



THE UNIVERSITY
of NORTH CAROLINA
at CHAPEL HILL

OFFICE OF THE VICE CHANCELLOR FOR RESEARCH

National Institutes of Health
9000 Rockville Pike
Bethesda, MD 20892

September 15, 2025

To whom it may concern:

We are writing to offer our perspective in response to NIH's Request for Information on Maximizing Research Funds by Limiting Allowable Publishing Costs (NOT-OD-25-138). First, we agree that federally funded research should be open and accessible to all, and we acknowledge that the current publishing system is broken. Publishing Costs have risen to levels that are burdensome and unsustainable, and funding this system with open access fees only shifts costs without providing sustainable solutions. We support change that can effectively tackle this problem nationally. However, we are concerned that the proposed solutions do not directly address the root problem, and that we will have unintended consequences that will lead to further disparities across academic disciplines.

At present, our academic systems of evaluation, whether for tenure, promotion, or professional recognition, rely on journal impact factors and other comparable measures as evaluative tools with few effective alternatives to measure individual faculty contributions beyond publication in established, prominent journals. Pairing this with open access imperatives creates both financial and structural challenges for faculty members and their institutions, particularly those who may have limited access to funding support.

While reducing author publication costs is an important goal, it is not, in itself, the full solution. The more meaningful and sustainable path forward will require us to rethink how faculty contributions are recognized across the academy. To do this effectively, we must work collectively through associations such as the Association of American Universities (AAU), the Association of Public and Land-grant Universities (APLU), and the Association of American Medical Colleges (AAMC), among others. These organizations are well positioned to convene institutions and stakeholders to explore, develop, and promote new models of recognition that move beyond reliance on high-cost journal publications. We recommend and encourage the aforementioned associations to convene a joint taskforce with broad representation, to begin considering effective ways to re-envision and rethink the inputs to the appointments, promotions and tenure (APT) process.

Addressing this issue will take time and collaboration, but doing so is critical to ensuring that the evaluation of faculty achievements is equitable, financially sustainable, and reflective of the many ways scholars contribute to their disciplines and to society.

Sincerely,

A handwritten signature in blue ink that appears to read "PL".

Penny Gordon-Larsen, PhD
Vice Chancellor for Research
University of North Carolina at Chapel Hill

A handwritten signature in blue ink that appears to read "Maria R. Estorino".

Maria R. Estorino
Vice Provost for University Libraries
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