

September 15, 2025

**National Institutes of Health – Submitted Electronically**

**RE: Response to NOT-OD-25-138, titled “Request for Information on Maximizing Research Funds by Limiting Allowable Publishing Costs**

Public Responsibility in Medicine & Research (PRIM&R), a nonprofit organization with over 3,500 active members throughout the research enterprise, is dedicated to advancing the highest ethical standards in research. PRIM&R appreciates the opportunity to comment on the importance of scientific publications and the support of these costs.

In its request, NOT-OD-25-138, NIH requests comments related to:

*“Other evidence or information not considered here that NIH should consider in its policy on limiting allowable publication costs.”*

Within this request, NIH presents its reasoning alongside five models for organizations to consider related to potential caps on NIH funding of publication costs. PRIM&R is not expressing a preference regarding Options 2-5, because we think NIH recipient organizations are in the best position to provide input on these options. PRIM&R is not specifying a position on an exact budget model for funding publication costs. Instead, the focus of our comment is on Option 1 which proposes to “Disallow all publication costs.” We think that Option 1 presented in NOT-OD-25-138 limits dissemination of findings and the importance of federal funding in research and therefore should not be considered.

While acknowledging that the federal government would like to reduce publication costs, PRIM&R fundamentally supports the dissemination of scientific discoveries to empower the public to access and interpret results from reputable innovative research. The reality is that many journals have publication costs. A complete disallowance to fund such costs could inadvertently restrict publication efforts and impede scientific communication with the public. Given the shared goal to release impactful and reliable research results widely, we encourage NIH to ensure that costs for reputable journals are adequately retained in research budget considerations.

If NIH proceeds with capping publication costs, PRIM&R urges NIH to consider using resultant cost savings to increase the availability of lay person abstracts or other means to promote easily understandable communication about quality, peer-reviewed science. For example, NIH RePORT<sup>1</sup> aims to provide information to the public about the results of NIH-funded research. These entries must be written in an approachable style that resonates with the general public. Most importantly, recognizing an adherence to standards such as those set by Office of Human Research Protections (OHRP) for informed consent forms for human participants enrolling in a study<sup>2</sup> (e.g., language and reading level), or standards

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<sup>1</sup> Home | RePORT, <https://report.nih.gov/> (last visited Sept. 8, 2025).

<sup>2</sup> Informed Consent FAQs, <https://www.hhs.gov/ohrp/regulations-and-policy/guidance/faq/informed-consent/index.html> (last visited Sept. 8, 2025).

set by clinicaltrials.gov would improve the public's understanding of NIH-funded studies' results and impacts to their communities. Efforts that improve the quality of the research publications resulting from the NIH Public Access Policy could widen the reach to all audiences, scientific and non-scientific. For example, the NIH publishes infographic resources and a webpage related to "Explaining How Research Works"<sup>3</sup>. A continuation and expansion of resources like these help build scientific awareness and may result in interest and involvement around scientific discovery.

PRIM&R appreciates the organization's consideration of the multiple options. As NIH outlines its next steps, it is our hope that these recommendations assist the agency in promoting transparency, integrity, and trust.

Sincerely,



Ivy R. Tillman, EdD, CIP  
Executive Director  
Public Responsibility in Medicine and Research (PRIM&R)

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<sup>3</sup> Explaining How Research Works | National Institutes of Health (NIH), (June 26, 2025),  
<https://www.nih.gov/about-nih/science-health-public-trust/tools/explaining-how-research-works>.