Response from the Undersigned Libraries of the Big Ten Academic Alliance

to the NIH "Request for Information on Maximizing Research Funds by Limiting Allowable Publishing Costs"

Notice Number: NOT-OD-25-138

Date: September 15, 2025

Lead Author

Carrie Nelson, University of Wisconsin

Contributors

Alicia Salaz, University of Oregon
Maureen Walsh, The Ohio State University
Verletta Kern, University of Washington
Rachael Kotarski, University of Chicago
Erin Ellis, Indiana University
Carrie Nelson, University of Wisconsin
Daniel Tracy, University of Illinois Urbana-Champaign (editorial)
Kate McCready, Big Ten Academic Alliance (editorial)

Report Review & Approval History

As of 9/15/2025

- BTAA Library Deans Committee:
  review from 9/11/25 - 9/13/25
- Keith Marshall, Executive Director of the BTAA:
  review from 9/14/2025 - 9/15/2025
- Endorsement by the undersigned

On Behalf of the Undersigned Libraries of the Big Ten Academic Alliance

- Claire Stewart, Juanita J and Robert E Simpson Dean of Libraries and University Librarian, University of Illinois Urbana-Champaign
- Diane Dallis-Comentale, Dean of IU Libraries, Indiana University Bloomington
- John Culshaw, Jack B. King University Librarian, University of Iowa
- Lisa R. Carter, Dean of Libraries and University Librarian, University of Michigan
- Neil Romanosky, Dean of Libraries, Michigan State University
- Lisa German, University Librarian and Dean of Libraries, University of Minnesota
- Elizabeth Lorang, Dean of University Libraries, University of Nebraska-Lincoln
- Xuemao Wang, Dean of Libraries and Charles Deering McCormick University Librarian, Northwestern University
- Damon E. Jaggars, Vice Provost and Dean of University Libraries, Ohio State University
- Alicia Salaz, Vice Provost and University Librarian, University of Oregon
- Faye A. Chadwell, Dean of University Libraries & Scholarly Communications, Penn State University
- Consuella Askew, Vice president for University Libraries and University Librarian, Rutgers, The State University of New Jersey
- Melissa Just, Dean, USC Libraries, University of Southern California
- Simon Neame, Dean, University Libraries, University of Washington
- Erla P. Heyns, Dean and Vice Provost, University of Wisconsin-Madison
- Melissa Gasparotto, Deputy University Librarian, University of Chicago

1. **Proposed policy options -** NIH seeks input on the option, or other option not considered in the Request for Information, that best achieves the goal of balancing flexibility in providing research results with maximizing the use of taxpayer funds to support research.

Big Ten Academic Alliance Response:

The research libraries of the Big Ten Academic Alliance are strong advocates for a sustainable and open ecosystem of publication. Collectively, our institutions' more than 75,000 faculty, staff and researchers are supported by over $19 billion in research expenditures, and our institutions have invested significantly in our capacity to further the research mission by advancing public knowledge through open publishing. Together, we produce roughly 15% of the research publications in the United States.

As partners with the NIH in our shared commitment to a strong and innovative American research enterprise and to ensuring broad public access to research outputs, we, the undersigned libraries of the Big Ten Academic Alliance, support the goals outlined in this request. We applaud the NIH for requiring all funded researchers to deposit copies of their Author Accepted Manuscripts (AAMs) immediately upon acceptance and strongly support the robust enforcement of this policy.

While we agree that journals with high publishing fees reduce the funds available for conducting research and place an undue burden on American taxpayers, we believe that none of the options proposed in this RFI will effectively achieve our shared goals. Instead, the NIH should ensure that authors can fully utilize the Federal Purpose License (FPL) to make their articles publicly available, and prioritize the development of a sustainable research publishing ecosystem prioritizing public access and community-driven infrastructure.

Currently, most publishers' standard author agreements require authors to embargo their AAM, preventing the public's timely access to these research materials. Additionally, publishers such as the American Chemical Society (ACS), are requiring new, upfront article development charges for authors who wish to deposit their AAM without embargo. These publisher models undermine the NIH public access policy and FPL, and we encourage the NIH to take steps to support authors' use of the FPL without interference while continuing to have the freedom to select their publisher of choice.

Any solution to the problem of unreasonably high publishing fees and their associated burden on the American public must be based on the understanding that article processing charges (APCs) do not reflect the actual costs of publishing, but rather what the market will bear. Authors are constrained by a system that rewards prestige publishing and is exploited by monopolistic profit-driven publishers. The options proposed in this RFI that limit payments to publishers will shift costs to other areas of the taxpayer-funded research enterprise, and will likely create a higher "floor" for APCs rather than limiting costs. The NIH can shift this dynamic by: 1) incentivizing publication options that do not rely on expensive fees, including preprints, AAM deposit, and diamond open access publishing and 2) expanding open access infrastructure in order to introduce greater choice into the publishing marketplace.

2. Available evidence related to publication costs and proposed options -

NIH seeks any evidence (either from your own work or other publicly available sources) that can be publicly shared that addresses the considerations of one or more of the options.

Big Ten Academic Alliance Response:

The evidence is clear: We cannot trust that Article Processing Charges (APCs) are based on the actual costs of publishing.

- In 2023, the editorial team of *NeuroImage* resigned in protest of Elsevier's refusal to lower the APC from $3,450. Elsevier claimed the fee covered editorial and peer-review services, copyediting, typesetting, archiving, indexing, marketing, and administrative costs, and was lower than that of comparable journals in the field. In response, the editorial team partnered with MIT Press to launch *Imaging Neuroscience*, maintaining the same scope, quality, and editorial leadership. The APC for *Imaging Neuroscience* is $1,600—less than half the fee charged by Elsevier.
- The wide variation in subscription prices and APCs across disciplines demonstrates that pricing is not a straightforward calculation based on peer-review and production costs. APCs for hybrid journals are often higher than for fully open access journals, even though the latter bear the full cost of publication.
- APCs for journals where NIH-funded authors publish range from $60 to $12,690 (https://doi.org/10.7910/DVN/3XDMNF). This disparity underscores the disconnect between proposed NIH caps and the actual costs of publishing.

Among the unintended consequences of the options proposed in the RFI is the potential erosion of research quality. Price controls can lead to market distortions and costly enforcement. In scholarly publishing, caps on APCs may incentivize publishers to increase article volume by lowering editorial standards. Evidence from *JAMA* (https://doi.org/10.1001/jama.2023.3212) and Christos Petrou in The Scholarly Kitchen (2023) (https://perma.cc/7GRD-HN2R) highlights the rapid growth of such journals and the concerns surrounding

their quality. Fee-based publishing is ultimately not the most effective path to maximizing public access to research.

3. **Peer review compensation -** NIH is interested in hearing ideas about factors related to paying for peer review. Specifically, NIH invites input on factors that NIH should consider in determining whether peer reviewers are appropriately compensated.

Big Ten Academic Alliance Response:

We support innovation and experimentation related to compensation for peer review activities to address challenges in this labor market. However, the proposals outlined by the NIH in this RFI do not address the cost control goals of this effort and would likely result in unintended consequences. Many peer reviewers are faculty at research institutions that pay salaries meant to include peer review activities. Thus payment for peer review could unnecessarily raise costs.

4. **Publishing best practices -** In addition to compensating peer reviewers, other kinds of publishing best practices, such as use of automated fraud detection capabilities, may contribute to higher publishing costs. NIH is seeking further input on additional factors that it should consider in determining the allowability of a higher per publication cost.

Big Ten Academic Alliance Response:

Profit-driven publishers can, and do, find any rationale for increasing publishing fees. Without accurate and transparent data on the true costs of publishing, we should not look for explanations for increasing fees beyond meeting shareholder expectations.

The NIH should be particularly cautious about any automated or AI-based fraud detection, peer-review, summarization, et cetera, system as justifications for higher publication costs. The primary intended value of these tools is to reduce costs. For example, improved AI-fraud detection mechanisms for publication review should limit the number of articles in need of peer review and editing support, and therefore reduce editorial vetting, peer review, and production labor. If the NIH is interested in a measure to base increased compensation to publishers with more manuscripts to review, perhaps trustworthy journal rejection rates are a more useful metric.

5. **Other Comments**

Big Ten Academic Alliance Response:

Ultimately, author behavior is largely driven by the academic incentive structure and profit-driven publishers will exploit that to profit from authors' need to publish in high-impact journals. Those market forces siphon valuable public research dollars away from actual research.

NIH policies should reward researcher productivity in areas beyond publishing in traditional journals. This could include: publishing in public or community-driven venues, providing research experience to trainees, sharing research data and code, or participating in preprint peer-review.

Ultimately, ensuring that research outputs are rigorously evaluated, peer reviewed, and available to the public requires investment in infrastructure that delivers these services efficiently and at predictable costs. APCs are market-driven, not cost-based, and the NIH should avoid taking steps that inadvertently drive inflation and/or commercial consolidation in this market. Instead, the NIH should invest in community-controlled infrastructure and sustainable publishing models such as diamond open access that maximize public value and minimize financial barriers to sharing research outputs.

About the Big Ten Academic Alliance

The Big Ten Academic Alliance is the nation's preeminent model for effective collaboration among research universities. For over half a century, these world-class institutions have advanced their academic missions, generated unique opportunities for students and faculty, and served the common good by sharing expertise, leveraging campus resources, and collaborating on innovative programs. Governed and funded by the provosts of the member universities, Big Ten Academic Alliance mandates are coordinated by a staff from its Champaign, Illinois headquarters.