every step is recorded in a transparent timeline, making peer review history open and portable. Partner journals can integrate with The Ark, ensuring reviews are visible, reusable, and directly linked to publication pathways.

OpenSci ID is a trusted, verified, and persistent digital ID for researchers and contributors to open science. It connects a verified identity and profile with a researcher’s contributions and reputation across platforms, preprints, peer reviews, and publications. By adding secure third-party identity verification to ORCID login, opensci.id assures publishers and peers of a contributor’s verified identity and credibility. Each verified researcher receives a permanent profile page to showcase their work, increasing visibility and trust. OpenSci.ID is free for Ark contributors, and required for roles such as Community Moderators and Curators, and to enter the OpenSci Exchange.

OpenSci Exchange is the manuscript marketplace platform of Plan P, connecting authors of reviewed and endorsed preprints with journal editors. Authors can choose to enter an open feed or create a cascade of preferred journals, while editors filter preprints based on community reviews, endorsements, and ratings. AI-powered matching supports efficient discovery, helping editors identify high-quality submissions aligned with their journal scope. Journals participate through membership and may negotiate publication fees, with a share returned to Ark Communities via the Community Payback Scheme, and to Plan P to support the development and maintenance of the OpenSci Ecosystem. OpenSci Exchange ensures transparent, community-driven preprint assessment flows seamlessly into formal publishing pathways.

OpenSci Reviewer is an AI-powered peer review assistant designed to strengthen community-driven scholarly evaluation within Plan P's Publish/Review/Curate (PRC) model. It generates clearly labeled AI reviews of preprints to prompt human engagement, provides tailored and contextualized review prompts, and synthesizes reviewer input into concise summaries to support curator decisions. By initiating structured assessment and aggregating perspectives, opensci.reviewer helps researchers receive early feedback, makes peer review more meaningful for communities, and aids curators in decision-making. Connected to The Ark, it produces review reports and contextualized questions for every preprint submitted or ingested into an Ark Community, creating structured, reusable review artefacts for the wider open science ecosystem.

OpenSci Rater is a structured, community-driven tool for evaluating research based on its intrinsic quality, impact, and readability rather than journal prestige. Available as both a browser plugin and an embeddable widget, Rater enables scholars to rate and provide feedback on research outputs directly where they encounter them—on publisher sites, preprint servers, or repositories. These ratings are aggregated and visualized to offer multidimensional insights into the reception, rigor, and readability of research. The resulting data can support community curation, editorial decision-making, and metaresearch, strengthening more transparent and diverse approaches to research assessment.

OpenSci Records (OSRec) is the OpenSci Ecosystem's structured metadata layer that preserves the full provenance and integrity of research objects across the ecosystem. Each OSRec links a preprint with every associated data point - reviews, ratings, recommendations, and endorsements - along with the verified IDs of contributors and their communities. When authors move into Open Exchange (OSX), their OSRec travels with them, and partner journals are required to update the record with the DOI of the Version of Record to complete it. OSRec ensures long-term traceability, recognition, and credit for community contributions, while also enabling revenue to be tied back to those who created the insight data points.

**2. Available evidence related to publication costs and proposed options:**
Evidence from prior work suggests that the value of gold open access far exceeds that of unreviewed preprints or green OA. In PLOS Biology, Eysenbach (2006, https://doi.org/10.1371/journal.pbio.0040157 ) showed that gold OA articles are cited earlier and more often than subscription or self-archived (green OA) articles, confirming that the citation advantage of fully open access strengthens the return on taxpayer investment. Eliminating or reducing support for publication costs (option 1) would disadvantage authors who wish to publish in full OA venues, pushing them toward subscription journals sustained by institutional "big deal" contracts and "transformative agreements" that are neither transformative nor inclusive of independent OA publishers.

Further, the NIH's own data (median APC ~$2,000 globally; U.S. median ~$2,040) aligns with Plan P's proposal to cap per-article expenditures at $3,000 only when journals adhere to best practices such as reviewer incentives and transparent peer review. Plan P's community-based preprint + open peer review workflow demonstrates that costs can be contained without sacrificing quality, speed, or accountability. The cap of $3,000 should only be implemented if a fair system like Plan P is implemented that ensures a level playing field among publishers without preferential treatment of legacy subscription publishers.

**3. Peer review compensation:**
Plan P already requires that at least 25% of any APC paid through the OpenSci Exchange is returned to

community reviewer pools, directly addressing the imbalance between author-paid costs and reviewer labor.

Incentivizing peer reviewers is essential to sustaining the integrity and fairness of the publishing system. However, compensation should not be narrowly defined as direct cash payments. We recommend that NIH adopt a broad, flexible framework that allows for both financial and non-financial incentives, tied to clear measures of reviewer effort and quality. Key factors to consider include:

1. Allocation of funds: At least 25% of any allowable APC should be reserved for reviewer incentives. Journals and platforms should disclose how these funds are distributed to reviewers and reviewer communities.

2. Seniority and expertise: Compensation may be scaled to reflect the reviewer's seniority and subject-matter expertise, recognizing the higher opportunity costs for established investigators while ensuring inclusivity for early-career researchers.

3. Quality of review: Incentives should be linked not just to submission volume but to the quality and constructiveness of reviews. This could be measured routinely by post-review evaluations from editors, authors, or community curators, as well as by structured scoring systems (clarity, depth, reproducibility checks).

4. Time spent: Compensation should reflect the actual time invested. Transparent reporting (e.g., reviewers logging time or providing structured reports) can ensure fairness.

5. Geographic context: NIH should encourage adjustments for purchasing power parity, ensuring that incentives are meaningful and equitable for reviewers in different regions.

6. Non-financial incentives: In addition to or instead of cash payments, journals may provide:

a) Credits that can be redeemed for APC discounts on future publications.

b) Reciprocal review obligations (e.g., completing two reviews provides credit toward having one's own manuscript reviewed).

c) Recognition systems (digital badges, reviewer DOIs, ORCID-linked records, verified OpenSci ID profiles, Pubmed-indexing of peer-review reports) to formalize peer review as a scholarly output.

By combining financial and non-financial mechanisms, NIH can ensure reviewer labor is respected, sustainable, and equitably distributed — while also fostering innovation in how peer review is valued and credited.

**4. Publishing best practices:**
NIH could reward journals and platforms that adopt verified integrity safeguards:

Fraud detection: Use of automated tools to detect paper mills, image manipulation, plagiarism, and statistical anomalies.

Identity verification: Verified researcher identities (e.g., OpenSci ID) to reduce fraud, impersonation, and untraceable misconduct.

Open science practices: Preregistration (presence of IRRIDs - International Registered Report Identifiers), mandatory open data, code, and protocols to improve reproducibility and compliance with funder mandates.

Transparent review: Public, portable, and signed peer reviews attached to persistent identifiers.

These practices not only protect taxpayers from funding fraudulent or low-quality publications, but also elevate the credibility and impact of NIH-funded science.

**5. Other Comments:**
NIH could reward journals and platforms that adopt verified integrity safeguards:

Fraud detection: Use of automated tools to detect paper mills, image manipulation, plagiarism, and statistical anomalies.

Identity verification: Verified researcher identities (e.g., OpenSci ID) to reduce fraud, impersonation, and untraceable misconduct.

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Transparent review: Public, portable, and signed peer reviews attached to persistent identifiers.

These practices not only protect taxpayers from funding fraudulent or low-quality publications, but also elevate the credibility and impact of NIH-funded science.

# 893. American Physical Society

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Rachel Burley

**Name of Organization:** American Physical Society

**Type of Organization:** Scholarly Publisher/Journal

**Role:** Organizational Official

**1. Proposed policy options:**

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/APS-Response-re-NIH-RFI-Publishing-Costs-Sept-2025-FINAL-1.pdf

**Description:** American Physical Society Response to NIH RFI re: Publishing Costs

## 894. Mary R Loeken

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Mary R Loeken

**Name of Organization:** Joslin Diabetes Center

**Type of Organization:** Non-profit Research Organization

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I support Option 2: Set a $2,000 limit on allowable costs per publication.

**2. Available evidence related to publication costs and proposed options:**
I don't think it is fair to establish a set $ or % direct cost amount/year, because numbers of publications can vary per year, and where publishing. I think Option 2 notifies publishers that they need to adjust their fees to be within $2000/publication.

**3. Peer review compensation:**
I do not feel that manuscript peer reviewers should be compensated. They should be motivated by securing the integrity of peer review.

**4. Publishing best practices:**
Automated fraud detection and AI composition should be considered in best practices.

**5. Other Comments:**
Automated fraud detection and AI composition should be considered in best practices.

# 895. Cold Spring Harbor Laboratory

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Dr John R Inglis

**Name of Organization:** Cold Spring Harbor Laboratory

**Type of Organization:** Non-profit Research Organization

**Role:** Organizational Official

**1. Proposed policy options:**
As outlined in our answer to question 2, we believe that there are benefits and opportunities in making publication significantly more cost-efficient through the development of new, robust methods of research assessment around the growing preprint platforms bioRxiv and medRxiv. NIH could assist in these efforts. However, they will take time. At present, for most biomedical scientists, peer review and acceptance of their work by conventional journals remain essential for community recognition and career advancement.

We understand and support NIH's desire to maximize the effective use of taxpayer funds in paying for the cost of journal publication. Publishing a journal is not free: expenses include people (editors, production and other staff), technology requirements (submission and peer review management, web hosting, burgeoning research integrity checks), and integration with publishing infrastructure (CrossRef, PubMed). A revenue model is necessary for a journal and it must generate sufficient funds for its the publication's continuous improvement. The APC is not an optimal business model, owing to inequities across disciplines and regions in the ability to pay, and efforts are being made to establish alternatives. But for now, APCs are essential to the viability of many not-for-profit journals owned by scientific societies and independent organizations such as CSHL. This non-commercial sector is typically enthusiastic about providing public access to scientific content. The inability of authors to pay publication fees from NIH grants (option #1) would therefore be a mortal blow for such community-oriented journals. Selective journals, which review many submissions but publish few, are particularly vulnerable. This decision would add to the pressure not-for-profit journals are experiencing owing to increased competition for submissions from major commercial houses. The disappearance of such journals would reduce author choice in where to publish at reasonable cost. A large proportion of NIH grants are awarded to early career investigators with no alternative sources of support for publication charges. By contrast, scientists with grants from private foundations that do not pay publication charges are often established career investigators with access to other funds.

If publication charges are allowable in NIH grants, what then is a reasonable charge? Publishers correctly point to the burden of increasing costs prompted by increasing demands on journals such as addressing research integrity issues, maintaining search and discovery processes across the ecosystem, and efforts to improve the speed and efficacy of peer review, including potential integration with generative AI. The cost of publication in any journal has to take into account the cost of rejection, which may be 80% or more of submissions at highly cited, career-boosting journals. NIH's survey shows a wide range of charges but research journals have enormous variations in how they operate. Peer review, for example,

can range from being so minimal that it barely deserves the term to a thoughtful, constructive, and lengthy process demanding expert staff time. This contributes to variation among journals in costs and charges. It has been observed, however, that the size of an APC correlates strongly with the impact factor (IF) of the journal concerned, with charges at the high end of $10-$12,000 per paper. Although it is regrettable, the IF and associated brand of the journal that publishes a scientist's work remain major determinants of that scientist's career progression. So an NIH-funded scientist prevented from publishing in a journal with a high IF and associated high APC is exposed to a risk of career stagnation that may drive her out of academic science altogether. And it will certainly undermine her ability to compete with scientists in different circumstances (other countries, other funders) who aren't so encumbered.

The solution to this problem is not a simple cap on APCs. The development of Read and Publish (R&P) agreements between publishers and academic institutions further complicates the picture. The terms of such agreements are not public so it is not clear what payments are actually being made in return for publication. What is clear is that small research institutions such as CSHL are much less able than larger organizations to negotiate R&P agreements, especially with commercial publishers whose journals have high APCs and IFs, so their investigators are more likely to have to pay the APC list price. If the publication charge within an NIH grant is capped at, say, $3000, and the listed APC is $10,000, the gap must be covered and institutional funds, especially at this time, are increasingly not available for this purpose. So the investigator concerned would have to publish elsewhere, in a less expensive, possibly lower profile journal, with perceived risk to career advancement.

Journals in the non-profit sector, like CSHL's, have been in the vanguard of providing open public access to published papers by, for example, adopting a short embargo (6 months) before all published content is made openly available. The costs of such journals are significant, including employment of in-house personnel who underpin a journal's quality and integrity. Because they are selective and publish relatively few papers, these journals cannot transition to support by APC's alone unless the charge concerned is set at a level high enough to cover costs. These might be as much as $8-10,000 per paper, close to the prices currently charged by high profile commercial journals in exchange for perceived career advantage. Non-profit publishers are typically reluctant to exploit the community with high APCs, and have pioneered new approaches to open access such as the APC-subscription hybrid to maintain financial viability while providing open content at a reasonable cost. Indiscriminate capping of APCs at too low a level by NIH would put the future of these selective, highly regarded, community-oriented journals at risk.

Of the options presented, option #4 gives investigators most choice and control over how cost-effectively they publish, much as they decide what experiments are financially practical when pursuing their research. This option would provide for the opportunity to publish selected work in a high profile (high IF and high APC) journal should they choose to do so, while electing to distribute other work in journals with more modest charges. However, we do not support the across-the-board recommendation that only 0.8% of a grant can be spent on publication charges. This would handicap the output of early career researchers with new, small grants and highly productive scientists who work in fields where small grants are the norm. We suggest a sliding scale in which larger proportions of smaller grants are permitted to support publication.

**2. Available evidence related to publication costs and proposed options:**
Cold Spring Harbor Laboratory (CSHL) is a New-York-based, private, not-for-profit institution founded in 1890 with a worldwide reputation for innovation in biomedical research, education, and scientific communication. It includes an NCI Cancer Center and 50 research groups in a variety of scientific fields. CSHL faculty currently hold 77 awards from the NIH. One division of the Laboratory, CSHL Press, established in 1988, is a highly regarded biomedical publisher with a mission to create materials and services that help scientists succeed in their research and careers. Any surplus from its operations helps support CSHL research and education activities. The output of the Press includes leading research journals, review journals, and books. CSHL also initiated the now independent preprint servers bioRxiv and medRxiv that are transforming scientists' communication practices. This response, therefore, comes from an institution that brings together both academic research scientists and professionals working to improve research collaboration, communication, discovery and assessment. Providing open public access to taxpayer-funded research is an important goal that CSHL supports. We also strongly advocate for the necessity of peer review in the assessment of new research.

Conventional journal publishing permits distribution of new papers only after approval by a small number of reviewers, a process that is slow (months or years), closed, and relies on limited expertise. In addition, even once accepted, a paper's final version may only be available behind a paywall. By contrast, the distribution of new papers as preprints is rapid (hours or days), open, and makes them available for assessment by the entire research community. NIH could add significantly to the growing momentum behind biomedical preprints by mandating, as other funders have, that grantees post preprints of their work before submitting them for publication, making new results immediately available to all. But not all preprint servers have the same mission and goals. Some are for-profit, and some simply extensions of a journal submission process. Most do not aggregate community assessment of the science being reported, or track and alert the funders that made the reported work possible. bioRxiv and medRxiv are the exceptions in all cases. They continue to increase in submissions (now averaging more than 5500 manuscripts each month) and readership (approximately 10 million each month). NIH could add significantly to the capacity of these increasingly important information resources through direct grant support of bioRxiv and medRxiv

The increased availability of preprints through funder mandates has begun to prompt innovation in the assessment of research, by adaptation of existing processes and adoption of new ones. A variety of approaches to evaluation can be seen in action on the dashboard that accompanies every bioRxiv preprint. Not all the evaluation is formal peer review but more than 10,000 preprints have associated peer reviews that can be read alongside the paper. The most prominent review initiatives are currently eLife and Review Commons but neither provides authors with a journal acceptance and publication decision. We are working towards the creation of a new type of journal – an "overlay" journal - in which a paper would be hosted on bioRxiv, going through successive versions during peer review. When accepted, the paper's presentation would change to indicate its change of status, with a new DOI. All peer reviews would be public. The journal's table of contents would be a dedicated independent webpage with links to the article's full content and associated information on bioRxiv. No such journal currently exists. The cost of publishing in this kind of journal could be significantly less than in conventional journals. NIH could assist this initiative by directly funding the development of non-profit overlay journals that are either new or adaptations of existing journals, and permitting their indexing in PubMed/Medline.

**3. Peer review compensation:**
Frustrations are frequently voiced within the research community about lengthy delays in journal-based peer review and dissatisfaction with the quality or value of the reviews authors eventually receive. Editors express similar discontents, pointing especially to the difficulty of getting suitably qualified scientists to agree to review papers. Reviews are generally done without compensation, on a vaguely defined premise of "community service". But such service is seldom recognized by the community in a practical sense: institutions appoint or promote faculty on the basis of their own research output, not their critical assessment of other people's work. There are no career incentives for doing peer review and with increasing pressure to compete for grants, fewer scientists are willing to put in the considerable time and expertise required.

Would reviewer compensation help? It's unproven. Compensation would acknowledge that peer review is skilled intellectual labor, not just community service. It could empower journals to insist on standards of thoroughness and rapid turnaround time. It could expand the reviewer pool and professionalize the activity, on a par with teaching and consulting. On the other hand, it would monetize an activity now considered community service done on time covered by a professional salary. It would be expensive, not just because of the payments themselves but the accounting required. While high-profit journals or publishers might be able to support reviewer payments, non-profit journals would not without raising prices and further deepening inequalities. And money, especially if tied to speed or volume of reviewing, might incentivize reviewers to be less thorough or accept assignments for which they are less qualified.

There are unanswered questions about how much compensation should be, how it should be paid, and to whom. Modest honoraria or vouchers for eg. discounted APCs would not incentivize the established investigators who are typically asked for reviews. There could be a credit system for institutions that discounts fees paid to publishers in proportion to the reviews done by the institution's faculty but the administration effort required may greatly outweigh the benefits. On balance, we do not recommend that NIH initiates a policy that encourages reviewer payments at this time, while there are still many significant unknown consequences. But NIH could encourage experimentation by journals and publishers willing to explore these consequences and report on their findings by, for example, increasing the allowable APC for journals that adopt reviewer payment. There is also a need to expand the pool of reviewers across international boundaries and to train early career researchers in the ethical practice of peer review. NIH could encourage such innovations in peer review by being willing to adjust APC caps in response to such initiatives.

**4. Publishing best practices:**
Journal activities and obligations that contribute to higher publishing costs fall into several categories.

Peer Review Standards

- Commissioning multiple reviewers per paper, including statistical or methodological experts
- Employing professional, PhD-level scientific editors rather than relying only on volunteer academics
- Screening for plagiarism, image manipulation, conflicts of interest, and research ethics compliance including fraud detection

- Publishing reviewer reports and using open peer review or double-blind review processes that require specific workflows
- Exploring the potential of generative AI in making peer review more effective and efficient and sparing, but not eliminating, human reviewers

Production Standards

- Ensuring clarity, grammar accuracy, scientific style, and adherence to journal guidelines
- Handling technical nomenclature and statistical reporting
- Professionally formatted PDFs, XML/HTML, interactive figures, and accessible layouts
- Processing, hosting, and ensuring long-term accessibility of datasets, videos, and code as supplementary information

Digital Infrastructure Standards

- Assigning DOIs and providing ORCID integration, Crossref linking, and citation metadata enrichment
- Long-term archiving via CLOCKSS/LOCKSS or Portico
- Enhanced discoverability via metadata tagging, indexing in PubMed/Scopus/Web of Science, and providing machine-readable formats (e.g., JATS XML)

Compliance Standards

- Managing APCs, waivers, funder mandates, repository deposits

Accessibility Standards

- Making content usable for screen readers, providing alt-text for images, and creating accessible PDFs

Compliance with Evolving Standards

- Verifying FAIR data standards, code repositories, reproducibility checklists
- Enforcing reporting guidelines eg. CONSORT, PRISMA that require editorial and production checks
- Open science integrations such as linking to preprints and registered reports and incorporating peer review credit systems such as ORCID

**5. Other Comments:**

Journal activities and obligations that contribute to higher publishing costs fall into several categories.

Peer Review Standards

- Commissioning multiple reviewers per paper, including statistical or methodological experts

- Employing professional, PhD-level scientific editors rather than relying only on volunteer academics
- Screening for plagiarism, image manipulation, conflicts of interest, and research ethics compliance including fraud detection
- Publishing reviewer reports and using open peer review or double-blind review processes that require specific workflows
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- Enforcing reporting guidelines eg. CONSORT, PRISMA that require editorial and production checks
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**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/CSHL-response-to-NIH-RFI.pdf

**Description:** Please see the attachment for the document from which the answers to these questions have been taken.

## 896. N/A

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
No allowable publishing cost.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

# 897. Lightoller LLC

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Gary McDowell

**Name of Organization:** Lightoller LLC

**Type of Organization:** Other

**Type of Organization - Other:** Academic Consultancy

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I support Option 1: Disallow all publication costs. NIH could no longer support publication costs through any funding mechanism.

**2. Available evidence related to publication costs and proposed options:**
I carry out work on federally-funded projects as a freelance academic researcher - I have a single-member LLC that allows me to work as a consultant/co-PI on research projects, and I carry out academic research using that support. This work focuses on educating American students about scholarly publishing and peer review, and including them in communicating their own science through engagement in these processes.

In my work, I operate as a consultant, which is very similar to how I carried out research as an academic researcher during my graduate and postdoctoral studies. The key difference arises at the point of communicating and disseminating my research.

As a consultant, when a client (such as the federal government) pays me to carry out analyses, I perform the research and then communicate ALL data back to my clients, and work on sharing it in totality and as widely as possible - for the case of federally-funded research, I make use of preprints.

When I worked in academia, however, the goal was not to share all research with the funder, but rather to publish a subset of positive, novel results in an academic journal. This is because, to progress in one's academic career, it is necessary to publish positive, novel research in an academic journal. The primary goal of the peer review process through this route is not to check that the work is valid, but to have a set of one's peers determine that your work is worthy of a place in an artificially scarce resource, namely the pages of an academic journal.

As a consultant, I am now no longer expected to publish my work in academic journals - it is not an expectation of a consultant who does not work at a university. As a graduate student and postdoc, I struggled to publish all of my valid research, because I was actively disincentivized from sharing the results of valid experiments that show when a hypothesis is false, or any results that repeat previous work (despite replicative results being useful to reinforce a prior finding, or to place caveats on how often the result can be repeated across different labs). Now that I work in this role, I am free to use preprints to make sure that I share ALL valid research data with the American taxpayer, not just the results that academic journals will allow in their pages.

I use preprints, and seek out preprint peer review services, because I value the ability to share my work openly and transparently, and because while peer review is highly important, I do not think that journals are able to manage peer review processes in a way that justifies the amount that they charge for it. Indeed, as an academic, I have carried out peer review at journals for free, and my colleagues and I could also do this work for free via preprint review services. Why journals charge the taxpayer to publish research is to support the operating costs of the entities that run them. Scientific societies in particular rely on journals to maintain their own operating costs, at a time of falling membership (most scientific societies represent only university faculty, not all scientists within the discipline they claim to represent, and as faculty numbers have fallen, so too have their subscriptions, leading to their dependence on revenue from academic publications that they manage).

It is important to point out explicitly the difference between how I communicate science when I worked at a university, versus how I am able to do it now. When I worked at universities, and was incentivized to publish in academic journals to advance my career, I was only able to publish work that was novel (i.e. sufficiently different from any prior research) and positive (i.e. shows that a particular intervention results in a new outcome). It was not possible to publish work that replicated prior work (and much of the early work of a graduate student can include verifying other's results). It was also not possible to publish results were an intervention has no effect, or when a technique or intervention does not work. Not only does this mean valid work funded by the taxpayer is not published - it means labs all across the country are trying the same experiments, using taxpayer funds to carry out the work, without the knowledge that it will not work, because it is not currently possible to publish these results in academic journals (at least not in a way that university academics will be able to get recognition for it from their peers). Now, as a consultant, I can share ALL of the work that the taxpayer has paid me to undertake - and also I work to share it in places where the taxpayer can also actually gain access to it (I have been a very vocal supporter of the need to share federally-funded research with taxpayers like myself at the point of publication, and am grateful for the previous work NIH has done on this).

There are numerous people like myself working on federal research who do not need to publish our work in academic journals, because we are not recognized for this behavior, and it is not deemed necessary for our work to go through this process. Publishing in academic journals is a behavior of university-based scientists only, and primarily for the goal of their own career advancement. If they wish to pay for this extravagance, they should of course feel free to do so, but out of their own pockets, and not using taxpayer's money. The processes of data dissemination and peer review can take place without the expense - and time - lost in dealing with academic journals.

**3. Peer review compensation:**
I carry out peer review of grant applications for federal funders, which is work that is compensated. I have never carried out compensated peer review work for journals. If journals were to charge the federal government to pay for peer reviewers, they would need to prove that they are providing an adequate service, namely ensuring that all their reviewers have gone through rigorous training, which most have not (please see papers that are attached, and my additional comments).

**4. Publishing best practices:**
NIH could consider, rather than compensating journals, finding ways of compensating researchers

directly for carrying out review services, and for supporting preprint services that allow federally-funded research to be openly shared and reviewed for the benefit of all American scientists, and the taxpayer.

**5. Other Comments:**

NIH could consider, rather than compensating journals, finding ways of compensating researchers directly for carrying out review services, and for supporting preprint services that allow federally-funded research to be openly shared and reviewed for the benefit of all American scientists, and the taxpayer.

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/McDowellpubs.pdf

**Description:** A compilation of 5 publications relating to peer review, journal publication, preprints and early career researchers/undergraduate students.

# 898. Cornell University

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Gary Koretzky

**Name of Organization:** Cornell University

**Type of Organization:** Academic Institution

**Role:** Organizational Official

**1. Proposed policy options:**

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/CornellUniversity_NIHRFIPubCosts_20250915.pdf

**Description:** Letter from Dr. Gary Koretzky, Vice Provost for Research, Cornell University

# 899. JMIR Publications

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Sean Jeong

**Name of Organization:** JMIR Publications

**Type of Organization:** Scholarly Publisher/Journal

**Role:** Organizational Official

**1. Proposed policy options:**
JMIR Publications thanks the National Institutes of Health (NIH) for the opportunity to provide feedback on the Request for Information (RFI) regarding the Draft Public Access Policy. We charge modest Article Processing Charges in the range of $950 to $3500 - charges that are generally much lower than the APCs of hybrid journals, even though the latter have additional revenue streams from subscriptions. As a pioneering independent open access (OA) scholarly publisher in digital health and informatics research, data science, and health services research, we support the NIH's overarching goal of ensuring free, immediate, and equitable public access to the results of federally funded research. We believe that open access is the optimal path to accelerate scientific discovery and enhance public well-being. Our operations and infrastructure were built from the ground up with OA as a foundational principle, giving us a unique understanding of the challenges and opportunities in this space. We are only one of 6 remaining independent full open access publishers represented in the Open Access Scholarly Publishers Association (OASPA) - others are the two non-profits eLife and PLOS, the two very large publishers Frontiers and MDPI, as well as Copernicus and JMIR Publications as small mission-driven publishers.

JMIR Publications is a small, scientist-owned and mission-driven company, which is very different from large commercial “legacy” publishers that built their brand with subscription journals and which now attempt to “flip” these to OA or try to maximize profit by double-dipping (charging APCs plus subscriptions), but are also very different from larger fully open access publishers like MDPI or Frontiers. Our APCs are substantially lower than APCs of hybrid journals, as such, while we understand the sentiment against APCs - we do not know that APCs as a whole are “unsustainable”, rather, the market needs to be opened up and the existing funds need to be funneled to the most cost-effective quality journals. One such mechanism could be what we called Plan P: Preprints first, then peer-review, then publication through a subsequent “manuscript marketplace”. Plan P was suggested by JMIR Publications in 2021 (Eysenbach G. Plan P - A Publishers' Offer to Institutions and Funders to Transform to Open Science. https://zenodo.org/records/5786370) but is now administered by the OpenSci.foundation (see separate response to the RFI).

Medical informatician Dr Gunther Eysenbach started our first open access journal, the Journal of Medical Internet Research (JMIR, https://www.jmir.org), in 1999 as one of the worlds’ first “Diamond Open Access Journal”, i.e., run by scientists for scientists out of an editorial office that was affiliated with the university. Eysenbach intentionally did not launch the journal with one of the large commercial publishers because he believed in the power of the Internet to disseminate research for free without access barriers, empowering also consumers and patients, and also saw the oligopoly of large publishers

as problematic. As early as 1999 the journal also embraced preprints and subsequent knowledge translation through journals (Eysenbach G. Challenges and changing roles for medical journals in the cyberspace age: electronic pre-prints and e-paper. J Med Internet Res. 1999 Oct-Dec;1(2):E9 https://www.jmir.org/1999/2/e9/): “These days, information is often first published on the Web and sometimes read by millions of users before printed journals can cover the story (...) A similar development in science seems to be inevitable and desirable. Medical journals - at least general medical journals - should give up their aim of being the primary and sole source of scientific information, but shift their aim toward acting as catalysts to get evidence-based medicine into practice. Their principal mission should not be newsworthiness, but putting "primary" information (which may have already been published on the Internet) into context and perspective, by evaluating, commenting, and weighting raw information.” 26 years ago, this was an early call for what we call today post-publication peer-review, or the “PRC” (publish as preprint-review-curate) model, which JMIR Publications has pioneered with its’ JMIRx-series of journals and Plan P.

In the early 2000s JMIR became one of the pioneering “Diamond” (free for authors and readers) open access journals that quickly gained recognition and was even ranked the top medical journal in the medical informatics discipline according to Journal Citation Reports (then Thomson Reuters, now Clarivate). We learned back then that the “diamond” (free for authors and readers) ideal of scientists working voluntarily on editorial tasks may be realistic for small journals that publish a small number of articles per year, but it hits its limits once a journal becomes very successful, is confronted with thousands of submissions, and where editorial, typesetting and marketing services require highly educated professionals who demand fair compensation, which is key for any successful journal in particular in the biomedical space. We emphasize this because NIH will no doubt receive submission to their RFI from people and organizations that advocate a “APC-free” “Diamond” model as a solution, which we deem “magical thinking” unrealistic for the biomedical space, which has different pre- and post-publication quality requirements than for example humanities and social journals, that constitute 60% of Diamond journals, are usually very small publishing less than 25 articles a year, and have sustainability issues due to volunteer work and exploitation of university staff (Bosman J et al. OA Diamond Journals Study. Part 1: Findings https://zenodo.org/records/4558704). We firmly believe that in order to offer professional, responsible and sustainable publishing services especially in the biomedical area, highly qualified staff including medical doctors, PhDs and professional editors need to be on staff and need to be fairly compensated. To run such operations as part-time endeavor out of a university has proven to be impossible, at least in the case of JMIR, which quickly grew from an amateur side hustle. Universities or governments should not take on the liabilities that come with running a journal or making sometimes uncomfortable or unpopular choices. As long as publications are also part of Tenure & Promotion or graduation requirements, and play a role in university rankings and national rankings on research output, there is also an obvious question on how the perceived conflict of interest should be handled. Trust in science is at an all-time low and if universities, academic institutions or even governments “own” journals and/or the peer-review process, this will lead to further erosion of trust in science. This is a major argument on why commercial publishing entities should exist - in addition to being able to hire and incentivize the best people, invest in publishing innovations (as JMIR has done, see https://support.jmir.org/hc/en-us/articles/115002923468-What-are-JMIR-s-innovations), smaller mission-driven publishers can serve as “independent” entities that help to judge the quality of research outputs and maximize knowledge translation. The latter is a key component to achieve NIH’s vision to “turn discovery into health”. In a seminal study, gold open access was shown to be associated with an

increased citation rate (as a marker of knowledge uptake) if adjusted for various confounders, compared not only to toll-access research (behind subscription pay-walls), but also compared to “green open access”, where preprints or accepted manuscripts are made available (Eysenbach G. Citation Advantage of Open Access Articles. PLoS Biol 2006;4(5):e157. https://journals.plos.org/plosbiology/article?id=10.1371/journal.pbio.0040157). This is a major justification for why “gold open access” should exist and needs to be supported by funders as well as libraries.

We acknowledge that the NIH Draft Public Access Policy states that submission of manuscripts to PubMed Central (PMC) remains free for authors, and that any fee requested for submission to PMC is not an allowable cost. However, this position inadvertently devalues the substantial work that precedes deposition of an “accepted manuscript” and ensures the quality and integrity of published research. The pathway to a peer-reviewed author-accepted manuscript or final published article involves critical services with costs necessary for routine operations in support of a high-quality, high-integrity scientific record. Costs for such services include:

- Editorial research integrity checks.

- Expert assessment of quality and methodological rigor.

- Comprehensive peer review management. This includes robust submission tracking, workflow configuration, task automation, and integrated communication tools, ensuring adherence to rigorous quality standards and ethical guidelines, and an optimal experience and support for all involved in the manuscript lifecycle, especially authors, peer reviewers, editors, and journal staff. Many hours of work by medical editors, statistical experts, manuscript editors, illustrators, proofreaders, and production staff contribute to this.

- Production services like professional copyediting, typesetting, layout, reference checks, XML data production, and generating various article file formats.

- Content delivery, including Indexing and archiving with DOIs and metadata distribution to various services.

- Marketing and dissemination to maximize global distribution and visibility, towards knowledge translation and real-world impact.

These activities are essential for producing vetted, quality research outputs and are not "free." In medicine, and in particular the area where we are publishing in (digital health as the intersection of medicine and engineering) quality publishing requires paying fair salaries to highly qualified editors with background in medicine. The often stated narrative that “peer-reviewers do all the work for free, and publishers cash in” demonstrates a lack of understanding of what publishers and editors do. Publishing is an increasingly complex endeavor that requires professionals to handle the 100+ things publishers do (see list by Kent Anderson in the Scholarly Kitchen, Focusing on Value — 102 Things Journal Publishers Do (2018 Update). https://scholarlykitchen.sspnet.org/2018/02/06/focusing-value-102-things-journal-publishers-2018-update/).

For full open access publishers such as JMIR Publications, which does not sell any subscriptions and does not benefit from “transformative agreements” (because it is already transformed to 100% open access),

and can also not bundle publishing with “read” access due to having been open access from the beginning, Article Processing Charges (APCs) are the only viable income stream other than institutional memberships. We advocate for these essential quality assessment and peer review, editing, and knowledge dissemination  costs to be recognized as allowable expenses under the policy, whether through individual article fees or through broader institutional agreements.

We are concerned that the NIH's strong emphasis on the "free" PMC deposit route (green Open Access), while crucial for accessibility, may unintentionally reinforce existing market power dynamics, and motivate researchers to publish in subscription journals, locking away the version of record for the future. Critiques of "transformative agreements" (TAs) highlight that they often channel resources to a few large commercial publishers, perpetuating their dominance rather than fostering true bibliodiversity and competition. These agreements can "trap" institutions in models that primarily benefit large legacy publishers, creating significant barriers for smaller independent OA publishers who lack a traditional subscription base to "transform."

We encourage NIH to:

- Recognize and support the full value chain of scholarly publishing, including the costs incurred for quality assessment, peer review, and editorial services that lead to a reliable published article.

- Promote financial models that foster bibliodiversity and genuine competition, such as direct support for independent, mission-driven, scientist-led open access publishers with annual subscription-like payments. This approach can provide financial stability without relying solely on burdensome APCs for authors or perpetuating entrenched legacy business models.

- Support independent open access publishers, rather than reinforcing legacy models.

- Support a “free market” by exerting its influence on academic institutions and libraries to provide mechanisms to support publication in any quality open access journal or platform (e.g. any journal indexed in Web of Science, PubMed, or Scopus) through Institutional Open Access Funds (financed by subscription cancellations and/or NIH funding i.e. indirect costs) to end the anticompetitive preferential treatment of legacy/subscription publishers through transformative agreements and Read & Publish agreements. Such agreements change researcher behavior.

- Experiment with novel platforms and ideas such as Plan P (http://planp.science)

Specific Responses to Proposed Policy Options:

- Option 1: Disallow all publication costs

- JMIR Publications strongly opposes this option at this point in time unless there is a broad adoption of an alternative “preprint first” model with dedicated funds to peer-review and ultimately disseminate peer-reviewed preprints (Plan P). Disallowing APCs would put open access pioneers such as JMIR Publications difficult to operate, or would force us to change to a subscription model. In the absence of broad library support of pure open access models, APCs (or institutional memberships) are essential to cover the critical, costly editorial  services essential for ensuring the quality and integrity of published research. Disallowing these costs would undermine the ability of independent OA publishers (including

medical societies, which depend on journal profits), who rely on APCs, to deliver high-impact, rigorously peer-reviewed research, ultimately harming the dissemination of high-quality federally funded research. As a small independent OA publisher, and one where our mission is to publish good science: we are mindful of fair pricing that is commensurate with the value of the work we do and consider these factors when we set fair prices. It is also not clear what exactly is meant by publication costs or APCs; does this include editing, copyediting, social media marketing? What about other knowledge translation and dissemination activities such as conference costs (conference proceedings are often part of registration fees)? Publishers are ultimately service providers just like airlines, hotels, biotech companies that produce reagents or monoclonal antibodies etc, and the publishing industry is by no means the only industry that “profits” from the research endeavor.

In summary, Option 1 would undermine NIH’s own public access goals by pushing researchers back into the arms of subscription publishers, reducing the reach and impact of taxpayer-funded research, and weakening the financial viability of independent, fully OA journals that embody the values of transparency, equity, and accessibility.

- Option 2: Set a limit on allowable costs per publication of $2,000.00

- While understanding NIH's aim for reasonable thresholds, JMIR Publications is concerned that a hard limit of $2,000.00 may be insufficient to cover the full costs of producing high-quality, rigorously peer-reviewed, and widely disseminated open access research. NIH's own analysis indicates average requested costs by applicants range from $2,565.07 to $3,104.06 per publication, suggesting that $2,000.00 is below the real costs anticipated by researchers. This limit could force publishers to compromise on crucial services or hinder researchers from publishing in journals that uphold the highest standards of research integrity and rigor. Journals indexed in DOAJ are not necessarily representative for biomedical journals and many are produced in the Global South which have lower costs than journals produced in North America.

- Option 3: Set a limit on allowable costs per publication of $2,000.00, and allow a higher amount of $3,000.00 when peer reviewers are compensated and reviews are publicly provided

- JMIR Publications recognizes the NIH's intent to incentivize peer reviewer compensation and transparency. The feasibility and impact of direct cash compensation for peer reviewers, who are typically volunteers, present significant considerations. Direct cash payments can create substantial administrative burdens for publishers. JMIR Publications had previously experimented with small cash payments (USD $90) to reviewers as an incentive for timely peer-review for fast-tracked papers and made the following observations: 1) We were unable to pay any employees (mainly federal employees from the US) who had restrictive employment contracts requiring permission for additional paid work. 2) While USD $90 is a nominal amount for North American researchers, it is a substantial amount in the Global South which also invites fraud and misconduct. In particular in the era of AI, where chatbots can easily generate peer-review reports, considerable resources would have to be spent to prevent misconduct, and to define and detect “low quality” peer-review reports. We ultimately have learned that even small financial incentives are the wrong incentives.

Since then, we have pivoted to provide more recognition to reviewers and we think this should also be mirrored in NIH policy, e.g. collecting peer-review activities as reported in ORCID to reward researchers. Our organization has implemented an innovative point-based program to compensate reviewers,

editors, and authors. Reviewers earn “karma” points for completing reviews, with bonus points for highly-rated contributions. These points do not expire and can be used for professional recognition or converted into monetary-equivalent credits to reduce or waive publication-related fees for their own work. This system creates a powerful incentive for community engagement and fosters a virtuous cycle of loyalty and participation, addressing compensation in a sustainable and administratively efficient manner that direct cash payments may not. We believe such models align with the spirit of compensation without the complexities of direct payments and help retain valuable peer reviewers. Regarding the public provision of reviews, we support transparency as it fosters inclusivity and collaboration. However, implementing public reviews requires additional infrastructure, management, and editorial oversight to ensure appropriate presentation and context, adding to the costs beyond peer review management.

- Option 4: Set a limit on the total amount of an award that can be spent on publication costs to 0.8% of the award’s direct costs or $20,000.00, whichever is greater

- This option offers more flexibility to grantees compared to strict per-publication limits, allowing institutions to allocate funds based on project needs. However, even with this flexibility, it is important that the cap does not disproportionately impact awards that produce a high volume of high-impact publications, which may cumulatively exceed the cap if consistently published in journals that fully cover the costs of quality and rigor.

- Option 5: Set a limit on both the per publication cost ($6,000.00) and the total amount of an award (0.8% of direct costs or $20,000.00, whichever is greater)

- Evidence from other groups show that APCs greater than $6000 are ironically often exceeded by hybrid journals, which also have revenue streams from subscriptions. We believe that a cap of $6000 (or lower for hybrid journals) is a reasonable policy as it limits hyperselective journals which spend most of their funds in rejecting submissions without peer-review. However, there are potential inadvertent side effects of such a policy, such as giving publishers like Springer Nature, which would be most affected from such policies (https://blogs.lse.ac.uk/impactofsocialsciences/2025/09/11/shaking-up-the-scholarly-publishing-market-why-caps-on-apcs-could-backfire/) additional leverage to “bundle” APCs with access to subscription content (read & publish agreements), which would increase costs for libraries. Any policy that would cap APCs would also have to limit or outlaw the ability of publishers to use subscription content as leverage to extort more funds from institutions.

**2. Available evidence related to publication costs and proposed options:**
JMIR Publications’ longevity and pioneering spirit in open access demonstrate a unique understanding of the challenges and opportunities in this space. Our commitment to open access has translated into significant impact and quality: The Journal of Medical Internet Research (JMIR) was ranked within the top 100 (#89) of all journals globally across all disciplines by h-index, and it remains the #1 journal in the Medical Informatics discipline according to Google Scholar metrics. Five JMIR Publications journals are listed in the top 20 within Medical Informatics. This quality is achieved through rigorous peer review and widespread accessibility, not exclusivity, requiring significant investment in the various services outlined above.

Our experience shows that high-quality publishing, including comprehensive peer review management, research integrity checks, and robust professional production services, incurs substantial costs. NIH's

own analysis indicates that the average requested costs by applicants range from $2,565.07 to $3,104.06 per publication. This data supports our assertion that a $2,000.00 limit (Option 2 and baseline for Option 3) is often insufficient to cover these essential services for high-quality journals.

**3. Peer review compensation:**
JMIR Publications recognizes the immense value of peer reviewers, who largely volunteer their time, and the NIH's interest in their compensation. As detailed in our response to Option 3, direct cash payments, while seemingly straightforward, can introduce significant administrative burdens for publishers.

We propose that NIH consider alternative incentive models, such as our point-based incentive system, as an appropriate and effective method of recognizing peer reviewer contributions. Factors NIH should consider include:

- Administrative Feasibility: Systems that minimize administrative overhead for publishers, allowing more funds to directly benefit reviewers or enhance the review process.

- Sustainability and Scalability: Models that can be sustained long-term and scaled to accommodate a large, diverse reviewer pool.

- Incentive Alignment: Compensation that encourages high-quality, timely reviews and fosters a sense of community and loyalty among reviewers. Our point-based system directly aligns with this by offering non-expiring points for professional recognition and monetary-equivalent credits for publication-related fees, which fosters a virtuous cycle of loyalty and participation.

- Flexibility: Allowing publishers to implement compensation strategies that best fit their operational models, rather than strictly mandating direct cash payments.

- Transparency: Any compensation model should be clearly communicated to reviewers and, if applicable, to authors and the broader community.

- Publication records provide non-financial incentives for reviewers, and NIH/NLM could consider indexing peer-review reports with names in PubMed. Our overlay journal JMIRx-Med publishes all peer-reviews of preprints with DOIs, but PubMed has decided against indexing these peer-review reports.

**4. Publishing best practices:**
In addition to compensating peer reviewers, other publishing best practices contribute to higher publishing costs but are crucial for maintaining the integrity and quality of the scientific record. JMIR Publications adheres to and advocates for these practices:

- Robust Research Integrity Checks: This includes screening for plagiarism, image manipulation, authorship conflicts, and data integrity issues. The NIH specifically mentioned automated fraud detection capabilities, which are indeed critical and incur costs for software, personnel training, and ongoing management. These checks are fundamental in maintaining the trustworthiness of published research.

- Expert Assessment of Quality and Methodological Rigor: Beyond basic peer review, this involves specialized editorial oversight, statistical review, and domain-specific expertise to ensure the scientific soundness of published work.

- Comprehensive Peer Review Management: Our system includes robust submission tracking, workflow configuration, task automation, and integrated communication tools, ensuring adherence to rigorous quality standards and ethical guidelines. This involves many hours of work by scientific editors, statistical experts, manuscript editors, and journal staff.

- Professional Production Services: This encompasses high-quality copyediting, typesetting, layout, reference checks, XML data production, and generating various article file formats. These services ensure readability, accessibility, and compatibility across platforms.

- Content Delivery, Indexing, and Archiving: Assigning DOIs and distributing metadata to various services ensures persistent access, discoverability, and long-term archiving of published content.

- Ethical Guidelines and Author/Reader Support: Maintaining high ethical standards throughout the publication process and providing continuous support to authors and readers are essential but resource-intensive activities.

These best practices ensure that research outputs are not only disseminated but are also reliable, credible, and impactful, maximizing the value of federally funded research. Any policy on allowable publication costs should fully recognize and support the costs associated with these indispensable practices. Preregistration of research by creating a public record of the planned research and analyses should become a standard and hallmark of good research.

**5. Other Comments:**
In addition to compensating peer reviewers, other publishing best practices contribute to higher publishing costs but are crucial for maintaining the integrity and quality of the scientific record. JMIR Publications adheres to and advocates for these practices:

- Robust Research Integrity Checks: This includes screening for plagiarism, image manipulation, authorship conflicts, and data integrity issues. The NIH specifically mentioned automated fraud detection capabilities, which are indeed critical and incur costs for software, personnel training, and ongoing management. These checks are fundamental in maintaining the trustworthiness of published research.

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- Content Delivery, Indexing, and Archiving: Assigning DOIs and distributing metadata to various services ensures persistent access, discoverability, and long-term archiving of published content.

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These best practices ensure that research outputs are not only disseminated but are also reliable, credible, and impactful, maximizing the value of federally funded research. Any policy on allowable publication costs should fully recognize and support the costs associated with these indispensable practices. Preregistration of research by creating a public record of the planned research and analyses should become a standard and hallmark of good research.

# 900. Marta Gaglia

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Marta Gaglia

**Name of Organization:** University of Wisconsin Madison

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
At this time, preprints are not considered equivalent to full publications because there is little quality control and their reach depends on personal advocacy from the authors, while articles in journals are peer reviewed and can be discovered by readers that are perusing journal issues' table of contents. The preprint system is still not widely used in the molecular biology field (i.e. use is very lab dependent) and there is no preprint reviewing to speak of. While in principle a good goal, moving to mainly preprints will mean removing reviewing in science. Thus, eliminating the option to pay for publication (option 1) will likely reduce the quality of the scientific output because of the lack of review. They will also reduce the reach of the science, since preprints are not all listed in databases like Pubmed and there is no" table of content" for issues to find articles. Smaller labs and labs at smaller institutions will likely not have other funds to compensate, so only bigger laboratories will continue to publish in high impact journal and get visibility. Option 2 and 3 will also cause a similar problem because many journals have fees higher than $2000 (see below). Also, I have not reviewed for any journals that has compensated me - so I don't think option 3 will apply widely. To note, one of the reasons these options are a problem is that they clash with the requirement for immediate released of published papers. Open access payments at most journals are more expensive than non-open access article processing fees (which in some cases are $0).

Option 4 or 5 seem to me the only ones that would work with the current cost of publication, while still putting some pressure on publishers to find different models and reduce per article fees.

Also, it seems like these options are designed to change the publishing ecosystem - but they will impact NIH grantees who would gladly pay less to publish if they could.

**2. Available evidence related to publication costs and proposed options:**
I am not sure where the $2000 figure was calculated from, since most if not all the journals in my field (microbiology/virology) have higher fees than that - at least for open access options (generalist journals from the same publishing houses, which are often considered even more high profile, have similar higher fees). Here are the main examples for high profile journals in my field:

-Nature Microbiology $12,690

-Cell Host and Microbe $10,400

-PLOS Pathogens $3,043

-mBio $3,100

-JVI - unclear with new subscribe to open system, but https://journals.asm.org/s2o-author-faq#benefits-for-authors suggests > $2000 for a normal length article

These are journals that are considered good to publish in for laboratories in my field. Publishing in these "higher impact journals" is not simply a matter of vanity. It provides greater visibility to the science, in a way that preprints currently do not. My laboratory is considered good, and we routinely publish in the journals mentioned above. Moreover, even "lower tier" journals in my field have open access fees >$3000 including Virology (Elsevier), Virology Journal (BMC/Springer Nature), Viruses (MDPI), and Frontiers in Microbiology (the last two are considered by some to be published by "predatory" publishers).

Other journals we have published/considered publishing /submitted papers to have similar open access fees (Cell Reports $5,460, EMBO journal/EMBO reports $7,990, eLife $3000, Journal of Immunology $2,800, PNAS $5,495).

While some of the journals I mentioned have lower or no fees in case of non-open access publication, this type of access is generally NOT compliant with the current NIH policy of the manuscript being available free of paywall upon acceptance, as far as I understand it.

Given these numbers, options 1-3 and to some extent even option 5 would almost prevent us from publishing papers in journals. I believe this would have an impact on the reach of our science, even if we continued to preprint our manuscripts, which would be against the NIH mission.

**3. Peer review compensation:**
I have never been compensated as a peer reviewer. It is one of the many ways in which academic researchers are expected to provide free labor. Some compensation would be good, especially as article publishing and subscription fees have increased.

**4. Publishing best practices:**

**5. Other Comments:**

# 901. American Medical Informatics Association

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Tayler Williams

**Name of Organization:** American Medical Informatics Association

**Type of Organization:** Professional Organization/Association

**Role:** Organizational Official

**1. Proposed policy options:**
We strongly support Option 4 as the most balanced and practical approach to managing NIH publication costs while maintaining research flexibility and scientific integrity. This option, which limits publication spending to 0.8% of direct costs or $20,000 (whichever is greater), provides necessary fiscal responsibility while preserving researchers' ability to publish in appropriate venues for their work. Our position is informed by extensive discussion among medical informatics researchers who regularly navigate the complex landscape of scientific publishing across multiple audiences and publication types.

**2. Available evidence related to publication costs and proposed options:**
Our research community is deeply concerned that overly restrictive publication policies could inadvertently suppress scientific knowledge, particularly negative results that are crucial for preventing duplicate studies and advancing scientific understanding. Publishing research findings is essential not only for sharing successful approaches but also for documenting what doesn't work, thereby preventing other researchers from pursuing unsuccessful directions.

The inability to publish findings due to cost constraints could lead to:

Suppression of important negative results

Unnecessary duplication of failed approaches

Reduced transparency in scientific research

Limited ability to build upon previous work

Ethical Considerations in Scientific Publishing

While we acknowledge concerns about the ethics of paying journals to publish research, we recognize that legitimate costs exist for peer review, editorial oversight, and manuscript processing. Open access journals, while not charging subscription fees, still incur substantial costs for maintaining rigorous review processes and ensuring broad accessibility of research findings. The investment in publication costs should be viewed as essential infrastructure for scientific knowledge dissemination rather than simply a fee for service.

**3. Peer review compensation:**

**4. Publishing best practices:**
Define "publication costs" comprehensively to include APCs, submission fees, and other direct publishing expenses while excluding related activities like manuscript preparation.

**5. Other Comments:**
Define "publication costs" comprehensively to include APCs, submission fees, and other direct publishing expenses while excluding related activities like manuscript preparation.

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/NLM-RFI-on-Maximizing-Research-Funds-by-Limiting-Allowable-Publishing-Costs-AMIA-Draft-1.pdf

**Description:** The American Medical Informatics Association response letter regarding the National Institutes of Health (NIH): Request for Information on Maximizing Research Funds by Limiting Allowable Publishing Costs.

# 902. Elizabeth Anne Ploetz

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Elizabeth Anne Ploetz

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
I earned by PhD in 2014 and have been working as a postdoc ever since. The majority of funding has come from NIH R01s. I also was an NIH F32 recipient.

I think that the previous rules of allowing a 12 month embargo were superior to any of the proposed options, due to the unintended consequences that the proposed options are likely to come with. If 12 months is unacceptable, perhaps 6 months could be negotiated instead. However, the fact that so many publishers were in compliance with the 12 months suggests to me that we should just be grateful for that and go back to it. While I understand that the public should have access to federally funded research, and I think publication charges are exorbitant, I think the 12 month embargo is perfectly reasonable. Most people who want to read the articles have access to them or can get them through inter-library loans. Most of the general public is not going to be needing direct access to the majority of the NIH funded articles, especially within the first year. The number of people who were inconvenienced by the way things were is surely a very small fraction of the number of researchers who are being crippled by the change. It does not make sense to make this change, because it is going to negatively impact the amount of research that can be performed, which is worse than a few people having to possibly wait 12 months to get access to a few articles.

An unintended consequence of this is that the NIH (and the taxpayer) will now be paying more money on publication costs (not less) than it was prior to invoking the new rules on July 1st, 2025. Since our research group previously spent $0 on publication costs, and now this will be likely tens of thousands of dollars a year, this is a very negative outcome.

The research group I work in has a current R01 grant, had requested $0 for publication costs from that R01 (and we have no other funding), and has spent $0 on publication costs in the past. We are now being forced to make decisions about where to submit manuscripts based upon the publication charges, rather than choosing the most suitable journal. This is not how it should be and we can easily go back now to how it was prior to July 1st. My position is paid entirely from the NIH R01, and the funds for my position are even more at risk due to now having to pay publication charges with no pool of money designated for this purpose. Another unintended consequence is that we will no long publish as much of our work, because we have no money to do so and must really prioritize what we decide to publish.

These are some of the problems with some of the listed options.

Option 1: Placing a higher value on pre-prints devalues peer-review. While flawed, peer-review serves a valuable purpose and it is better to have it than to not have it. We generally don't use pre-prints for

serious work. We read them, but then immediately try to see if the paper actually was published somewhere so we can use and cite it.

Option 2: It is not useful to provide some money to cover the charges if it is not going to be enough to actually cover the charges. We don't have another source of money to make up the difference.

Option 3: Again, if the amount offered is not enough to cover the costs, it is not going to be useful to us.

For groups with current R01 grants but a publication budget of $0, supplemental payments need to be provided so that we can continue to publish. This is a vicious cycle. We must publish to get grants, to get and keep jobs, and to be promoted -- yet we have no means by which to pay for publications and we hate spending money on something silly like APCs in the first place.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**
If one of these new policies are adopted, there should be a way that authors earn a free publication voucher (no APC charges) for each peer-review they complete.

**4. Publishing best practices:**

**5. Other Comments:**

## 903. N/A

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Institutional Information Sciences Professional/Librarian

**1. Proposed policy options:**

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/NIH-RFI-Response-1.pdf

## 904. N/A

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Dear NIH,

I applaud NIH's effort to put a cap on publishing costs for manuscripts at journals. As an Early Career Researcher (new faculty) I find article publishing charges in journals too high. So by paying over $1500 USD APC on multiple articles per year, I am preventing multiple promising talents from doing research and training in my lab. I can fund multiple students with the funds required by journals every year to publish. Thus Option 2 proposed in this RFI for a cap of $1500-$2000 USD is reasonable.

I also believe that NIH needs to help change the terrible publishing culture with policy so play the long game as well, and not just think of impacting publishing in the next couple of years. As an Early Career Researcher, I find that it is very hard for us individually to combat perverse intentions and practices of journals and the multi billion dollar publishing economy of Springer Nature, Elsevier, Taylor and Frances etc. NIH who has taxpayer money and power at it's disposal needs to step in and help with culture change and use of preprints (Free to read and publish). In this regard, I recommend a preprint mandate (modified option 1 proposed by RFI) based on Plan U (article describing this is cited in section 2 on this form). At this point (2025), there are plenty of preprint servers but despite decades of their availability, only ~10% of researchers preprint. So merely encouraging preprints or saying that they can be included on one's biosketch or grant references is not enought, it is not helping change the culture in decades. But if preprints are mandated, then the preprinting percentage among researchers will increase and communal entities such as Review Commons (https://www.reviewcommons.org/) and PREReview (https://prereview.org/en-us), eLife (https://elifesciences.org/), and even well-meaning journals such as PLOS journals can perform/coordinate open peer review on preprints and post the peer reviews on preprint servers such as bioRxiv, medRxiv, OSF, Arxiv etc (as they already do, but for more manuscripts/preprints than they currently do).

I also think that NIH should improve grant peer review practices to value open data and code deposits to open repositories more. These are free of charge and are research outputs.

Options 3,4,5,6 do not make much sense. They just serve perverse practices of profit seeking and predatory publishing by researchers and journals. Journals who charge over $2,000 USD per article seek to profit from publishing so setting $6,000 USD or $12,000 per article in option 6 is Not OK.

**2. Available evidence related to publication costs and proposed options:**
https://doi.org/10.1371/journal.pbio.3000151

https://doi.org/10.1371/journal.pbio.3000273

https://doi.org/10.1371/journal.pbio.3002234

https://doi.org/10.1371/journal.pbio.3002502

https://doi.org/10.1101/833400

https://doi.org/10.1038/s41592-023-01817-y

https://osf.io/ew8uv/

https://doi.org/10.31219/osf.io/8zj9w

https://doi.org/10.20344/amp.19675

**3. Peer review compensation:**
I do not think that NIH or journals should compensate peer reviewers because it will create perverse incentives. It will create bad practices among reviewers. Peer review is a great learning opportunity for all researchers and it is quite reasonable to expect every researcher to review 2-3 papers per year. I think that instead of paying peer reviewers, journals and NIH can create pools of peer reviewers that include postdoctoral researchers and early career faculty. This will distribute the burden of peer review more evenly among researchers and allocate fewer manuscript to each researcher for review.

Compensating peer reviewers is not contributing to current insane publishing costs. Academics are already compensated for their salaries by grants paid to their institutions by funding agencies so reviewing 2-5 articles per year is not a tragedy really, it is a great opportunity to learn and contribute to the community, it is part of our job as researchers. Please do not open mechanisms for reviewer compensations, it does not make sense and will lead to more tax payer money waste and cultural issues in publishing.

**4. Publishing best practices:**
Reviewing entities (journals or peer review platforms) currently are not charging for fraud detection really. They pay their editors and staff and rest is their profits. Automated platforms may add to cost a bit indeed but should not raise publishing costs to beyond $1500-$2000 USD.

**5. Other Comments:**
Reviewing entities (journals or peer review platforms) currently are not charging for fraud detection really. They pay their editors and staff and rest is their profits. Automated platforms may add to cost a bit indeed but should not raise publishing costs to beyond $1500-$2000 USD.

## 905. N/A

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of myself

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Institutional Information Sciences Professional/Librarian

**1. Proposed policy options:**

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

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## 906. N/A

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of an organization

**Name:**

**Name of Organization:**

**Type of Organization:** Academic Institution

**Role:** Organizational Official

**1. Proposed policy options:**
Publicly-funded biomedical research has the most impact, and thus is most effectively invested, when the scientific work is disseminated in the form of peer-reviewed publications. Restrictions that lead to reduced productivity run counter to the goal of such funding, leading to a penny-wise but pound foolish effort all for a mere 0.8% of direct grant costs. We strongly suggest not limiting publication costs by researchers. Strategies that risk preventing discoveries from reaching the public domain are not an effective way to address the monopoly power or pricing strategies of for-profit publishers; instead, the federal government should directly engage with publishers to cap fees for NIH-funded research and ensure availability in a federal repository.

Of the five options presented, implementing a $20,000 cap on total costs (option 4) would be the least damaging to research dissemination, as it allows for a range of publishing decisions in response to the number and novelty of the discoveries resulting from the grant funding. Without any publication allowance (option 1), few PIs would be able to freely publish their work at all, and dissemination would be largely dependent on the wealth of the institution employing the researcher rather than the quality of the work itself. High-impact results in particular would no longer be publishable in the venues where they will be most frequently seen, downloaded, utilized for future research, and ultimately cited, which will set back the discipline as a whole. A per-publication cap (option 2) that is below what PIs currently spend on average, based on the data provided in the NOT, would have a similar effect; note that the proposals included in the NIH's own cost analysis were prepared prior to implementation of the Public Access Policy, and thus significantly underestimate APCs for Open Access. Increasing the cap for journals with compensation for peer reviewers (option 3) robs Peter to pay Paul, as PIs seeking to publish are also the experts called upon to review, and review compensation introduces an additional risk of unethical conduct as a reviewer-for-hire. Option 5, which combines a per-publication and total cap, would both prevent investment into high-impact publications and limit total productivity, which makes no sense.

Even under option 4, we would suggest adding an option for requesting approval for additional publication expenditures to accommodate projects that lead to an unexpectedly high number of significant results. The proposed total cap represents only 6-7 publications, but a quality 5-year project can easily generate 3 times that number, as was noted in the NOT. These should not be relegated to minor outlets where they will not be seen or used simply to save a miniscule amount of money relative to what it cost to produce the data.

**2. Available evidence related to publication costs and proposed options:**
Our own internal survey of publication charges in biomedical journals suggests that PIs selecting the most appropriate journals for the discipline and impact level of their results pay an average of approximately $3,500USD per publication, with OA tiers costing 1.5 - 2X that of embargoed versions.

**3. Peer review compensation:**
Although in theory compensation would be desirable, providing a financial incentive for both journals and reviewers has the potential to lead to biases toward reviewers who provide more favorable reviews that lead to manuscript acceptance (and thus payment to the journal). This system would be ripe for abuse, and would require very strict oversight to prevent problems from undermining the peer-review process. Making reviews public has pros and cons, but on balance this makes more sense for pre-print repositories than for the formal peer-review publication process.

**4. Publishing best practices:**
As a journal editor myself, I know that most reputable journals already have fraud detection systems in place already, though the increasing use of generative AI has made such detection much more challenging. The publishing ecosystem is unfortunately being flooded with bad actors, which are the bigger problem by far. An industry-wide audit system would help to identify and blacklist clearly predatory paper-mills.

**5. Other Comments:**
As a journal editor myself, I know that most reputable journals already have fraud detection systems in place already, though the increasing use of generative AI has made such detection much more challenging. The publishing ecosystem is unfortunately being flooded with bad actors, which are the bigger problem by far. An industry-wide audit system would help to identify and blacklist clearly predatory paper-mills.

## 907. Bishr Omary

**Submit date:** 9/15/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Bishr Omary

**Name of Organization:** rutgers university

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
Thank you for the opportunity to provide input.

My recommendation if option 2 plus $1000 compensation for reviewer payments. I also suggesting putting a limit of no more than 4 original research publications per year. Anything above this that is needed can be easily re-budgeted by the PI.

**2. Available evidence related to publication costs and proposed options:**
In my own experience, the APCs vary as outlined in the NOT-OD-25-138 is my experience.

I believe that NIH setting limits will hopefully place market pressure on the journals that charge outrageous rates.

Also, I believe many institutions now have arrangements with publishers that limit APCs.

**3. Peer review compensation:**
If NIH is to support peer review compensation, I recommend setting an upper limit (e.g., $1000 per article). There are so may journal others nowadays so finding a reasonable journal for reasonable work is not an issue.

**4. Publishing best practices:**
In my opinion, would not complicate what NIH covers for publications costs beyond the above. It makes sense to address the issue and set some goals posts. The major benefit of considering the policy is putting pressure on the publishers and NIH and tax dollars are better spent in supporting research rather than publishing companies.

Would let the authors who want to publish in such ridiculous charges pay for it using other means (eg, within the remaining direct costs).

**5. Other Comments:**
In my opinion, would not complicate what NIH covers for publications costs beyond the above. It makes sense to address the issue and set some goals posts. The major benefit of considering the policy is putting pressure on the publishers and NIH and tax dollars are better spent in supporting research rather than publishing companies.

Would let the authors who want to publish in such ridiculous charges pay for it using other means (eg, within the remaining direct costs).

## 908. Davud Allan Drummond

**Submit date:** 9/16/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Davud Allan Drummond

**Name of Organization:** The University of Chicago

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
NIH should not cover publication costs.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

# 909. Zach Hensel

**Submit date:** 9/16/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Zach Hensel

**Name of Organization:** ITQB NOVA, Universidade NOVA de Lisboa

**Type of Organization:** Academic Institution

**Role:** Investigator/Researcher

**1. Proposed policy options:**
The proposed options attempt to address a perceived market inefficiency: that high journal publication fees divert taxpayer funds from research activities and more cost effective ways to communicate results. However, each option imposes a form of PRICE CONTROL, a notoriously ineffective economic tool for correcting such problems. Instead of fostering competition or rewarding value, these rigid, one-size-fits-all caps will likely create market distortions without addressing the root cause of high costs.

A more effective and flexible solution is to reject a PRICE CONTROL and instead require that all grant proposals include a detailed "Publication and Dissemination Plan." This plan would justify the chosen publication venues and their associated costs as part of the overall research strategy. To the extent that budget evaluations already exist and are failing to constrain these costs, it's evidence of a systemic weakness in how peer review assesses cost-benefit across all aspects of a proposal.

Imposing a PRICE CONTROL on investigators is a superficial fix for this deeper evaluation problem; it wrongly limits researchers' academic freedom and strategic choices to compensate for a flaw in the review system itself. The correct solution isn't to restrict investigators but to improve the rigor of cost-benefit analysis during grant review.

**2. Available evidence related to publication costs and proposed options:**
No comment

**3. Peer review compensation:**
The decision to pay for peer review, and the appropriate level of compensation, should be a factor for the principal investigator to justify within their publication plan. Rather than creating a separate, fixed allowance as in Option 3, the NIH should empower grant reviewers to assess whether the potential benefits of a journal's peer review model (e.g., increased speed, rigor, or transparency) justify the costs for a specific research project. Innovation in this area is valuable, as research projects could benefit from truly independent constructive criticism at stages prior to having a finished scientific manuscript.

The fixed-price mechanism proposed in Option 3 is a form of arbitrary PRICE CONTROL that will likely exacerbate economic inefficiencies rather than solve them. For instance, the policy could incentivize journals to pay reviewers a token fee simply to qualify for the higher $3,000 cap, allowing the publisher to profit from the difference without genuinely improving the peer review process. This demonstrates why a case-by-case evaluation during grant review is superior to a rigid, top-down price-setting policy.

**4. Publishing best practices:**
This question's premise—that grant funds should cover publisher costs for services like "automated fraud detection capabilities"—is based on a misplaced sense of responsibility. Ensuring the rigor and integrity of research is the fundamental duty of funders and the scientific community, not a value-added service to be outsourced to publishers.

Instead of paying journals to police science, the NIH should strengthen its own review processes. Grant review panels should be empowered to heavily weigh an investigator's track record on rigor and transparency. This includes evaluating whether their previous publications provide sufficient methodological detail to be reproducible and considering any history of research misconduct. Using grant funds to pay publishers for fraud detection is an inappropriate use of taxpayer money and an abdication of the funder's core responsibility to uphold scientific integrity.

**5. Other Comments:**
This question's premise—that grant funds should cover publisher costs for services like "automated fraud detection capabilities"—is based on a misplaced sense of responsibility. Ensuring the rigor and integrity of research is the fundamental duty of funders and the scientific community, not a value-added service to be outsourced to publishers.

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## 910. Tendai Chisowa

**Submit date:** 9/16/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Tendai Chisowa

**Name of Organization:** Enveda

**Type of Organization:** Healthcare Industry (Biotech/Device/ Pharmaceutical Company)

**Role:** Other

**1. Proposed policy options:**

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/Enveda-Response-for-NOT-OD-25-138.pdf

# 911. Michael B. Eisen

**Submit date:** 9/10/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Michael B. Eisen

**Name of Organization:**

**Type of Organization:** Not Applicable

**Role:** Other

**1. Proposed policy options:**

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**

Dr. Jay Bhattacharya

Director

National Institutes of Health

Bethesda, MD 20892

Dear Dr. Bhattacharya,

I am writing in response to the recently issued Request for Information on Maximizing Research Funds by Limiting Allowable Publishing Costs (NOT-OD-25-138). Based on my experiences as a practicing biomedical scientist, a long-time NIH grantee, a former journal editor, and the founder of a successful publishing company, I strongly encourage the NIH to disallow all publication costs. This would, for reasons I set out below, be by far the best option for American science and for the taxpayers who depend on us to deliver maximally in both the short and long term on their investment in our work.

As you point out, the amount of money we spend on publishing is obscene. Over the past several decades the NIH and other funding agencies have squandered billions of public dollars on absurdly high subscription charges and per-paper fees. Given that the publishing industry has shown no interest in controlling costs (which have risen every year at a rate far greater than inflation since at least the 1980s) and given that prestige rather than price drives publishing decisions, the NIH has no choice but to limit what authors can spend.

In trying to determine what would be a reasonable amount to spend on publishing services, most people - and I'm sure many of the respondents to this RFI - will focus on the narrow scoped value proposition of a journal article for individual authors, and conclude it provides some positive value to them and therefore merits some form of modest payment.

But this is absolutely not the right way to look at the system. Our willingness to spend money to publish individual articles must be predicated on a determination that the journal publishing system as a whole is good for science and the US taxpayers who fund our work. And it manifestly is not!

Nearly everything about the journal publishing system we have today is bad for science.

It is slow. In a world where the Internet has sped the communication of all manner of information from the most important to the most trivial, science communication has gotten slower. It takes longer to go from submission of a paper to publication at a typical journal today than it did before the ascension of the modern Internet. Indeed we can send a rocket to Mars in less time than it takes the typical scientific paper to be published.

Access is limited. Although the vast majority of the funding for the research published in journals comes from public funders (of which NIH is by far the biggest), and even though these public funders along with public universities bear most of the costs, the papers themselves are often unavailable, because of expensive paywalls, to researchers, let alone the public who funded the work. Under pressure from Congress, begun by former Oklahoma Representative Ernest Istook, the NIH now makes works it funds freely available. But the poisonous legacy of paywalls remains a problem across the publishing world.

The system is bloated. There used to be a reason to have many different journals to disseminate information - it cost money to print and mail physical journals and it made sense to group articles together by audience. But even as the Internet has rendered that need obsolete, the number of journals has exploded - driven, except in rare circumstances, not by any scholarly need or value to authors, readers or the public, but rather by a desire by publishers to extract more taxpayer money, and the unwillingness (until now) of anyone to push back at them.

The peer review process is intrusive and ineffective. Peer reviewers have in many journals decided their job is to dictate to authors how their science should be done, rather than evaluate the soundness of the work presented to them. This has led the process of publishing an article to become more about satisfying the often absurd demands of reviewers rather than communicating work in a simple and clear way to readers. And there is a wealth of evidence that the process fails to accomplish its stated purpose - to ensure the science in a paper is reliable and to identify works of potential importance - on both accounts. This is in large part because the system is poorly implemented, but even if it were done to the highest standards everywhere, the reality is that it is simply not possible for three researchers reading a paper at a fixed point in time to serve as the ultimate arbiters of a works rigor and import - those are things that can only reliably be determined by the test of time. And yet, we continue to demand that scientists and the public treat the imprint of "peer reviewed" as if it is a deeply meaningful stamp of approval that must not be questioned or impugned. This is bad for science, bad for the public, and most importantly bad for the relationship between science and the public as it misleads them about how science works and ultimately undermines their faith in science and its institutions.

Journals are deeply biased. Too often works are rejected not because they are determined to be unsound or of no interest, but because they are at odds with the scientific, political and social orthodoxies of the moment. This happens most prominently in the political and social spheres, often with severe negative consequences, but its greatest damage occurs within science as the heterodox ideas that often move science forward in profound ways never get the scrutiny and attention they warrant.

In short, we pay publishers billions of dollars a year to oversee a process to publish material they played no role in creating, where scientists do all of the critical work for free, and in exchange we get slow, incomplete access to a 350 year old product that isn't reliable, which distorts who gets to have science careers, how those careers are built, and shapes in destructive ways how science is actually done.

It is impossible to comprehend - let alone quantify - the true cost of the life changing discoveries and advances that have been delayed or never made, to science, to the economy, and to the US taxpayers whose health and well-being depend on them. I think a fair starting point would be to demand that any NIH grantee who submits their work for publication in a scientific journal reimburse the US government $100,000 per article.

However, since this is obviously not practical, I would set the cap on allowable payments to journals at the closest positive number to the true cost - that is at $0 paper. I recommend this with full knowledge that this step would spell the end of journal publishing. And good riddance. We do not need the system. We cannot afford either its costs or its consequences.

Thank you for your attention to this matter.

Sincerely

Michael B. Eisen, Ph.D.

Professor of Genetics, Genomics and Development

Investigator, Howard Hughes Medical Institute

Department of Molecular and Cell Biology

University of California, Berkeley

# 912. Society for Neuroscience

**Submit date:** 9/16/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Marina Picciotto, PhD

**Name of Organization:** Society for Neuroscience

**Type of Organization:** Professional Organization/Association

**Role:** Organizational Official

**1. Proposed policy options:**
On behalf of the Society for Neuroscience (SfN), the world's largest organization of scientists and physicians devoted to understanding the brain and central nervous system, thank you for the opportunity to provide feedback on your policy proposals aimed at maximizing research funds by limiting allowable publishing costs (NOT-OD-25-138).

While the Society for Neuroscience supports the efforts of the NIH to maximize the use of federal research funds, we urge NIH not to cap publication costs. Setting a limit on the total publication spend (option 4) would be the least disruptive to the research lifecycle, but consideration must be given to the type of research as well as to the level and type of award.

SfN self-publishes two journals, the Journal of Neuroscience (JNeurosci) and eNeuro. Common costs associated with journal publishing include staff salaries, editor honoraria, and costs for editorial systems, production, and online hosting.

JNeurosci is a subscription-based journal and permits authors to post their accepted author manuscripts as they choose, with zero embargo, so NIH-funded researchers are not required to pay additional fees to comply with the NIH public access policy. eNeuro is fully open access and assesses an article processing charge (APC) as its sole revenue source. The APCs for both journals exceed the proposed $2,000 cap. A limit on APCs for individual journals would negatively impact submissions, especially for authors at smaller and/or less well-funded institutions.

**2. Available evidence related to publication costs and proposed options:**
As a traditional subscription journal, JNeurosci is primarily supported by institutional subscription costs, though authors are also assessed a publication fee and can opt to pay a surcharge for immediate open access. Due to increasingly common public and open access funder mandates, subscription revenue is increasingly at risk. Libraries are less likely to subscribe when free versions of peer reviewed material are available from reputable sources online, including PubMed Central. The diversity of revenue streams helps to insulate against major market shifts, as well as keeping costs lower for both institutional library customers and authors.

Furthermore, the proposed options do not account for open access publishing models. Open access allows for immediate access to published research at no cost to the reader, as well as allows liberal reuse policies that promote the free sharing and dissemination of science. While author fees are higher than traditional subscription journals, open access publishing has no other source of revenue to support operations, and income fluctuates based on published article volume. As an open access journal, eNeuro

has been subsidized by JNeurosci's more stable revenue for most of its existence and additional cuts to its income may threaten its longevity.

The Scientific Publications program accounts for about 25% of SfN's revenue and 9% of its expenses. The surplus revenue helps to support the other work of the Society, including scientific advocacy, public education activities, and training and professional development for early career researchers.

Large, commercial publishers will be well situated to weather these kinds of changes to the publishing landscape. As a small, non-profit publisher, SfN does not have the agility or scale to drastically alter its business models or cut expenses without partnering with a commercial publisher. As a result, the proposed caps may further strengthen large for-profit companies and result in the elimination of independent society publishers, who, in turn, invest in their communities.

SfN's costs and revenues are noted in its FY2024 Consolidated Financial Statement and https://www.sfn.org/-/media/SfN/Documents/NEW-SfN/About/Annual-Report/20241004-SfN-2024AnnualReport-final.pdf

**3. Peer review compensation:**
Each journal has a board of active scientists working as Reviewing Editors. These Editors are subject matter experts, assign qualified peer reviewers, and act as reviewers themselves when two reviewers do not agree, or other concerns are raised. They draft decisions and provide author feedback based on the reviewers' insights. They also provide detailed feedback on the over 1,000 articles that receive a decision without external review. These editors are compensated on a per-decision basis. In the previous fiscal year, JNeurosci Editors received on average $5,700 for the year; eNeuro editors received an average of $750.

In 2024, SfN journals acknowledged over 3,000 individual reviewers worldwide, who reviewed approximately 3,350 article versions that were sent for review across the two journals. With generally two reviewers per round of review, introducing reviewer compensation at the proposed level ($300/review) would create an additional $2M expense per year. Additionally, many of these articles will ultimately go on to be rejected, resulting in no revenue to support these new costs of peer review. Tracking and issuing payments for such a large pool of reviewers would create a significant administrative burden and likely require additional staff to manage, creating additional expenses.

In addition to the proposed payment structure for reviewers being out of step with SfN's existing compensation for editors, compensating reviewers is still unusual across the industry. Paying reviewers may create new conflicts of interest in the peer review system, which has previously been built on trust and reputation: reviewers may agree to review articles outside of their areas of expertise; they may only agree to review for publishers with the highest reviewer compensation, further rewarding large, commercial publishers; or they may use AI or other tools to turn out untrustworthy reviews quickly.

SfN continues to explore non-monetary ways to acknowledge the important contribution of reviewers, including an annual public acknowledgment, publishing reviewer profiles, and discounts on publication fees.

**4. Publishing best practices:**
SfN incurs several additional costs to support fairness and integrity in science, discoverability and stability of published material, and open science.

eNeuro uses a double-blind review process, where the authors' and reviewers' identities are unknown to each other. Both journals also feature an open peer review policy, where the reviewers' feedback is made public when an accepted article is ultimately published. While both initiatives contribute to a more collegial, fair, and transparent peer review process, they also require significant, resource-intensive administration by journal staff and customizations to the peer review software to run smoothly.

Both journals conduct routine research integrity screening for plagiarism, image duplication and manipulation, generative AI, paper mill submissions, and other checks. These screening tools alone can cost up to $30K annually, while also requiring staff and editor time to manage. Like most scholarly journals, SfN also pays to participate in programs like the CLOCKSS archiving service, ORCID author identifiers, the Ringgold institutional database, Copyright Clearance Center, the bioRxiv preprint transfer service, and Crossref's DOI and funder registries. All these initiatives support an interconnected system of research output and robust article metadata.

Over the last several years, there has been an increased focus on open data and data sharing policies. For cases where a public repository is not available or an author is unable to find a suitable home for data, both SfN journals will host data related to an article on their website. The journals will also host the code or software needed to reproduce an experiment. As the volume of material that needs to be hosted increases, SfN will incur additional online hosting costs, which are not insignificant.

**5. Other Comments:**
SfN incurs several additional costs to support fairness and integrity in science, discoverability and stability of published material, and open science.

eNeuro uses a double-blind review process, where the authors' and reviewers' identities are unknown to each other. Both journals also feature an open peer review policy, where the reviewers' feedback is made public when an accepted article is ultimately published. While both initiatives contribute to a more collegial, fair, and transparent peer review process, they also require significant, resource-intensive administration by journal staff and customizations to the peer review software to run smoothly.

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Over the last several years, there has been an increased focus on open data and data sharing policies. For cases where a public repository is not available or an author is unable to find a suitable home for data, both SfN journals will host data related to an article on their website. The journals will also host the code or software needed to reproduce an experiment. As the volume of material that needs to be hosted increases, SfN will incur additional online hosting costs, which are not insignificant.

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/SfN-RFI-NOT-OD-25-138-Maximizing-Research-Funds-by-Limiting-Allowable-Publishing-Costs.pdf

**Description:** Consolidated remarks from the Society for Neuroscience as an attached PDF

## 913. Smarter Learning

**Submit date:** 9/16/2025

**I am responding to this RFI:** On behalf of an organization

**Name:** Tom Ciavarella

**Name of Organization:** Smarter Learning

**Type of Organization:** Other

**Type of Organization - Other:** Publishing Consultancy

**Role:** Organizational Official

**1. Proposed policy options:**
All comments in the attached PDF

**2. Available evidence related to publication costs and proposed options:**
All comments in the attached PDF

**3. Peer review compensation:**
All comments in the attached PDF

**4. Publishing best practices:**
All comments in the attached PDF

**5. Other Comments:**
All comments in the attached PDF

**Uploaded File:** https://osp.od.nih.gov/wp-content/uploads/ninja-forms/51/Smarter-Learning-response-to-NOT-OD-25-138-Request-for-Information-on-Maximizing-Research-Funds-by-Limiting-Allowable-Publishing-Costs.pdf

**Description:** Smarter Learning response to NOT-OD-25-138 Request for Information on Maximizing Research Funds by Limiting Allowable Publishing Costs

## 914. Ismail Safi

**Submit date:** 9/23/2025

**I am responding to this RFI:** On behalf of myself

**Name:** Ismail Safi

**Name of Organization:** National Human Genome Research Institute

**Type of Organization:** Other

**Role:** Other

**1. Proposed policy options:**
I am reaching out to provide direct input on NOT-OD-25-138 (Request for Information on Maximizing Research Funds by Limiting Allowable Publishing Costs). I am excited to see NIH address a long-standing concern of mine, which is the rising cost of journal publications.

A concern I have regarding placing too many limits is that it will steer US-based researchers, particularly early-stage investigators, towards publishing in lesser-known, lower impact journals. This may have a significant impact on the reputation and standing of NIH-funded research as major publishers like Cell and Nature will compensate by publishing more articles from other countries.

Of the options presented, the only one that seems reasonable is placing a limit on the total award (option 4; limit of 0.8%). This approach will provide researchers with the scientific freedom the new administration promises will maximizing research value of the total award. Further, different disciplines (i.e. basic research vs clinical trials, or pharmacology vs genomics) have significantly different publication needs and costs. Placing per-publication limits may impact the ability of certain disciplines differently, introducing a new form of unintentional censorship on research findings.

We may benefit from running a trial on this proposed option to evaluate its impact. Good changes arise from thorough, mindful planning.

**2. Available evidence related to publication costs and proposed options:**

**3. Peer review compensation:**

**4. Publishing best practices:**

**5. Other Comments:**