

March 24, 2020

Lisa Nichols, Ph.D.
Assistant Director for Academic Engagement
White House Office of Science and Technology Policy

Re: Office of Science and Technology Policy Request for Information on Public Access to Peer-Reviewed Scholarly Publications, Data and Code Resulting from Federally Funded Research

Via: publicaccess@ostp.eop.gov

Dear Dr. Nichols:

The International Association for Dental Research (IADR) and its American Division, the American Association for Dental Research (AADR), appreciate the opportunity to share our thoughts on public access to peer-reviewed scholarly publications resulting from federally funded scientific research. We are responding to this Request for Information (RFI) both as scientific non-profit 501(c)(3) associations and as co-owners of the *Journal of Dental Research (JDR)* and *JDR Clinical & Translational Research (JDR CTR)*.

IADR and AADR appreciate that the Office of Science and Technology Policy (OSTP) is exploring new mechanisms and opportunities to disseminate the information generated by federally funded research. We recognize that is not enough to generate data and information; we must use and continually build upon that knowledge in a way that benefits society. Therefore, it is important that we continue to regularly engage in conversations surrounding scholarly communication.

As OSTP considers new opportunities surrounding scholarly communication, IADR and AADR would like to provide feedback on the potential challenges with a change in federal policy to provide immediate free access to all published federally funded research, including data and code.

To provide some background, our journals, the *JDR* and the *JDR CTR*, are both specialized and highly regarded scientific journals that serve the oral health and dental research community. The *JDR*, which in 2019 celebrated its 100-year anniversary, is the leading journal in the Dentistry, Oral Surgery & Medicine category, as determined by its Eigenfactor™ Score, and ranks second according to the Thomson Reuters 2-year impact factor. Both *JDR* and *JDR CTR* contain research supported by federal research agencies, including the National Institutes of Health (NIH). From 2016-2019, the average percentage of accepted research manuscripts that contained some funding from NIH was 30 percent for *JDR* and 23 percent for *JDR CTR*.

I

IADR and AADR fully support and are compliant with the current 12-month embargo period, which was established following multiple conversations between stakeholders, including scientific societies, publishers and open access advocates. We believe that model, which was carefully deliberated and collaboratively crafted, has proven to be a successful one. Indeed, a recent analysis concluded that the carefully balanced NIH policy did not harm journal publishing as measured by death and birth rates of biomedical journals.¹

The current embargo period allows us—and other American publishers—to not only support manuscript copyediting, layout and publishing the *JDR* and *JDR CTR* online, all of which are supported by offering individual and institutional subscriptions, but it also allows us to support the peer-review process and drive scientific innovation and advancement through activities, including but not limited to scientific meetings. A move to shorten or remove entirely the current embargo period would not only affect the financial stability of our journals and other critical research publications, but it could undermine larger cooperative efforts to ensure the U.S. scientific enterprise remains a leader on the world stage.

Additionally, an open access model has financial consequences that must be considered. While a movement toward open access would make information free to the public, someone—whether a university, the federal government, the scientist who produced the work, etc.—would still have to pay for the editorial and production costs associated with putting out a journal. Therefore, immediate free access to research outputs could easily move the cost burden from the reader to individual researchers, who would have to pay fees to publish their work. Such a shift would place the financial burden disproportionately on students and early career scientists, which could cause a significant ripple effect within the research enterprise. While federal grants may include funding for publishing, there is often a limit on how much of that grant can be spent on publishing fees.

IADR and AADR are grateful that OSTP is seeking ways to maximize access and enhance the usability of federally supported research and believe that there are new frontiers to discover in publishing. However, we are concerned that the move to make research results immediately available could have negative and unintended consequences for research and discovery. We see the current 12-month embargo period as an appropriate compromise between the desire for a public access model and the recognition of the value that publishers provide to research.

¹ Peterson AT, Johnson PE, Barve N, Emmett A, Greenberg ML, et al. (2019) The NIH public access policy did not harm biomedical journals. *PLOS Biology* 17(10): e3000352. <https://doi.org/10.1371/journal.pbio.3000352>