



September 15, 2025

National Institutes of Health
6705 Rockledge Drive, Suite 630
Bethesda, MD 20892

Submitted via electronic form

Re: Request for Information on Maximizing Research Funds by Limiting Allowable Publishing Costs

Dear Sir or Madam:

On behalf of the American Institute of Aeronautics and Astronautics (AIAA), we appreciate the opportunity to provide comments on NIH's proposed approaches to limit allowable publishing costs under federally funded research. AIAA is the world's largest aerospace professional society, representing nearly 30,000 members from academia, industry, and government. Our mission is to advance the aerospace profession, including the communication of rigorous, peer-reviewed research.

The Role of Scholarly Publishing

Publication is a core part of the research process. The peer review, editorial oversight, curation, and archival services that journals provide ensure integrity, reproducibility, and long-term accessibility of federally funded research. These activities are not subsidized by federal research grants; they are supported by publishers, societies, and readers. NIH and other agencies have long recognized that grantees should be able to recover reasonable publication costs to disseminate research outcomes broadly.

The Office of Science and Technology Policy (OSTP) has noted that publishing enables dissemination, collaboration, and recognition which are all central to a healthy research ecosystem. For this reason, NIH's past policies have allowed flexibility for grantees to select appropriate journals and publishing models.

Concerns with Price Caps

NIH's proposal to set fixed limits on allowable publishing costs raises several concerns:



- Risk to quality: Capping article processing charges (APCs) below prevailing market rates may push researchers toward lower-quality outlets, undermining the integrity of the published record.
- Equability considerations: Researchers at smaller institutions or in less-resourced fields may lack institutional support to cover out-of-pocket costs if caps are set too low.
- Precedent: NIH has not historically imposed direct price controls on other research inputs, such as lab equipment, reagents, or data services, which often represent a far larger share of grant expenditures.

Evidence suggests that average APCs in leading biomedical journals are higher than the levels NIH has proposed (e.g. \$3,300 for fully open journals and \$4,800 for hybrid journals, according to OSTP's own analysis of federally funded publications). Setting caps significantly below these averages could have unintended consequences for grantees.

Policy Options

Of the approaches NIH outlined, AIAA offers the following observations:

- *Option 1 (Disallowing all publication costs)*: Inconsistent with federal cost principles (2 CFR 200.461) and NIH Grants Policy Statement 7.9, both of which explicitly allow publication costs. This would impose undue personal financial burdens on researchers.
- *Option 2/3 (Fixed per-article caps, with or without peer reviewer compensation add-on)*: Likely to disadvantage authors working in higher-cost fields. Implementation details around reviewer compensation remain unclear.
- *Option 4 (Overall award percentage cap)*: This option provides greater flexibility by allowing investigators to budget and prioritize publication expenses. However, the proposed percentage may underestimate actual needs. NIH should ensure any cap is indexed to inflation and based on empirical APC data.
- *Option 5 (Combined per-article and overall award caps)*: Adds unnecessary complexity without clear benefit beyond Option 4.

Recommendations

AIAA recommends NIH:

1. Maintain publication costs as allowable under federal grants, consistent with long-standing practice.
2. Avoid arbitrary per-article caps; instead, consider a flexible overall award percentage to allow grantees to make appropriate choices.
3. Continue consultation with the publishing community, scientific societies, and grantees before implementing final rules, as Congress has directed in previous statutes.
4. Support a range of publishing models, including both subscription-based and open access, to preserve researcher choice and maintain a competitive marketplace.



Conclusion

We share NIH's commitment to advancing public access and ensuring taxpayer value. However, arbitrary cost-control mechanisms risk undermining the quality, equability, and sustainability of scholarly communication. A collaborative approach, grounded in evidence and stakeholder input, will serve the research community and the public better.

Thank you for considering these comments. AIAA looks forward to continuing dialogue with NIH on this important issue.

Respectfully submitted,

A handwritten signature in black ink, reading "Michele Dominiak". The signature is written in a cursive style and is positioned above a vertical line.

Michele Dominiak
SVP, Publishing and Education
AIAA