May 6, 2020

ADA Response to OSTP RFI on Open Access Publication

On behalf of the American Dental Association (ADA) and our 163,000+ members nationwide, we appreciate the opportunity to comment on the Request for Information: Public Access to Peer-Reviewed Scholarly Publications, Data and Code Resulting From Federally Funded Research. The ADA publishes *The Journal of the American Dental Association* with the primary goal of advancing clinical practice and is supportive of open access publishing models and open science. Revenues that are generated from the journal are used to offset operational costs associated with producing quality peer reviewed content. The ADA supports the current 12-month embargo period and asks that the Office of Science and Technology Policy (OSTP) maintain it. We believe that the proposed change to publishing federally funded research is not needed to effectively promote scientific advancement and are concerned that such a change would negatively impact researchers and publishers.

- What current limitations exist to the effective communication of research outputs (publications, data, and code) and how might communications evolve to accelerate public access while advancing the quality of scientific research? What are the barriers to and opportunities for change?

The current policy requires associations that publish scientific and technical journals to make publicly funded research openly available within one year of publication. Association journals permit members of their professional society to gain immediate access to articles that will advance their research and/or clinical activities. Subscription fees support the infrastructure to perform peer review and so ensures quality control of published articles. Many society journals also have mechanisms to allow articles to be immediately available at the authors’ discretion. Authors pay article-processing costs (APCs) in order to make their articles open. Subscription revenues subsidize APCs, and many associations report that APCs would be prohibitive if they were to lose subscription revenue. In addition, net revenue from subscription fees supports other vital association activities including professional and public education programs, research support, and outreach efforts.

There are actually few limitations in the current system to effective communication of research outputs. The existing model of peer review and publication allows high-quality and significant research findings to be curated and placed in front of the audience of scientists and clinicians most likely to advance the research and carry it into applied practice, through clinical advances and technological innovations.

Society journals do this particularly well, aggregating not only research papers in each issue of the journal, but the appropriate audience for it, through society membership, bringing about a very efficient transfer of information from researchers and clinicians to their peers.
Occasionally, a research paper rises to the level of general importance—having a potential impact on the general public welfare that extends beyond a publication’s subscriber base. Such papers may describe clinical guidelines, profoundly positive results for a new treatment paradigm, or an effective protocol to stop the transmission of an ongoing global viral outbreak, for example. These papers in particular should be made immediately available and open to all scientists, clinicians, and the public in general. Most journals currently provide a mechanism for authors to exercise their discretion to pay author fees and open an article, but the suggestion to open an article could be extended to include recommendations from the peer reviewers or the journal editor as part of the peer-review process.

Funding just the subset of articles that rise to the level of general public importance could preserve hybrid models of publication, in which subscription fees subsidize author fees, making author fees affordable, saving taxpayer money, and preserving the infrastructure for peer review of the current system.

The current COVID-19 crisis illustrates this point. Association and commercial publishers immediately and voluntarily made articles relevant to the pandemic freely and publicly available, without any federal mandate to do so. Continuing this practice for all articles going forward would negatively impact the research and publishing ecosystems.

Furthermore, association publishers marshaled their communities of peer reviewers with expertise in virology, public health, and epidemiology to assess incoming articles, and in so doing ensured that articles reaching the public reflect the highest quality, most reliable information available. This cannot be understated. Scholarly publishers’ systems of vetting technical information becomes crucially important in such a crisis. Scholarly publishers provide a foil against the release of unfounded, anecdotal, and out-right fraudulent information to a credulous public.

- What more can Federal agencies do to make tax-payer funded research results, including peer-reviewed author manuscripts, data, and code funded by the Federal Government, freely and publicly accessible in a way that minimizes delay, maximizes access, and enhances usability? How can the Federal Government engage with other sectors to achieve these goals?

Federal agencies could subsidize the open publication of research outputs with the potential for immediate public benefit, while maintaining the current 12-month embargo period for most federally funded research papers.

- How would American science leadership and American competitiveness benefit from immediate access to these resources? What are potential challenges and effective approaches for overcoming them? Analyses that weigh the trade-offs of different approaches and models, especially those that provide data, will be particularly helpful.

It is important to consider the inefficiencies that might come about if all research were published in an open-access model. Imagine that any public posting of a research paper could, under this system, be considered a “publication.” Papers could be published on journal websites, in public repositories (for example PubMed), on article servers, university servers, or on individual researcher’s websites. As a result, the number of sites containing research information relevant to a particular audience will increase dramatically, requiring investigators to scan scores of websites rather than review a few topical journals to stay current within their fields. In such a system, important research results may become less discoverable and less
visible to their communities. Transmission of key research results may become less, rather than more, efficient, obscuring, rather than promoting, important scientific advances.

Furthermore, the burden to pay for publication falls to the grant recipient, and author fees most likely will come out of grants. Paying author fees will likely be easier for large, well established, well-funded research programs and later-career scientists. But smaller, less well-funded programs, and particularly early-career scientists and investigators in new and emerging disciplines may find author fees onerous. A totally open-access program will favor larger programs and later-career scientists, and early-career scientists may find they have limited funds and therefore limited opportunities to publish their work. This will limit the ability of early-stage and less well-funded scientists to obtain more grants and to advance their research and their careers. Ultimately, an open-access system based on author fees may limit or discourage participation in the scientific enterprise by early-stage researchers and those in new and emerging disciplines.

- Any additional information that might be considered for Federal policies related to public access to peer-reviewed author manuscripts, data, and code resulting from federally supported research.

As has been noted by others, a policy mandating immediate open access publication creates disincentives for publishers to invest in publishing and archiving scientific journal articles, which in turn may diminish the quality of scientific publications in the US, and may prove detrimental to the communities of researchers, scientists, and clinicians informed by these journals.

Thank you for your consideration of these important issues. The ADA looks forward to continuing to work with OSTP. Should you have any questions, please do not hesitate to contact Ms. Michelle Hoffman at (312) 440-2769 and hoffmanm@ada.org.

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1 Centers for Disease Control and Prevention, Infection Control – Dental Settings, April 2020.