



September 15, 2025

To: National Institutes of Health (NIH)

Re: Maximizing Research Funds by Limiting Allowable Publishing Costs

On behalf of the members of the Association of Research Libraries (ARL), thank you for the opportunity to provide comments on the proposal to limit allowable publication costs under NIH awards described in NOT-OD-25-138. ARL is a nonprofit membership organization representing research libraries and archives across the United States and Canada, which aims to create a trusted, equitable, and inclusive research and learning ecosystem. Research libraries have long seen cost containment in

In our view, the most effective course of action that NIH can take to promote broad, affordable dissemination of agency-funded research is to ***ensure robust compliance with its existing Public Access Policy***. By depositing accepted manuscripts in PubMed Central and, at their discretion, in institutional repositories, researchers can ensure that their results are shared without delay and at no cost to the researcher. It is regrettable that some scientific publishers are declining to allow authors to deposit accepted manuscripts without embargo or directing them toward the payment of publication costs as a means of policy compliance, in contradiction with agency guidance. We encourage NIH to clarify the availability of a no-cost compliance pathway with both grant recipients and publishers, invoking the federal purpose license created by 2 CFR 200.315 as needed. We also call on NIH to maintain and deepen its investment in PubMed Central, as a proven solution for research dissemination that can coexist with a competitive marketplace of publishing services.

A growing number of funders, publishers, and libraries have concluded that the article processing charge (APC) is a suboptimal business model for scientific publishing, because it creates barriers to participation, incentivizes unsustainable growth in publication volume, and entrenches the journal article as the sole research output of value. Yet our concern is that ***imposing caps on APCs will simply shift high costs elsewhere rather than addressing their root causes***. Institutions can expect renewed pressure to sign open-access publishing agreements so that their researchers can still publish in prestige journals with APCs that exceed the cap, straining library budgets at a moment when federal

investments in institutional research support are being pared back. Efforts to move research assessment away from an emphasis on journal brand are underway, and we recommend that NIH support these efforts by ensuring consideration of the value of nonarticle outputs in the review of funding proposals. We also encourage NIH to expand its definition of allowable publication costs to include preprint review services that offer rigorous expert assessments of research results but may not issue binary accept/reject decisions. In our view, actions like these are more likely to align with existing reform efforts and to avoid damaging second-order effects than imposing isolated caps on publication costs.

Please feel free to contact me or my colleague Marcel LaFlamme, Director, Research Policy and Scholarship, [marcel@arl.org](mailto:marcel@arl.org), to discuss these comments. We look forward to continuing to work with NIH to promote broad, cost-effective access to the evolving scholarly record.

Sincerely,

A handwritten signature in black ink that reads "Andrew K. Pace". The signature is fluid and cursive, with "Andrew" on the top line and "K. Pace" on the bottom line.

Andrew K. Pace, Executive Director  
Association of Research Libraries