



American Society for Nutrition
Excellence in Nutrition Research and Practice
www.nutrition.org

January 21, 2010

Office of Science and Technology Policy
Attn: Open Government Recommendations
725 17th Street, NW
Washington, DC 20502

VIA EMAIL TO: publicaccess@ostp.gov

Dear Office of Science and Technology Policy:

The American Society for Nutrition is the professional scientific society dedicated to bringing together the world's top researchers, clinical nutritionists and industry to advance our knowledge and application of nutrition. Our focus ranges from the most critical details of nutrition research to its dissemination and application. ASN publishes *The American Journal of Clinical Nutrition (AJCN)* and *The Journal of Nutrition (JN)*, the two leading, peer-reviewed scientific journals in the areas of nutrition science and dietetics. ASN appreciates this opportunity to provide comment on public access to published scientific manuscripts. ASN supports the principle of public access to science and voluntarily has taken the significant steps to support broad access to content published in the two society journals.

Notwithstanding our commitment to public access, ASN has serious concerns about possible unintended consequences of public access policies; these are outlined below in responses to specific questions in the Federal Register Notice December 9, 2009, Vol. 74, Number 235, pages 65173-65175.

1. How do authors, primary and secondary publishers, libraries, universities, and the federal government contribute to the development and dissemination of peer reviewed papers arising from federal funds now and how might this change under a public access policy?

How do publishers contribute: Publishers contribute to the development of peer reviewed papers by conducting peer review, the process whereby experts in the field evaluate research reports, provide feedback to improve the quality of the report, and ensure that reports based on poorly designed or executed research are not published. In addition, publishers support the editing and formatting of published papers which contributes to the accuracy, clarity, readability and discoverability of published reports. Publishers make published articles available world-wide in print and online versions, which are indexed via multiple search engines and databases to enable the broadest possible access to this content. In 2000, ASN began offering free public access to all published articles 12 months after publication. By 2006, the ASN put its entire journal collection, including over 110 years of archival content, online through Stanford University's High Wire Press. Approximately 98% of online journal content is freely accessible to both subscribers and non-subscribers.

How could this change under a public access policy: there is a danger that mandated public access will interfere with the ability of journals to recover costs for the peer review and distribution of published research. This could lead to fewer journals, if journals are not able to sustain operations, and/or a loss in the rigor of peer review. Consideration should be given to the potential economic impacts of any public access initiative on publishers and the fundamental roles and services scientific societies provide to their membership and the scientific community at-large. These impacts may be especially severe for scholarly societies and not-for-profit publishers. As ASN has implemented policies to improve public access to the research it publishes, the economic impact of these new policies was carefully considered. Certain considerations influence how soon free public access is economically feasible for a particular journal. These include revenue sources, production costs, utilization patterns, time needed for cost recovery, and frequency of publication.

For example, on average, the cost to publish an article in *AJCN* or *JN* is \$3,500. Publishing costs include, but are not limited to:

- Administrative support for authors, editors and reviewers who submit and review articles;
- Development and ongoing maintenance of manuscript submission and journal content hosting sites;
- Continued enhancements to sites and programs and investments in new technologies to improve functionalities for authors and readers, and to increase the discoverability of content;
- Support for editor and publisher offices, including rent, telephone, internet, equipment, supplies, audit and legal fees; (e) copyediting and composition services; (f) production of electronic deliverables for print and online versions of journal; and (g) press, paper and distribution costs for print issues.

Any agency implementing a public access policy should have the same consideration for these factors. Ironically, it is possible that public access policies could have the greatest deleterious impact on not-for-profit publishers who already provide some form of free access.

2. What characteristics of a public access policy would best accommodate the needs and interests of authors, primary and secondary publishers, libraries, universities, the federal government, users of scientific literature and the public?

As noted above, the public access policy should not undermine the business models of publishers. Most publishers rely heavily on subscription revenue to support publishing operations. If a public access policy includes a very short embargo period, the impact will be to devalue journal subscriptions. Two studies completed in 2006, “Self-Archiving and Journal Subscriptions: Co-existence or Competition?” (Publishing Research Consortium, http://www.publishingresearch.net/self_archiving2.htm) “ALPSP Survey of Librarians on Factors in Journal Cancellation” (ALSPS, www.alpsp.org), demonstrated that an embargo period of 6 months or less would increase the likelihood of librarians making decisions to cancel a journal subscription. The current NIH policy stipulates public access 12 months after publication; it is recommended that the embargo period for a broader federal public access policy be consistent with the NIH policy, and not less than 12 months after publication.

6. What version of the paper should be made public under a public access policy?

ASN strongly supports access to the final, published version of the article, as the single version of record, to reduce the incidence of errors and ambiguity in the scientific literature.

7. At what point in time should peer-reviewed papers be made public via a public access policy relative to the date a publisher releases the final version?

As noted above, in the response to question 2, ASN recommends that papers be publicly accessible no sooner than 12 months after publication.

8. How should peer-reviewed papers arising from federal investment be made publicly available?

To minimize administrative tasks for authors, publishers and the government, papers should be posted to and made publicly available via a single site, rather than multiple repositories for different agencies or disciplines. In addition, to avoid unnecessary costs for the government and the publisher, the federal repository should link to the published version on publisher's site rather than post a duplicate copy of the paper.

Conclusion

We respectfully request that the Office of Science and Technology Policy consider the concerns as outlined above, and we urge you to fully involve publishers in the implementation of any public access policy. We look forward to continued dialogue on this important issue. If you have any questions, please contact John Courtney, ASN's Executive Officer, at (301) 634-7050 or jcourtney@nutrition.org.

Sincerely,



Robert M. Russell, MD
President