

RFI: Request for Information on Maximizing Research Funds by Limiting Allowable Publishing Costs (NOT-OD-25-138). Responses due **September 15, 2025.**

For reference:

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

[Comment Form: Maximizing Research Funds by Limiting Allowable Publishing Costs - Office of Science Policy](#)

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.

Cambridge University Press shares NIH's goal to maximize the return on taxpayer investment while preserving the integrity and impact of gold standard American scientific research.

The Press is a global leader in open access publishing, with a public ambition to become a fully open access journal publisher. We are also embedded and invested in the American research ecosystem and providing American authors routes to Gold OA. In 2024, 68 percent of our new journal research content was published open access, and over 650 US institutions are covered by our open access publishing agreements.

Gold OA plays a critical role in ensuring the best possible return on research investment. Independent meta-research and scientometrics continue to show that publishing articles Gold OA strongly boosts both citations and usage and amplifies impact, increasing the ROI of research spend. Publishing Gold OA also increases the reach of research (see [Open access research outputs receive more diverse citations | Scientometrics](#)).

Per-article caps and reimbursements are not the only, nor the most efficient, way to underwrite high-quality dissemination. We are actively growing service-based, annual agreements that cover a portfolio of publication types. This programmatic model shifts funding from variable, per-article charges to predictable, auditable annual fees, reducing administrative burden, improving budget planning for institutions and funders, and creating headroom to invest in quality safeguards and transparent reporting. Within a reasonable allowance for true costs, such agreements enable NIH and universities to manage spend more effectively.

Of the options presented, a transparency-first, sustainable version of Option 4 could potentially create the needed flexibility for researchers to decide how to allocate funds across publishing routes. Implemented carefully, this approach could also grow innovation and the quality investments that drive research impact, represented by the hundreds of billions of dollar value that American scientific research adds to the annual GDP.

To avoid constraining high quality, high value research outputs, Option 4 should include a clear, administratively light exceptions pathway. If NIH were to consider this cap with exemptions model, we recommend monitoring and further study before locking in thresholds, alongside periodic review with key stakeholders from scientific society and publishing industry leadership, to ensure the publication of gold standard science remains sustainable in this model.

However, the overall award-level limit in Option 4 appears too low relative to the real costs of high-quality publishing venues commonly used by NIH-funded authors. Simply put, a \$2,000 per-article ceiling is not viable for most high-quality journals that adhere to robust peer review, robust research-integrity safeguards, and full-service publication workflows that result in the publication of globally impactful, Gold Open Access articles.

The cost gap between proposed caps and actual costs to publish gold standard science via Gold OA publication models represents a major risk that can all too easily translate into a loss of impact, and value, for the best, and most important, American scientific research.

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.

Independent research suggests typical APCs in the high-quality publication venues NIH authors seek out are often well above \$2,000. Combining an evidence-driven per-article cap with exemptions will fit the observed range with less risk and ensure this gold standard science achieves maximum impact and value in publication.

Publishers can support by transparently surfacing journal costs and pricing practices. Cambridge University Press publishes ongoing program-level cost transparency and a transparent pricing policy. These policies reflect the way we responsibly reduce online subscription prices as subscription content falls (avoiding “double-dipping”). We provide worked examples and a cap on the subscription-content adjustment. We believe our approach represents a reasonable, fair, auditable model.

- [Open research transparent pricing policy for journals](#)
- [Open research journal cost transparency](#)

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.

Cambridge University Press recognizes the burden on peer reviewers and has invested in studying this issue through internal data reviews and collaborations with external partners, building an evidence base to guide targeted interventions. Our research has uncovered that peer review capacity is being outpaced by an exponential increase in submissions due to academic reward and recognition systems that are out of alignment with actual capacity, demanding increases in publication output while not rewarding the review processes that underpin their existence. These systemic pressures on authors have led to, and been compounded by, the proliferation of paper mills, AI generated manuscripts, and other issues that must be solved at scale.

We caution against line-item mandates that add cost and bureaucracy without addressing the root problem: the sheer volume of submissions creating strain on the peer review system. To solve this core problem at scale requires sustained investment in both human checks and thoughtfully, strategically developed tooling. Creating a new payment regime

for reviewers will add material costs across the entire research ecosystem while leaving the root submission volume pressures unresolved.

If NIH explores investing in this issue, rather than direct compensation to peer reviewers, we suggest solutions that focus on system-level investments like tools for integrity checks, identity verification, and training.

At the Press we are making major, ongoing investments in systems and processes to ensure peer review maintains its robustness for the future (see “Publishing best practices” below).

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.

We appreciate NIH’s recognition that delivering essential publication quality-assurance and integrity services requires significant, ongoing investment by publishers. Safeguarding the scholarly record by preventing fraud, monitoring and reviewing content at scale, and upholding integrity in each step of the publication process, comes with significant costs. At Cambridge University Press, we invest in and design our research integrity and peer review approach carefully, ensuring that our publications are trustworthy and impactful.

We recommend that if NIH ties higher per-article limits to quality signals, that the focus be on requirements that are feasible to measurably attest and minimally burdensome to verify, including:

1. The existence of research-integrity control pathways, built into the submissions process.
2. Publisher cost and pricing transparency: for example, public statements of pricing principles and program-level cost transparency pages (as Cambridge University Press provides).
3. Accessibility, preservation, and interoperability of published articles requirements.
4. Publisher investment in support for open data, and implementation strategies to support author compliance with requirements such as the NIH zero-embargo policy.

5. Other Comments

NIH welcomes input on any aspect of the RFI.

We acknowledge the affordability challenge and the rapid growth in article outputs that is straining the system’s capacity and budgets; the system is facing escalating integrity threats that leverage this weakness. This represents a direct threat to the continued function of the publishing ecosystem, and therefore the publication of gold standard American scientific research.

The best American scientific research deserves to be published open access in high quality publishing venues that meet recognized standards. Publishing Gold OA is an investment in American research and innovation, representing a small fraction of overall

grant funding costs but delivering immense potential, and measurable, ROI in terms of impact on the American (and global) economy. We would welcome the opportunity to open a dialogue with NIH in order to best support future decision making in this area of critical importance to America's scientific future.