

September 15, 2025

Here are the responses that were posted to the 5 questions on the comment form, with links to [Rockefeller University Press](#) and other.

1. Proposed policy options

NIH seeks input on the option, or other option not considered in the Request for Information, that best achieves the goal of balancing flexibility in providing research results with maximizing the use of taxpayer funds to support research.

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 [here](#) 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

NIH seeks 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.

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

NIH is interested in hearing ideas about factors related to paying for peer review. Specifically, NIH invites input on factors that NIH should consider in determining whether peer reviewers are appropriately compensated.

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

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 availability of a higher per publication cost.

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.