

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 a librarian, I am committed to bolstering the scholarly ecosystem by providing support to faculty, staff, and students throughout the research cycle, especially in the publication and impact stages of research. I 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 sharing my own experience as a librarian working directly with university researchers/authors and publishers.

First, I 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 the broader community. It is in this perspective that I write this letter, as my focus is on the broadening of research knowledge and impact that has been limited by rising publication costs.

In general, I have seen rising costs associated with Article/Allowable Processing/Publication Charges from major publishers. The literature on this subject confirms this. Harlan and Rigby (2024) found that the majority of library expenditures on open access was on APCs after transformative agreements; that money went directly to publishers, who libraries often pay for access to subscription title. While our library does have transformative agreements that help offset these costs to researchers, these agreements are becoming increasingly exorbitant to libraries. In essence, I 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, something we already see in our currently scholarly publishing ecosystem.

With this in mind, I believe that the options proposed by NIH as they are currently written are untenable. As SPARC has outlined in their shared conversations and letters: 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.

Based on my experience as a librarian, I recommend that, instead of choosing only one option, NIH should continue supporting open access through policy initiatives. I also believe that a Diamond OA ecosystem is the most conducive to realizing the full benefit of

research, which allows taxpayers to see the clear benefit of their investment in federal funds. I further 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.  
<https://doi.org/10.23974/ijol.2024.vol9.4.394>