NATIONAL SOCIETY FOR HISTOTECHNOLOGY

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National Institutes of Health
Office of Science Policy
6705 Rockledge Dr #750
Bethesda, MD 20817

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

To Whom it May Concern,

On behalf of the National Society for Histotechnology, we write to strongly support **Option 3** in NOT-OD-25-138, which establishes a $3,000 per-publication cap when peer reviewers are compensated, and reviews are openly shared. This option meaningfully addresses the unsustainable growth of publishing costs while also promoting transparency and accountability in the peer review process.

At the same time, we urge NIH to recognize the serious risks if this policy is implemented without oversight. Large commercial publishers, when faced with reduced APC revenues, will likely attempt to recover profits through other charges - submission fees, page charges, or new service surcharges. Smaller, specialized journals that operate with limited budgets will be the most vulnerable to these pressures. Journals such as the *Journal of Histotechnology* are indispensable to advancing focused areas of biomedical science, yet they lack the financial buffers of large publishing houses. If NIH does not account for these dynamics, cost caps could unintentionally destabilize the very journals that sustain disciplinary knowledge and professional communities.

At the same time, Option 3 presents an opportunity to directly undermine the predatory publishing model. These outlets are sustained almost entirely by high APCs and thrive on a volume-over-quality approach. By capping allowable publication costs, NIH removes the incentive that sustains such operations, reducing their appeal to researchers and reinforcing the credibility of NIH-funded science.

It is equally critical that NIH ensure researchers who publish in reputable, low-cost, or no-cost journals are not disadvantaged. Journals like the *Journal of Histotechnology* deliver rigorous, peer-reviewed science while keeping fees minimal. Publishing in these journals should be recognized as fiscally responsible stewardship of NIH funds, not as a limitation. To reinforce this, we strongly recommend that NIH create a mechanism to **formally recognize and encourage NIH-funded research published in low- or no-APC journals**, thereby elevating their reputation and protecting their role in the publishing ecosystem.

In addition, NIH should commit to **monitoring publisher practices annually** to track and prevent cost-shifting behaviors. Transparent reporting on submission charges, page fees, and other costs would allow NIH to quickly identify unintended consequences of this policy and take corrective action if publishers exploit alternative revenue streams. By maintaining active oversight, NIH can ensure that the benefits of Option 3 are not eroded over time.

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In short, we believe Option 3 is a responsible path forward, but its success depends on implementation. With clear safeguards—annual monitoring of publisher practices and recognition of reputable low/no-APC journals—NIH can protect the diversity of scholarly publishing, preserve specialized outlets critical to disciplines like histotechnology, and accelerate the decline of predatory publishers. This moment is an opportunity for NIH to lead a cultural shift toward equitable, transparent, and sustainable dissemination of research.

About the National Society for Histotechnology

The National Society for Histotechnology is a non-profit professional membership organization representing histology professionals practicing in the medical and public health laboratory workforce. Histotechnology is the science dealing with the structure of cells and their formation into tissues and organs. The profession is responsible for the preparation of all pathological tissue samples removed and collected from the human body. The samples are assessed microscopically for diagnostic, prognostic, and treatment purposes. The National Society of Histotechnology supports practicing histologists worldwide by providing education to train and demonstrate competency in an increasingly complex medical laboratory-testing environment.

Thank you for your leadership in this critical area and for considering these comments.

Sincerely,

M. Lamar Jones, BS, HTL(ASCP)
President
National Society for Histotechnology

Yongfu Wang, PhD
Editor in Chief
Journal of Histotechnology