

Response to NIH Request for Information: Maximizing Research Funds by Limiting Allowable Publishing Costs

Submitted by: Galter Health Sciences Library and Learning Center, Northwestern University Feinberg School of Medicine

Date: September 15, 2025

RFI Reference: [NOT-OD-25-138](#)

Contact: Kristi Holmes

Galter Health Sciences Library at Northwestern University Feinberg School of Medicine appreciates the opportunity to provide input on NIH's consideration of publication cost policies. As a health sciences library supporting significant NIH-funded research, we offer perspectives based on our experience with scholarly communication trends and institutional publishing patterns.

We feel that any policy related to publication costs will have varied impacts across the research ecosystem. The NIH should consider how differences in financial capacity may affect institutions' ability to absorb costs shifted from federal to institutional budgets. We also would like to note that early career researchers, particularly those with limited funding options, may be vulnerable if publication venue choices become driven by cost rather than scientific merit. Finally, we feel that any individual institutional responses will likely have limited influence on overall publishing economics, which points toward the need for broader coordinated approaches to achieve meaningful cost reductions in scholarly communication.

International open access initiatives offer valuable lessons for policy development. Plan S, launched in 2018 by cOAlition S (a consortium of European research funders), provides insights into both the opportunities and challenges of coordinated funder policies aimed at transforming scholarly publishing (1). Various models have emerged globally, including consortium-based negotiations that leverage collective purchasing power (2,3), transformative agreements that transition journals from subscription to open access models (4), alternative publishing platforms that bypass traditional commercial structures (5), and institutional repositories that provide direct access to research outputs while supporting compliance with open access mandates (6). Each approach has yielded different outcomes in terms of cost management, researcher compliance, and publishing market responses, offering important considerations for NIH's policy development process.

We respectfully suggest that NIH consider:

1. **Convening stakeholder discussions** to explore collaborative approaches to publication cost challenges, possibly involving institutions, publishers, repositories, and/or international partners with experience in policies around publishing costs.
2. **Investigating coordinated publication cost negotiation models** that leverage NIH's substantial market influence, such as developing standardized pricing frameworks for NIH-funded research, exploring volume-based discount structures similar to those used by large institutional consortia, or creating certification programs for cost-transparent publishing venues, and negotiating improved green open access terms that provide researchers with greater flexibility in meeting public access requirements.
3. **Developing graduated implementation timelines** that allow for market adaptation and stakeholder coordination, such as pilot programs with select publishers, phased rollouts beginning with specific research areas or journal categories, transition periods that provide sufficient time for institutions and publishers to adapt their workflows and business models, and/or shifts to workflows which include open and alternative platforms for compliance.
4. **Exploring infrastructure investment opportunities** that could provide long-term, sustainable alternatives to current market dynamics, such as supporting development of diamond open access models that eliminate author fees or investing in next-generation peer review and editorial technologies that reduce overall publishing costs.
5. **Investing in institutional repository infrastructure** to enable flexible compliance pathways and sustainable publishing alternatives. This includes supporting repository development and interoperability with PubMed Central, potentially allowing deposit of peer-reviewed manuscripts in institutional repositories as an alternative compliance mechanism with the NIH Public Access Policy. Beyond compliance, repositories can serve as publishing venues for standalone, citable works while providing access to diverse research outputs including preprints, datasets, code, and protocols. To sustainably support this infrastructure, institutions could allocate a portion of their Facilities and Administration (F&A) funds to enhance platforms with FAIR (Findable, Accessible, Interoperable, Reusable) capabilities and facilitate greater coordination at the national level, reducing administrative burden while maintaining public access goals.

Balancing cost control with effective research dissemination creates opportunities for new approaches. NIH's unique position as the largest biomedical research funder enables the agency to bring stakeholders together to develop sustainable, high-quality scholarly communication solutions that benefit the research community and the public.

We appreciate NIH's consideration of stakeholder input in this important policy development process and remain available for further discussion of these issues.

References:

1. de Castro, P., Herb, U., Rothfritz, L., Schmal, W. B., & Schöpfel, J. (2024). Galvanising the Open Access Community: A Study on the Impact of Plan S. Zenodo. <https://doi.org/10.5281/zenodo.13738479>
2. Jisc. (2024, February 2). Jisc, UK institutions and Wiley renew open access agreement. *Jisc News*. <https://www.jisc.ac.uk/news/all/jisc-uk-institutions-and-wiley-renew-open-access-agreement>
3. Earney, L. (2020). Jisc Wiley agreement. *UKSG eNews*, 464. <https://www.uksg.org/newsletter/uksg-enews-464/jisc-wiley-agreement>
4. ESAC Initiative. (2024). Transformative Agreement Registry. <https://esac-initiative.org/about/transformative-agreements/agreement-registry/>
5. Bosman, J., Frantsovåg, J. E., Kramer, B., Langlais, P. C., & Proudman, V. (2021). *OA Diamond Journals Study. Part 1: Findings*. Science Europe. <https://doi.org/10.5281/zenodo.4558704>
6. Open Science Community Leiden. (n.d.). Rethinking publishing: Alternative outputs and platforms. *Leiden University*. <https://www.universiteitleiden.nl/open-science-community-leiden/news/rethinking-publishing>

Authors:

- Karen Gutzman, Northwestern University, [0000-0001-6331-4451](#), Head, Research Assessment & Communications
- Pamela Shaw, Northwestern University, [0000-0003-3698-1608](#), Research Policy Librarian
- Matthew Carson, Northwestern University, [0000-0003-4105-9220](#), Head, Data Management & Technology
- Kristi Holmes, Northwestern University, [0000-0001-8420-5254](#), Library Director, Professor of Preventive Medicine

Contributors:

- Mark Berendsen, Northwestern University, [0000-0002-2929-5952](#), Deputy Director
- Bart Davis, Northwestern University, [0000-0002-0338-5650](#), Head, Collection Management and Metadata Services
- Emma Wilson, Northwestern University, [0009-0002-9995-5458](#), Research Impact and Communications Librarian
- Sara Gonzales, Northwestern University, [0000-0002-1193-2298](#), Senior Data Librarian
- Molly Beestrup, Northwestern University, [0000-0001-6524-6464](#), Head, Research Information Services

Acknowledgments:

This response was developed with input from Galter Health Sciences Library and Northwestern University Clinical and Translational Sciences (NUCATS) Institute faculty and administration.