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National Institutes of Health (NIH)
Department of Health and Human Services (HHS)
Notice Number: NOT-OD-25-138

September 15th, 2025

RE: Maximizing Research Funds by Limiting Allowable Publishing Costs

The Society for Research in Child Development (SRCD) is pleased to respond and submit comments on behalf of our nearly 5,000 members. We thank the National Institutes of Health (NIH) for the opportunity to provide input on this announcement, which seeks to establish new policies limiting the allowable publication costs.

SRCD is a nonpartisan, international, multidisciplinary professional membership association representing thousands of developmental scientists. Our members' work seeks to improve the lives of children and families by exploring how individual differences and complex systems influence human behavior. Their research informs policies and practices in homes, early childhood development and education settings, schools, pediatric practices, public policymaking and more.

SRCD is committed to ensuring that research dissemination remains accessible and follows the most rigorous processes to uphold scientific integrity. Our comments focus on the potential impacts of these proposed policies on research, institutions and the broader scientific community.

1. **Overall feedback**

While we acknowledge the NIH's goal to manage publication costs and applaud the desire to lead the world in the U.S.'s scientific rigor and integrity, the framework presented in this proposal should be rethought. As written, the options do not address the underlying issue of transparency and rigor, and risk shifting the administrative and financial responsibility to individual scholars or institutes of higher education, creating undue publication burdens on specific groups of scholars. The proposals do not identify how costs such as peer review will be fairly compensated or how institutes of higher education that pay for bulk publication packages will calculate per-publication costs. The proposals are fixed, rather than responsive to dynamic publication costs and needs that will evolve over time, which could have longer-term consequences. Additionally, the options could undermine scientific societies who rely on publication costs to support the discipline. Scientific societies, which provide trust, quality control, and rigorous oversight in the publication process, may struggle to sustain journals if revenue streams are constrained, undermining the broader research ecosystem. This value that scientific societies add to the publication process is crucial in an age of artificial intelligence and

misinformation. Finally, as proposed, the options may create the unintended consequence of lowering U.S. publishing output, which will weaken the U.S. scientific enterprise and disadvantage the U.S. globally. Therefore, SRCD firmly requests that the NIH rethink its proposed options.

2. **Addressing the proposed options**

It is not clear how the NIH derived the percentages and approximations used in the RFI. Without detailed data or justification, the proposed caps may not accurately reflect actual publication costs, especially across different disciplines, journals, and regions. Decisions based on unverified information and those that are fixed in time risk unintended consequences for the research enterprise.

Imposing caps, regardless of their structure, may shift the financial burden to researchers. The potential impacts of these proposed options on different groups of scholars are significant. Early career researchers, graduate students, under-published scholars, and those at under-resourced institutions are particularly vulnerable to the caps proposed here. Without the financial support of a high resource institution, these groups may have individualized financial burdens to publish and progress scientific literature and their own careers.

Option one, for example, which would require open-access publication without adequate support, poses serious risk for these groups by potentially limiting their ability to disseminate their work. Other options, including the per-article or percentage caps such as option two, three and five, may also restrict publication opportunities while introducing administrative complexities and challenges for collaborative or multi-site research projects.

Option four may disadvantage smaller projects producing multiple publications despite their scaling by grant size and the guaranteed minimum allocation. Large-scale and collaborative studies often generate multiple publications, including secondary analyses and replication studies. Any cap on allowable publication costs may discourage the full dissemination of these findings, reducing the visibility and impact of important research. This is particularly concerning, given the international context, as overly restrictive policies could compromise the global competitiveness of the American research enterprise. In addition, publishing costs vary widely depending on the journal, discipline, region and publisher. Flat caps, whether per-article or as a percentage of the award, fail to capture these variations. Although option four seems to partially address this concern, it does not fully accommodate smaller projects or studies with multiple publications.

Scientific rigor and the integrity of the peer review process are also at stake. High-quality peer review, editorial oversight, and safeguards such as fraud detection require real resources, and any cap that reduces the funds available for these activities could

weaken these essential processes. When considering option one, by forcing open-access publishing without support, it threatens rigor directly, while the combined per-article percentage caps in option five could pressure journals to reduce investment in these critical activities. By limiting both publication costs and the total amount of an award that can be spent on publication costs (Option 5), it could dramatically reduce both the quality and quantity of scholarly outputs from a research project as researchers must budget their scientific outputs. Because many early-career researchers (including graduate students) begin their scholarly contributions by working with secondary data, this option can be especially harmful to the career development of early-career researchers.

3. **An Alternative**

SRCD proposes that the NIH consider the following, when considering a reimagined framework:

- Provide clarification on what counts as a cap (e.g., data generation, secondary analyses, journal submission costs).
- Establish a process for regularly revising caps.
- Incorporate differences in publication costs across disciplines, regions, and types of research when setting limits.
- Consider and mitigate the burden that caps will provide on specific groups of scholars, such as early career, collaborative teams, under-published scholars, and those at lower resourced institutions of higher education.
- Consider and mitigate the burden that caps will provide on scientific societies, whose work supports the advancement of the scientific workforce, as well as who provide trust, oversight, and integrity in the publication process.
- Ensure that caps will not lower U.S. academic output of scholarly work, weakening our ability to maintain our status as a global leader in scientific research.

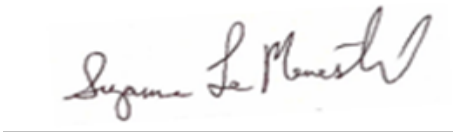
4. **Conclusion**

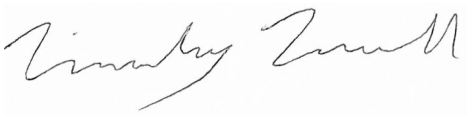
SRCD values NIH's commitment to advancing rigorous and transparent science, and we share the goal of ensuring that research dissemination remains accountable and sustainable. However, the current proposal risks undermining the very infrastructure that upholds scientific integrity and global leadership. By shifting financial and administrative burdens onto individual researchers and institutions, particularly those with fewer resources, the options presented could unintentionally stifle innovation, limit access to publications, and weaken the broader research ecosystem, including scientific societies that safeguard quality and rigor.

We respectfully urge the NIH to reconsider this proposed framework and engage in a more flexible, evidence-based approach that accounts for disciplinary and institutional differences, sustains rigorous peer review, and ensures accessibility for scholars. In doing so, NIH can preserve the strength and competitiveness of the U.S. scientific enterprise while continuing to lead the word in producing high-quality, trustworthy research.

Thank you for taking the time to read our response to this notice. Please do not hesitate to reach out to us.

Sincerely,





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