

September 15, 2025

Lyric Jorgenson, PhD
Associate Director for Science Policy
National Institutes of Health
6705 Rockledge Drive
Bethesda, MD 20817

Dear Dr. Jorgenson,

The Society for Leukocyte Biology is an organization comprised of approximately 1000 biomedical researchers who promote human health through the study of the immune system and application of that knowledge to translational and clinical applications to detect and treat disease. The Society runs the Journal of Leukocyte Biology. From our perspective, as a society that oversees a not-for-profit journal, we have concerns that the proposed limitations for allowable publishing costs will negatively impact immunology research, the American taxpayers' ability to access and understand NIH-funded research, and ultimately the health of the US population.

Although we agree that current publishing models are not perfect and could be improved, the proposed changes fail to improve publishing models for several reasons. There are real costs associated with evaluating and distributing research findings that are generated with grant funding, which include presenting the results at scientific conferences and publishing the results in journals. Thus, Option 1 to disallow all publication costs would critically impede dissemination of the findings generated using grant dollars. This option is inconsistent with the principle of ensuring open and transparent access to scientific findings, and would hurt American taxpayers by burying valuable peer reviewed research in a mountain of pre-prints that have not been rigorously peer-reviewed and edited as is common practice for high quality, reputable journals like the Journal of Leukocyte Biology.

Moreover, any changes must be made in a way that maintains the high quality of scientific publication by ensuring a rigorous review process and that enables authors to choose the most suitable journal in which to disseminate their results.

Therefore, we note the following issues with the proposed changes:

- 1) The proposed effective date is too soon to be implemented. Publication cycles take months, and many articles are already submitted and in various stages of review. Moreover, many grantees are part way through multi-year grants and may have several publications already. Therefore, any limits put in place will impact their ability to publish going forward. A phased implementation would help to address this issue.
- 2) Limiting costs per publication will limit NIH-funded researcher's choice of where to publish. There are typically no other sources of funds for a particular project that could be used to supplement shortfalls if a publication charge exceeds the NIH limit. This would interfere with taxpayers' ability to use journals as a starting point to evaluate the credibility of the science.

- 3) Limits placed per publication or on the overall amount of an award that can be spent on publications will reduce output by highly productive researchers, and/or a particularly successful project. We should be celebrating successful projects, sharing them with the taxpayers who funded the research, and not limiting them.
- 4) Publication cost caps must be regularly reassessed because they are unlikely to maintain pace with inflation. This review will cost the taxpayers additional government funds for these assessments.
- 5) Complex models (e.g. different allowable costs for journals that compensate reviewers or use fraud detection) will cause confusion and challenges, especially if limits on total allowable costs per award are implemented in parallel. Moreover, these types of models will stifle innovation and progress in the publishing industry.

Thank you for the opportunity to provide this input and for your service.

Sincerely,

The Society for Leukocyte Biology