



September 4, 2025

Jay Bhattacharya, MD, PhD  
Director, National Institutes of Health

Submitted electronically at <https://osp.od.nih.gov/comment-form-maximizing-research-funds-by-limiting-allowable-publishing-costs/>

**RE: *Maximizing Research Funds by Limiting Allowable Publishing Costs* (Notice Number NOT-OD-25-138)**

Dear Dr. Bhattacharya:

The American Psychological Association (APA) commends NIH on its efforts to maximize the value of research grants and to ensure the use of funds for research activities. We appreciate your commitment to transparency in posting proposed policies for public comment, and we are glad to have the opportunity to respond to this request for information.

APA is the nation's largest scientific and professional nonprofit organization representing the discipline and profession of psychology, as well as more than 173,000 members and affiliates who are clinicians, researchers, educators, consultants, and students in psychological science. APA's mission is to promote the advancement, communication, and application of psychological science and knowledge to benefit society and improve lives. Among the organization's aims are to elevate the public's understanding of, regard for, and use of psychology and to prepare the discipline and profession of psychology for the future.

As a means of achieving these goals, APA has built a reputable publishing program. Through the program's output as a nonprofit society publisher, APA balances the needs of scholars, members, and the organization while seeking to apply psychology broadly in society. APA's publishing program is dedicated to producing high-quality, evidence-based content that informs the discipline of psychology; the program also publishes the journals of many other scholarly societies in psychology and related disciplines. APA creates publishing standards through its collaboration with the community the publishing program serves. APA's publishing program supports psychologist members and helps fund the work of the organization, which applies the scholarship of psychology to improve everyday life.

As the APA publishing program frequently publishes research funded by NIH, we have a number of recommendations regarding NIH's plan to maximize research funds by limiting allowable publishing costs. Those recommendations include the following:

1. **Threatening Research Quality and Restoring Public Trust:** Faced with revenue constraints, some publishers may adjust their business models to prioritize volume over quality, leading to the publication of more articles with less rigorous review. This trend could undermine public trust in science. Recent events have already highlighted this danger; for example, [several publishers](#) have been forced to retract thousands of articles due to fraudulent peer review rings that arise in volume-based publishing models (Frontiers, 2025; Kincaid, 2022).
2. **Disadvantaging Certain Researchers and Institutions:** A price cap may inadvertently harm early-career researchers and those at less-resourced institutions. We anticipate that journals currently charging below a potential cap would have a strong incentive to raise their prices to that new ceiling. Furthermore, well-established researchers might have access to non-NIH funds to publish in journals that charge more than the cap allows, creating a two-tiered system that disadvantages researchers who rely solely on their NIH grant funds for publication.
3. **Inhibiting Investment in Research Integrity and Innovation:** Responsible publishers continually invest in the infrastructure and staff necessary to ensure high standards of research integrity. This includes developing tools for automated fraud detection, reducing fraudulent submissions, ensuring ethical oversight, and maintaining robust peer review processes. A price cap may force publishers to cut these essential, but costly, services, leading to decreased rigor and fewer safeguards against misconduct.
4. **Preserve the Integrity of Unbiased Peer Review:** Unbiased peer review is foundational to scientific rigor and reproducibility. Federal policy should not privilege specific peer review models, such as paying for or publishing peer reviews, as this could disrupt established disciplinary norms and compromise the review process. Psychological science has shown, for example, that rewarding a person for their performance can lead to lower, rather than higher, interest in the activity (Deci, 1971). Mandating or incentivizing payment for reviews could create perverse incentives, leading to a “**gig economy**” for **peer review** where speed and volume are rewarded over thoughtful, expert critique. It could also introduce financial conflicts of interest. Similarly, mandating the publication of reviews could **stifle honest feedback**, as reviewers—especially junior scholars commenting on the work of senior figures—may fear professional retaliation. This could shrink the pool of willing reviewers and diminish the rigor of published findings.
5. **Accelerating Market Consolidation:** A price cap could disadvantage nonprofit and society publishers. Large commercial publishers are better positioned to absorb lower APC fees through broad “read-and-publish” transformative agreements with institutions. This could accelerate market consolidation and reduce the diversity of publishing venues available to researchers, many of which are tailored to the specific needs of scientific sub-disciplines.

Next, we offer comments on and questions regarding topics in your request for information.

**The option, or other option not considered here, that best achieves the goal of balancing flexibility in providing research results with maximizing the use of taxpayer funds to support research (Issue no. 1).** We applaud NIH for continuing to protect researchers’ freedom to publish where they choose to do so, without payment. As we said in our letter of April 17, 2020, in response to the request for information titled

*Public Access to Peer-Reviewed Scholarly Publications, Data, and Code Resulting From Federally Funded Research*, protecting researchers' freedom to publish without payment is imperative. Federal intervention that privileges a mandatory pay-to-publish model (e.g., gold open access) disadvantages researchers without access to funding. And it is imperative to ensure sufficient funding for research and discovery; for sharing both the elements necessary to validate and replicate the results of this research; and for metadata and infrastructure required to label, host, and link these elements.

We are concerned about models in which publication fees are reapplied to transformative agreements (e.g., read-and-publish agreements wherein journal subscription fees are reallocated for open access publishing). We note also that society publishers who move to open access models may lose revenues that would have funded other scientific activities.

We wonder why it is necessary to cap article processing charges when NIH-funded researchers now make their research available to the public via PubMed Central immediately on publication, per the 2024 NIH Public Access Policy. A rigid cap undermines researcher choice and risks the unintended consequences outlined above. The focus should be on ensuring grant funds are sufficient to cover the costs of rigorous peer review and high-quality publication, rather than capping those costs.

**In addition to compensating peer reviewers, other kinds of publishing best practices that NIH should consider as factors in determining the potential allowability of a higher per publication cost, such as use of automated fraud detection capabilities (Issue no. 4).** As we said in our letter of April 20, 2023, in response to the request for information titled “NIH Plan to Enhance Public Access to the Results of NIH-Supported Research,” assessing the costs of publication is difficult. Beyond managing peer review, essential publisher activities that justify fees include:

- **Investment in Infrastructure:** Developing and maintaining systems for manuscript submission, fraud detection, metadata creation and dissemination for machine-readability, and digital preservation.
- **Upholding Research Integrity:** Funding staff and processes to establish and enforce ethical standards, investigate misconduct allegations, correct the scholarly record, and link data, code, and materials to publications.
- **Ensuring Discipline-Specific Standards:** Supporting the distinct needs of various scientific fields. Psychological science, for example, is a diverse discipline with unique requirements for research involving human participants, including the careful stewardship of sensitive data. A one-size-fits-all approach to publication costs fails to account for this variability.

**Other evidence or information not considered here that NIH should consider in its policy on limiting allowable publication costs (Issue no. 5).** As a member organization, we note that it is important for researchers to have clear expectations as they navigate NIH's funding requirements. Will price caps be tied to economic indicators as costs rise? Will NIH coordinate caps with other federal agencies to reduce confusion?

## Closing Comments

APA supports NIH's efforts to maximize the value of research grants and to ensure the use of funds for research activities. The ultimate objective of funders, researchers, and publishers should be advancing the quality and pace of scientific research. APA also shares NIH's aim of exemplifying and promoting the highest level of scientific integrity, public accountability, and social responsibility in the conduct of science.

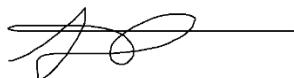
In keeping with APA's mission to promote the advancement and communication of psychological science to benefit society and improve lives, we end this letter by highlighting the need to protect the American people's faith in the scientific enterprise and institutions that create and apply scientific knowledge in service of the public good. Maximizing the value of each research grant to allow NIH grantees to use as much of their grant funds as possible for research activities is important, but care must be taken to avoid potential unintended consequences that could diminish the quality and pace of scientific research.

APA thanks NIH for this opportunity to share comments on *Maximizing Research Funds by Limiting Allowable Publishing Costs*. If you have any questions or if we can provide any further information, please contact Corbin Evans at [CEvans@apa.org](mailto:CEvans@apa.org).

Sincerely,



Katherine B. McGuire  
Chief Advocacy Officer



Jasper Simons  
Chief Publishing Officer

## References

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