

September 15, 2025

NIH Office of Science Policy  
6705 Rockledge Drive, Suite 630  
Bethesda, MD 20892

**RE: NOT-OD-25-138 Request for Information on Maximizing Research Funds by Limiting Allowable Publishing Costs**

Dear Colleagues:

On behalf of the [Gerontological Society of America](http://www.geron.org), thank you for this opportunity to respond to the National Institutes of Health's (NIH) [Request for Information on Maximizing Research Funds by Limiting Allowable Publishing Costs](#) (APC).

GSA's mission is to foster excellence, innovation, and collaboration to advance aging research, education, practice, and policy. We envision meaningful lives as we age. GSA's 6,000 members include gerontologists, health professionals, behavioral & social scientists, biologists, demographers, economists, and many other disciplines. These experts study all facets of aging with a life-course orientation. The multidisciplinary nature of the GSA membership is a valued strength, enabling the Society to provide a rich perspective on the issues facing our population as we age. GSA [publishes five peer-reviewed journals](#) with high-impact research that advances the focus on biomedical research and psychological social sciences, informs the broad community of disciplines and professions involved in understanding the aging process and providing care to older people, and innovative approaches to evaluating and addressing the challenges and opportunities of human aging.

We celebrate the ground-breaking research supported by the NIH that contributes to improved lifespan and healthspan for all of us as we age. It is crucial that the NIH continues its global leadership in the research enterprise and maintains an interdisciplinary approach, spanning from basic biology to the most effective medical and behavioral interventions, thereby leading to paths to cures and improvements that promote longer and healthier lives.

**GSA urges NIH to adopt guiding principles that help sustain quality research, including careful peer review, supporting the long-term availability of research outputs, and ensuring transparency in pricing pertaining to APC.** An across-the-board price limit may disproportionately favor high-volume publishers with low editorial overheads while undermining journals that prioritize research quality and integrity. The likely result could be more low-quality publications rather than better stewardship of taxpayer dollars.

*Journals of professional societies, including the GSA's, generally provide trusted venues for robust, rigorous, solutions-oriented science in fields that NIH has identified as critical, including reproducibility, addressing nutrition and chronic disease, practical artificial intelligence (AI) applications, and translational studies that directly benefit Americans. Society-owned journals reinvest their publishing revenues in research communities, training, and education, thereby magnifying the impact of NIH funding. This makes societies indispensable partners in delivering the "results that matter to the public" as emphasized by NIH Director Jay Bhattacharya, MD, PhD. A rigid APC cap weakens journals and channels NIH-funded studies toward less selective, bulk-publishing outlets that do not align with NIH's emphasis on rigor and reproducibility.*

*Maintaining the quality and integrity of scholarly publications requires rigorous unbiased peer review and quality checks. This includes resources and expert assessment, transparency, impartiality, fairness, confidentiality, efficiency, integrity, security, investments in systems that support reproducibility and research integrity, as well as screening tools for plagiarism detection and fraud prevention. These expenditures sustain the trustworthiness of the scientific record. Despite these investments, publishing costs for NIH-funded research amount to less than one percent of typical grants--evidence that scholarly publishing is a highly efficient use of taxpayer dollars.*

**The NIH must ensure that researchers retain the freedom to publish in venues most appropriate for their work.** Caps that undermine selective, high-quality journals risk forcing authors toward lower-cost, high-volume outlets, which would reduce the visibility, impact, and credibility of NIH-funded science. America's research competitiveness depends on access to respected journals, including society titles that are selective and mission-driven. **A policy that inadvertently limits these options would work against NIH's goals of advancing results that matter to the public and sustaining a strong biomedical workforce.**

Thank you for the opportunity to provide input. If you have any questions, please contact Patricia D'Antonio, Vice President of Policy and Professional Affairs at [pdantonio@geron.org](mailto:pdantonio@geron.org) or 202-587-5880 or Jordan Miles, Director of Policy at [jmiles@geron.org](mailto:jmiles@geron.org) or 202-587-5884.

Sincerely,

A handwritten signature in dark ink, reading "James C. Appleby". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

James C. Appleby, BSPHarm, MPH, ScD (Hon)  
Chief Executive Officer