THE OHIO STATE UNIVERSITY

Enterprise for Research, Innovation, and Knowledge
Office of Research Compliance

University Libraries

September 12, 2025

Dr. Jay Bhattacharya
National Institutes of Health
Office of Science Policy
9000 Rockville Pike Bethesda, MD 20892

RE: Request for Information on Maximizing Research Funds by Limiting Allowable Publishing Costs (Notice Number: NOT-OD-25-138)

Dear Director Bhattacharya and NIH Leadership:

We are responding on behalf of The Ohio State University's Working Group on Public Access to Sponsored Research Data to the NIH's Request for Information on Maximizing Research Funds by Limiting Allowable Publishing Costs. Our committee is a joint initiative of Ohio State's Office of Research Compliance and University Libraries, with representation from university faculty and more than a dozen offices in the research support enterprise. Thank you for the opportunity to share our experiences and recommendations with you.

1. Proposed policy options

We support NIH's goal of maximizing research funds for research activities although we do not believe the proposed options will achieve that goal. The five proposed options shift unallowable costs to authors and universities (many of which are also funded by taxpayers) without addressing the root causes of market-driven inflated publishing fees.

- Shifting unallowable overages in article processing charges (APCs) to authors and universities may disproportionately disadvantage researchers at less well-resourced institutions.
- Instituting caps without addressing the larger market issues could negatively impact author publication venue choice, especially for authors without other sources of publication funding.
- We are concerned that imposing publication cost limits will create significant additional

administrative work that effectively undermines the goal of maximizing the use of taxpayer funds to support research. For example, shifting partial payment of APCs to two or more funding sources will create accounting obstacles, while tasking grant support staff with additional cost and compliance monitoring will create further bureaucratic challenges.

Rather than imposing publication cost caps that limit author choice and create administrative burden, we encourage the NIH to explore models that incentivize the use of open access publication options that do not rely on APCs. There are foreseeable ways in which publishers will adapt to price caps that undermine the stated goals of the proposal.

- Price caps could have the unintended consequence of creating a price floor that may raise lower-than-maximum publishing costs to meet the maximum allowable.
- Price caps may also incentivize publishers to increase article volume by lowering editorial standards.

We encourage the NIH to fully enforce its existing deposit requirement for Author Accepted Manuscripts into PubMed Central immediately upon acceptance for public availability upon the Official Date of Publication without embargo.

- We appreciate the NIH stance that paying to publish open access is not a requirement of its Public Access Policy and that a free pathway to compliance can be achieved by depositing the Author Accepted Manuscript into PubMed Central; however, authors are currently encountering obstacles and barriers from publishers who are charging green open access fees that amount to deposit fees and mandating paid hybrid gold open access for NIH compliance.
- We encourage the NIH to assert the Federal Purpose License to enforce no-charge, no-embargo green open access archiving for policy compliance.

2. Available evidence related to publication costs and proposed options

The DOAJ data used for determining the average global APC and the average for U.S. published journals' APCs is limited to fully open access journals which skews the publishing cost data toward lower average costs.

- Hybrid journals have a higher average APC cost. As noted in the "Updated Report to the U.S. Congress on Financing Mechanisms for Open Access Publishing of Federally Funded Research" (page 10, OSTP, June 2024), which analyzed the costs associated with the top 100 journals for federally funded research, the average APC for those hybrid

journals in 2024 was approximately $4,000.

- If researchers are forced by publishers to publish gold open access in hybrid journals to comply with the NIH Public Access Policy, they will likely incur costs over and above the maximum allowable in Option 2 and those higher costs would also negatively affect authors under Options 3-5.

3. Peer review compensation

We appreciate the NIH's desire to improve the peer review system and the transparency of reviews, but we do not believe that peer review compensation would serve to control publishing costs.

- The appropriate recognition of effort involved in peer review is an important issue with many complex and ethical considerations. Due to this complexity, we recommend that it is best addressed separately from a discussion of limiting publication costs.
- Offering a higher allowable cost (Option 3) may encourage more publishers to use a pay model for peer review; however, we caution that without additional guardrails in place, this could lead to unintended consequences and may serve to degrade the peer review process.

4. Publishing best practices

We fully support best practices in publishing, but we do not believe that this discussion can figure into any publication cost cap without first obtaining a more accurate understanding of the true cost of publishing.

- The true cost of the work undertaken to produce articles and journals is a black box, and the prices set for APCs by for-profit publishers are driven by what the market will bear. Without accurate and transparent data on the true cost of publishing to serve as a base, we cannot realistically consider the implications of additional costs from best practice implementation.

Thank you again for the opportunity to share our recommendations. We appreciate the NIH's ongoing commitment to maximizing the value of research grants.

Sincerely,
Anna Biszaha and Maureen Walsh on behalf of the Working Group on Public Access to Sponsored Research Data