PREREVIEW

Dr. Jay Bhattacharya
Director
National Institutes of Health

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

Date: September 11, 2025

Dear Drs. Bhattacharya and Jorgensen,

PREreview is writing in response to the NIH NOT-OD-25-138 Request for Information on Maximizing Research Funds by Limiting Allowable Publishing Costs (RFI). PREreview welcomes 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.

About PREreview

PREreview's mission is to bring greater openness and equity to the peer-review process by empowering anyone who wants to participate in reviewing preprints with the tools and community support needed to do so. We question and challenge the *status quo*, which too often places control in the hands of publishers rather than those involved in the research. Additionally, we strive to rethink and redefine who is considered an expert. We believe that expertise comes from both formal research and lived experiences that provide unique insights. We believe that anyone with relevant knowledge can and should be empowered to offer valuable feedback to a research field and even influence its direction.

PREreview.org is the only free, open-source platform that enables anyone with an ORCID ID to share public feedback on research manuscripts before they enter publisher-controlled peer review. To date, more than 1,050 reviewers have authored over 1,330 reviews on our site. Most reviews focus on preprints in the life sciences (~500) and health sciences (~300), with others covering the physical sciences (~227) and social sciences (~167). Soon, we will expand beyond preprints to support reviews of datasets, opening the door to even more participatory and transparent evaluation of research outputs.

We also know that technology alone won't create the change we seek in scholarly communication. We work directly with communities—from researchers to patients and caregivers in the rare disease space—to co-create inclusive ways for people to participate in reviewing research. We're not asking people to adapt to an outdated system; we're working with them to build a better one. The platform is just one pillar of our broader strategy. We also create and openly share practical resources that guide readers through a socially conscious peer review process.

PREreview Responses to RFI Questions

1. **Proposed policy options**

   NIH seeks input on the option, or other option not considered in the Request for Information, that best achieves the goal of balancing flexibility in providing research results with maximizing the use of taxpayer funds to support research.

   Of the proposed options, PREreview's vision most closely aligns with Option 1. However, eliminating support for Author Processing Charges (APCs) without simultaneously shifting incentives, updating policies, and investing in valid, free, and open alternatives will likely fall short of achieving the stated goal of "maximizing the use of taxpayer funds to support research."

   APCs do not accelerate the dissemination of scientific knowledge—they reinforce the traditional publishing model and make participation more costly. Scholarly publishing is already prohibitively expensive, and APCs add yet another financial barrier. Fees have risen sharply in recent years, and even imposing caps could create unintended market distortions. Most importantly, APCs uphold a system that rewards journal prestige rather than the substance of the research, while disproportionately hurting underfunded groups and institutions around the world who are least able to absorb these costs.

   The most effective and equitable way to reduce the costs of scholarly publishing is to reform the incentive structure itself—shifting recognition away from journal brands and toward the quality and impact of the research. This requires decoupling the dissemination of scientific outputs from their evaluation, ensuring that sharing

knowledge and assessing its merit are treated as distinct but complementary processes.

To achieve this goal, we recommend NIH considers adopting the following practices:

- **Mandating that NIH-funded research outputs be shared as openly licensed preprints**—along with openly licensed code and data—either before or at the time of journal submission. This policy, already adopted by a growing number of funders, ensures faster and broader access to knowledge.
- **Recognizing** that open peer review of preprints—including the reviews that are community-driven such as those published on the PREreview platform—as fulfilling the peer-review requirement in NIH's open access policy.
- **Investing** a dedicated portion of its budget in supporting the maintenance, growth in adoption, and interoperability capabilities of existing free, open, and journal-independent infrastructure to ensure the free and public dissemination and evaluation of research.

Adopting these measures will not only accelerate the dissemination of critical research findings, making them immediately accessible for feedback and reuse, but will also drive down costs for researchers and NIH alike. More importantly, it will catalyze the systemic change in scholarly publishing that is urgently needed to create a more open, equitable, and sustainable research ecosystem.

2. Available evidence related to publication costs and proposed options

NIH seeks any evidence (either from your own work or other publicly available sources) that can be publicly shared that addresses the considerations of one or more of the options.

There is a growing body of literature supporting the value of the movement towards preprint review and away from traditional scholarly publishing. We recommend that NIH consider this evidence in making their final policy decisions:

- Expert consensus report lists recommendations for researchers, funders, journals, preprint servers, and non-specialist readers on how to engage with

preprint review: Recommendations for accelerating open preprint peer review to improve the culture of science

- Preprint feedback improves the quality of the results that may eventually appear in traditional publications: Robustness of evidence reported in preprints during peer review

- Preprint review is cost-effective and draws from the widest possible pool of reviewers at a time when traditional peer-review is in crisis: The present and future of peer review: Ideas, interventions, and evidence

- Preprints can accelerate peer review as peers can discover research and can provide constructive feedback or suggest new studies earlier in the research life cycle: On the value of preprints: An early career researcher perspective

3. Peer review compensation

NIH is interested in hearing ideas about factors related to paying for peer review. Specifically, NIH invites input on factors that NIH should consider in determining whether peer reviewers are appropriately compensated.

PREreview believes in the value that voluntary, transparent, and constructive preprint review brings to strengthening the integrity of the peer-review ecosystem. While PREreview recognizes the importance of compensating experts for their time—offering generous honoraria to community members who contribute through user research, to our Champions, and to members of the Advisory Committee—we do not provide monetary compensation for the publication of preprint reviews. Instead, researchers and experts who engage with the PREreview community are supported through *recognition* and *training*.

- **Recognition:** PREreview affirms that open preprint reviews are part of a researcher's scholarly contributions and should be recognized in evaluations for promotion, grants, and prizes.

  To support this recognition, PREreview has developed features that make it simple for reviewers to include their open preprint reviews as part of their public scholarly record. These features also ensure PREreview.org is interoperable with

other key platforms, contributing to the long-term sustainability of open scholarly infrastructure.

- **Training:** PREreview believes that all experts should have the tools and opportunities to contribute constructive, impactful preprint reviews that advance a more open and equitable scholarly future.

  To support this, with contributions from the community, PREreview develops multilingual openly available resources to support all experts in participating in open preprint reviews. We also lead and train others in facilitating peer review trainings and collaborative review sessions.

NIH would substantially accelerate and support the adoption of community-driven, open preprint review by:

- **Recognizing and rewarding** researchers' contributions to open preprint peer review by granting scoring advantages in funding applications and permitting these contributions to be listed in CVs and biosketches;
- **Encouraging universities to recognize** contributions to open preprint review as part of their evaluations for academic tenure and promotion;
- **Allocating a portion of grant funding**—through direct or indirect costs—to support preprint and open preprint review infrastructure that broadens participation in open preprint review;
- **Investing grant funding** in training researchers and other experts in participating in the review of preprints and other research outputs (*e.g.*, datasets, analytical source code, software, etc.).

4. **Publishing best practices**

In addition to compensating peer reviewers, other kinds of publishing best practices, such as use of automated fraud detection capabilities, may contribute to higher publishing costs. NIH is seeking further input on additional factors that it should consider in determining the allowability of a higher per publication cost.

Community-driven, open preprint review is key to building greater trust and transparency in research. At PREreview, we are transforming trust in science by reimagining peer review as a dynamic, transparent process applied to all research outputs—not just journal articles—unlocking faster validation, broader collaboration, and more accountable knowledge creation. When more expert eyes are engaged in evaluating research, fraudulent or scientifically unsound work is far less likely to take root. Our approach to combating fraud and unchecked automation is to build a strong, global coalition of human experts grounded in shared values and a common purpose.

The type of community-driven, open preprint review supported by PREreview is a great foil against some forms of fraud found in academic publishing. For instance, transparent collaborative reviews are less likely to result in reviewers requesting that authors cite reviewer papers in order to win their approval, reduces the ambiguity of motivations behind critical reviewer feedback where conflicts of interest may be involved, and distributes the ownership of the review to a larger pool through consensus rather than concentrating it among just one, two, or three reviewers whose identity is unknown.

Importantly, community-driven, open preprint review does not have to be an alternative to journal-organized manuscript review. Open preprint review works in parallel and in support of more traditional review modalities. Several journals allow for or even require the publication of manuscripts submitted to their journal as preprints (*e.g.*, eLife, PLOS, JMIR Publications and many others). Currently editors can search databases such as EuropePMC and Sciety that index preprints with reviews and consider using the public reviews as part of their review process. Additionally, publishers can choose to more formally partner with services such as PREreview to host crowd-sourced, collaborative review sessions (*e.g.*, Live Reviews), or automate requests for community reviews via standard notification protocols such as COAR Notify—a protocol that PREreview already uses to enable preprint authors to request feedback from the PREreview community at the time of submission to a preprint server.

Finally, while PREreview focuses on developing the technological and social infrastructure to improve human-centered peer review, we believe that, when done responsibly and with proper consideration, there can be additional value brought in by the use of machine-driven automated validation to perform basic checks, integrity checks, and compliance checks (such as datasets being shared appropriately). While the latter should not exist without the former, we believe that together and layered on

top of openly and freely available preprints make scholarly evaluation significantly more transparent and efficient than outdated, opaque journal-organized systems.

To help support the evolution of an inclusive and open ecosystem that allows for easy and seamless integrations between key open infrastructure services and value-aligned publishers, NIH should consider:

- **Encouraging publishers** to develop partnerships and workflow integrations with open preprint review services, ensuring that community-driven open preprint review can be incorporated into transparent, journal-organized peer review processes;
- **Allocating a portion of grant funding**—through direct or indirect costs—to support the integration between open preprint review infrastructure with publishers' peer review workflows, thereby helping authors publish preprints and request feedback more easily and enabling publishers to recognize and incorporate community-driven open preprint review into their evaluation processes.

5. **Other comments**

Thank you for the opportunity to submit comments on this Request for Information.

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PREreview

On behalf of the PREreview Team and PREreview Advisory Committee Members