

Response to Request for Information on Maximizing Research Funds by Limiting Allowable Publishing Costs (Notice Number: NOT-OD-25-138) The following feedback is provided in response to the National Institute of Health's RFI on maximizing grant awards by limiting publishing fees. The current publishing ecosystem, with high Open Access (OA) article processing charges (APCs), creates an expensive cost for a necessary part of the research lifecycle. This cost is typically shouldered by the author, the author's institution, or the sponsor of the funding source (in the case of this RFI, the NIH). While we agree with the need to address these important and limiting costs, we note the options presented in this RFI do not to effectively mitigate the problem. Rather, these options may have the outcome of shifting the totality of the costs to the individual researcher or institution, which may cause a sequela of unintended consequences. We maintain that none of the options presented in the RFI are ideal and support options that:

1. give investigators the most flexibility in determining how to allocate publishing costs;
2. do not lead to changes in publisher behavior;
3. do not hinder access to research.

We present this response in terms of additional analyses, potential consequences, and additional considerations.

Additional Analysis

• **The average and median APCs quoted in this RFI are grossly underestimated.** The first analysis only used data from journals with the publishing models of gold open access or subscribe to open (the criteria of Directory of Open Access Journals (DOAJ)). Hybrid journals (primarily subscription-based journals which offer authors the option to pay an APC to make their specific article immediately open access), are prominent in disciplines of NIH funded authors and were excluded from the study. The APCs for hybrid journals are on average much higher than those charged by fully open access journals.¹⁻³

Potential Consequences

- **Place limitations on the number of articles an author can afford to publish.**

Historically, publishing costs increase each year, but the options presented in the RFI use static caps. If caps are not routinely adjusted, these changes would impact prolific authors and limit the dissemination of scientific discoveries.

Force authors to select journals based on budget, not impact. Libraries and academic departments have already seen costs limit the journal choices of clinicians, researchers,

faculty, postdocs, and students. Many authors are already selecting journals by budget, rather than those having the greatest impact and reach for their discipline.

- **Authors may engage in unethical authorship practices.** Currently “read and publish” agreements with publishers cover the APCs for corresponding authors from the signing institution. There is concern that underfunded researchers will seek out collaborators from institutions with these agreements, inviting them to be the corresponding author of a paper for financial benefit, rather than based on their true scientific contributions.
- **Create a disproportionate impact for early-career and junior investigators.** Many predoctoral students, postdoctoral trainees and early-career faculty have limited funding for research or publication. As publications are vital to career development (e.g., employment, advancement, future large-scale funding), these individuals would be in jeopardy of falling out of the scientific workforce as they may not be able to publish their work.
- **Increase the costs to the investigator or institution.** A loss of publication support from grants may cause publishers to adapt their methods of securing revenue to support publication costs (i.e., the embargo period). These costs would most likely be redirected to authors and institutions and could require other sources of funding such as “top ups” to cover costs. This would be a burden to early career researchers, students, fellows, non-R1 institutions, and any institution encumbered by losses in federal funding.
- **Trigger further increases in publication bias.** These policies have the potential to exacerbate what gets published and what does not. Should only select studies be published (because of who can afford to publish or who has funding), the work of unfunded studies, small pilot studies, and early career researchers could be marginalized and hinder their contributions to innovation.

Additional considerations

- **Support authors with the Federal Purpose License.** Many authors fear legal consequences from publishers for breach of contract and thus feel forced into APC payments. The NIH needs to ensure that authors and institutions (1) understand the NIH's Federal Purpose License and (2) are empowered to push back when publishers provide contradictory

information or state that authors are in violation of their publishing agreement(e.g., for making their accepted manuscripts available in PubMed Central (PMC) without delay). Several publishers (e.g., Elsevier, Wiley, and Springer Nature) have updated their policies, requiring NIH funded authors to publish OA and pay an APC to comply with the updated public access policy that requires a zero embargo.

Do not support APCs for hybrid journals. Open access can be achieved through other means such as self-archiving (often referred to as green open access) in institutional or disciplinary repositories (PMC for NIH funded articles). Hybrid journals are criticized for ‘double-dipping’ as they benefit from two revenue streams for publishers, (1) charging

APCs and (2) charging subscription fees¹. Two major funders already prohibit hybrid journal APCs in their funding support.

- **Support institutions or consortia to negotiate with publishers.** Specifically, institutions should be able to negotiate the “read and publish agreements” that cover any APCs for all authors (clinicians, researchers, faculty, staff, students) of an institution.
- **Support scholarly communication infrastructure.** These options, including institutional repositories, diamond open access journals, and mechanisms for pulling in NIH research objects (preprints, articles, protocols, data, and code), promote transparency, access to research, and are cost-effective alternatives to proprietary systems.

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