



September 5, 2025

Lyric Jorgenson, Ph.D.
Associate Director for Science Policy
The National Institutes of Health
6705 Rockledge Drive, Suite 630
Bethesda, Md. 20892

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

Dear Dr. Jorgenson,

The American Society for Microbiology (ASM) appreciates the opportunity to respond to the *Request for Information (RFI) on Maximizing Research Funds by Limiting Allowable Publishing Costs*. As one of the oldest and largest life science societies with more than 37,000 members in the U.S. and around the globe, our mission is to promote and advance the microbial sciences. ASM's 16 peer-reviewed journals are fundamental to ASM's mission and provide a critical service to the advancement of the microbial sciences. While the immediate impact of a cap on APCs would allow scientists to spend allocated funds on other scientific costs, ASM is concerned that cost of publishing will be passed on to researchers in other ways, ultimately hampering the scientific enterprise and scientific integrity. ASM is committed to working with NIH to achieve shared goals of maximizing research impact while maintaining scientific excellence.

ASM would like to work with the NIH to ensure that the approaches outlined in the RFI fully consider the needs of non-profit, scientific society publishers, which are a key component of the biomedical research ecosystem. If implemented, this policy may unintentionally impact scientific innovation and integrity. The proposed approaches would discourage publishing high-quality science and we urge NIH to consider alternative approaches. Furthermore, ASM is concerned by the relatively short timeframe for implementation of the policy, and urges the NIH to consider a longer timeframe to allow publishers to adequately prepare for the impact of an APC cap on their operations. ASM also requests that NIH publish a detailed, full implementation plan for the APC cap policy with opportunities for stakeholder feedback on the plan. If NIH implements an APC cap, ASM requests that NIH track and share the impacts of the policy with the scientific community.

Revenues from non-profit scientific society publishing are reinvested in programs and services to uphold gold standard science that supports and encourages the open exchange of ideas through conferences, online fora, and educational initiatives. Although we understand and support the intent of this proposed guidance to ensure that publication fees remain reasonable while maximizing the public value of each research grant, ASM and similar non-for-profit

scientific societies and publishers will face unique challenges by this rule, pushing authors toward high-volume, lower barrier commercial publishers not motivated by maintaining the gold standard of science. This is particularly concerning when considering biothreats and other infectious diseases, where a higher level of peer review is often warranted, particularly for research that could pose biosecurity risks.

ASM has long been an open access leader and supporter of the fundamental principles of open science. In the spirit of increasing the accessibility of science, ASM publishes 7 Gold Open Access journals and shifted its 6 subscription journal titles to a Subscribe to Open (S2O) publishing model for the 2025 publishing year. Unlike conventional subscription and APC models, the S2O model distributes costs across authors, institutions and funders. The S2O model allows journals to convert from subscription to Open Access. If a sufficient number of journal subscribers continue their subscriptions, the publisher makes the content covered by that year's subscriptions Open Access. In our first year of this model, S2O allowed all articles in the 2025 volumes of these 6 journals to be published open access, ensuring that scientists and the public can freely access critical microbiology research. This demonstrates ASM's commitment to innovative solutions that balance accessibility with sustainability.

Publishing costs are variable across types of journals and publishers and support technology infrastructure, peer review and scientific integrity, including AI fraud detection, plagiarism checking and image verification. The proposed \$2,000 APC cap does not cover most publishers' average costs to publish an article. ASM is concerned that APC caps could incentivize publishers to accept as many journal articles as possible, harming scientific quality, rigor and reproducibility in maintaining a gold standard of science, and ultimately severely harm US leadership and competitiveness in science and technology. ASM believes that sustainable publishing models should incentivize quality over quantity, which we think is aligned with the vision of the current NIH Director.

ASM encourages NIH to engage in collaborative dialogue, pause the consideration of APC caps and work with non-profit, scientific society publishers to develop policies that promote innovation and equity in publishing. ASM stands ready to contribute expertise and data to help develop effective solutions. To arrange a further conversation, please contact Nicole Zimmerman, Senior Federal Affairs Officer at ASM at nzimmerman@asmusa.org.

Thank you,



Stefano Bertuzzi, Ph.D, MPH
CEO, ASM