

Re: NIH Request for Information on Maximizing Research Funds by Limiting Allowable Publishing Costs

As an academic librarian who specializes in scholarly publishing and open access, as well as who supports NIH-funded researchers, I know how article processing charges (APCs) strain both grant budgets and institutional resources. While I share NIH's commitment to maximizing the impact of public funds, I am concerned that banning or capping APCs would not solve the underlying problem of publisher price inflation and may further entrench problematic and exclusionary systems.

Disallowing costs shifts the burden to institutions, while capping APCs risks becoming a pricing signal that publishers exploit. Both approaches could disadvantage nonprofit and community-driven journals that operate more sustainably and in better alignment with researchers and research institutions.

Instead, NIH should strengthen repository-based access by requiring immediate deposit of manuscripts in PubMed Central through no-cost options. Investment in community-owned infrastructure—such as repositories, preprint servers, and diamond open access platforms—would provide lasting alternatives to extractive commercial publishing practices. Finally, NIH should realign incentives by rewarding openness and compliance rather than journal prestige or ability to pay.

By emphasizing repositories, community-led infrastructure, and equitable incentives, NIH can ensure taxpayer-funded research is shared widely and sustainably, without reinforcing the costly APC-driven model.

Thank you for considering this perspective from an academic librarian based at KU.

*Josh Bolick*

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NOTE: my title and affiliation are included because they inform my perspective. This letter is submitted on my behalf alone. I do not presume to speak for my institution.