May 6th, 2020

BY ELECTRONIC SUBMISSION

Dr. Kelvin K. Droegemeier
Director, Office of Science and Technology Policy
Eisenhower Executive Office Building
1650 Pennsylvania Avenue, NW
Washington, DC 20504

Response to OSTP Request for Information – FR Doc. 2020-06622 – "Public Access to Peer-Reviewed Scholarly Publications, Data and Code Resulting From Federally Funded Research"

Dear Dr. Droegemeier,

The American Society for Pharmacology and Experimental Therapeutics (ASPET) presents its comment to the Office of Science and Technology Policy (OSTP) and the National Science and Technology Council's (NSTC) Subcommittee on Open Science (SOS) to inform the administration of the challenges to scientific societies presented by instituting public access to peer-reviewed scholarly publications resulting from federally funded research. ASPET broadly supports the goals of increasing access to scientific research, but full open access will upend revenue models at many scientific societies and force them to scale back or eliminate services. Some societies will be forced to close entirely. ASPET urges the administration to work with stakeholders to find alternative revenue models that ensure the preservation of scientific societies and their essential role in the research community.

ASPET is a 5,000-member scientific society located in Rockville, MD. Founded in 1908, ASPET is also a founding member of the Federation of American Societies for Experimental Biology (FASEB) and counts among its members 22 Nobel prize winners. ASPET's members conduct essential basic and clinical pharmacological research and work for academia, government, large pharmaceutical companies, small biotech companies, and non-profit organizations. Their efforts help to develop new medicines and therapeutic agents to fight existing and emerging diseases. In the over 100 years that ASPET and several of its journals have existed, we have published landmark research that has contributed to significant therapeutic discoveries that advanced the field and improved human health.

To assist the administration in accurately evaluating the effects of moving to an open access model of publication on scientific societies, ASPET has provided answers to the questions in the request for information.

What current limitations exist to the effective communication of research outputs (publications, data, and code) and how might communications evolve to accelerate

public access while advancing the quality of scientific research? What are the barriers to and opportunities for change?

Since April 2005, ASPET has made the peer-reviewed manuscript version of all content in the Society's primary research journals freely accessible upon acceptance for publication. That version remains freely accessible even after the copyedited and formatted version is posted. Usage data show that the manuscript version is frequently and widely accessed for many years. In addition, ASPET makes all content (including that in its high-impact review journal) freely accessible after 12 months for a period of 5 years. ASPET occasionally publishes special sections focused on a topic of particular interest and makes the formatted version of those articles freely accessible for 90 days. These articles again become freely accessible after 12 months and remain so for 5 years. All research that cites NIH funding is deposited in PubMed Central on behalf of authors, assuring that it is promptly submitted and made freely accessible there after 12 months. ASPET provides free access to its journals in developing countries. ASPET's mission is to "promote pharmacological knowledge and its application…." Our publication model has removed barriers to access while maintaining low-cost subscriptions that fund the journals and the work of the Society. The independent self-publishing programs of scientific societies do not operate like those of commercial publishers.

What more can Federal agencies do to make tax-payer funded research results, including peer-reviewed author manuscript, data, and code funded by the Federal Government, freely and publicly accessible in a way that minimizes delay, maximizes access, and enhances usability? How can the Federal Government engage with other sectors to achieve these goals?

Significant changes in current policies regarding publication of tax-payer funded research results are likely to hurt scientific societies and their journals while aiding multinational commercial publishers. Librarians and others acknowledge that scientific societies such as ASPET provide high-quality peer-reviewed content at the lowest prices compared with for-profit publishers. The majority of ASPET's income is derived from subscriptions to our journals, as low priced as they are.

Beyond supporting our publishing operations and the peer review process, this revenue supports many programs and services for young scientists. For example, the ASPET Mentoring Network is a program designed to supplement the training that graduate students and postdoctoral trainees receive through their university programs. ASPET also supports a summer undergraduate research fellowship (SURF) program designed to introduce pharmacology research to undergraduates through a 10-week summer laboratory experience. The goal of the SURF program is to use authentic, mentored research experiences in pharmacology to heighten student interest in careers in biomedical research and related health care disciplines. Students who have engaged in research experiences report improvements in their technical and personal skills as well as increased confidence in their research skills.

Journal revenue also subsidizes ASPET's advocacy efforts on behalf of the pharmacology profession. ASPET's Public Affairs staff provides an invaluable link between researchers in the profession and the congressional committees and executive branch agencies that regulate them. The Public Affairs staff provides these authorities with feedback from the pharmacology community that produces stronger, narrowly tailored laws and regulations that achieve public policy goals without significantly disrupting the pharmacology practice. For instance, ASPET has recently served as a valuable resource to lawmakers tackling the opioid crisis, pushing for

expanded research access to drugs of abuse so that we might better understand their methods of action and therapeutic potential while crafting safer alternatives to those currently in use.

ASPET cannot sustain its services under an open access model. Subscriptions provide 77% of the income from ASPET's journals. ASPET has offered two open access options since 2015: publication under a CC BY license for $3,000 article processing charge (APC) or under a CC BY-NC license for a $2,000 APC. If all of the content ASPET published in 2019 had been published under the $3,000 APC, the income would equal only 61% of subscription income for that year. It does not even cover the costs of producing the Society's journals, much less support other valuable services provided by the Society to the scientific community. The Society would have to increase the APC to over $6,500 per article to come close to matching subscription income. ASPET's journals department operates with a staff of only 5 FTEs working with outside vendors to publish four peer-reviewed journals. We have always worked to keep our costs as low as possible to provide low subscription prices. Our journals are specialized and published under 570 articles in 2019. There are many fixed costs, and that volume of content cannot be supported by reasonable APCs without eliminating services provided to authors, readers, reviewers, and editorial boards. Additionally, as manuscript submissions grow and wane from year to year, APCs do not provide a reliable source of income compared to subscription fees. The journals have seen manuscript submissions fluctuate by up to 20% from year to year. Subscription income has never varied by a similar percentage. Having to publish under open access would require ceasing publication for most if not all ASPET journals, and that would bring about the end of the Society and the services it provides to the scientific community. This would not serve science or the Federal Government.

How would American science leadership and American competitiveness benefit from immediate access to these resources? What are potential challenges and effective approaches for overcoming them? Analyses that weigh the trade-offs of different approaches and models, especially those that provide data, will be particularly helpful.

Open access provides no advantage to American science leadership and American competitiveness over that of other countries. Open access cannot be limited to a country, and it provides greater help to countries with fewer economic resources than the United States.

Federally funded scientists note that their research grants do not provide additional money for APCs. Thus, having to pay to *publish* their research will decrease the money available to *conduct* research.

Any additional information that might be considered for Federal policies related to public access to peer-reviewed author manuscripts, data, and code resulting from federally supported research.

Scientific and professional societies that self-publish journals have different goals and business models from commercial publishers. Nonprofit scientific societies provide low-cost, high-quality content, often making it freely accessible after a period designed to recoup expenses. A one-size-fits-all open access policy will likely mean the end to many of these journals and their societies. We respectfully ask the Federal Government to take this into consideration and understand the irreversible impact that an open access mandate will have on those organizations seeking to support and further science. We also ask any changes that affect society publishers be pursued via the rulemaking process.

Respectfully,

Judith Siuciak, Ph.D. CAE
Executive Officer