September 15, 2025

Director Jay Bhattacharya
National Institutes of Health
6705 Rockledge Drive, Suite 630
Bethesda, MD 20892

To Director Bhattacharya and the NIH team:

The American Physical Society (APS) — the nation's largest physics membership organization with approximately 50,000 members — welcomes the opportunity to provide comments in response to the **Request for Information on Maximizing Research Funds by Limiting Allowable Publishing Costs (Notice Number NOT-OD-25-138)**.

APS' and NIH's stated missions and goals indicate many common commitments, including to advance fundamental and applied science that benefits society, the economy, and the world; to uphold research integrity; and to build public trust in science. APS fully understands the motivation to maximize the proportion of federal funding available for conducting high-quality impactful research.

In fact, APS and its journals help to ensure the quality and impact of research through robust validation, effective curation, and broad dissemination. The publications and services APS provides are critical to the research cycle, and thus to achieving our shared objectives. These include robust peer review, workflows and technology that enable the efficient implementation of high-quality publishing standards, campaigns and protocols to enhance the promotion and discoverability of research, and responsible stewardship of the scholarly record. Without these services provided by APS, the value of investments in research would be harmfully constrained.

APS appreciates the notice explicitly stating "NIH recognizes the value of disseminating and publishing findings" and that it encourages comments from all relevant stakeholders. However, based on the analyses and policy options presented, we are concerned that the proposal undervalues the role publishers and their journals contribute to maximizing the visibility and impact of research, maintaining the scientific record, and continuing the United States' leadership role in an increasingly competitive global landscape of science and innovation.

APS also is concerned with the impact the proposed new policies could have on researchers' ability to choose their preferred journals, models, licenses, and other publishing options. Individual

researchers consider many factors when making these choices. APS believes authors are best positioned to determine the publication venues and options that will reach the intended audiences, thus maximizing the impact of the published research. Authors who are unable to find additional funds to supplement the spend that could be limited under the proposed NIH policies would have many high-quality, impactful journals effectively eliminated from their publication options. Recent analysis indicates authors of nearly three-quarters of NIH-supported research articles could face this dilemma if the proposed policies were adopted.[1]

Moreover, NIH's proposals could unnecessarily drive authors to choose lower-quality publication venues misaligned with the Administration's commitment to fundamental scientific tenets that have been prioritized by OSTP[2], NIH[3], and other federal agencies. Implementing overly restrictive limits on allowable costs for publishing research could result in more authors choosing lower-cost publishing options that deliver lower quality and value, including authors publishing in "predatory journals" that offer less rigorous — or zero — peer review, integrity and ethical checks, etc. In a world where paper mills and peer review fraud are increasingly commonplace, forcing such a shift in where researchers can publish could further deepen the crises around research integrity and erosion of public trust in science.

Reputable, high-quality journals and publishers with sustainable business models are known to invest in peer review and research integrity, as well as other areas the U.S. has identified as strategically important. These include support for reproducibility, transparency, and other open science practices, as well as policies and processes to ensure disclosure and handling of biases and conflicts of interest.

Finally, we are concerned with the analyses used to estimate relevant Article Publication Charge (APC) averages, medians, and ranges that informed the policy options proposed.

Specifically, we are concerned that the sample from the Directory of Open Access Journals (DOAJ) utilized in the first analysis does not realistically represent the options NIH-supported researchers typically deem to be the best venues for publishing their research for the following reasons:

[1] "Notably, the five largest publishers by volume in the market all require the Gold OA route and payment of an APC for compliance. Overall, those listed that require Gold OA published around 42% of the total journal literature in 2024, and more importantly, published 73% of papers that listed NIH funding."
https://www.ce-strategy.com/the-brief/capped/

[2] https://www.whitehouse.gov/wp-content/uploads/2025/03/OSTP-Guidance-for-GSS-June-2025.pdf

[3] https://www.nih.gov/sites/default/files/2025-08/2025-gss.pdf

- Researchers often choose the highest-impact journals for communicating their most important findings, and many of these are hybrid journals, rather than fully open access titles. The DOAJ only includes fully open access journals, and so any hybrid journals that are often preferred by NIH-supported researchers are not taken into account by this approach. Analyses of APC prices have shown that hybrid titles often require a higher APC than many fully open access journals, and so this omission from the sample has likely significantly depressed the APC averages, medians, and ranges that informed proposed policy Options 2 and 3.
- Although the DOAJ results were filtered for journals published in the US, they do not appear to have been filtered to select for journals that serve the scientific, technical, and medical (STM) communities. Because journals cater to the needs of their communities, including titles from other disciplines that require different standards and levels of service also holds the potential of underestimating the APC prices of relevant journals.
- The worldwide range that includes APCs as low as $0.01 is difficult to imagine. It is unclear how extremely low-priced APC-supported journals could possibly be sustainable, either financially or in terms of meeting the needs of STM research communities. Again, inclusion of such journals has likely introduced bias that has underestimated APC pricing of journals relevant to NIH researchers.

The second analysis, which seems to have informed Option 5, presents a range that is more realistic, but still lower than other recent analyses of APC pricing. Further, this analysis is not based on actual APC pricing data, but rather on the estimates of researchers, who may have either prepared the cost estimates prior to NIH's updated Public Access Policy announcement or based on experience gathered in the context of previous Public Access Policy requirements. For these reasons, we are concerned that this analysis is also underestimating the true costs of APCs for quality journals and thus informing policy options that would ultimately severely constrain author choice if implemented.

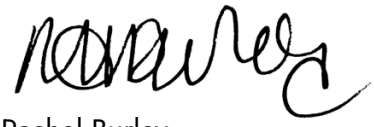
For the reasons outlined above, APS recommends that none of the policy Options (nos. 1, 2, 3, 4, or 5) should be implemented in their current form. Option 1 is directly in conflict with guidance on usage of Federal awards issued by the Office of Management and Budget, stating that publication costs are allowable. Four of the five options include per-publication caps, which are likely to constrain author choice. Additionally, these issues come with other practical concerns that could be counterproductive in the context of objectives prioritized by the United States, OSTP, federal agencies, researchers and related stakeholders, and the broader scientific endeavor.

Option 4, which would allow a suggested proportion of a grant award's total direct costs (0.8%) to cover publication costs, also raises concerns. In particular, 0.8% could be an underestimate of the funding that would be sufficient to ensure author choice and support for the fundamental tenets of

high-quality research and science. Additionally, Option 4 does not include considerations for adjustments to account for rising publication costs that will drive incremental increases in APC prices over time. So, while a policy similar to Option 4 may be viable, it would need to be indexed for inflation and regularly reviewed.

In conclusion, **there is both too much at stake and too much unknown to force a hasty decision towards determining a new policy to be implemented by January 1, 2026**. Because the proposed policy options represent substantial changes that could result in severe unintended consequences, we strongly encourage adjusting the timeline to allow for additional analysis. APS stands ready to collaborate with the NIH on evidence-based approaches that safeguard research integrity, preserve researcher choice, and maximize return on investment.

Sincerely,



Rachel Burley
Chief Publications Officer
American Physical Society

About APS and its Publications Program

Founded in 1899, APS is a nonprofit membership organization working to advance physics by fostering a vibrant, inclusive, and global community dedicated to science and society.

APS represents 50,000 members globally, including more than 39,000 physicists working in academia, national laboratories, and industry within the United States. APS employs an almost entirely domestic workforce of more than 320 full-time employees in the U.S., and roughly half of these staff members work directly on APS publications and related operations and functions.

As a mission-driven, not-for-profit publisher *and* scientific society, APS reinvests any surplus revenue generated by its publishing activities into operations and other activities that support our members as well as the broader physics community and scientific enterprise, such as:

- organizing and hosting scientific meetings, including the world's largest annual physics conference, the Global Physics Summit;

- supporting physics departments, faculty, and K-12 teachers in preparing the next generation of students and scientists;
- and providing career advice, mentorship opportunities, and other resources to support members of the physics community in their career journeys.

In 2024, APS reaffirmed this commitment to reinvesting 100% of its publishing surplus back into science when we became a founding member of the Purpose-Led Publishing coalition,[4] which proudly declares that science is our only shareholder, promises to always put purpose and research integrity above profit, and follows other standards that underpin high-quality and ethical scholarly communications.

The *Physical Review* journals, founded in 1893 and published by APS since 1913, rank among the most trusted and influential peer-reviewed scientific publications in the world. Our flagship title, *Physical Review Letters*, has published more Nobel Prize-winning physics research than any other journal.[5,6] The scholarly record documenting the last 130 years of progress in physics, including the founding of new research fields and approaches, would be far from complete without the more than 750,000 articles published by the *Physical Review* journals. These publications continue to be considered essential by researchers, institutions, and funders pursuing future discoveries and applications that will deliver great impact and benefit to society.

Our journals have attained this notable status within the scientific community because APS has long remained committed to shaping its publications to best meet the needs of the scientific community it exists to serve.

APC pricing for journals published by APS is available online[7] and range from $2,270 – $4,550, with a median value of $2,840. All of our journals charge an APC only after an article has been accepted for publication, none of our journals require authors to pay a fee to submit a manuscript for editorial consideration, and there are no other fees, other than APCs, required for Open Access publication. For these reasons, journals that select for and publish the most timely and impactful research are more expensive to manage and so charge higher APC prices.

[4] https://www.purposeledpublishing.org/
[5] https://www.nature.com/nature-index/news/journals-publish-most-nobel-prize-winning-research-papers-physics
[6] https://www.aps.org/publications/nobel-prize-winning-research
[7] https://journals.aps.org/authors/apcs