Biophysical Society

September 15, 2025

Biophysical Society Response to NIH Request for Information on Maximizing Research Funds by Limiting Allowable Publishing Costs (Notice No. NOT-OD-25-138)

The Biophysical Society has been representing the interests of biophysicists around the world for almost 70 years. One of its main functions is to disseminate research results to its community through its peer-reviewed journals. The Society publishes three, with its flagship journal, *Biophysical Journal*, first publishing in 1960.

The established system of peer reviewing and sharing scientific results through journals has served scientists for hundreds of years. It is effective and has continued to evolve over time, in part to keep up with ever-changing technology; however, it is not perfect, and it does have financial costs.

There are many scientific organizations, journals, and other outlets that researchers can use to share their results. Scientists entrusted with funding to perform research should have the freedom to choose the best place to communicate their findings. Research involves many costs, including for computers, microscopes, labware, chemicals, etc. The dissemination of research findings is a necessary part of the scientific process and has costs that are as valid as for any other material or service used.

The option that best achieves the goal of balancing flexibility with maximizing the use of taxpayer funds to support research is the current system, which gives scientists who understand their fields and their research the ability to choose from hundreds of journals with different publishing models and fee structures. When choosing to submit a paper to a journal, researchers take into consideration factors such as fit for their specific research, the prestige and reach of the journal being chosen, the publishing model used by the journal, the likelihood of having their paper accepted, and cost. An arbitrary cap would take that freedom of choice from funded researchers. Although we would be open to an analysis of existing publication fees, any serious project to study and recommend guidelines should be undertaken with the input of scientists, publishers, societies, and libraries, and could not be completed by the proposed effective date of January 1, 2026.

The five options presented in the Request for Information would all harm the scientific enterprise.

Option 1 by disallowing publication costs would be devastating to science, publishers, and societies.

Option 4 is not recommended. However, it would be the least harmful in that it allows for the highest cap and would retain the most freedom for authors to choose a journal.

Options 2, 3, and 5, while not as extreme as Option 1, are more restrictive and limit scientists' ability to make the publishing decisions that are best for their research. In addition, the proposal in Option 3 to tie fees to compensation of peer reviewers (or any other specific publishing policy) is not advisable. Compensating peer reviewers would increase publishing costs, it would incentivize reviewers to increase

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their quantity of reviews while calling the quality into question, and it would be difficult to constantly police which journals were adhering to the requirement.

Scientists take pride in their work and understand the importance of sharing the results of their research with their fellow scientists and the public. Scientific societies and journals play an important role in that process. We are constantly seeking ways to improve the quality and efficiency of peer review and publication. We agree with the idea of spending public funds judiciously and would be willing to take part in a project to thoroughly study how research funds are spent on publishing. However, the options currently proposed, with an implementation date only several months away, would inject into the scientific publishing ecosystem too much harm and uncertainty, without an adequate amount of time for parties to adjust.

We strongly urge NIH to abandon the current proposals and take a more deliberate approach, in conjunction with the relevant parties, to determine what, if any, alternate policies would further science while protecting public funds from abuse or misuse.

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The Biophysical Society, founded in 1958, is a professional, scientific society established to lead an innovative global community working at the interface of the physical and life sciences, across all levels of complexity, and to foster the dissemination of that knowledge. The Society promotes growth in this expanding field through its Annual Meeting, publications, and outreach activities. Its 6,500 members are located throughout the world, where they teach and conduct research in colleges, universities, laboratories, government agencies, and industry.