



**Public Comment from the Federation of Associations in Behavioral & Brain Sciences
(FABBS)**

Re: [NOT-OD-25-138](#) ("Request for Information on Maximizing Research Funds by Limiting Allowable Publishing Costs")

Date: September 15, 2025

The Federation of Associations in Behavioral & Brain Sciences (FABBS) represents 32 of the nation's leading scientific societies in the psychological, cognitive, and behavioral sciences. Our mission is to advance the sciences of mind, brain, and behavior; promote evidence-based policymaking; and support the integrity and independence of the federal scientific enterprise. We value the opportunity to comment on the National Institutes of Health (NIH) proposals for limiting allowable publishing costs, which cover article processing charges (APCs), in NIH grants.

We appreciate that NIH is addressing high publication costs, especially in light of the agency's recently effected public access policy. FABBS agrees with the goal of maximizing the value of each research grant and is open to limits on how much NIH contributes to publication costs, but we have concerns about the solutions proposed in this notice and want to bring attention to the potential unintended consequences of these policies.

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

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. *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.*

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. *Factors that NIH should consider in determining whether peer reviewers are appropriately compensated.*

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. *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.*

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 evidence or information not considered here that NIH should consider in its policy on limiting allowable publication costs.*

Broadly speaking, FABBS has concerns about potential unintended consequences of the policies proposed by NIH in this notice and allowable publication cost limits more generally. Before moving forward, we urge NIH to consider how to mitigate such consequences. The following list is not intended to be exhaustive.

- In some cases, a grant will produce a large dataset (or datasets) that can be used for years to come and lead to far more articles than initially expected. (The median number of publications per R01 grant is about 8; [Agarwal & Tu, 2021](#).) For example, undergraduate and graduate students may use such data in their own research many years removed from the completion of the grant. NIH must consider whether the publication fees for those articles featuring secondary analysis of grant data are subject to the NIH policy on APCs, and how grantees might be able to access additional resources to support that dissemination so that students are not discouraged from publishing with NIH-supported data. This could be through administrative supplements, for example.
- Publishers might increase acceptance rates to make up the difference caused by lower APCS. This could lead to the publication of poorer quality research that, when APCs were higher, would have been rejected. This could also further strain an already fraught peer review ecosystem as publishers seek more reviewers than are available, perhaps by recruiting reviewers who are not experts in the relevant field(s) needed to properly review a manuscript.

- If publishers keep their APCs high even in the face of an NIH cap on allowable publication costs, this could lead to the concentration of the work of better-resourced scientists in the most prestigious (and expensive) journals. Given how important publications are to tenure and advancement in academia, this could severely disadvantage graduate students, early-career investigators, and researchers at lower-resourced institutions.
- NIH should be mindful of publisher-institution agreements that might lead to a concentration of research being submitted to a small number of journals. For example, if Institution A has an agreement with Publisher B and not Publisher C, Institution A might urge its researchers to publish in Publisher B's journals rather than in Publisher C's journals, even if the latter are a better fit for the research. This outcome is even more likely if Option 1 is enacted.
- If a per-publication cost limit is set, the price cap might become the price floor, as previously lower-cost journals increase their APCs to match the cap. This has been a concern in the past when NIH has considered setting allowable production cost limits.
- A static cost cap might become obsolete and unsustainable as the economy changes. How will NIH account for changes in publishing costs (i.e., on the publisher's side) over time?
- Given the current landscape, these proposals ignore considerations for other methods of disseminating research to the public (i.e., without relying on public access to peer-reviewed journal articles).

FABBS emphasizes the need for NIH to work with stakeholders, including publishers and scientific societies, to learn more about actual publication costs, and recognize and mitigate the potential unintended consequences of funding limits in combination with the NIH public access policy.

Further, while we accept that some form of APC has become the only path for open access, FABBS can't help but wonder if we should, in addition, continue to think about other models that address all of the concerns raised above. Recognizing the ongoing conversation between Congress and the Office of Science and Technology Policy (OSTP), FABBS is eager to see additional communication and dissemination opportunities beyond the APC model.

FABBS is grateful for the opportunity to weigh in on this important issue and are eager to be a resource to NIH as it develops this policy.