SOCIETY for NEUROSCIENCE

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National Institutes of Health
NIH Office of Science Policy
6705 Rockledge Drive #750
Bethesda, MD 20817

Dear Director Bhattacharya, MD, PhD,

On behalf of the Society for Neuroscience (SfN), the world's largest organization of scientists and physicians devoted to understanding the brain and central nervous system, thank you for the opportunity to provide feedback on your policy proposals aimed at maximizing research funds by limiting allowable publishing costs (NOT-OD-25-138).

While the Society for Neuroscience supports the efforts of the NIH to maximize the use of federal research funds, we urge NIH not to cap publication costs. Setting a limit on the total publication spend (option 4) would be the least disruptive to the research lifecycle, but consideration must be given to the type of research as well as to the level and type of award.

SfN self-publishes two journals, *the Journal of Neuroscience* (*JNeurosci*) and *eNeuro*. Common costs associated with journal publishing include staff salaries, editor honoraria, and costs for editorial systems, production, and online hosting.

JNeurosci is a subscription-based journal and permits authors to post their accepted author manuscripts as they choose, with zero embargo, so NIH-funded researchers are not required to pay additional fees to comply with the NIH public access policy. e*Neuro* is fully open access and assesses an article processing charge (APC) as its sole revenue source. The APCs for both journals exceed the proposed $2,000 cap. A limit on APCs for individual journals would negatively impact submissions, especially for authors at smaller and/or less well-funded institutions.

Publication Costs
As a traditional subscription journal, *JNeurosci* is primarily supported by institutional subscription costs, though authors are also assessed a publication fee and can opt to pay a surcharge for immediate open access. Due to increasingly common public and open access funder mandates, subscription revenue is increasingly at risk. Libraries are less likely to subscribe when free versions of peer reviewed material are available from reputable sources online, including PubMed Central. The diversity of revenue streams helps to insulate against major market shifts, as well as keeping costs lower for both institutional library customers and authors.

Furthermore, the proposed options do not account for open access publishing models. Open access allows for immediate access to published research at no cost to the reader, as well as allows liberal reuse policies that promote the free sharing and dissemination of science. While author fees are higher than traditional subscription journals, open access publishing has no other source of revenue to support operations, and income fluctuates based on published article volume. As an open access journal, *eNeuro* has been subsidized by *JNeurosci*'s more stable revenue for most of its existence and additional cuts to its income may threaten its longevity.

The Scientific Publications program accounts for about 25% of SfN's revenue and 9% of its expenses. The surplus revenue helps to support the other work of the Society, including scientific advocacy, public education activities, and training and professional development for early career researchers.

Large, commercial publishers will be well situated to weather these kinds of changes to the publishing landscape. As a small, non-profit publisher, SfN does not have the agility or scale to drastically alter its business models or cut expenses without partnering with a commercial publisher. As a result, the proposed caps may further strengthen large for-profit companies and result in the elimination of independent society publishers, who, in turn, invest in their communities.

SfN's costs and revenues are noted in its FY2024 Consolidated Financial Statement and https://www.sfn.org/-/media/SfN/Documents/NEW-SfN/About/Annual-Report/20241004-SfN-2024AnnualReport-final.pdf

Peer Review Compensation

Each journal has a board of active scientists working as Reviewing Editors. These Editors are subject matter experts, assign qualified peer reviewers, and act as reviewers themselves when two reviewers do not agree, or other concerns are raised. They draft decisions and provide author feedback based on the reviewers' insights. They also provide detailed feedback on the over 1,000 articles that receive a decision without external review. These editors are compensated on a per-decision basis. In the previous fiscal year, *JNeurosci* Editors received on average $5,700 for the year; *eNeuro* editors received an average of $750.

In 2024, SfN journals acknowledged over 3,000 individual reviewers worldwide, who reviewed approximately 3,350 article versions that were sent for review across the two journals. With generally two reviewers per round of review, introducing reviewer compensation at the proposed level ($300/review) would create an additional $2M expense per year. Additionally, many of these articles will ultimately go on to be rejected, resulting in no revenue to support these new costs of peer review. Tracking and issuing payments for such a large pool of reviewers would create a significant administrative burden and likely require additional staff to manage, creating additional expenses.

In addition to the proposed payment structure for reviewers being out of step with SfN's existing compensation for editors, compensating reviewers is still unusual across the industry. Paying reviewers may create new conflicts of interest in the peer review system, which has previously been built on trust and reputation: reviewers may agree to review articles outside of their areas of expertise; they may only agree to review for publishers with the highest reviewer compensation, further rewarding large, commercial publishers; or they may use AI or other tools to turn out untrustworthy reviews quickly.

SfN continues to explore non-monetary ways to acknowledge the important contribution of reviewers, including an annual public acknowledgment, publishing reviewer profiles, and discounts on publication fees.

Publishing Best Practices

SfN incurs several additional costs to support fairness and integrity in science, discoverability and stability of published material, and open science.

eNeuro uses a double-blind review process, where the authors' and reviewers' identities are unknown to each other. Both journals also feature an open peer review policy, where the reviewers' feedback is made public when an accepted article is ultimately published. While both initiatives contribute to a more

collegial, fair, and transparent peer review process, they also require significant, resource-intensive administration by journal staff and customizations to the peer review software to run smoothly.

Both journals conduct routine research integrity screening for plagiarism, image duplication and manipulation, generative AI, paper mill submissions, and other checks. These screening tools alone can cost up to $30K annually, while also requiring staff and editor time to manage. Like most scholarly journals, SfN also pays to participate in programs like the CLOCKSS archiving service, ORCID author identifiers, the Ringgold institutional database, Copyright Clearance Center, the bioRxiv preprint transfer service, and Crossref's DOI and funder registries. All these initiatives support an interconnected system of research output and robust article metadata.

Over the last several years, there has been an increased focus on open data and data sharing policies. For cases where a public repository is not available or an author is unable to find a suitable home for data, both SfN journals will host data related to an article on their website. The journals will also host the code or software needed to reproduce an experiment. As the volume of material that needs to be hosted increases, SfN will incur additional online hosting costs, which are not insignificant.

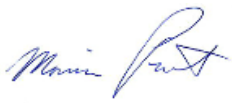
Conclusion

SfN supports NIH's goal of maximizing the use of taxpayer funds in research but urges caution in implementing publication cost caps, especially the proposed $2,000 APC limit. Such a cap would disproportionately affect smaller, nonprofit publishers like SfN and potentially reduce accessibility for authors at less-resourced institutions. SfN's two journals, *JNeurosci* and *eNeuro*, operate under different business models (subscription and open access, respectively) and rely on diverse revenue streams to maintain operations and uphold publishing best practices. Open access models, while promoting immediate and free access to research, depend solely on APCs to cover costs like editorial oversight, integrity screening, and digital infrastructure. Additionally, proposed reviewer compensation levels would significantly increase expenses and create administrative burdens.

SfN emphasizes that any policy must account for the varied publishing models and operational realities of nonprofit publishers to avoid unintentionally consolidating power among large commercial publishers and weakening the broader scientific publishing ecosystem.

Thank you again for the opportunity to provide feedback on this proposed policy for NIH grantees. As this process progresses, SfN encourages NIH to seek outside, unbiased expertise to review potential reforms and ensure that the most effective proposals are considered. The aim of the research community is to enhance, rather than diminish, the broader research ecosystem, to advance health and well-being for all. Please contact SfN's Director of Advocacy and Training, Adam Katz, at akatz@sfn.org with any questions.

Sincerely,



Marina Picciotto, PhD
Past President, Society for Neuroscience
Former Editor in Chief, *the Journal of Neuroscience* (2015-2022)