FASEB
Federation of American Societies for Experimental Biology

Representing Over 110,000 Researchers

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Lyric Jorgenson, PhD
Associate Director for Science Policy
National Institutes of Health
6705 Rockledge Drive
Bethesda, MD 20817

Transmitted electronically via online form

Dear Dr. Jorgenson,

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.

Question 1: The option, or other option not considered here, that best achieves that goal of balancing flexibility in providing research results with maximizing the use of taxpayer funds to support research.

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.

Question 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 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.

Question 3: Factors that NIH should consider in determining whether peer reviewers are appropriately compensated.

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.

Question 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.

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.

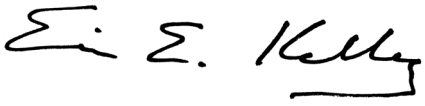
Question 5: Other evidence or information not considered here that NIH should consider in its policy on limiting allowable publication costs.

Throughout our response, we have highlighted both opportunities and challenges for NIH to consider when finalizing its policy to limit allowable publication costs. While amenable to exploring opportunities to make publishing less cost-prohibitive and equitable for members of both the research community and public, there are real costs associated with not only communicating research results, but ensuring these results uphold the tenets of Gold Standard Science and restore trust in science.

To ensure a policy that reduces costs while maintaining equity and quality, FASEB strongly encourages NIH to delay the timeline for implementation and take additional time to work with stakeholders and utilize the feedback from this RFI to update and re-evaluate the proposed options.

FASEB looks forward to continued engagement with NIH on this important issue.

Sincerely,



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