Rapid Science

September 15, 2025

Dr. Jay Bhattacharya
Director
National Institutes of Health

Dr. Lyric Jorgensen
Director, Office of Science Policy
National Institutes of Health

Dear Drs. Bhattacharya and Jorgensen,

Rapid Science is writing in response to the NIH NOT-OD-25-138 Request for Information on Maximizing Research Funds by Limiting Allowable Publishing Costs (RFI). Rapid Science, founded in 2013 to accelerate the pace and accuracy of scientific discovery through open, equitable and collaborative practices, and its family of associated projects support the NIH's efforts to lower costs for scholarly publishing. In addition to this letter, we have submitted our responses to the specific questions in the RFI using the online comment form.

As a 501(c)(3) fiscal sponsor, Rapid Science connects and strategizes with organizations offering real-world solutions that transform vision to policies and practices, including Incentivizing Collaborative Open Research (ICOR) and Strategies for Open Science (Stratos).

We believe that the first option, **disallow all publication costs**, provided in the RFI is really the only viable way to achieve an ecosystem shift. The current paradigm that incentivizes journal publishing has proven to be costly, opaque, and lacking in innovation. It has created a static, incomplete record of science that is frequently not accessible.

Neither the current slow and expensive publishing process nor the article as an endpoint reflect the dynamic, iterative, and data-rich nature of science. We are paying ever increasing prices for a product that gets less and less useful in the digital era. Articles frequently do not even contain links to underline data and other supporting materials and often have to remove metadata and reduce figure fidelity or image quality to fit the work into the print paradigm that has persisted for more than 25 years since journals went online.

The National Academies Strategic Plan, released in 2024, calls for reform: "There is growing awareness that current promotion and tenure decisions are far too focused on publications in

high-profile journals. Other essential contributions to the research enterprise such as mentoring, promoting diversity, communicating with the public, improving the research process, or striving to elevate public trust in science are either not recognized or insufficiently rewarded."

While the challenges posed by the current system are well understood, the open science and publishing reform movements have not yet provided an alternative for research sharing that is more efficient and data-complete. The logical choice is a preprint that includes underlying data and other research outputs needed to reproduce the work. And additionally an ecosystem in which AI validation and human peer review of many types can flourish.

Repurposing a fraction of the funds used to pay for APCs today could evolve data sharing, preprinting, and independent peer review, resulting in a new faster and more efficient ecosystem that makes all research outputs available earlier and more broadly. Rapid Science, ICOR, Stratos, and our affiliated projects propose standing up this preprint-based alternative and investing in and incentivizing open-first, born-with-integrity workflows and tools that capture research as it is being conducted and credit researchers for sharing early and often.

We believe it is only through convergence of ideas and collective action that we will achieve a true shift away from an expensive, print based system towards a dynamic paradigm that will accelerate the benefits of our collective investment in science.

With this in mind, we suggest that NIH take the following actions:

1. Mandate preprints with underlying data and other outputs as the primary method of sharing research prior to or instead of journal publishing
2. Do not pay for APCs
3. Credit data-complete preprints and preprint reviewing in grant decisions and research assessment

Thank you for the opportunity to respond.

Best wishes,

Kristen Ratan

Kristen Ratan
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CEO, Stratos
CoFounder, ICOR