

Society for Experimental Biology and Medicine
197 West Spring Valley Avenue
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November 16, 2004

TO: Public Access@nih.gov

FROM: The Society for Experimental Biology and Medicine

RE: NIH Notice on Enhanced Public Access to NIH Research Information
NOT-OD-04-64 (September 3, 2004)
Notice for Comment, 69 Fed. Reg. 56074 (September 17, 2004)

These comments are submitted on behalf of the Society for Experimental Biology and Medicine (SEBM).

The SEBM supports the general principle of public access to science but believes that the NIH plan is not the optimal approach. This proposal will do little to enhance public access to biomedical research beyond that which is already available. In addition, it will interject temporary errors in the publicly available research database because the final copyedited and redacted version of the paper is not what will initially be placed online. We believe this will cause disproportionate harm to not-for-profit society publishers who already provide some form of free access to all published articles. As a small society with a single publication, SEBM would be particularly vulnerable. The SEBM believes that a better approach would be to enhance the existing MedLine/PubMed web site so it is possible to freely search the full text of articles on the Journals' own websites at a reasonable time after publication.

SEBM publishing history

Founded in 1903, the Society for Experimental Biology and Medicine is a not-for-profit scientific society formed to promote investigation in the biomedical sciences by encouraging and facilitating interchange of scientific information among disciplines. The principal means for achieving this purpose are the publication of a peer-reviewed journal, *Experimental Biology and Medicine* (EBM), and support of regional and national scientific meetings. The Society fosters the career development of students and new investigators. The Society has over 1,600 members worldwide who are actively engaged in various fields of biomedical research.

Published monthly (except August), EBM (formerly *Proceedings of the Society for Experimental Biology and Medicine*) provides original research, mini-review, symposia proceedings and brief communication articles on topics of cross-disciplinary interest in endocrinology, molecular biology, nutrition, experimental medicine, physiology, genetics immunology, biochemistry, microbiology and other, biomedical, pharmaceutical and animal science specialties. EBM publishes results of basic studies with clinical and public health implications, as well as novel findings on topics in the realm of experimental biology and medicine.

SEBM joined a group of scholarly not-for-profit publishers who developed the DC Principles for Free Access to Science. The group currently consists of 57 publishers and university presses representing 125 publications. Consistent with the DC Principles, SEBM has done the following:

In October 1999, the Society began publishing both print and online versions of its journal

EBM online full-text articles are free to members and to researchers at institutions that have paid library subscriptions to EBM, and abstracts of all articles are available free to the public as soon as they are published

In January 2003, SEBM began providing free public access to all journal articles 12 months after publication

In January 2004, SEBM instituted use of the AllenTrack online manuscripts submission and tracking system to facilitate manuscript submission, review and early publication of all articles

Abstracts of newly published EBM articles are indexed in MedLine and the full text of EBM articles are included in the Google search system

EBM is freely available to scientists in 65 low income nations

A separate digital archive at NIH is not needed to provide access to articles in EBM because they are easily accessible through our online publisher, HighWire Press either directly or through a search on the MedLine site. As is indexed by Google, which has been granted permission to search the full content of nearly all journals in the HighWire online collection, all articles of specific interest to the public can be readily identified. During the first year of publication, EBM provides pay-per-view access at \$8 per article. Thus, there is no need for manuscripts to reside on an NIH server to be accessible.

Impact on researchers

The NIH proposal was intended to benefit researchers and the public by broadening early access to the scientific literature for research supported by NIH. Productive science generated with both public and private funds is a major economic and societal resource. Increasingly this resource is generated by interdisciplinary groups comprising biology, engineering, physical sciences and social sciences. These groups are not supported by one government agency but reflect a blend of funding from NIH, NSF, DOE, VA, DOD, USDA, HRSA, NASA, state governments and industry in general. For one member,

albeit an important one like NIH, to unilaterally change the way research is published in a way that is potentially disruptive to the mission of professional organizations committed to the support and promulgation of biomedical research is seriously ill-advised. Consequences may impact negatively on the total fabric of research creation, review, dissemination, and translation into economic and social benefits.

We believe the NIH proposal would adversely affect SEBM members as both authors and readers of the Journal and as beneficiaries of the Society's career development and advocacy programs. Since approximately 30% of EBM papers are supported by NIH grants and since subscriptions represent 84% of EBM journal income, the SEBM believes that access to its NIH supported articles after only 6 months would result in a reduction of subscriptions to EBM. This loss of revenue would require that all peer review and production costs be shifted to the authors and, in turn, to his or her research grants or other funding sources. This would effectively increase the costs incurred by all Federal, State, and other funding agencies without their concurrence in the NIH decision. The only other alternative for not-for-profit professional societies like SEBM would be to eliminate the journal and thus, the peer review process that is so essential to validate the science in articles to be published and made available to the public.

A better and more cost effective approach

The SEBM believes that a better approach would be to enhance the existing MedLine/PubMed web site so it is possible to freely search the full text of articles on the Journals' own websites at a more reasonable time after publication. Many publishers have already expressed interest in this approach. For NIH this arrangement would make it possible to search the text of all biomedical research articles including those supported by NIH and those related to pending NIH proposals. Societies would still be able to determine their own access policies to assure recovery of their peer review and production costs through subscription income. Also in this way, the final copy-edited version with links to related materials such as commentaries and corrections would be the only publicly accessible copy thus eliminating inaccuracies caused by inclusion of yet to be edited but accepted manuscripts. Immediate identification of articles of interest would be through one or more comprehensive full text indexing services and immediate public access to published articles would be through their authorized links to libraries which subscribe to the journal or directly from the journal on a pay-per-view basis. This balanced approach would accomplish the stated objectives of NIH without inflicting unanticipated destruction of professional societies, their essential peer review processes, and contamination of the scientific literature with the partially edited content of manuscripts that have not undergone full redaction.

These comments are respectfully submitted on behalf of the Society for Experimental Biology and Medicine by President Kenneth L. Barker, PhD, and Executive Director Felice O'Grady.