SocPC response to NIH Request for Information on Maximizing Research Funds by Limiting Allowable Publishing Costs (https://grants.nih.gov/grants/guide/notice-files/NOT-OD-25-138.html)

I am responding: *

On behalf of myself
On behalf of an organization (SocPC)

Name of Organization

Society Publishers' Coalition (https://www.socpc.org/)

Type of Organization

Other - Collective of ~150 nonprofit organisations who publish as part of their mission (https://www.socpc.org/)

1. Proposed policy options

NIH seeks input on the option, or other option not considered in the Request for Information, that best achieves the goal of balancing flexibility in providing research results with maximizing the use of taxpayer funds to support research

The Society Publishers' Coalition (SocPC) is a group of around 150 like-minded, nonprofit learned societies, community publishers and charities who publish as part of their charitable objectives and who reinvest any surplus from their publishing into the disciplinary communities they serve. SocPC members share the common ambition to see an orderly and sustainable transition to open scholarship and to improve the efficiency of the scholarly communication ecosystem for the benefit of researchers and society at large in a fair and sustainable way.

This feedback is from those members who publish NIH-funded research - the full membership list can be found here: https://www.socpc.org/. Members are either self-published or partner with other nonprofit or commercial publishers to fulfill their mission.

These SocPC members invest heavily in providing only high-quality, discipline-specific publications as well as in open science mechanisms of dissemination. There are significant costs associated with rigorous quality control and curation in publishing and these costs are rising as the challenges of protecting the scholarly record mount. Charges are required to cover these services.

In the absence of realistic alternatives to author-linked charges (such as 'diamond OA'), Option 1 is therefore not feasible, and there are similar challenges with Options 2 – 5 in the limits set. Of the options provided, Option 4 is the most realistic, and provides greater flexibility for researchers. However, as proposed, there is a risk that the proposed limits will effectively restrict researchers to publish in lower-quality – but cheaper – outlets that may not maximize the quality control and visibility that this NIH-funded research should receive.

It is also unclear how these proposals would serve to allow researchers to comply with the NIH Public Access Policy. For example, some subscription or hybrid journals - many published by our members - allow authors to publish at no cost and deposit the Author's Accepted Manuscript (AAM) in PubMed Central. Likewise, the relationship between these proposed routes and Read and Publish/Publish and Read/Transformative Agreements or Subscribe to Open models is unclear.

2. Available evidence related to publication costs and proposed options

NIH seeks any evidence (either from your own work or other publicly available sources) that can be publicly shared that addresses the considerations of one or more of the options.

As a collective, our Article Processing Charges (APCs) span from $1960 to $7990, and our members are transparent about publication costs where they are able. Many participated in the cOAlition S Journal Comparison Service and data related to median APCs, including specifically for the Medical and Health Sciences (MHS), can be found here: https://www.coalition-s.org/blog/journal-comparison-service-analysis-of-the-2022-

data/ In addition, further breakdowns are available at https://www.embo.org/features/the-cost-of-scientific-publishing/ and https://elifesciences.org/inside-elife/e3e8def1/annual-report-2023-in-review.

Option 1: Disallow all publication costs.

This option would severely restrict author choice in publishing venues to journals that have a free-to-publish option – primarily subscription-based journals and those that are diamond open access. Subscription journals are frequently not compliant with the current NIH Public Access policy requiring immediate deposition of the article in PubMed Central. Even where deposition is allowed, the available version of the article is not the final published version. Providing access to the Version of Record has significant benefits to the reader in terms of accessibility, integrity and avoiding redundancy in the scientific literature.

Option 2: Set a limit on allowable costs per publication.

Any potential limit on costs needs to recognize that the costs of publishing vary considerably across publishers – depending on size, selectivity and additional services provided to authors and readers. Notably, a journal with a low acceptance rate will need to charge a significantly higher APC than one with a high acceptance rate - to recoup costs associated with processing articles ultimately rejected. This is particularly relevant for small publishers that do not have a large portfolio and routes to channel rejected papers to other journals in the same organisation. Imposing a limit will likely mean that many smaller independent and/or nonprofit publishers, who do not operate with the same economies of scale as larger publishers, will be unable to recover costs through APCs.

Only one of our members reported an APC lower than the proposed cap of $2000 ($1960 for one of their journals); a cap at this level would therefore be unsustainable for the vast majority of small/society publishers. This may lead to further market consolidation in the hands of larger commercial organizations. Importantly, a charge cap may favor low selectivity journals that add the least value to the scientific process in terms of quality assurance and knowledge enrichment.

Option 3: Set a limit on allowable costs per publication and allow a higher amount to be paid when peer reviewers are compensated.

This is addressed in more detail in Question 3 on peer review compensation.

Option 4: Set a limit on the total amount of an award that can be spent on publication costs, and Option 5: Set a limit on both the per publication cost and the total amount of an award that can be spent on publications.

These options would provide authors with more flexibility than a limit on individual per-publication costs and are in principle more preferable, though may mean that researchers coming towards the end of a grant are disadvantaged as they will already have spent their funds and will be unable to publish their outputs in their journals of choice. This could benefit journals publishing more preliminary work than those requiring a comprehensive, fully developed, research project as it will complete earlier in the funding cycle. The cap of $6000 in Option 5 is insufficient for highly-selective journals that evaluate many more manuscripts than they publish and which incorporate more thorough quality control and curation services. These cannot recoup their costs without a higher APC for the articles that are accepted for publication, such as those published by EMBO (https://www.embo.org/features/the-cost-of-scientific-publishing/).

In summary, disallowing all publication costs (Option 1) would severely limit author choice and hinder compliance with NIH's Public Access Policy. A flat APC cap (Option 2) is unrealistic given the wide variation in publishing costs, especially for small and selective publishers, and may lead to market consolidation and reduced quality. Options 4 and 5 offer more flexibility but could disadvantage researchers nearing the end of their grants and are insufficient for high-selectivity journals so an increase in the cap is recommended.

3. Peer review compensation

NIH is interested in hearing ideas about factors related to paying for peer review. Specifically, NIH invites input on factors that NIH should consider in determining whether peer reviewers are appropriately compensated.

The Coalition for Advancing Research Assessment (CoARA) – of which there are 754 member organizations worldwide – have consulted across stakeholder groups and produced recommendations on recognizing and rewarding peer review: https://zenodo.org/records/15968446. Their position, and one which is supported by SocPC, is that peer review is vital to research endeavor, to developing critical appraisal skills and core to academic life. We suggest that the most effective way of recognizing the valuable contribution of peer reviewers - as a core part of their researcher role - would be through formal recognition by research institutions and/or funding agencies in assessment procedures at all levels. Most journals provide certificates to reviewers that they can include as part of their annual appraisal and so they can also claim Continuing Professional Development (CPD) points.

Monetizing peer review without appropriate measures in place could incentivize superficial or biased assessments that have a negative impact on the quality of science published, as well as dramatically increasing costs. There are several practical considerations that make this proposal unrealistic for the majority of publishers:

- High quality peer review takes several hours; fully compensating this work would be financially unsustainable. Providing even just a modest token amount e.g. $300, would lead to an additional cost of around $600 or $900 (for two or three reviewers) per accepted paper. However, papers that are not accepted after peer review also need to be factored in so this could be far in excess of $1000. The Company of Biologists are currently trialing this at small scale (to incentivize rapid peer review) and more information on costs can be found here: https://www.biorxiv.org/content/10.1101/2025.03.18.644032v1.full.pdf.
- There would need to be appropriate policies and guardrails in place to ensure a) that publishers are passing those additional fees on to reviewers through payments and b) that any such payment does not compromise the quality of peer review. Such processes also incur significant administrative costs.
- The administration of multiple payments in multiple currencies will increase costs, and experience has found that researchers are sometimes reluctant to receive

small tokens e.g. author and editor honoraria, due to the tax implications. It would be very difficult for smaller and non-profit publishers to absorb these costs and facilitate payments.

- Given that reviewers would be compensated for papers rejected after peer review, this may create an incentive for publishers to increase the acceptance rate of their journals rather than pay reviewers for papers that should be rejected - potentially leading to the publication of more poor quality research. It may also incentivize bad actors to manipulate the peer review system for money and the use of AI tools could only facilitate this.
- Providing payment as an incentive for more specialist, in-depth or speedier reviews is a different proposition as this would be in excess of usual academic practice. However, the administrative challenges still remain.

4. Publishing best practices

In addition to compensating peer reviewers, other kinds of publishing best practices, such as use of automated fraud detection capabilities, may contribute to higher publishing costs. NIH is seeking further input on additional factors that it should consider in determining the allowability of a higher per publication cost.

SocPC members are utilizing commercial tools and services, and some are creating such tools, to screen for research integrity and reproducibility (this includes checks for papermills, duplicate submissions, image manipulation/duplication detection, plagiarism). These services are essential to preserve the quality of the academic literature. These are further supplemented by in-house expert staff to monitor these tools and conduct integrity checks. One of our members estimates that integrity screening costs around $800 per manuscript - including both staffing and software costs.

In addition to this pre-publication research integrity screening, SocPC members also support authors' data deposition to comply with open science best practice e.g. by providing source data repositories, monitoring and encouraging compliance, structured methods platforms and data curation support. There are also additional costs in ensuring accessibility in line with The Americans with Disabilities Act (ADA) e.g. in generating alt text for figures.

Publishers should not be financially disincentivized from providing these vital services that help to ensure the integrity and accessibility of the scientific record. A system that allows for tiered pricing to reflect the type and level of service provided to researchers could therefore be a more realistic model.

5. Other Comments

NIH welcomes input on any aspect of the RFI.