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Dear Colleagues:

We appreciate the opportunity to comment on the proposed options in **NOT-OD-25-138: Request for Information on Maximizing Research Funds by Limiting Allowable Publishing Costs**. We represent the members of the Society for Psychophysiological Research (SPR), a scientific society founded in 1960, that promotes gold standard scientific practice for those using physiological measures (of both body and brain) to understand behavior, cognition and emotion. For 65 years, SPR has existed to develop and disseminate new scientific findings and best practices among scientists, including those learning psychophysiological methods for the first time. Gold standard scientific approaches are shared via our scientific journal, *Psychophysiology*, which publishes new research findings as well as editorial and guidelines papers intended to guide researchers in scientific best practices for our methods. Editorials, guidelines papers, society presidential addresses and early career award addresses are all published open access on our society website (sprweb.org). We also disseminate knowledge to other scientists at our annual scientific meeting, in virtual webinars, and via research and teaching resources shared on our website, which is accessible to the public. The proceeds we earn from our journal are used by the society to support the training of members and sharing of scientific information, including partially defraying the costs of our annual in-person conference. The pandemic made clear how important in-person, face-to-face meetings are, especially for younger scientists, as they build collaborative social networks and learn new scientific techniques, frameworks and concepts.

It is useful to understand how our journal, *Psychophysiology*, functions and how it contributes to the public scientific good, both for scientific readers and members of the general public. Our journal is currently a hybrid journal, meaning that once a paper is accepted following a peer-review process, the author(s) can publish an accepted article either Open Access (by paying an article processing charge, currently \$4,020) or without Open Access (no fee). Most authors do make their accepted papers accessible as soon as possible,

but due to costs, not always via Open Access. In the case where a paper is not made Open Access, an author can still make a non-copyedited and non-typeset version of the paper immediately accessible to the public using one of several public archives (e.g., PsyArXiv). One downside of posting an archived, non-final manuscript version is that it is not considered the paper of record, and changes often occur between the time the paper is accepted for publication (the version posted in an archive) and when the paper appears in the journal in its typeset, copyrighted form. The journal version, as the version of record, is typically the version cited by other scientists. Those authors with research funding often prefer the Open Access choice (which, on average, results in a paper being more heavily cited by other scientists). Those with resource limitations may not have the funds to pay an article processing charge and choose not to make the article Open Access (but then post a version in an archive). Some authors at more well-resourced institutions (e.g., large research institutions) also have another option for making their article Open Access – the use of a Transformative Agreement. A Transformative Agreement is an agreement between a publisher and an institution whereby the institution pays a yearly fee to allow Open Access publication for papers written by authors affiliated with that institution. These agreements sound terrific, and they are – but there is a catch. These agreements are most common at large research universities and much less common at smaller colleges and universities. Thus, larger, more well-resourced institutions have an advantage in making their papers Open Access, because the publication costs under a Transformative Agreement are borne by the institution and publishers, rather than by individual investigators. Further, Transformative Agreements only exist for some journals and some publishers, so it can be cost-prohibitive to make articles Open Access in journals with a high article processing charge when there is no Transformative Agreement at the author's institution. In Germany, Project DEAL (https://en.wikipedia.org/wiki/Project_DEAL) is a set of country-wide, negotiated Transformative Agreements with the largest scientific publishers (Wiley, Springer Nature, Elsevier), which could serve as a model to be emulated in the United States. We would encourage the US administration to consider such a possibility. **If the US government were to negotiate a set of US-wide Transformative Agreements similar to Project DEAL with the largest scientific publishers, it would have the added benefit of leveling the playing field for scientists at all institutions (both small and large, well-resourced or less so), something that is a goal of the current US administration.** There would be many details to be worked out, but this proposal has the potential for several advantages to the scientific community in the US. In this way, negotiations at the highest levels of the government would directly benefit the wider dissemination of scientific findings to the US public.

Below, we consider how each option in NOT-OD-25-138 may impact an NIH-funded author wishing to publish an Open Access paper(s) using awarded NIH funds. Most problematic, Option 3 (**set a limit on allowable costs per publication and allow a higher amount to be paid when peer reviewers are compensated**) creates very likely unintended consequences with substantial additional costs. For reference, most top-tier journals do not pay for peer reviews, instead viewing peer review as a professional responsibility that is shared across a community of scholars. Thus, scientists collectively share the burden of peer review. Reviewing an excellent, novel paper means that the peer reviewer sees interesting new work earliest. Those reviewers also help make that work even better by providing actionable suggestions to the authors. The Option 3 proposal indicates that only reviews of ultimately accepted manuscripts would lead to reviewers being paid, creating a potential perverse incentive to accept more manuscripts. In addition, there would be considerable additional administrative oversight required to handle paying reviewers, making the already very difficult (and underpaid) work of Editors and Associate Editors even more difficult. For these reasons, we are not in favor of Option 3.

Option 1 (**disallow all publication costs**) is also untenable. Federal funding of scientific work is needed not only to conduct the work, but to ensure its dissemination — dissemination is as critical to the scientific process as collecting high-quality data and analyzing it appropriately. To remove the ability to seek funds for dissemination, which has real costs to scientists in making their work accessible to the public, damages the public interest.

Option 2 (**set a limit on allowable costs per publication to \$2,000.00 per publication**) is problematic because it is inflexible and would prevent authors without other funds (or sufficient institutional support) from publishing Open Access in many of the highest tier (most credible) journals. For example, authors funded by NIH and submitting to our journal would have to choose the non-Open Access option, which often slows the speed with which other scientists and the general public can find the work on-line. This is because archived manuscripts are not widely indexed and thus more difficult to find than articles appearing in journals, which are often searchable via databases such as PubMed, Google Scholar, Web of Science or Scopus.

Of the options suggested, Option 4 (**Set a limit on the total amount of an award that can be spent on publication costs**) provides perhaps the best balance of flexibility and assurance for public access, although the 0.8% of direct costs or \$20,000 cap, while currently reasonable for many scientists and many journals, has no built-in inflation adjustment, raising the possibility that inflation could soon outpace the cap.

We appreciate the opportunity to comment on this important issue.

Sincerely,

A handwritten signature in cursive script that reads "Christine L. Larson".

Christine Larson, Ph.D.
President
Society for Psychophysiological Research

A handwritten signature in cursive script that reads "Karen S. Quigley".

Karen S. Quigley, Ph.D.
Publication Committee Chair
Society for Psychophysiological Research