

November 2004 – The Histochemical Society’s Response to “Enhanced Public Access to National Institutes of Health (NIH) Research Information”

The Histochemical Society welcomes the opportunity to provide comments on the NIH draft policy; #0147; Enhanced Public Access to National Institutes of Health (NIH) Research Information, #0148; as described in the Federal Register on September 17, 2004 (Volume 69, Number 180, Page 56074). The Histochemical Society supports the principle of enhanced public access; as a scientific society, our mission is the dissemination of scientific knowledge. As such The Histochemical Society has published the *Journal of Histochemistry and Cytochemistry* for over 50 years. Regrettably, we cannot support NIH’s proposal as now written. The proposal fails in addressing economic ramifications for societies, scientists and the federal government. Moreover, the proposed archiving of manuscripts by NIH is a costly duplication of effort already fully realized by publishers and the proposal is a disservice to readers by having more than the final redacted version be made available.

Society publishers have always been on the forefront of providing free content to readers. The Histochemical Society and other publishers provide thousands of articles of the highest scientific value free to the public on the HighWire Website. These publishers, which are largely not-for-profit scientific societies, continually work to accelerate the free access of their content to the public. The NIH proposal will severely impact these not-for-profit publishers economically by forcing the release of their content in a timeframe that will virtually ensure the cancellation of all subscriptions. The consequence of this loss of revenue will be dramatically increased costs to authors for publishing their research. Furthermore, the ability of these publishers to add value to their publications, such as retrospective conversion of archival issues to online access and to provide supplemental online material such as extended data sets will no longer be financially feasible. NIH and the scientific community would be better served if they would join with society publishers in a dialogue to define an open access policy that promotes public access to journal content while preserving the financial stability of the publishers to make that content available.

NIH estimates that only 60-65,000 articles out of the 600,000 published on Medline annually are NIH funded and that this should not impact subscriptions. However, HighWire Press has determined that 26,000 of the 60-65,000 articles are published by HighWire publishers. So not only will this proposal negatively effect many not-for-profit society publishers but it is disproportionately weighted against those of us working the hardest to promote access.

NIH has not presented a budget for its proposal. NIH owes a full financial accounting of its proposal to the research community. There is considerable concern in the research community that NIH will appropriate research funds to defer the costs of publishing, thus shifting the costs of biomedical publishing from public and private institutions to the federal government. We are convinced that the use of scarce research funds to subsidize obligation costs of authors (essentially replacing the subscription income now provided by subscriptions) is a grave mistake and not justified by substantiated research. A

thorough analysis of the financial impact to authors and NIH should precede any decision by NIH to implement an Open Access policy. To our knowledge, this analysis has not been done or released to the public.

The Histochemical Society joins with many society publishers in questioning the need for an NIH archive on PubMed Central of the author's final version of a manuscript. The Histochemical Society and many other society publishers already archive our articles and provide full and free access to the content of over 650 journals on the HighWire Website. We all share advanced searching capabilities on our sites and we not only archive NIH funded articles but all the articles included in our journals. The Histochemical Society proposes the NIH should either link to the publisher's final redacted version of the manuscript or spider our websites for the article. Our journal's Website and the whole of HighWire publishers are extremely comprehensive in providing reader services. Reproducing our complete archive on an NIH site is redundant and an unnecessary use of tax dollars.

The Histochemical Society does not see the value of allowing more than one version of the final manuscript be made available to the public. To the contrary, we think this is a disservice to the public and introduces the possibility of faulty and potentially harmful biomedical research data entering the public domain.

The Histochemical Society desires to work with NIH and other society publishers to develop a program of open access and archiving that works well for the public, the authors, and the publishers, and we request that NIH give thoughtful consideration to this request. While we are in agreement with the principle of free access of the public to biomedical information supported by federal dollars, we are deeply concerned that NIH has pushed their advocacy of an open access proposal prematurely in the absence of public discussion and debate, and with unforeseen, possibly disastrous, consequences to authors and publishers alike.

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