

April 24, 2023

## **Joint Response to RFI on the NIH Plan to Enhance Public Access to the Results of NIH-Supported Research**

As representatives of the American scientific community, the undersigned scientific societies and associations welcome the NIH's efforts to enhance public access, in line with the recent OSTP guidance aimed at making federally funded research publications and supporting data publicly available. We further applaud the NIH for emphasizing equity in its approach to public access policy development.

As a critical component of its public access plan, we urge the NIH to focus on creating an environment that balances reader access to published work with researchers' ability to publish. This will require transparency and recognition of the costs borne by researchers and research funders. We must strive to create a system wherein scientists are not required to pay additional fees to publish and where grants are not required to bear the brunt of publishing costs. Otherwise, we risk creating heavy cost burdens not only for researchers and their institutions, but also for funders of research, including taxpayers. Our organizations and others are experimenting with various sustainability models for public access, including diamond, green, and Subscribe to Open. These represent potential pathways towards the goal of optimizing equity for researchers and readers. We are open to other models that achieve NIH's equity goals.

Scientists' ability to communicate their scientific results through publication is critical to the incorporation of their expertise into the scientific enterprise and the progression of their careers. Monitoring implementation of changes to the public access policy, and how researchers and institutions pay publishing costs, will be critical to ensuring that public access plans do not create new systemic inequities or reinforce existing ones. Careful and continued study will be essential for understanding the near- and long-term effects of related changes. A study of cost effects at the researcher, institution, and enterprise levels is needed. It may also be valuable for NIH to survey researchers and institutions about publishing costs and about tradeoffs made to pay such costs.

Adaptation of federal grant agreements to require reporting on the payment of publication fees and reliance on transformative agreements (in instances where authors avoid payment of a fee because their institution has a transformative agreement with their journal of choice) represents one logical approach to monitoring fees. All analyses of and reporting on costs paid by institutions or researchers for publication should examine potential variability in costs across disciplines, career stages, and institution types, as well as variability based on researcher backgrounds.

As representatives of the scientific community, we believe we are at a crucial moment in the timeline of public access policy development, and we continue to share our view that public access should optimize equity for researchers and readers. We appreciate your consideration of these comments, and are committed to collaborating with NIH, other federal research agencies, and OSTP to develop public access policies that balance access to published work with the ability to publish.

Sincerely,

American Anthropological Association

American Association for the Advancement of Science  
American Association for Anatomy  
American Association for Dental, Oral, and Craniofacial Research  
American Institute of Biological Sciences  
American Society of Tropical Medicine and Hygiene  
Association for Women in Science  
Association of Independent Research Institutes  
Biophysical Society  
Federation of Associations in Behavioral and Brain Sciences  
Human Factors and Ergonomics Society  
Research!America  
Sigma Xi, The Scientific Research Honor Society  
Society for Research in Child Development  
The American Society for Biochemistry and Molecular Biology  
The American Society for Cell Biology  
The Gerontological Society of America