

January 21, 2010

Dianne DiEuliis, PhD  
Assistant Director, Life Sciences  
White House Office of Science and Technology Policy  
725 17<sup>th</sup> Street, NW  
Washington, DC 20502

RE: Request for Information on Public Access Policies for Science and Technology Funding Agencies across the Federal Government

Dear Dr. DiEuliis:

The American Association for Cancer Research (AACR) is pleased to respond to the Office of Science and Technology Policy's request for comments on "Public Access Policies for Science and Technology Funding Agencies Across the Federal Government." AACR, a not-for-profit association with nearly 30,000 members, is the oldest and largest scientific organization in the world dedicated to advancing cancer research. The programs and services of AACR foster the exchange of knowledge among scientists involved in cancer research. AACR publishes six peer-reviewed scientific journals and a magazine for the general public; convenes topical scientific think tanks, conferences, workshops, and an annual meeting; offers fellowships and grants; raises public awareness of the progress and cause for hope in cancer research; and advocates for federal research funding.

We applaud the administration for "exploring ways to leverage federal investments to increase access to information that promises to stimulate scientific and technological innovation and competitiveness." The request for information focuses on leveraging federal investments to increase public access to scholarly publications resulting from research conducted by federal employees or funded by a federal agency. As mentioned above, communication of cancer research through publications is one of the ways AACR contributes to scientific innovation and advancement. The peer-reviewed, subscription-based journals published by AACR are available in print and online. Revenue generated by subscriptions supports AACR's publishing program and other association activities that are essential to progress in the fight against cancer.

#### AACR's Public Access Approach

AACR voluntarily makes *all* journal content freely available 12 months after publication through our journal sites, which are hosted by HighWire Press. Nearly 95% of *all* articles ever published by AACR are freely available and easily discoverable on these sites. User interest in content after the 12-month embargo is significant, as evidenced by our online usage data during the 24-month period after publication for journal articles published in 2007. Content under the 12-month embargo comprised 51% of article usage, while free content comprised 49% of usage during that period. After the articles are available for longer than 24 months, these percentages change to show that lifetime usage extends for many years. Indeed, of the more than 70,000 AACR journal articles accessed by readers in 2009, more than 64,000 were freely available—and the

articles accessed dated back to 1941, indicating that the content maintains its value to readers well beyond the 12-month embargo.

AACR's decision to make our content freely available after a 12-month embargo period was based on the particulars of our publications with the desire to both sustain them and contribute to the scientific endeavor. We join many other publishers in this regard – working together without government mandates, scientific publishers provide more access to scholarly content to more people than ever before.

### Investment in Scholarly Publications

To offer and maintain the highest quality research information, AACR, like many other publishers, invests in the creation and dissemination of scientific content by the following activities:

- selecting and managing editorial boards
- educating and informing authors about scientific practices and procedures
- embracing standards of scholarly communications that advance the industry (e.g., Digital Object Identifiers)
- practicing and promoting norms in communication that benefit the research endeavor and society (e.g., investigating allegations of ethics violations and correcting the literature when appropriate, and developing policies for the presentation of images)
- evaluating and peer reviewing new submissions and revised manuscripts
- developing an online submission and peer-review system to accommodate various editorial workflows
- copyediting and proofreading manuscripts, drawing and enhancing artwork, and typesetting information for improved readability
- adding XML coding in an industry standard DTD in order to format, link, and aid online searchability and reuse
- tagging content and forwarding it to abstracting and indexing services, such as the National Library of Medicine
- incorporating features and functionality that enhance the user experience and offer interoperability among online content
- archiving information for current and future use
- extending the reach and dissemination of information through various marketing and communication efforts (e.g., alerting systems, RSS feeds, press releases, newsletters, and meetings)

As a result of these value-added activities, no research article is published as it was originally submitted. These unique contributions strengthen the research literature and improve its accessibility – without direct taxpayer support. As an association publisher, we build our brand by constantly improving the quality and presentation of the science, and streamlining its dissemination while keeping costs low. AACR publications convey trust that the articles meet the journals' standards of excellence and represent the integrity of the literature.

### PubMed Central

AACR currently provides its authors the service of meeting the NIH Public Access mandate by depositing accepted manuscripts to the PubMed Central (PMC) repository on their behalf for release after a 12-month embargo. We ensure that articles accepted for AACR publications are properly posted and report errors to the PMC staff. Our services in this regard are highly valued

by authors whose time is more productively spent conducting research. As part of our analysis of the interest in AACR content, we regularly review usage data provided by HighWire Press. This type of data is not easily obtainable from the PMC site. Because some users now go to the PMC instead of AACR's journal sites, we are unable to gather complete usage metrics. Analysis of usage data helps our editors, meeting committees, task forces, and working groups to identify and examine the most promising emerging areas of research so that the scientific community can quickly focus on potential breakthroughs. Additionally, publishers follow usage metrics because libraries make purchasing decisions based on them.

### Recommendations

We would like to work with the Office of Science and Technology to ensure that government activities do not duplicate those of scientific publishers, diverting federal funding away from research itself. The current NIH Public Access Policy requires authors receiving federal funds to deposit their accepted manuscript versions to PMC, thereby creating the problem of having various versions of articles in multiple locations. A more efficient method would be to leverage the valuable work already done by publishers by developing cooperative linking to and mining of data from publishers' existing sites, where the final version of record is maintained.

We believe that the spirit of public access to research results can be achieved in a carefully considered new policy. The current NIH Public Access Policy does not provide for all scientific information supported by taxpayers to be made public. By calling for only those articles that have been peer-reviewed and accepted by publishers, the policy does not address a body of data that could provide new leads to researchers, warn against unfruitful lines of investigation, or pre-empt repetition of unsuccessful experiments. Instead, the NIH policy seizes a subset of information supported by taxpayers along with the value added through the investment of publishers and mandates a one-size-fits-all embargo for publications from a variety of scientific fields, with different frequencies of publications, and various types of articles.

In order to resolve these issues, AACR supports the America Competes Act enacted by Congress in 2007 for research funded by the National Science Foundation, and we suggest that this approach be applied more generally to NIH and other government-funded research as well. This model makes taxpayer-funded information available via final project reports, citations to published research documents, and summaries of research project outcomes. It is a more comprehensive approach and provides information about the *entire* body of funded research. These summaries could also be presented in a style and format that is more understandable and useful to the lay public than primary research articles. NIH's website directed toward the public, MedLinePlus, could be further developed with information gained through these summaries.

### Synergistic Partnerships

Collaboration between the federal government and private sector industries that takes advantage of existing and future technology could improve the effectiveness of research dissemination. This must begin with thorough, objective analyses of open-access experiments, assessing the evidence of benefit while considering the risk of destabilizing the publishing system upon which researchers and society depend for scientific integrity, dissemination of information, collaboration, and employment. Harnessing the power of the federal government and the capabilities of the private publishing sector will significantly improve our potential for realizing our shared goals of preventing and eliminating disease, spurring innovation, and promoting economic growth.

Thank you for the opportunity to provide comments on this important topic. We look forward to working with the Office of Science and Technology Policy and other stakeholders to further consider public access.

Sincerely,

A handwritten signature in black ink that reads "Diane Scott-Lichter". The signature is written in a cursive style with a light blue shadow effect behind the text.

Diane Scott-Lichter  
Publisher