

September 15, 2025

NIH Office of Science Policy
9000 Rockville Pike
Bethesda, Maryland 20892

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

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

On behalf of the University of Chicago (UChicago), I want to start by thanking the NIH Office of Science Policy for engaging the community on this important subject. UChicago welcomes the agency's continued effort to make the results of NIH funded research openly accessible to the public, ensuring value for money from the American taxpayers and enabling faster and more trustworthy research. UChicago endorses and fully supports the joint comments submitted by COGR, the Association of American Medical Colleges, the Association of Public and Land-grant Universities and the Association of American Universities, some of which we restate below. Additional feedback from the University of Chicago is summarized below, aimed at providing a thoughtful response for NIH's consideration to inform implementation of this important policy initiative.

Solutions proposed in the RFI will not achieve the desired goals of the NIH. UChicago encourages socialization: focusing on the Federal Purpose License and engagement with the publishing community on transparency around true costs to meet the goals of balancing flexibility in research results with maximizing taxpayer funds

The solution proposed by the NIH in the RFI are likely to discourage traditional publication altogether and limit the marketplace for journal publication. Shifting the financial burden and costs of publications to the grantee will reduce available funding for other necessary scientific activities at UChicago that benefit the taxpayers and may disincentivize researchers from sharing their research data and results in the best way to serve the public.

Fees and other costs associated with publication are set and controlled by academic journals/publishers, not by the recipients of NIH's research funding. It is vital that there is more transparency around these costs to consider any model going forward.

We do not believe that any of these proposed changes will result in the desired impact, and we encourage NIH to explore *other mechanisms* for addressing concerns around publication costs. We agree with and endorse the recommendation by our association partners that NIH retain the current policy, which relies on the investigators to assess how their grant dollars should be used to support the

robust and effective dissemination of the results of federally-funded research. If NIH moves forward with this policy, the University requests clarity on implementation and at least a year-long implementation period to allow grantees the opportunity to adjust to new models and requirements.

UChicago remains fully committed to partnering with the federal government in support of the U.S. research enterprise and we thank you again for providing this opportunity for us to engage with the NIH as it considers this impactful policy update. We appreciate your consideration of the points we have raised in this letter, as well as your consideration of issues identified by our peer institutions and our professional associations. If you have any additional questions or would like to discuss these comments further, please do not hesitate to contact me directly.

Erin J. Adams Ph.D.
Vice Provost for Research
Senior Research Officer
Office of Research
Joseph Regenstein Professor
Department of Biochemistry and Molecular Biology
University of Chicago