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American Society for Nutrition (ASN) Response to NIH Request for Information on Allowable Publication Costs (APCs)

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

Option 1: Disallow all publication costs. NIH could no longer support publication costs through any funding mechanism. Some private funders have disallowed costs for peer-reviewed publications as they seek to place increased value on preprints.

Option 2: Set a limit on allowable costs per publication. NIH could limit allowable direct costs to $2,000.00 per publication, including APCs and other fees. This amount is between what NIH found as the average global APC ($1,235.51) and the average requested in budgets (approximately $2,600.00-3,100.00), and close to the average for U.S. published journals' APCs ($2,177.00).

Option 3: Set a limit on allowable costs per publication and allow a higher amount to be paid when peer reviewers are compensated. NIH could adopt the $2,000.00 limit per publication in Option 1, and allow a higher limit of $3,000.00 per publication when publishing in journals that compensate peer reviewers at a level equivalent to the average hourly wage reported by the U.S. Bureau of Labor Statistics for Medical Scientists and Biochemists/Biophysicists (approximately $50.00 in 2025) and that publicly provide all reviews resulting from the peer-review process of accepted, NIH-funded manuscripts. This option considers the limit in Option 2, with an additional $1,000.00 to allow journals to compensate peer reviewers. Given surveyed reports that reviewers spend 6 hours per review,1 three peer reviewers can be compensated at $50.00 per hour for 6 hours per peer review ($300.00 for each reviewer), while rounding up to $1000.00 to account for additional costs of organizing peer review and accompanying payments. There may be other situations where a higher rate may be justified (e.g., use of automated fraud protection capabilities).

Option 4: Set a limit on the total amount of an award that can be spent on publication costs. NIH could limit the maximum amount of an award that could be spent on publication costs to 0.8% of the award's direct costs over the length of the award or $20,000.00, whichever is greater, in order to not disproportionately impact smaller awards. Limiting the award to 0.8% or $20,000.00 is consistent with recent requested average amounts for publication costs and provides institutions flexibility in publication while containing future cost increases. NIH may consider exemptions to the cap with agency approval for unusual, high-volume publication situations.

Option 5: Set a limit on both the per publication cost and the total amount of an award that can be spent on publications. NIH could limit both the total amount of an award that could be spent on publication costs to the greater of 0.8% of the award's direct costs or $20,000.00 over the life of the award, in addition to limiting the amount per publication to $6,000.00.

This option considers the limit in Option 4, as well as NIH applicants' range of estimated per publication costs of $0 to $12,000.00. A per-publication limit of $6,000.00 reflects the mid-point of the range of applicants' estimated per publication costs, and encompasses the majority of

reported per-publication costs. By combining an overall percentage of the budget and a generous per publication limit of half of the maximum that NIH applicants estimated, this option allows awardees more flexibility while prohibiting use of taxpayer funds for unreasonably high fees.

Name of Organization: American Society for Nutrition

Type of Organization: Professional Organization/Association

Question 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 American Society for Nutrition (ASN) strongly supports open science and believes that publicly funded research should be accessible to everyone. ASN journals ensure high-quality peer review, editorial oversight, and scientific integrity, and ASN is committed to balancing open access with long-term sustainability. ASN's publishing program helps sustain the broader ecosystem of support for the research community through conferences, training, mentoring, and professional development programs.

ASN's Perspective on Option #4
Of the proposed approaches, ASN supports Option #4 as the least harmful path forward. While not without limitations, it gives NIH the flexibility to manage costs without restricting researcher choice. It allows researchers to choose the journals that are best able to reach the target audience for their work.

ASN members have expressed concerns about the affordability of Article Processing Charges (APCs). They also note that the number of articles resulting from a grant can be difficult to predict and may vary considerably depending on the type of research conducted. For example, epidemiological studies often generate a larger number of published articles, relative to the size of the grant, than some other studies.

ASN stresses that none of the proposed options, including Option #4, accurately reflect the true costs of publishing. For example, the European Molecular Biology Organization's (EMBO) has estimated a cost of about $6,400 per paper. In addition, the proposed APC caps in this RFI, at both the article and the grant level, are set below both the 5-year average and median cost to publish in gold open access journals (as identified in the search of the DOAJ database), and in the gold and hybrid-open access journals preferred by researchers (as identified in a search of 1,500 RO1 grants awarded in FY 2025).

If APC caps are set below the real cost of publishing, nonprofit and society publishers like ASN could not sustain their journals. Operating at a loss would threaten the long-term viability of these publications and hinder researchers' ability to share their work and connect with researchers in their field.

Unlike commercial publishers, societies reinvest publication revenue directly into the scientific community. At ASN, these funds support vital activities such as scientific meetings, professional

development, mentoring, and training for researchers at all career stages. If publishing revenue no longer covers costs, these programs would be reduced or eliminated --directly harming the very community the policy is meant to support.

Although APC caps are an attractive option, they would not change the direct costs associated with publishing, and they do not guarantee that publishers will lower their APCs as a result. Caps on APCs may limit publication options for researchers at smaller or less well-funded institutions, while those at wealthier institutions could continue to publish in top-tier journals. This imbalance risks reducing fair access to visibility, recognition, and career advancement.

Alternative Option for NIH Consideration

ASN commends the NIH on their recommendation of a hybrid approach that ties APCs to a percentage of the overall grant award. Given the uncertainty inherent in research, ASN also recommends creating a mechanism that would facilitate additional funding of APC funding after results of the research are known. Such an approach would:

- Give researchers flexibility, since some projects produce many papers while others result in fewer, but more complex ones.
- Scale publishing costs to the size of the grant, allowing larger projects to support more publications and smaller projects to fund fewer, but in proportion to their budget.
- Avoid a flat, one-size-fits-all cap, which would put smaller nonprofit publishers at a disadvantage while favoring large commercial publishers.
- Cover the real costs of publishing, including peer review, editorial support, research integrity checks, and post-publication updates, while still encouraging efficiency.

This kind of sliding scale model would strike a better balance between flexibility, fairness, and sustainability, while ensuring NIH-funded research is shared widely and responsibly.

The Real Nature of Publishing Work

Publishing high-quality research carries real and growing costs. The volume of articles coming to publishers is increasing, and the work required to curate, review, and edit each article grows along with it. Publishers are investing in technologies such as AI to help check statistics, detect image manipulation, and screen for plagiarism. However, these tools cannot replace careful human review, especially at this early stage in the adoption and oversight of AI in scientific publishing. The human effort and expertise required to maintain scientific rigor and integrity are essential, and the use of AI tools does not necessarily lower these costs.

Caps on publication costs may also pressure publishers to cut corners on essential quality safeguards, such as peer review, editorial support, research integrity checks, and ongoing curation. These activities are critical to maintaining trust in published nutrition research and should be viewed as necessary investments, not optional extras. Similarly, proposals to pay reviewers only for accepted articles could unintentionally encourage higher acceptance rates, which could compromise the rigor of the review process. Such dynamics risk reducing overall quality and the reliability of the scientific record.

Lower caps would also favor large commercial publishers and predatory journals, who are better able to absorb costs. Smaller nonprofit and society publishers, which provide high-quality, mission-

driven services, would struggle to compete. Over time, this could lead to more consolidation in the publishing industry and fewer journal options for researchers.

Finally, APC caps overlook the costs of post-publication work, such as corrections and updates. These activities are critical to maintaining accuracy and trust in scientific research and often take more time and resources than the initial peer review.

Conclusion

For these reasons, ASN believes that Option #4 is the least harmful among the proposed choices. Linking publishing costs to the size of the grant rather than setting a flat cap allows larger projects to support more publications while keeping costs in proportion for smaller projects. Such a model would make use of taxpayer funds wisely, protect author choice, support nonprofit and society publishers, and help maintain the long-term quality and integrity of scientific research.

Question 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.)

ASN recognizes that publishing high-quality research comes with significant costs. Data from organizations such as the European Molecular Biology Organization (EMBO) show that the fees charged per article are often lower than the actual cost of publishing. This means that many journals, including society publishers, would operate at a loss if they relied solely on APCs to cover their expenses.

Capping APCs could unintentionally create a new industry standard. Once a cap is set, APCs below that limit may rise to match the cap, effectively becoming the new norm.

Smaller nonprofit and society publishers, such as ASN, could face additional challenges because publication revenue supports essential activities, including conferences and professional development programs that directly support the research community. APC caps could threaten the sustainability of these programs, making it harder for societies to continue providing these important resources and opportunities to researchers.

Summary

Limits on APCs are meant to lower costs and improve access, but they could also have negative effects. In nutrition science, strict limits could reduce opportunities for researchers to share findings that guide public health, clinical practice, and food and nutrition policy.

ASN supports broad and fair access to research and urges NIH to adopt flexible approaches that reflect the needs of different fields and publishers. Authors should remain free to choose the journal that best serves their science and community. Policies must expand access without lowering quality, creating unfair barriers, or undermining the sustainability of nonprofit societies that play a critical role in advancing nutrition research.

Question 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.)

Peer review is the backbone of scientific publishing and ensures the credibility of nutrition research. ASN believes that introducing payment for reviewers, especially only for accepted articles, could create incentives that compromise review rigor. Nutrition researchers, including experts in areas such as statistics, epidemiology, and clinical practice, already volunteer substantial time and effort to ensure scientific quality. Preserving this culture of voluntary peer review is critical for maintaining trust in published research. NIH policies on publishing costs should recognize and protect the essential role of peer review without introducing financial incentives that could weaken it.

ASN commends ORCID for providing a platform where researchers can receive recognition, validated directly by journals, when a researcher reviews for a journal. ASN's journals seamlessly integrate with ORCID to supply this information to ORCID for all manuscripts where reviewers opt into this. In addition, ASN recognizes all reviewers and exceptionally productive reviewers on an annual basis (https://journals.nutrition.org/top_reviewer_awards). Further industry efforts to recognize researchers' review work could include standardized metrics, not unlike the h-index of authorship.

Question 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.)

Maintaining high-quality nutrition science publishing requires strong safeguards to make sure research is accurate and trustworthy. Publishers must invest in tools such as fraud detection, plagiarism checks, data-sharing systems, and steps to prevent image or text manipulation. Just as important are the contributions of skilled editors and subject matter experts who uphold rigorous scientific standards.

While technology such as AI can help, it cannot replace human expertise and judgment. These practices are essential to protect the integrity of the quality and reliability of published research, and ASN encourages NIH to consider them when deciding if higher publication costs are justified.

Question 5: Other Comments

- NIH should avoid rigid APC caps and consider flexible approaches that reflect differences across fields, journal types (nonprofit vs. commercial), and publishing models. A one-size-fits-all policy could hurt nonprofit societies like ASN that reinvest publishing revenues into supporting their scientific communities.

- Cost-cutting measures should not weaken peer review, editorial oversight, or research integrity safeguards, all of which protect trust in nutrition science.

- NIH should ensure that researchers retain the freedom to publish in the journals that best reach their peers, practitioners, and policy makers. Restricting choice risks reducing the visibility and impact of nutrition science.

- Nonprofit societies like ASN depend on publishing revenue to fund training, mentoring, conferences, and career development for the next generation of nutrition scientists. Policies that weaken the sustainability of society journals risk undermining these vital contributions to the research ecosystem.