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**ASME Response to NIH Request for Information on Maximizing Research Funds by Limiting
Allowable Publishing Costs ([NOT-OD-25-138](#))**

September 15, 2025

On behalf of the American Society of Mechanical Engineers (ASME), thank you for the opportunity to respond to the National Institutes of Health's (NIH) Request for Information on policies to maximize research funds by limiting allowable publishing costs.

Founded in 1880, ASME is a not-for-profit professional society with more than 70,000 members worldwide. ASME is one of the largest engineering publishers in the United States, offering 33 technical journals, 26 annual conference proceedings, and thousands of peer-reviewed articles in areas including pressure technology, bioengineering, power generation, manufacturing, and advanced nuclear energy. Our publishing program is deeply invested in sustaining high-quality, peer-reviewed research and advancing public access to engineering knowledge.

We strongly support the principle that federally funded research should be broadly accessible to the public. However, we believe NIH's consideration of limits on publishing costs must be designed to avoid unintended consequences that could reduce author choice, harm smaller and mission-driven publishers, and undermine the sustainability of the peer-review ecosystem that underpins research integrity.

Publication, dissemination, and curation are essential components of the research process, ensuring that taxpayer-funded discoveries are shared with the scientific community and the public. The Code of Federal Regulations expressly recognizes this by listing publication and printing costs as allowable expenses for federally funded research (§ 200.461). These costs are not ancillary but integral to the responsible conduct of research, as peer-reviewed dissemination validates results, fosters reproducibility, broadens research impacts, and advances innovation. Any NIH new policy that restricts the ability of researchers to allocate grant funds toward legitimate publishing expenses should not conflict with longstanding federal cost principles or undermine the goal of ensuring broad and equitable access to the results of federally supported research.

Recommendations:

Preserve Author Choice and Flexibility

- Researchers should retain the ability to publish in the journals that best serve their scientific community, whether through subscription-based, hybrid open access, or fully open access models.
- Any cost caps, total award limits, or other restrictions must not create a “one-size-fits-all” publishing approach that disadvantages authors at smaller institutions or research fields or favors a particular business or organizational model in publishing.
- Return of a limited embargo period of 12 months could allow for continued support from the subscription model of publishing and should be considered by NIH as a way to leverage non-federal sources of revenue to support the agency’s research dissemination objectives.
- Despite inflationary cost increases, ASME's maximum Open Access fee of \$3000 for Hybrid Journals has been maintained since its establishment by subsidizing any additional expense via subscription revenue.¹ In addition, our newest fully open journal has a reduced fee of \$1950, with further discounts for ASME members (\$1700), to encourage paper submissions under this new model of publishing.
- ASME also offers a Read & Publish Open Access option to institutions that subscribe to our journals package that further subsidizes the Open Access model through our traditional subscription revenue. With a trend towards removal of the subscription model as an option for publication, Open Access options will likely require additional revenue support from sponsoring agencies.²

Support Sustainability of the Scholarly Publishing Ecosystem

- High-quality peer review, editorial oversight, digital infrastructure, archiving, and indexing all require substantial ongoing investment. Limiting the use of research funds for publication costs without providing alternative mechanisms for cost recovery risks destabilizing nonprofit and society publishers, reducing options in the publishing marketplace.
- A sustainable model must acknowledge the legitimate costs of publication and provide flexibility for different pricing structures across disciplines and journals.
- Direct publishing costs do not reflect the full investment by high-quality, reputable publishers in disseminating Gold Standard Science. This includes investing in continuous process improvements, improved quality-control practices, and improved software and systems. These investments are necessary to address new and ongoing threats and challenges such as Gen AI, fraudulent practices, and cybersecurity needs, including foreign interference.³

Flexibility in Research Dissemination

- Strict caps or prohibitions on publishing costs could inadvertently privilege well-resourced institutions able to subsidize open access publication while disadvantaging under-resourced institutions, HBCUs, community colleges, and smaller research groups.
- NIH should conduct an impact analysis to ensure that any new policy supports equitable participation across the research community.
- NIH should emphasize compliance methods that present minimal costs to authors and publishers while maximizing agency public information objectives, such as allowing immediate deposit of an author's submitted manuscript, followed by delayed submission of an Accepted or VOR Manuscript.

Transparent Guidance and Coordination

- NIH should provide clear and timely guidance to researchers on how to budget for publication expenses under any new policy.
- Coordination with other federal agencies, as well as with the publishing and research communities, is critical to harmonizing approaches and preventing fragmentation.
- Primary consideration should be given to how new policies support the research and publishing community in advancing agency research dissemination objectives, rather than how to expand access for the sake of access to a theoretical non-subscriber community that does not currently engage in scholarly publication or research activities.

ASME urges NIH to pursue policies that promote public access and innovation while preserving a vibrant and sustainable scholarly publishing ecosystem. We believe that an effective model must balance affordability, accessibility, and sustainability, ensuring that federally funded research continues to be rigorously peer-reviewed, widely disseminated, and equitably accessible.