

Department of Health and Human Services National Institutes of Health (NIH)

12 September 2025

Response to NOT-OD-25-138

CTSC of Northern Ohio

For eighteen years as an NCATS CTSA hub, we have sought to increase and accelerate the translation of scientific innovation into the public health realm. We are also dedicated to supporting and advancing early-career scientists. Open access to publicly funded research is a crucial aspect of ensuring that the results are accessible and reusable by the research community and the public.<sup>1</sup> **The core values of NCATS in 2025 are in concert with the goals of open access policies.** In particular, “transparent communication and open discourse,” and “team science and collaboration among different groups” are two values that emphasize the intent behind available and accessible published research findings. Supporting publication practices that uphold peer collaboration is vital to good science. Peer review is valuable, and particularly valuable for establishing and mentoring early-career professionals. Therefore, we support Option 3 of NOT-OD-25-138: Set a limit on allowable costs per publication and allow a higher amount to be paid when peer reviewers are compensated.

A priority of NCATS is supporting early-career investigators. Startup packages and institutional Article Processing Charge (APC) support vary widely, and when grants do not cover reasonable publication costs, investigators may opt for less visible outlets where their valuable results will not reach a broad audience. Keeping APCs allowable within a cap is the most equitable way to preserve venue choice for the widest and most discerning dissemination. It also keeps nonprofit society journals within reach, where manuscripts are reviewed by editors and reviewers who are active in the field and where senior members often mentor newer investigators. Many societies rely on journal revenue to support meetings, training, awards, and guideline development, so a capped cost policy helps authors afford these venues and enables societies to sustain their mission.<sup>23</sup> In parallel, to reach broad clinical and policy audiences, our investigators also publish in for-profit journals.

For-profit journals have higher publication costs, but still provide the most effective conduit for publishing, public policy impact, and global reach.<sup>4</sup> A PubMed search of our publications citing our CTSA hub and associated training grants returned 2258 publications

---

<sup>1</sup> (Foppe van Mil, 2019)

<sup>2</sup> (Ware & Mabe, 2015)

<sup>3</sup> (Dolan et al., 2024)

<sup>4</sup> ( Editorial “Publishing at what cost?” The Lancet Planetary Health, Vol 6 March 2022)

since 2016. A significant proportion of these publications comes from five for-profit publishers: Elsevier, Wolters Kluwer, Springer Nature, Wiley, and Oxford University Press (Figure 1). Without grant support to fund submissions, the number of publications would be substantially lower, thereby diminishing the overall number of publications and hindering public access to the results of research investment.

The public impact of this research would also be compromised without public funding of publication costs. Using Overton.io, our CTSA-associated NIH grants are cited in 636 policy documents from 2016 to 2025. These citations indicate how our publicly funded research has reached public health policy. Noteworthy is the number of citations per publication, indicating how research continues to pay dividends to the public funding it receives. This impact would be significantly diminished without dissemination in high-profile publications, the majority of which are through profit publishers with costs paid by NIH grant dollars.

The publication fees for these presses can be among the highest in the industry, including those of Springer Nature and Elsevier, ranging from \$2,000 to \$ 8,000, depending on the journal. However, the publication costs fund valuable activities supportive of quality science communication. These journals offer a global reach and adhere to strong editorial standards, including plagiarism screening, article-level metrics, and experienced reviewers. University agreements (e.g., at CWRU) help keep them accessible to authors at less resourced campuses. Like most for-profit journals, “Springer Nature has a policy waiving publishing fees for authors who can demonstrate a financial need for its journals that publish all content open access.”<sup>5</sup> Therefore, supporting these journals supports academic research publication vitality, dissemination of research findings, and the translation of science into public health.<sup>6</sup> Compromising the ability to cover costs on NIH grants will inhibit the public’s ability to fully enjoy and use the fruits of their investment in science.<sup>7 8 9</sup>

---

<sup>5</sup> <https://www.science.org/content/article/9500-nature-journals-will-now-make-your-paper-free-read>, Accessed 8-20-2025; verified in 2025: <https://www.nature.com/srep/open-access>, accessed 8-20-2025.

<sup>6</sup> (Wellen, 2004)

<sup>7</sup> (Editorial “Publishing at what cost?” The Lancet Planetary Health, Vol 6 March 2022

<sup>8</sup> (Ciubotariu & Bosch, 2022)

<sup>9</sup> (Editorial “Publishing at what cost?” The Lancet Planetary Health, Vol 6 March 2022.)