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National Institutes of Health  
Office of Science Policy  
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**Response to Request for Information on Maximizing Research Funds by Limiting Allowable Publishing Costs**  
**NOTICE NUMBER: NOT-OD-25-138**

Scientific publishing remains entrenched in an opaque, inefficient, and costly paradigm suffering from the constraints of a bygone print-based era. The dissemination of research still largely depends on journals that confer prestige on articles through editorial selection and then charge exorbitant fees for the privilege of placement. While capping article processing charges (APCs) will reduce the financial burden of this system on the American taxpayer, it will not address many of the endemic pathologies in scholarly publishing. Instead, we must ask ourselves how a healthy scholarly publishing system should be structured and what aspects are worth paying for.

We envision an alternative system that fully leverages digital technologies to put authors, not journals, in control of the dissemination of their science, leaving journals to focus on providing transparent peer review and curation services. Rather than capping article processing charges, which could pressure journals to accept papers with less scrutiny or use revenue from less selective titles to subsidize highly selective ones, we propose that the NIH:

- **Use preprints (manuscripts published by authors on open platforms) to meet public access requirements for NIH-funded research.**
- **Limit NIH-funded journal payments to editorial services (i.e., peer review) with the expectation that peer review reports, author responses, and revised preprints be published openly, regardless of whether an article is accepted by a journal.**

A preprint-first publishing model that restricts payments to services like peer review would ensure that taxpayer-funded science supports a more open and dynamic research ecosystem, thereby **accelerating discovery, enhancing transparency, minimizing waste, strengthening trust, and lowering costs.**

**Accelerate Discovery**

Preprints offer an efficient, scalable solution for providing public access to scientific knowledge. Because they can be published on trusted repositories immediately, unimpeded by lengthy editorial delays, preprints ensure that the scientific community can rapidly and openly engage with, debate, and build upon new insights.

**Enhance Transparency**

Preprints place scientific merit over editorial gatekeeping by enabling transparent, community-driven peer review. Traditional journals treat peer review as a consulting service for editors, not as a scholarly contribution. With preprints, the manuscript is already public, so peer review can be conducted openly.

Review reports, author responses, and revised manuscripts can be published alongside the original manuscript, making the entire evaluative process visible. This improves accountability and provides valuable context on how research evolves through critical feedback.

### **Minimize Waste**

Peer review under the current system is highly inefficient. Articles often undergo multiple rounds of review across different journals, with reviewers having to start from scratch in every round. This redundancy arises because peer review reports are kept confidential. An open peer review process ensures that future evaluations can build on and respond to earlier feedback, enhancing the credibility and usefulness of the research record, while also minimizing the waste of peer reviews that are never seen except by editors and authors. Like replication studies, such cumulative open reviews can strengthen scientific rigor and resolve controversy more quickly.

### **Strengthen Trust**

Preprints can foster a healthier culture around error correction. In the current system, errors are primarily addressed during confidential review prior to acceptance. After publication, the “version of record” is not updated as often as it should, because corrections are stigmatized and procedurally complex. By contrast, public preprints encourage dialogue and open peer review, which empowers authors to refine, correct, or defend their work in real time. This strengthens trust in the scientific record.

### **Lower Costs**

Preprints are a highly cost-effective foundation for a more open, nimble, and modern publishing ecosystem. The cost of producing a preprint is one to two orders of magnitude lower than the range of APCs. Capping APCs may curb costs, but it fails to challenge the underlying inefficiencies of the APC model. Because APCs are collected only upon acceptance, journals must recoup costs from a small number of published papers—effectively making successful authors subsidize the processing of rejected submissions.

### **Conclusion**

The necessary infrastructure and pioneering services—such as preprint servers, data repositories, and open peer review platforms—are already in place to usher in a more open, efficient, and trustworthy publishing ecosystem. What’s missing is support from major research funders to use their policies and research funds to scale this paradigm across the research enterprise.

The NIH has a pivotal opportunity to lead this transformation. HHMI is committed to this vision and stands ready to partner with the NIH. Beginning in 2026, HHMI will require lab heads to make all original research articles publicly available as both initial and revised preprints, under an open license. By 2027, we plan to discontinue payment of APCs and transition to a fee-for-service model, which funds only services like peer review, that will be initially negotiated with publishers.

We urge the NIH to adopt this forward-looking model for scientific publishing: one that ensures public access through preprints and funds journal services like peer review through transparent fees.

Sincerely,



Erin K. O'Shea, PhD  
President  
Howard Hughes Medical Institute

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