In responding to NIH's RFI, I encourage NIH to analyze and report APC spending with greater granularity—specifically distinguishing for-profit publishers vs. society/nonprofit journals, and identifying journals that advertise rapid or "guaranteed" acceptance tied to high fees. Several public sources underscore why this matters:

1. **APC levels and growth vary widely by publisher type.** A recent multi-publisher analysis (2019–2023) estimated that global APC payments more than doubled (with hybrid OA often costing more than fully OA) and highlighted the broader lack of price transparency—an issue most acute among large commercial publishers. Making publisher-type distinctions in NIH reporting would illuminate where public funds concentrate. arXivopusproject.eu
2. **Concrete APC benchmarks show large price dispersion.** For example, Nature (commercial) lists a Gold OA APC of about $12,690; Nature Communications lists $6,990. In contrast, the society-published PNAS lists immediate OA at $5,495 (or $2,945 for delayed OA), illustrating how charges differ between high-prestige commercial titles and a flagship society journal. Nature+1PNAS
3. **Ethical guardrails exist but are inconsistently applied.** COPE and DOAJ publish transparency and fee-disclosure guidelines; Plan S also calls for transparent costing. NIH could reference these standards in policy and compliance checks to ensure public funds support journals adhering to recognized best practices. publicationethics.org+1Directory of Open Access Journalscoalition-s.org
4. **Evidence of "pay-to-publish" harms is documented.** The U.S. FTC's successful action against OMICS details deceptive practices (including hidden fees and sham peer review). NIH tracking that flags journals with claims of guaranteed acceptance or unusually short review times—especially at high APCs—would help prevent public funds from supporting such venues. Federal Trade Commission+1Chemistry World

What I'm asking NIH to publish or collect:

- Breakdowns of APC outlays by **publisher type** (for-profit vs. society/nonprofit), **journal model** (fully OA vs. hybrid), and **journal-level APC** to reveal concentration of spending. Consider leveraging datasets like the recent multi-publisher APC dataset to inform methodology. arXiv
- Indicators of **peer-review rigor and transparency** (e.g., DOAJ inclusion, COPE adherence, public APC disclosures) tied to APC payments. Directory of Open Access Journalspublicationethics.org
- Flags for journals marketing **guaranteed or expedited acceptance** and those with **APCs far above field norms**, with clear exclusion or extra-scrutiny criteria informed by FTC precedent and community standards. Federal Trade Commission
- Summary statistics that normalize APC use by **grant size and number of publications**, so costs can be fairly compared across projects and disciplines (e.g., APC spend per $100k of direct costs; APC spend per publication).

These steps would help NIH balance flexibility for investigators with responsible stewardship of taxpayer funds by steering APC spending toward transparent, reputable venues and away from low-quality "pay-to-publish" outlets.