WOMEN'S HEALTH ISSUES
Official Publication of the Jacobs Institute of Women's Health

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Office of the Director
National Institutes of Health
U.S. Department of Health and Human Services
9000 Rockville Pike
Bethesda, Maryland 20892

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

As editors of the peer-reviewed journal *Women's Health Issues*, we appreciate the opportunity to comment in response to "Request for Information on Maximizing Research Funds by Limiting Allowable Publishing Costs" (NOT-OD-25-138). We agree with NIH that article processing charges (APCs) paid by authors to publish in academic journals should be reasonable, but we are concerned that the analyses NIH conducted to arrive at a proposed APC limit do not consider a) the impacts of the recent NIH policy change requiring immediate public access to NIH-funded studies published in journals or b) the places where NIH grantees typically publish. We therefore suggest that NIH take the following steps:

- Conduct a new analysis of grant budgets submitted once authors are aware of how publishers are addressing NIH's new public access policy;
- Analyze time spent by journal editorial and publishing staff on articles to understand journals' costs;
- Analyze APCs for journals where NIH grantees typically publish; and
- Either index the APC limit to inflation or require periodic resets based on journal costs.

Women's Health Issues (*WHI*) is the peer-reviewed journal of the Jacobs Institute of Women's Health, which is based at the Milken Institute School of Public Health at the George Washington University. *WHI* is dedicated to improving the health and health care of all women throughout the lifespan and in diverse communities. The journal seeks to inform health services researchers, health care and public health professionals, social scientists, policymakers, and others concerned with women's health. *WHI* is published by Elsevier, which charges $3,220 for *WHI* authors to purchase an Open Access (OA) license.

1) Conduct a New Analysis of More Recent Grant Budgets

In the Request for Information, NIH indicates that it analyzed data from the budgets of R01 grants awarded in fiscal year (FY) 2025. The grant budgets reflect conditions prior to the July 1, 2025, implementation of the policy requiring that all publications resulting from NIH funding be made available to the public upon publication. That policy has resulted in substantial changes that authors likely were not aware of when they submitted budgets for grants that were awarded in FY2025.

In December 2024, NIH finalized the "2024 NIH Public Access Policy" (NOT-OD-25-047).[1] This policy requires that all journal publications that result in whole or in part from NIH funding be deposited with PubMed Central (PMC) so that they can be made available to the public as soon as the article is published by the journal. The effective date was originally set for December 31, 2025, but on April 30, 2025, NIH announced that it was moving the effective date to July 1, 2025 (NOT-OD-25-101).[2] Our publisher, Elsevier, subsequently informed us that they would consider it a violation of their policy for authors to send their articles to PMC for immediate publication unless the authors had purchased an OA license. We have been contacting authors who report NIH funding in order to alert them to this requirement, and the majority of those who have responded indicate that they were not aware of this new policy until we informed them of it.

Prior to implementation of this policy, NIH-funded authors had many options for publishing their work for free – i.e., publishing it in journals that did not charge a publication fee and doing so without purchasing an OA license. Where many journals are concerned, NIH-funded authors no longer have that option unless they are willing to violate NIH policy (by not depositing the article with PMC for immediate posting upon publication) or the publisher's policy (by depositing the article with PMC for immediate posting without having an OA license). Some journals might allow NIH-funded authors to send their manuscripts to PMC for immediate posting without requiring purchase of an OA license, but Elsevier is one of the two largest journal publishers[3] and does require purchase of an OA license in order for authors to comply with NIH's new policy as well as Elsevier's. Springer Nature, the other top journal publisher, also states that an OA license purchase is the way for NIH-funded authors to comply with NIH's new policy.[4]

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[1] National Institutes of Health. (2024). 2024 NIH Public Access Policy, NOT-OD-25-047. https://grants.nih.gov/grants/guide/notice-files/NOT-OD-25-047.html

[2] National Institutes of Health. (2025). Revision: Notice of Updated Effective Date for the 2024 NIH Public Access Policy, NOT-OD-25-101. https://grants.nih.gov/grants/guide/notice-files/NOT-OD-25-101.html

[3] Kim S & Park KS. (2020). Market share of the largest publishers in Journal Citation Reports based on journal price and article processing charge. *Science Editing*, 7(2): 149-155. https://www.escienceediting.org/journal/view.php?number=221

[4] Springer Nature. (no date). US federal agency public access compliance. https://www.springernature.com/gp/open-science/us-federal-agency-compliance

In the past, NIH grant proposals likely budgeted for a small number of OA licenses but were created with the expectation that some of the studies arising from grant-funded research could be published for free. Given that free publication and complete compliance with both NIH and publisher policies is no longer an option for NIH-funded authors submitting their work to journals published by the top two journal publishers, future NIH budgets are likely to be based on different expectations about the journals from which authors would purchase OA licenses (or to which they would pay other kinds of APCs). NIH should conduct a new analysis of grant budgets submitted once current NIH grantees have all been informed about future publishing options under the new policy. Judging by the responses we have received from the NIH-funded authors we have contacted, the process of informing NIH grantees of the new reality is not yet complete.

2) **Analyze Time Spent by Journal Staff on Articles**

We recommend that in addition to updating one of the analyses it already conducted, NIH conduct two additional analyses to help identify an appropriate APC limit. One rational approach for setting an APC limit is to aim to cover the costs of the time that journal staff and contractors devote to evaluating, improving, and publishing articles. This likely varies substantially by journal and includes some variability between articles, but it should be feasible to obtain estimates from a range of journals. As an illustration of the kind of staff time commitment editorial work can involve, we describe some of the more time-intensive elements of our journal's process. We would be happy to provide more granular information to NIH upon request.

Our journal is committed to helping authors publish the highest-quality versions of their manuscripts possible. Most of the manuscripts we publish undergo extensive revisions, and the final accepted version of the manuscript is typically substantially different from the original submitted version. This evolution involves not only peer review but extensive time from our editorial team. Here are some of the steps our team takes that require the greatest investment of time.

A) **Initial evaluation of an original submissions:** Our managing editor reads the original submission and provides detailed notes to the editor-in-chief regarding the strengths and weaknesses of the submission. This process can involve reviewing relevant published works to determine how novel the new submission is. The editor-in-chief reviews the managing editor's notes and decides whether the manuscript should go for peer review; in some cases, she and the managing editor discuss the manuscript in a meeting. This process requires an average of one hour of staff time per manuscript. Because we do not want to waste reviewers' time, we aim to only send manuscripts for review if we think there is a high likelihood that the reviewers will recommend revisions or acceptance rather than

rejection. We therefore devote substantial time to evaluating manuscripts that we do not end up sending for peer review. For instance, in 2024 we sent 80 full-length research articles for peer review but conducted evaluations of 279. This works out to an average of approximately 3.5 hours for each article we consider for publication.

B) **Sending for peer review and making the first decision:** For manuscripts that the editor-in-chief has determined should go for peer review, the managing editor identifies changes necessary prior to peer review. She often applies masking to anonymize articles for peer review and adds line numbers to assist reviewers in making comments. (Our instructions to authors ask that authors submit masked and line-numbered articles, but these elements are often missing.) For approximately 25-30% of manuscripts, the managing editor asks the authors to make changes that will smooth the peer review process, such as supplying missing methodology details or strengthening the abstract.

   Once the author and/or managing editor have made any necessary changes, the managing editor and editorial assistant work to identify potential peer reviewers with relevant expertise who do not have conflicts of interest. The editorial assistant then sends invitations to potential peer reviewers until we have received the necessary number of reviews (usually two); in 2024, we sent an average of 11 invitations per manuscript. Once the reviews are completed, the managing editor writes a summary of them for the editor-in-chief and identifies areas where additional comments from the editorial team to the author are necessary. The editor-in-chief decides whether to request revisions or reject the manuscript based on an editorial team assessment that includes, but is not limited to, the reviewers' advice. (During the past decade, we have not accepted the original version of any full-length article; we always request at least one, and usually two, round of revisions.) Editorial staff time needed for this step varies depending on the difficulty of securing peer reviews; a typical range is 3-6 hours per manuscript.

C) **Copyediting manuscripts:** The managing editor performs a copyediting read-through on either the original submission (if we request only minor revisions and anticipate being able to accept the first revision) or the first revision. When we request major revisions on an original submission — which is the most common outcome for manuscripts sent for peer review — we typically send the manuscript back to the original peer reviewers and perform the copyediting read-through while they are reviewing it. This read-through results in a list of comments for the authors; most request sentence-level changes for clarity, precision, and flow, but we sometimes catch discrepancies or other more substantive problems. In addition to creating a list of comments for the authors to address, the managing editor

compiles a list of proofreading corrections (e.g., to fix references, standardize style, fix typos, and edit for grammar) that she will implement just before accepting the manuscript.

In the past, copyediting time averaged approximately two hours per manuscript, but it has been slowly increasing (1.9 hours in September 2021-August 2022; 2.2 hours in September 2022-August 2023; 2.7 hours in September 2023-August 2024) and is now at 3.4 hours per manuscript. Some of this increase could be due to reviewers being pressed for time and identifying fewer problems than they used to (which means the editorial team must address the problems instead), and some could be due to authors being pressed for time or lacking the training or mentorship that would allow them to submit more polished manuscripts.

D) **Proofreading articles in press:** Although Elsevier performs copyediting and proofreading on accepted manuscripts, we have found that errors still appear in typeset articles slated for publication if we do not do our own proofreading. Our managing editor downloads each article in press and reads through it to detect typos and style inconsistencies. She often compares the typeset article with the accepted version to see whether errors were introduced during the publisher's typesetting or copyediting process (in which case she will alert Elsevier to the problem as part of an ongoing quality improvement process), and she typically makes a dozen or more corrections to each article. Where corrections require re-wording, she will consult with the author to make sure they agree with her proposed changes. Occasionally these read-throughs uncover serious errors such as incorrect values in a table. The read-through takes an average of one hour per article, and follow-up with authors can take an additional 30-60 minutes when there is a complex issue to convey or where an author has a question or would like different or additional changes.

These tasks add up to an average of approximately 12 hours on each individual research article that we publish. In addition to evaluating, making decisions on, and securing peer reviews for submitted research articles, the editorial team devotes time to tasks necessary to run the journal, such as the following:

- Responding to authors who have questions or encounter difficulties with the manuscript handling system;
- Working with Elsevier staff to compile and publish six issues of the journal per year, with most issues including a highlighted Editor's Choice article, and to address emerging issues, such as potential use of artificial intelligence by authors;
- Collaborating with the journal's editorial board to address high-level issues, award the annual Gibbs Prize for the best manuscript, and undertake projects such as calls for papers;

- Working with the journal's associate editors to evaluate commentary submissions (which are editorial in nature and do not report research findings) and request revisions from commentary authors; and
- Conducting publicity around Editor's Choice and Gibbs Prize-winning articles.

Our editorial staff consists of a part-time editor-in-chief with a doctoral degree and decades of experience conducting research and publishing peer-reviewed articles; a part-time managing editor with a master's degree and more than a decade of experience in academic publishing; and a part-time editorial assistant with at least a bachelor's degree. Our associate editors and other board members also have doctoral degrees and many years of experience in conducting and publishing research.

Our publisher devotes substantial additional time to each individual article and to the tasks required to run our journal. Elsevier's copyeditors and typesetters also perform essential services, such as identifying discrepancies between in-text citations and reference lists and applying consistent style. Elsevier staff also handle logistical elements, from the manuscript submission system to the online posting of articles. We do not know how many hours they devote to these tasks, but the work involves several different staff members and contractors and is essential.

It is likely that some other journals devote less editorial staff time to evaluating and improving the quality of submitted manuscripts than we do, and some journals with larger staffs likely invest far more. When experienced teams of authors have sufficient time to generate polished manuscripts, those manuscripts need less editorial staff time. Given the many demands on researchers' time and the fact that early-career authors often improve their skills at writing scholarly manuscripts over the course of several years, it is unsurprising that many manuscripts require substantial time from reviewers and editors (as well as from authors incorporating their suggestions). Editorial and publishing staff members deserve to be paid for their time and expertise. If NIH sets an APC limit that is too low to allow for the necessary staff time to improve articles, the quality of published work will suffer.

3) Analyze APCs for the Journals Where NIH Grantees Typically Publish

NIH analyzed data on US publishers from the Directory of Open Access Journals and found that the average reported APC was $2,176.84. However, this analysis seems to assume that NIH-funded authors would publish the same number of articles in each of the journals listed in that directory, which is not an appropriate assumption. A better approach would be to take a representative sample of NIH grants and then identify all publications that arose from each grant and were published within the timeframe that would allow grant funds to cover APCs (because funds cannot be used for APCs after a grant has concluded). For each of these individual publications, NIH should identify the APC — including OA

license fee — for the relevant journal and then add all of the publications together to find the average APC (and the average of total APC charges anticipated per grant).

4) Index the APC Limit to Inflation or Require Periodic Resets Based on Journal Costs

As the cost of living — and the cost of health care in particular — continues to rise, it is important that APC limits rise, too, so that journals can continue to devote the necessary amount of staff time to ensuring that the articles they publish are of high quality. We recommend that any APC limit be indexed to inflation. If it is not, then NIH should require re-assessments, at intervals of no longer than five years, of journal expenditures required to produce high-quality articles and adjust the APC limit accordingly. Once an APC limit takes effect, average APC charges will become a poor metric for adjusting prices because some journals will reduce their APCs (or not raise them as costs increase) to align with the limit because they calculate that getting many partial payments is better than a few full ones.

In summary, we recommend that NIH re-run its analysis of APCs in grant budgets after ensuring that applicants are aware of publishers' responses to the new NIH public access policy; analyze time spent by journal editorial and publishing staff on articles to identify the costs required; analyze APCs for journals where NIH grantees typically publish; and either index the APC limit to inflation or require periodic resets based on journal costs. Such actions will generate a more appropriate estimate of a reasonable APC limit and help support the survival of journals that we all depend on to ensure that research results receive appropriate scrutiny prior to dissemination.

Thank you for this opportunity to comment. If you have any questions, please contact us at whieditor@gwu.edu.

Sincerely,

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