



September 15, 2025

To whom it may concern,

Please consider the attached as a formal response to the NIH Request for Information on Maximizing Research Funds by Limiting Allowable Publishing Costs. The undersigned of this letter are members of the [Open Research Funders Group](#) (ORFG), a coalition of private philanthropic funders committed to the open sharing of research outputs. Collectively, the ORFG members hold assets in excess of \$200 billion, with total annual grantmaking in the \$22 billion range. We believe openness is better for the American public, better for research, better for global society, and better for philanthropy. Open research accelerates the pace of discovery, reduces information-sharing gaps, encourages innovation, and promotes reproducibility.

As members of the private philanthropic community, we strive to support the rapid and wide dissemination of scientific outputs that serve our society. This community uses a variety of strategies and approaches to increase scientific discovery and continuously works to improve the scientific ecosystem. We have knowledge and expertise in funding scientific outputs – such as preprints, datasets, code and tangible materials – as well as assessing their impacts.

**Much like the NIH, we are concerned with exorbitant publication costs, specifically article processing charges (APCs).** A recent report by International Network for Advancing Science and Policy (INASP) estimated the cumulative APC costs for 21 global development funders to be between **\$74 million and \$81 million total**.<sup>1</sup> Moreover, the report concludes, "The amounts invested by research funders in open access publication are not translating into all their funded research outputs being immediately available to everyone. There is potential for this money to be reinvested in open, sustainable, and equitable publishing models for the future."<sup>2</sup> Estimated federal taxpayer dollars spent on APCs rose from \$281 million in 2016 to \$399 million in 2022—a \$118 million increase in 6 years.<sup>3</sup>

As a response to the ineffectiveness of APCs and allowable costs models, several private funders limit funding of publication costs, including but not limited to Astera Institute, Navigation Fund, Gates Foundation, and Howard Hughes Medical Institute. Many private philanthropic funders require or strongly encourage the immediate deposit of preprints into repositories

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<sup>1</sup> Alice Chadwick El-Ali et al., *A Review of Open Access Policy Options for Development Research Funders* | INASP (INASP, 2025), <https://www.inasp.info/open-access-policy-options-paper>.

<sup>2</sup> Chadwick El-Ali et al., *A Review of Open Access Policy Options for Development Research Funders* | INASP.

<sup>3</sup> *Updated Report to the U.S. Congress on Financing Mechanisms for Open Access Publishing of Federally Funded Research* (Office of Science and Technology Policy, 2024), <https://bidenwhitehouse.archives.gov/wp-content/uploads/2024/06/2024-Report-to-Appropriation-s-Committee-on-Scholarly-Publishing-and-Public-Access-Implementation.pdf>.

alongside other research outputs such as data, tangible materials, code, and more. These funders include: Aligning Science Across Parkinson's, Gates Foundation, Alex's Lemonade Stand, Chan Zuckerberg Initiative, the Simons Foundation, Wellcome Trust, Arcadia, Michael J. Fox Foundation, Moore Foundation, Templeton World Charity Foundation. For a matrix of some funders' approaches to preprints, visit the Preprint Policy Framework developed by Creative Commons and hosted by ASAPbio.<sup>4</sup>

**We also note that allowable cost models, in general, fail to solve the price problem.<sup>5 6</sup>**

Allowable costs still allow the commercial publishing industry to realize profits from APCs, and worse, they will incentivize publishers to develop new revenue streams that generate more barriers to the rapid dissemination of openly shared research outputs. Instituting allowable costs will, in effect, perpetuate the status quo of publishing.

**The fundamental issue is that publishing and evaluation systems are bundled with the sharing of scientific outputs.** To relieve the publishing costs burdening NIH-funded research, sharing scientific outputs should be unbundled from the traditional publishing and evaluation system. This would allow cost savings to be repurposed to robust open science infrastructure, which—when appropriately funded—entails a substantially smaller financial investment than the roughly \$400 million spent by the federal government on article processing charges per year. Moreover, it provides for a robust contextual open science landscape that will increase the rapidity of sharing scientific findings and offer increased transparency of the research and funding ecosystem.

**Robust open science infrastructures already exist and are being used and embraced by the scientific community.** Examples include any number of preprint servers and repositories hosting datasets, code, and other materials. These repositories rely on open licensing and quality metadata standards that allow for machine readability and interoperability, ensuring that learning models can access and retrieve scientific outputs. In turn, this will make way for future innovations and iterations of scientific communication, ending our reliance on the broken publishing system.

Funding open access infrastructure that supports the rapid dissemination of research findings is paramount for improving science. The NIH should consider shifting its focus from the traditional publishing system to supporting the continued development and adoption of open science infrastructures that can serve as dissemination systems decoupled from article publishing.

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<sup>4</sup> *Advancing Openly Licensed Preprints: Aligning Across A Standard Preprints Policy Framework – ASAPbio*, July 16, 2025, <https://asapbio.org/preprint-policy-framework/>.

<sup>5</sup> Leigh-Ann Butler et al., “The Oligopoly’s Shift to Open Access: How the Big Five Academic Publishers Profit from Article Processing Charges,” *Quantitative Science Studies* 4, no. 4 (2023): 778–99, [https://doi.org/10.1162/qss\\_a\\_00272](https://doi.org/10.1162/qss_a_00272).

<sup>6</sup> Katharina Rieck, “The FWF’s Open Access Policy over the Last 15 Years – Developments and Outlook,” *Mitteilungen Der Vereinigung Österreichischer Bibliothekarinnen Und Bibliothekare* 72, no. 2 (2019): 2, <https://doi.org/10.31263/voebm.v72i2.2837>.

Thank you for your efforts to study the scientific publication costs problem and dedication to improving the rapidity of sharing scientific outputs. We welcome deeper conversations with the NIH as it tackles this important problem and makes science openly available to the public.

Sincerely,  
Aligning Science Across Parkinson's  
Arcadia  
Burroughs Wellcome Fund  
Gates Foundation  
Navigation Fund  
Templeton World Charity Foundation