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September 15, 2025

NIH Office of Science Policy
9000 Rockville Pike
Bethesda, Maryland 20892

Re: Request for Information (RFI) on Maximizing Research Funds by Limiting Allowable Publishing Costs (NOT-OD-25-138)

Submitted online at <https://osp.od.nih.gov/comment-form-maximizing-research-funds-by-limiting-allowable-publishing-costs/>

Dear NIH Office of Science Policy,

We recognize that capping publication costs will enable the NIH to maximize use of federal research funds and to promote transparency and cost-effectiveness in the dissemination of research. However, we have significant concerns about each of the proposed options mentioned in the recent NIH RFI. Capping publication costs, whether total or per journal article, will prevent researchers from publishing their work in top tier journals that often have high article processing charges (APCs), and still be able to comply with the NIH zero embargo public access policy. This will likely be especially challenging for researchers at smaller institutions as well as those that often do not have complementary non-federal sources of funding. In addition, university presses, scientific society publishers, and other not-for-profit publishers will be significantly impacted by limits on publication costs, driving continued acquisition of smaller and/or not-for-profit publishers by large commercial companies. We urge the NIH to consider the potential unintended consequences of these proposed policies and to prioritize sustainability and the long-term integrity of scientific communication when creating the final policy.

1. Preferred Option: Percentage-Based Cap

While our preference would be for the NIH to forego formal limits on publication costs, our preferred option of the 5 presented by the NIH is the cap based on a percentage of total direct costs. This model provides much-needed flexibility across fields and project types. It also accommodates the very real variation in APCs, particularly for higher-quality or open-access journals. While the NIH proposes to limit publication costs to 0.8% of direct costs (or \$20,000, whichever is greater), based on researcher feedback, we encourage a higher percentage as well as consideration for the type and level of award. There is a vast difference between smaller awards and large multimillion dollar

grants with respect to the number of projects and people being supported, and the anticipated number of papers produced.

This approach:

- Avoids, to some extent, penalizing larger, more data-intensive projects that may yield more publications although a distinction should be made based on level and type of award.
- Reduces the incentive for publishers to converge on a fixed per-article floor price.
- Better reflects actual publication costs and will be easier to adapt over time as the publishing landscape evolves.

2. Opposition to Fixed Per-Publication Caps

Fixed publication cost caps—such as \$2,000 or \$3,000 (if reviewers are paid) per publication—are too low and will have detrimental effects on publishing practices and scientific progress. These proposals fail to reflect current APC trends. Yale data show that for the journals in which NIH-funded research is published, over 90% of APCs exceed \$2,000.

These caps:

- Will prevent NIH-funded researchers from publishing in top-tier journals, especially those with higher APCs due to high rejection rates or full open-access models.
- Will disproportionately disadvantage early-career researchers and those at less-resourced institutions who cannot subsidize publication costs from other sources.
- May encourage publication in marginal or even potentially ‘predatory’ journals as these generally have lower APCs.

A ‘one size fits all’ cap on APCs is not realistic in today’s scientific publishing environment. The costs are highly variable, depending on discipline as well as whether the journal is fully open access (OA) or hybrid (subscription with an OA option). Hybrid journals oftentimes have higher APCs than fully OA journals. It appears that NIH did not consider hybrid journal APCs in their analysis as DOAJ does not include those titles. In addition, journals published by society publishers and not-for-profit organizations may have different fee structures than those published by large commercial companies. Several levels of APC caps could potentially be implemented, distinguishing society/not-for-profit publishers and commercials, as well as fully OA and hybrid journals, but that

induces an additional level of complexity and yet more administrative burden for researchers.

In addition, we are concerned about compensation for peer review, not a common practice in top-tier journals, and the tie-in to APC caps. Paying reviewers has complicated tax implications and there are myriad international employment rules. There is also a potential for reviewers with financial motivations and non-expert reviews. A better way to acknowledge the hard work of peer reviewers is with 'in kind' compensation such as reduced APCs, various book discounts, and, for society journals, discounts on meeting registration fees.

3. Concerns About Policy Impact on Publishing Ecosystem

We are concerned that certain cost caps will:

- Fail to account for inflation, will rapidly become outdated, and will ultimately limit access to scientific research.
- Accelerate consolidation of smaller and society publishers into larger commercial publishers, further reducing diversity in the publishing ecosystem.
- Undermine society journals, which often use publication revenues to support training, education, and international collaboration.
- Disincentivize transparency in publishing costs.

We encourage NIH to recognize and support society journals and nonprofit publishers, many of which align more closely with academic and public values than large for-profit entities.

4. Preprints

We appreciate the NIH's mention of preprints and encourage the development of a clear policy affirming the value and acceptability of preprints as evidence of productivity and scholarly contribution.

Recommendations

We urge NIH to:

- Adopt the percentage-based cap as the most viable model, with consideration for level and type of award.
- Reject fixed per-publication cost caps as they are too inflexible and likely to cause harm.

- Explore models to support a robust preprint infrastructure.
- Monitor long-term outcomes and impacts of any cap policy and be willing to revise the policy based on data.

We thank the NIH for soliciting input and strongly encourage continued engagement with the academic community before finalizing this and any additional policy changes.

Sincerely,

A handwritten signature in blue ink, appearing to read 'MGC', with a stylized flourish at the end.

Michael Crair, PhD