



ENTOMOLOGICAL SOCIETY OF AMERICA

SHARING INSECT SCIENCE GLOBALLY

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September 15, 2025

Dr. Lyric Jorgenson
NIH Associate Director for Science Policy
6705 Rockledge Drive, Suite 630
Bethesda, MD 20892

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

Notice Number: NOT-OD-25-138

Please accept the following comments submitted on behalf of the Entomological Society of America (ESA) in response to the Request for Information on Maximizing Research Funds by Limiting Allowable Publishing Costs. ESA is the largest organization in the world serving the professional and scientific needs of entomologists and individuals in related disciplines. Founded in 1889, ESA has more than 7,000 members affiliated with educational institutions, science agencies, private industry, and government. We appreciate the opportunity to comment on this important proposal.

NIH funds an enormous range of critical research for public health, veterinary health, and domestic security, and ESA supports efforts to increase funding going towards this research. The threat of vector-borne diseases continues to grow through range expansion of vectors and the introduction of vectors and diseases new to the United States. It's crucial that research on prevention and control of arthropod vectors and treatment of arthropod-borne diseases continues to be fully supported and funded.

ESA believes that publishing research is a critical part of the research process, not something that stands apart from research, and is therefore worth investing in. Research only reaches its full potential when it is shared in an accessible way and preserved in stable archives so that scientists in current and future generations can learn from the research and build upon the science. Furthermore, independent peer review is essential in validating that studies and analyses have been conducted in appropriate ways and that conclusions align with results. As technology makes it easier to create and share content regardless of its accuracy or reliability, publishers play a critical role in safeguarding the integrity of science and public trust in science while ensuring research is built upon reliable foundations. Scientists report that they are more careful in their study design, analysis, and reporting when they know they will be subjected to critical review. Science builds upon itself, and taxpayer money should not be used to fund research built upon unreliable, unvetted foundations.

Our concern with the options proposed for maximizing the value of each research grant by disallowing or limiting grant funds that can be used to pay publication fees is that they will favor large, commercial publishers at the expense of scientific society publishers, and will favor publishers valuing quantity over scientific quality.

High quality publishing has real and significant costs. Unlike the big publishing groups (Elsevier, Springer, etc.), the revenue generated from the journals within societies in part goes back into supporting other programming, which is often especially targeted to students and early career professionals and those with the fewest number of resources to support their professional development without scientific



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“homes” outside of their respective training locations. If a publication fee cap is set, larger publishers will be able to absorb less revenue on a per paper basis due to the volume they publish, but the cuts could become existential for small to medium sized publishers. Per-paper revenue losses have an outsized effect on smaller and mid-sized society publishers and would threaten not only the sustainability of the journals, but the programs and initiatives that societies run for the benefit of science and scientists. A very real threat of this proposal is a consolidation of the publishing industry into shrinking number of partners and the subsequent loss of market-based competition.

Scientific societies make publishing decisions with the good of science at the forefront, including decisions on journal pricing and which papers to accept for publication. We value sound science, experimental rigor, and other markers of high-quality research over metrics such as potential citations in a two-year window or an author's willingness or ability to pay a fee. Because the disciplines served by small and mid-sized societies tend to be smaller, the papers often don't receive as many citations, which leads to lower impact factors. Because impact factor is often correlated with the perceived prestige of a journal, journals with high impact factors tend to have higher publication fees. If a cap on the percentage of a grant that can be used to pay publication fees is set, there is a risk that authors will use the full cap to pay for publication in journals with high impact factors and high fees and will not have space left in their budget to publish in journals that value soundness of science over potential citations or immediate impact. Furthermore, if revenue on a per paper basis decreases due to caps, publishers who value quantity over quality will benefit because they can accept more papers to offset potential revenue losses, while journals who opt not to lower scientific standards when choosing which papers to accept will simply incur losses.

ESA values the contributions of peer reviewers, and scientific societies have long operated in a spirit of volunteerism with the ultimate shared goal of improving scientific knowledge. The contributions of peer reviewers and the resulting revenue from publishing peer-reviewed papers for society publishers are not profiting shareholders but are benefiting the society programs the reviewers may access to improve their skills and relationships as scientists. Introducing payments for reviewers would once again benefit the larger publishers who are able to build the most efficient systems for payment, who would be able to pay reviewers more, and who could spread costs out more easily across larger portfolios. Paying reviewers would also favor publishers who value quantity over quality. Only some papers that are peer reviewed end up being accepted and therefore owing publication fees. If a peer review becomes a chargeable item, publishers will favor publishing as much as they can regardless of quality so that they don't incur losses on papers that are reviewed and not published, in which cases reviewer payments would still be owed but no charges to authors would be levied.

Societies are trying to adjust their publishing models to meet the needs of researchers, readers, society programs, and taxpayers, and to compete with larger for-profit publishers that are rapidly expanding their market share. ESA encourages NIH to consider how the proposed options will negatively affect non-profit scientific societies and will expedite a shift in market share to larger, for-profit publishers. ESA is happy to discuss some of these concerns and would also support bringing other peer societies to the table for a larger conversation with NIH on the topic of how to maximize scientific research funding.

Best Regards,
Christopher J. Stelzig, CAE
Executive Director
Entomological Society of America