Gates Foundation Response to NIH RFI: Limiting Allowable Publishing Costs (NOT-OD-25-138)

1. Recommended Policy Approach: Support for Option 1

> Option 1: Disallow all publication costs. NIH could no longer support publication costs through any funding mechanism. Some private funders have disallowed costs for peer-reviewed publications as they seek to place increased value on preprints.
>
> *Example:* NIH awardees may not use NIH funds to cover any publication expenses.

The Gates Foundation recommends **Option 1** as the most pragmatic and actionable policy to balance the need for broad, equitable dissemination of research results with the responsible stewardship of taxpayer funds.

Option 1 achieves this balance by:

- **Curbing excessive APC spending**, much of which supports journal prestige and branding rather than critical publishing services.
- **Sending a clear market signal** that unsustainable APC inflation will no longer be supported through public funding.
- **Creating space for reinvestment** in alternative, equitable publishing models, such as non-APC-based journals (Subscribe 2 Open, Diamond Open Access), preprints, and community-led infrastructures.

There are significant challenges and risks associated with implementing price caps. They would impose a high administrative burden on NIH, publishers, and institutions, while also creating the risk that article processing charges (APCs) pricing converges upward toward the cap. Rather than reducing costs, this could normalize higher prices and perpetuate existing inequities in the publishing system, particularly for researchers and institutions with fewer resources. Options 2 through 5 introduce layers of complexity that would require a great deal of additional time, oversight, and administrative energy to manage effectively across the full NIH portfolio of funded publications. Ensuring fairness, consistency, and compliance on such a large scale would not only strain internal resources but also risk slowing progress toward the broader goal of advancing equitable open access.

The foundation introduced its refreshed Open Access policy in January 2025, discontinuing APC payments for all publications. Our experience is that **Option 1 is a necessary first step** in the pursuit of a more open and equitable publishing ecosystem that prioritizes research integrity over publisher profit. It halts the most egregious forms of overspending while giving funders the opportunity to explore long-term structural reforms. NIH should build on current infrastructure, leverage the Federal Purpose License, and require immediate sharing of the author accepted-manuscript.

Equally important to maintain forward momentum is ensuring grantees have practical and sustainable compliance options that align with their existing workflows and workloads. At the foundation, we've prioritized preprints and accepted manuscript sharing as effective ways to make funded research immediately available at no author-facing cost under an open license – ready for reuse and reproduction.

After just eight months of implementation, the foundation's renewed policy has proven both effective and sustainable. Grantees have continued publishing at their usual volume, achieved full compliance with the open access requirements, and actively adopted preprinting as part of their workflow. As a result, the foundation is on track to reduce APC spending by 50% in 2025 compared to 2024—clear evidence that the policy delivers cost savings without diminishing research output or access.

2. Evidence from Policy Experience and Sector Research

Efforts to determine or enforce "reasonable" APCs have largely failed. Initiatives across the globe have underscored the structural opacity of scholarly publishing economics:

Key Initiatives and Data Sources:

- Plan S Price Transparency Frameworks & Journal Comparison Service
- ESAC's Common Understanding on APCs
- OASPA Guidelines on Equity in APC Models
- How Equitable Is It?
- Pricing framework to foster global equity in scholarly publishing

Publisher Transparency Efforts:

  - PLOS: Price Transparency Report 2024
  - F1000: APC Disclosure
  - Ubiquity Press: APC Cost Breakdown

Notable Reports & Studies:

- *A Decade of Open Access Policy at the Gates Foundation*
- *Policy opportunities: Economics of academic publishing*
- *A Review of OA Policy Options for Development Research Funders*
- *AAAS Survey on Difficulties Paying APCs*
- *ALLEA: "It Matters How We Open Knowledge"*
- *Research Outputs as Testimony & APCs as Testimonial Injustice in the Global South*
- *Article processing charges are stalling the progress of African researchers: a call for urgent reforms*
- *Open access in low-income countries — open letter on equity*

These sources consistently show that APCs:

- Favor well-funded researchers.
- Reinforce **perverse incentives** that value journal prestige over knowledge dissemination.
- Are **insufficiently transparent** and continue to rise year-over-year without clear justification.

3. Peer Review Compensation Considerations

NIH's consideration of compensating peer reviewers is timely, but several foundational questions must be resolved before any payment model can be meaningfully evaluated.

Structural Challenges:

- **Peer review is overloaded**, yet there is no comprehensive data on reviewer demographics, workload, or distribution of burden.
- **Current practices often fall short** of rigor, fairness, and transparency.
- **AI-assisted peer review and workflow automation hold promise** for alleviating pressure on reviewers and should be tested before introducing financial incentives.

On Reviewer Compensation:

- Without strong safeguards, paying reviewers risks **shifting additional costs to authors or funders**, unless publishers are explicitly prohibited from passing costs downstream.

- Peer review has long been considered a scholarly contribution supported by institutions—**a community service, not a commercial transaction**.

- If compensation were pursued, it would require a well-defined **governance structure** to answer critical questions: Who qualifies as a paid reviewer? Who provides the funds? How is review quality evaluated and enforced?

Broader Considerations

Before setting APC caps and expecting journals to allocate funds for reviewer payment, NIH must first address these unresolved issues. While some new research suggests reviewer payment models can be designed effectively, the risks of escalating publishing costs are substantial. Shifting resources in this direction could undermine the sustainability of open access. A more promising path would be to strengthen society-led, nonprofit, and diamond journal models, which emphasize quality and equity while keeping costs down.

4. Publishing Best Practices and Allowable Costs

We urge NIH to evaluate any increases in publication prices against clear, measurable benchmarks of publishing quality and integrity. Higher prices should only be justified when publishers demonstrate meaningful investments that directly improve the reliability, accessibility, and transparency of the scientific record.

Examples of such benchmarks include:

- Adoption of fraud detection and AI-based screening tools to identify image manipulation, plagiarism, and other forms of misconduct before publication.
- Transparent peer review practices that make reviewer reports, editorial decisions, and revision histories openly available.
- Mandatory data availability statements and enforcement of policies requiring underlying datasets to be shared in trusted repositories.
- Rigorous editorial and corrections workflows to ensure that errors, retractions, and updates are managed swiftly and transparently.
- Integration of preprints and published versions into trusted repositories such as PubMed Central, ensuring long-term discoverability and reducing barriers to access.

Importantly, publishers must not be allowed to invoke “technology adoption” as a blanket rationale for higher costs without providing transparency into what tools are being implemented, how they are applied, and what measurable benefits they provide to authors,

reviewers, and readers. Investments in advanced technologies should be amortized across many articles and multiple years, rather than treated as a per-article surcharge.

Absent clear benchmarks and accountability, higher publication costs risk reinforcing existing inefficiencies and inequities in the publishing ecosystem rather than addressing them. NIH has the opportunity to insist that costs reflect genuine improvements in publishing practices—improvements that protect research integrity, advance open science, and deliver real value to the research community.

5. Additional Considerations

As NIH considers mechanisms to contain publication costs and promote open access, policy design must go beyond price caps alone. Strong compliance measures and proactive incentives are essential to ensure that cost-control policies lead to greater equity, transparency, and sustainability in the scholarly publishing ecosystem.

Compliance and Monitoring

We encourage NIH to consider how compliance with publication cost caps (if implemented) will be tracked. Potential strategies include:

- **Integrate with PubMed Central (PMC):** Require deposit of NIH-funded manuscripts and use PMC metadata to monitor compliance.
- **Mandate Publisher Disclosures:** Make APC, service, and licensing transparency a condition of eligibility for NIH-funded submissions.
- **Coordinate with Other Funders:** Align with DOAJ, cOAlition S, ESAC, and others to share compliance data and prevent policy arbitrage.
- **Enforce Accountability:** Impose sanctions for noncompliant publishers and guide grantees toward compliant options.

Incentives for Innovation

Cost-control policies should not simply restrain prices but actively support the transition toward more sustainable publishing models. NIH can leverage its influence to encourage systemic change:

- **Shift Away from APCs:** Encourage Diamond OA and Subscribe2Open (S2O) models that remove author costs.

- **Support Community infrastructure:** Invest in nonprofit publishing platforms, repositories, and society-led models, especially in underserved areas.

- **Align Globally:** Coordinate efforts with international partners to realize a shared vision for scholarly publishing.

- **Reward Good Practices: Recognize and support publishers that demonstrate transparency, rigor (e.g., transparent peer review, fraud detection), and equity.**

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6. Conclusion

The Gates Foundation strongly supports Option 1 as a **necessary and impactful starting point** to ensure public funding is used effectively, equitably, and in service of open, inclusive science.

High APCs do not reflect true publishing quality or value; they are legacy artifacts that must be challenged. By capping APC support and enforcing transparency and accountability, NIH can reshape incentives across the publishing sector while responsibly stewarding taxpayer dollars. Cost caps alone will not fix systemic challenges, but when paired with forward-looking incentives and support for sustainable, community-led models, they can drive lasting improvements in quality, accessibility, and equity.

The Gates Foundation welcomes continued collaboration with NIH and other funders to advance these solutions and build a more open, durable, and inclusive publishing ecosystem.