

The NIH [seeks comments](#) on, but not limited to, NIH's Goals across the three Priorities articulated in the framework—including potential benefits, drawbacks, opportunities, or challenges, and other areas of focus for consideration.

Please include any comments on NIH's Goals across the three Priorities articulated in the Strategic Plan Framework, including potential benefits, drawbacks or challenges, and other areas of focus for consideration. (500 words each)

Priority 1: Research Areas

Goal 1: Advance Foundational Knowledge of Human Health and Disease

Goal 2: Prevent Disease and Promote Health Across the Lifespan

Goal 3: Advance and Optimize Interventions, Treatments, and Cures

STM strongly supports the objectives under Priority 1, noting that trusted, high-quality scholarly publishing is essential to achieving each of the articulated goals. Research findings only advance health when they are rigorously validated, clearly communicated, discoverable, and preserved as part of the permanent scientific record. The President's Executive Order on Gold Standard Science, and Director Bhattacharya's commitment to "ensuring our scientific findings are objective, credible, and accessible to the public," requires nothing less.

There is a good reason that peer-reviewed journals remain the primary mechanism through which findings from NIH-funded research are evaluated, contextualized, and integrated into the broader evidence base. Publishers add value throughout the publishing process, and continued investments are necessary to ensure high-quality information supports both foundational knowledge and health. Publishing is not a passive dissemination step, but a combination of different human and technological efforts that support reproducibility, methodological transparency, and scientific debate, amongst many other benefits. As Director Bhattacharya has noted, these are core elements of NIH's mission to advance reliable knowledge.

Investments by publishers in editorial oversight, peer-review systems, research integrity screening, metadata, and correction and retraction infrastructure directly support NIH's goals to optimize the quality and impact of funded research and drive research advancements. These investments become even more important as science becomes increasingly computational and AI-enabled, where errors can propagate quickly if the record is not trustworthy. The quality of AI systems relies on access to good inputs. The Version of Record – which provides the standardized metadata, DOIs, structured supplementary data, and links to any updates/ corrections – is what connects data infrastructure to trusted knowledge.

A key opportunity for each of the Priority 1 goals is to explicitly recognize publishing as an integral part of the research lifecycle, rather than a downstream or optional activity. That includes funding open research practices such as sharing data or code. Together, these constitute a complete and transparent scientific record. Without adequate support for publication, NIH risks undermining its own investments and opportunity for research impact. Opportunities also include expanding support for emerging open research practices, such as the publication of negative results and replication studies and preregistration.

A challenge that warrants attention is the growing misalignment between NIH's expectations for immediate access, transparency, and integrity, and the lack of consistent, durable funding mechanisms to support those requirements in grants. When publishing costs are constrained or

treated as marginal, the burden shifts to individual researchers or institutions, limiting publishing options and potentially disadvantaging early-career investigators and those working in under-resourced fields.

In sum, STM encourages NIH to treat support for high-quality publishing as a pre-requisite for achieving Priority 1 goals and to align scientific ambition with realistic, sustainable funding policies that ensure the findings from NIH-funded research can be communicated with maximum rigor, reach, and impact. To do so, NIH should explicitly recognize that the Version of Record, robust peer review, and ongoing integrity maintenance are essential to NIH's research priorities and maximizing the return on NIH's scientific investments.

Priority 2: Research Capacity

Goal 1: Develop and Sustain an Interdisciplinary Research Workforce

Goal 2: Build, Improve, and Sustain Research Resources and Infrastructure

STM welcomes NIH's focus on workforce development and sustaining research infrastructure. A strong opportunity under Priority 2 is to recognize that scholarly communication infrastructure is itself research capacity—supporting the nine tenets of Gold Standard Science across disciplines, institutions, and career stages.

Publishers invest continuously in systems that enable researchers to comply with funder requirements, share results responsibly, and participate fully in open and collaborative science. These include manuscript and peer-review platforms, persistent identifiers, metadata standards, data and software linking, accessibility services, and training for editors and reviewers. Collectively, this infrastructure supports workforce development by helping researchers – especially early-career scientists – learn disciplinary norms, research ethics, and effective scientific communication. In addition, research collaboration and dissemination itself, alongside a wider range of contributions to the publishing process, supports career progression and professional development.

Through these activities, publishing functions as capacity-building infrastructure that underpins workforce diversity, interdisciplinarity, and global collaboration. Society and mission-driven publishers in particular play a critical role in sustaining scientific communities, mentoring editors and early career researchers, and supporting specialized fields that may not otherwise be well served. Publishers are also continuously investing in workflows that enable all tenets of Gold Standard Science. These investments, which reduce administrative burden and increase capacity, are even more essential when researchers already spend over 40% of their time on administration and resources continue to be constrained across funders and institutions.

As NIH articulates activities towards Priority 2 goals, it must ensure that capacity-building efforts include the research communication layer: incentivizing high-quality reporting, supporting standards adoption, and ensuring that the costs of maintaining a trustworthy scholarly record are understood as part of the national research infrastructure rather than as optional add-ons. The opportunity is to build on existing infrastructure investments rather than wasting precious taxpayer funds on rebuilding or duplicating them.

A major challenge is that capacity-building goals can be undermined if researchers, especially early-career investigators and under-resourced institutions, cannot reliably budget for compliant, high-quality publication and preservation and publishers also cannot continue to maintain and improve the infrastructure that delivers value. Policies that restrict or destabilize support for publishing risk weakening the very infrastructure NIH relies on to build and sustain research capacity.

Therefore, STM encourages the Strategic Plan to treat publishing infrastructure, integrity workflows, and long-term stewardship of the scholarly record as part of NIH's research capacity agenda. To achieve the Priority 2 goals, NIH should: explicitly acknowledge publishing and editorial systems as part of the research infrastructure ecosystem; ensure that grant policies and budgets allow researchers to plan and pay for publication in ways that support compliance, integrity, and equity; and explore partnership and pilot opportunities with the publishing community to reduce administrative burden and improve interoperability across the research enterprise to build research capacity for Gold Standard Science.

Priority 3: Research Operations

Goal 1: Enhance Scientific Stewardship and Decision-Making

Goal 2: Foster Transparency and Accountability to Improve Public Trust in Science

Scholarly publishing directly supports Priority 3's stewardship, transparency, and public-trust goals. A trustworthy Version of Record—built and maintained through professional publishing—is foundational to Gold Standard Science and to evidence that policymakers, clinicians, and the public can rely on, including for replication, meta-analysis, and downstream policy and clinical evaluation. In effect, publishing is essential information infrastructure for NIH's research operations.

The outcomes NIH seeks depend on concrete integrity and stewardship functions—editorial oversight, peer review, integrity screening, metadata curation, accessibility support, version control, and post-publication correction and preservation—that carry real, ongoing human and technical costs. Those costs are rising as submission volume grows, and as publishers invest to tackle integrity challenges, such as paper mills (commercial operations producing fabricated research at industrial scale), data fabrication, and image manipulation, which have expanded in recent years. To scale these safeguards without shifting burdens inefficiently and inequitably to researchers and institutions, NIH should align operational expectations with durable grant budgeting norms that treat research communication and integrity functions as part of stewardship rather than incidental publication expenses; otherwise, NIH risks policy fragmentation (expanding requirements for immediate access, transparency, and accountability while constraining the mechanisms that operationalize and fund them).

Goal 2 is an opportunity to make this collaboration explicit: transparency and accountability are achieved through structured communication with integrity. In practice, this is operationalized through the publication process which includes: standardized disclosures (funding, competing interests, ethics approvals), persistent identifiers that link articles to grants, data, and software, and visible post-publication updates (corrections, expressions of concern, and retractions); and policies that foster open science practices such as sharing data, methods, or code and, increasingly, preregistration and the publication of negative results. Individual publisher investments in research integrity and collaborative cross-sector initiatives like the STM Integrity Hub and shared integrity markers help deliver these trust signals at scale.

Without scholarly publishing, there would be no shared system to distinguish validated knowledge from unverified claims, making it far harder for science to progress. Policymakers, researchers, and the public would face a flood of assertions without clear signals of reliability, accountability, or consensus. Inaccurate claims could outpace reliable dissemination, leading to repeated experiments, fragmented awareness of prior work, and wasted taxpayer dollars. In an AI-mediated information environment, provenance signals—peer-review status, versioning, correction history, and retraction propagation—are essential to prevent low-quality claims from being amplified as “evidence.” In the age of AI, when fact is easily confused with fiction, the Version of Record as an

authoritative output of scholarly publishing is more important than ever, and requires policies to protect, not displace it.

By reinforcing partnership with scholarly publishers as operational partners and stewards of authoritative, trusted knowledge, NIH can strengthen public trust, improve operational efficiency, and implement transparency and accountability consistently, sustainably, and at scale.