

September 15, 2025

Dr. Jay Bhattacharya
National Institutes of Health
Office of Science Policy
9000 Rockville Pike, Bethesda, MD 20892

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

Dear Director Bhattacharya and NIH Leadership:

As the Libraries of an R1 institution, Utah State University is committed to bolstering our scholarly ecosystem by providing support to faculty, staff, and students throughout the research cycle, especially in the publication and impact stages of research. We work with these researchers on finding relevant publication avenues, providing support for APCs for researchers publishing in OA journals, and help with utilizing Green OA practices that include publishing in our Institutional Repository (DigitalCommons). The following response is coming from USU Libraries' work related to APCs in the NIH. We are not speaking for/on behalf of Utah State University; instead, we are sharing our experiences and thoughts as librarians working directly with university researchers/authors and publishers.

First, we want to recognize the value and importance of NIH-funded opportunities. These are invaluable resources that advance scientific knowledge and inquiry, and we recognize that the benefits of that knowledge and inquiry should be shared and returned to taxpayers. It is in this perspective that we write this letter, as our focus is on the broadening of research knowledge and impact that has been limited by rising publication costs.

In general, we have witnessed rising costs associated with Article Processing Charges from major publishers. While we do have transformative agreements that help offset these costs to researchers, these agreements are becoming increasingly exorbitant to libraries. The literature on this subject confirms this. Harlan and Rigby (2024) found that the majority of library expenditures on open access was on APCs; that money went directly to publishers, who the libraries often pay for access to subscription titles.¹ In essence, we worry that any cap on APCs will undo the great progress that NIH and other government agencies have made in broadening the scope of research by shifting cost burdens to researchers and institutions.

¹ (Harlan & Rigby, 2024), {Citation}67-68.

With this in mind, we believe that the options proposed by NIH as they are currently written are untenable. As SPARC has outlined: Option 1 just shifts the cost burden to institutions/researchers while Options 2-5 create price floors, which will incentivize publishers to simply raise their APC costs to the limit outlined in each option are selected.

Based on our experiences as librarians, we recommend that, instead of choosing only one option, NIH should continue supporting open access through policy initiatives (such as the Public Access Policy that NIH has already enacted as of July 1). We also believe that a Diamond OA ecosystem is the most conducive to realizing the benefit of research, which allows taxpayers to see the clear benefit of their investment in federal funds. We recommend that NIH continue reinforcing ethical reuse strategies to bolster the OA publishing ecosystem.

Harlan, L., & Rigby, M. (2024). Open Secrets: Exploring Institutional Spending on Open

Access. *International Journal of Librarianship*, 9(4), 52–72.

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