



September 15, 2025

Office of Science Policy
National Institutes of Health
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Bethesda, MD 20817
Comments submitted through [NIH website](#)

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

On behalf of the American Educational Research Association (AERA), thank you for the opportunity to provide comments on the Request for Information (RFI) on Maximizing Research Funds by Limiting Allowable Publishing Costs. AERA is the major national scientific association of 25,000 faculty, researchers, graduate students, and other distinguished professionals dedicated to advancing knowledge about education, encouraging scholarly inquiry related to education, and promoting the use of research to improve education and serve the public good. As part of this mission, AERA publishes seven peer-reviewed journals that include one open access journal, *AERA Open*. These journals include research articles developed as a result of NIH funding, among other federal funding sources.

We appreciate NIH's consideration of ways to enable the public availability of NIH-funded research. This response reflects the categories included in the online form for comment.

Proposed policy options

AERA opposes option 1 to disallow the use of NIH funding for publication costs altogether. NIH has endorsed and has taken many steps to implement the White House Office of Science and Technology Policy (OSTP) memorandum, "Ensuring Free, Immediate, and Equitable Access to Federally Funded Research," including updating its public access policy. It would go against the spirit of NIH's commitment to making NIH-funded research publicly available upon publication to disallow grant funds to be used to disseminate research results.

The other 4 options may have unintended consequences on the dissemination of research findings in journal articles through placing a cap on the amount of funds allocated per publication or per grant. Option 2 to implement a \$2,000 per article cap would require those who have accepted articles for nearly all AERA journals to allocate non-NIH funds to make up the difference for making their articles publicly available. Researchers from institutions with fewer resources would be disproportionately

disadvantaged in opportunities to publish and disseminate high quality research. Option 3 may have the opposite effect of raising article processing fees through an incentive structure for peer review compensation that would result in a significant budget increase for scientific societies that publish journals.

Options 4 and 5 have the likelihood of capping the total number of publications resulting from a grant, limiting the return on investment of the grants through dissemination and use of knowledge for positive impact. Across all fields of science, research faculty are incentivized to publish high quality articles in peer reviewed journals to advance their careers, including accessing future grants. The cap would likely have further disproportionate impacts on graduate students and early career scholars for whom high publication productivity in academic journals directly influences future job/career prospects and advancement opportunities.

Available evidence related to publication costs and proposed options

AERA currently charges the following article processing fees per article for its journals upon acceptance. These fees are on the lower end of what scientific societies charge and do not cover all of the costs associated with journal publishing. With the exception of *AERA Open*, AERA journals are not open access and authors of accepted articles would need to pay a fee to make their articles publicly available.

- *AERA Open* (open access journal): \$1,000 (standard), \$400 member rate, \$100 member graduate student rate, \$500 non-member graduate student rate
- *American Educational Research Journal*: \$2,500
- *Educational Evaluation and Policy Analysis*: \$2,500
- *Educational Researcher*: \$2,500
- *Journal of Educational and Behavioral Statistics*: \$2,500
- *Review of Educational Research*: \$2,500
- *Review of Research in Education*: \$2,500

Peer review compensation

As NIH continues to gather data to make an informed decision on policies governing the use of grant funding for publication costs, we encourage NIH to include the number of peer reviewers for journals as a data point. While three reviews are the standard for initial AERA journal article submissions, typically an accepted journal article is reviewed by 5-8 peer reviewers across multiple rounds of review. Accounting for the number of articles that are reviewed by peer reviewers, the multiplied cost over time would represent a significant portion of a non-profit association's budget. These costs would also be allocated toward peer review of submissions that are accepted along with those that are rejected and where authors are encouraged to revise and resubmit. Ultimately, without a data point for what costs would be borne by publishers and scientific societies, instituting an incentive for compensating peer reviewers may have the opposite effect of raising article processing fees.

For interdisciplinary societies such as AERA that publish journal articles that are the result of other federal and non-federal funding sources, peer review compensation would also need to be inclusive of articles beyond those resulting from NIH funding. NIH should incorporate estimated peer review compensation costs for all journal submissions in its analysis, not solely ones that are results of NIH funding.

Publishing best practices

We have appreciated the attention to the use of artificial intelligence (AI) and NIH's policies governing the use of AI in the submission and review of NIH grant proposals. As publishers and scientific societies grapple with the impact of AI on journal article submissions, reviews, and related costs, we would also urge NIH to incorporate evolving policies on the use of AI in the production and review of NIH-funded research.

In addition, NIH should account for the production and infrastructure costs that support the review of article submissions and the production of accepted articles to understand their roles in how article processing fees may be developed. These costs also include additional dissemination/implementation and engagement efforts, as making research accessible to the public goes beyond simply making the article available for free (i.e., beyond open access). For example, AERA promotes timely research through press releases and webinars, among additional communication activities.

Thank you again for the opportunity to provide comments. AERA looks forward to continuing to work with NIH and is willing to be a resource on ideas or questions that AERA has in addressing publication costs and the policies to encourage scholarly inquiry of all kinds through NIH funding.

Sincerely,



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