ENDOCRINE SOCIETY
Hormone Science to Health

April 30, 2020
Re: 85 FR 17907 2020-06622

Lisa Nichols, PhD
Assistant Director for Academic Engagement
Office of Science and Technology Policy
Executive Office of the President
Eisenhower Executive Office Building
1650 Pennsylvania Avenue
Washington, DC 20504

Dear Dr. Nichols,

On behalf of the Endocrine Society, thank you for the opportunity to comment on your Request For Information on "Public Access to Peer-Reviewed Scholarly Publications, Data and Code Resulting From Federally Funded Research." Founded in 1918, the Endocrine Society is the world's oldest and largest organization dedicated to research on hormone biology and the clinical care of patients with endocrine diseases. We are committed to increasing access to research products; however, we have serious concerns about the effects that a policy mandating immediate open access publishing for all federally funded biomedical research would have on research, the scientific community, and the country as a leader in science. We believe a mandated open access policy would reduce the quality of research, decrease the speed at which results are reported, and create barriers to the dissemination of validated results (see discussions below). **We caution OSTP against adopting a policy mandating the free distribution of peer-reviewed manuscripts earlier than one year after publication and urge OSTP to follow the official rulemaking process for any policy changes that will affect scientific publishing.**

1. **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?**

We are not aware of any limitations to access and communication of research results under the current system. Anyone may request a copy of a scientific article from the author of a publication in our journals for noncommercial use. We make abstracts for biomedical research publications available immediately on Pubmed, and the full paper is made available on Pubmed Central after a 12-month embargo. Endocrine Society journals and others support free public access to practice-changing research discoveries that improve health. For example, our clinical practice guidelines are freely available immediately; we provide patients with free access to breakthrough studies related to their endocrine disease immediately upon request; we participate in initiatives to provide free or

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low-cost access to scientific research for individuals, libraries, and other institutions in developing countries; and we provide feature articles, including scientific statements, immediately without charge. On average, our journals publish over 150 open access articles each year. We also provide access to resources such as an antibody table and require authors to deposit research datasets in appropriate public repositories for free access.

Nonprofit scientific societies such as the Endocrine Society use subscription revenues from their journals to further advance the dissemination of highly technical and specialized information for the broader scientific, clinical, and patient community. These include educational activities, professional development programs, patient resources, and travel grants for early career researchers. We also employ media relations professionals that assist reporters with the communication of technical scientific information to broader audiences. Approximately 40% of our revenue is derived from publications-related activities. Abruptly changing from a subscription-based business model would jeopardize not only our ability to continuing to publish journals, but also these and other vital educational and public engagement activities. By acutely decreasing subscription-related revenue, mandating immediate open access for research would, in fact, limit the ability of the Endocrine Society and similar nonprofit organizations to share information and overall diminish scientific communication.

We request that OSTP clearly articulate what barriers have been identified to the efficient dissemination of scientific results, so that we may collectively work together to address any issues without disrupting the world-class US research enterprise.

2. **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?**

The current publishing system in the United States effectively balances access with quality control and other activities that enhance the usability of scientific information. An important component of the cost of publishing is to ensure rigorous and ethical peer review which the public rightly expects and relies upon. Immediate open access would endanger the quality and accuracy of peer review, introduce the potential for the publication of incorrect information, conflicts of interest, and benefit predatory “pay to publish” journals at the expense of specialist societies and other learned-societies who provide publications with independent control of standards and content. Researchers might also need to exclusively submit to pre-print servers to make their work accessible and forego peer review processes that incur associated higher costs. Without peer review by individuals with appropriate discipline-specific expertise, the overall quality of published research would decrease, making it more difficult to ensure the reproducibility of published studies. A less-rigorous research foundation would ultimately result in more delays and fewer effective treatments and cures for patients.

To ensure that scientific content is accurate and well-curated in an immediate open-access environment journals like ours would need to recoup the loss of revenue from subscriptions through additional article processing charges (APCs). For the Endocrine Society, the cost of publishing a single journal article would increase by at least 500% on average to a total of ~$5,000 with the potential for additional charges depending on the type of open access license mandated by the policy. These publication charges are usually paid from the same federal grant for the research project and higher charges would further erode research budgets that are already overstretched.

Because publications are a key measure of academic success and a critical component for promotions and competitive grant applications, researchers might need to reduce personnel or cede projects and research resources in order to offset anticipated publication fees. The loss of laboratory personnel would raise unemployment and negatively impact overall productivity, inhibiting the timely reporting and distribution of scientific results. Moreover, early-career investigators with already limited resources would be particularly vulnerable to these changes, which would further widen the gap between aspiring and established investigators. Subsequently, such measures are likely to lead to the collapse of a an already thin pipeline of young investigators.

Instead of a blanket mandate, the federal government could consider establishing dedicated pools of money separate from existing grant budgets to cover APCs. Grants could also be made directly to scientific societies to support additional open-access publications and other dissemination activities. The Federal Government could also the adoption of standardized tools or other resources to make datasets more user-friendly.

3. **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.**

We are unaware of any evidence that the current model of publication negatively impacts American scientific leadership and American competitiveness. Pharmaceutical companies and universities maintain subscriptions to necessary journals and share resources through inter-library loans. However, there is some evidence from the experience of other countries that policies mandating free and immediate open access have resulted in challenges for researchers and obstacles to publishing. For example, some countries have centralized grant authorities that provide targeted funds to support APCs for open-access publications. When these limited funds run out, researchers are unable to publish their work and must wait until the next fiscal year to report their findings. These experiences demonstrate that mandating immediate open access will slow the publication and broader dissemination of research, despite assurances suggestions to the contrary.

4. **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.**

The COVID-19 crisis illustrates the importance of ensuring that scientific information is communicated accurately, professionally, rapidly, and has been vetted by individuals with discipline-specific expertise. Implementing a change to the publishing marketplace will severely disrupt well-established methods for disseminating important and reliable scientific information that benefits public health. Abruptly changing our publishing business model will jeopardize our Society and journals by creating further financial loss at a time when we have already suffered economically and have no margins to absorb.

We implore OSTP to refrain from any policy changes and instead continue a dialogue with all stakeholders including medical specialty societies and nonprofit publishers to understand the problem the Administration is trying to correct and then, if policy change is necessary, to move through the official rulemaking process.

We would be happy to meet with you and provide additional information and data. Please do not hesitate to contact Joe Laakso, PhD, Director of Science Policy at jlaakso@endocrine.org if we can be a resource.

Sincerely,

Gary D. Hammer, MD, PhD
President
Endocrine Society