



January 9, 2012

As Executive Officer of the American Sociological Association (ASA), I appreciate the opportunity to respond to the Office of Science and Technology Policy's (OSTP) November 3, 2011 *Federal Register* notice (2011-28623) on "Public Access to Peer-Reviewed Scholarly Publications Resulting From Federally Funded Research."

The American Sociological Association

ASA, founded in 1905, is a non-profit membership association dedicated to advancing sociology as a scientific discipline and profession serving the public good. With over 14,000 members, ASA encompasses sociologists who are faculty at colleges and universities, researchers, practitioners, and students. About 20 percent of our members work in government, business, or non-profit organizations. ASA hosts an Annual Meeting with more than 6,000 participants and publishes nine scholarly journals that are among the most selective in our discipline.

ASA's publication of these nine scholarly journals is central to our mission of advancing sociology as a scientific discipline and promoting the contributions and uses of sociology to society. Government requirements for mandatory free access to the final copy of articles published in our journals could diminish this mission because it does not recognize the significant financial costs the Association incurs to support our editorial process, including peer review and editing. If the financial stability of our scholarly journals and others in the social and behavior sciences is damaged through free public access, it could threaten the ability of scholarly societies, including the ASA, to continue publishing journals, much less expand in areas of scientific growth.

Responses to issues raised in the Federal Register request for comment

The need for free federal repositories. It remains unclear why the federal government should spend scarce taxpayer dollars appropriated for scientific research to add to existing dissemination avenues. This is what scientific societies such as the ASA and our private sector publishing partners have done for over a century, and continue to do extremely well today. The national and international marketplace demonstrates that non-profit and profit-making scientific publishers in collaboration with scholarly societies have responded vigorously and competitively to expand access to scientific

knowledge as new demands for content and sophisticated communication technologies have emerged. This success suggests that federal science agencies should invest taxpayer dollars in the research itself, especially as federal dollars that support scientific innovation fail to keep up with the pace of research.

Non-profit and profit-making publishers who collaborate with scholarly societies such as the ASA are growing new markets around the world as developing economies become more robust and their societies need the products of science. Making U.S. scientific societies' content available worldwide at no cost is likely to stifle our expansion as journal subscribers choose to access free versions of journal articles rather than pay for the Version of Record. This will dry up ASA's only source of revenue to support our peer review and publication program as well as make it difficult for us and our publishing partners to utilize the newest communication technology. We all know that there are businesses across the world already engaged in the wholesale commercial *selling* of free PubMed Central content, which largely consists of content published in scientific journals. The requirement that NIH-funded studies be made available for free on PubMed coupled with the fact that businesses are repackaging and selling the articles deprive scholarly societies of our ability to generate necessary revenue from our copyrighted content. It seem extremely unclear how U.S. taxpayers benefit from the free transfer of intellectual property owned by U.S. not-for-profit scientific societies to businesses and governments in the developed as well as less-developed world.

There are no empirical studies that I know of which support the notion that free access to the scientific research literature will increase research productivity or economic growth in the United States.

The contributions of scientific societies as publishers. Our nation depends on a system of scientific research communication that provides strong quality controls as well as broad access. The ASA and other scholarly societies are the custodians of this system because of the essential role we play in assuring the quality, dissemination, and permanent preservation of scientific knowledge. No one who is knowledgeable about science and its value to our society disputes the centrality of scientific peer review as the standard for assuring quality science.

ASA invests significant resources in the management of the peer review process through financial support of the editorial groups who review, edit, and manage the selection of submitted articles for publication in our nine journals. Managing the peer review and editing of social science research papers is an expensive undertaking that requires a considerable financial commitment. ASA spends nearly \$600,000 annually on journal editorial office expenses alone (which does not include administrative costs, printing and mailing expenses, editor honoraria, legal or overhead costs). ASA does not pay peer reviewers, but in return we sacrifice some revenue by a long-standing policy of keeping our university library subscription prices low (averaging well under \$300 in 2011) in

explicit recognition of the contribution university faculty make as peer reviewers, editors, and editorial board members.

The high cost of scientific publication in the social sciences. Independent audits of *social science* journals have shown that per-article costs are far higher than in the natural and bio-medical sciences. (See report at http://www.nhalliance.org/bm~doc/hss-study_press-release.pdf.) One reason is that social science articles are significantly longer; another is the nature of peer reviewing in the social sciences. Our scholarly societies view peer review of submissions to our journals as part of the professional development of our scholars who submit manuscripts. Therefore, our journal editors return to authors multiple, lengthy written reviews whether the manuscript is accepted *or not accepted* for publication. Peer reviewers' extensive comments are used by authors and our journal editors to edit accepted articles for final publication. Peer reviewer comments are also used by authors of rejected articles (or those asked to revise and re-submit) to improve their manuscripts for resubmission to the same journal or to another social science journal. This pedagogical function is not common in the natural sciences.

ASA makes ongoing capital investments and incurs significant operating expenses in carrying out the value-added activities that identify the scholarship we publish as quality science and make it widely available electronically. These are not now paid for by taxpayer dollars; but in a free public access world, federally-funded and non-funded social science researchers will have to find the resources to pay to have their scientific contributions published in our peer-reviewed journals. This is already happening in some journals and social scientists are unhappy about the costs. In the social sciences, it is likely that the costs of a free open-access publication will be borne by the authors' universities, scholars themselves, or, in some cases, larger federal research grant requests. None of this is desirable for obvious reasons: universities should not be in the position of picking and choosing which science/scholars to subsidize; scholars with limited resources should not be left outside the scientific publication process; and federal funders should not have to add dollars to research grants to cover dissemination. It is hard to see how any process with these characteristics advances scientific knowledge building in the U.S.

The problems with free federal access to journal content. There are no "appropriate" universal embargo periods for free federal government copies of research publications that protect the current financial support of scholarly publications at least in the social sciences because research in different disciplines (and even subfields) have different useful life spans. Articles published in the ASA's nine journals, for example, have documented citation half-lives of over 10 years. Free electronic access of peer-reviewed content, regardless of the embargo period, is likely to significantly impact ASA's ability to continue publishing nine sociology journals, much less develop new journals in currently underserved areas of scientific research. Over time, free public access to our journal content is likely to seriously erode and eventually jeopardize our financial ability

to perform the critical, value-added peer review and editorial functions of scientific publishing because, at this time in the social sciences, there is no viable alternative to library subscription income as a means of recovering our costs.

In sociology, as in other social sciences, the federal government often provides grant support *for only part of the research costs* that go into a single scientific study (and it is often only a *small* part). The federal government can and should claim on behalf of the taxpayer the research reports submitted to the government agency as a result of its grant-making; but the federal government should not lay claim to final peer-reviewed, edited scholarly publications based on these studies for which the ASA pays. It should also not lay claim to copyrighted scholarship that is published years after the conclusion of the federal grant just because the author uses some data from a federal grant made years previously. *This situation is extremely common in the social sciences.*

Long-term retention of scholarly content carries significant costs that are already being borne by scholarly publishers and will continue to be. In an era of dwindling federal resources, federal repositories not only do not contain the Version of Record, but they are also a recurring financial burden that may not be sustainable for long-term stewardship of this content. *ASA is a scholarly society that is over a hundred years old. It is, has been, and always will be, our organizational responsibility to the discipline of sociology to maintain permanent access to all scholarship published in our journals. As a scholarly society, we must protect the scientific knowledge that has been placed in our care by scholars who transfer copyright for the Version of Record to us for that purpose. We cannot abandon this responsibility even if the federal government creates repositories.*

How the federal government could be helpful. OSTP could encourage federal science funding agencies to make freely available electronic copies of all products of taxpayer-funded research submitted to the government, including final grant reports (or other reports that contain research knowledge), as well as databases collected under the grants (as, for example, the National Institute of Justice has done for decades). The ASA and our publishing partners would be open to finding ways to link that type of content to relevant published literature.

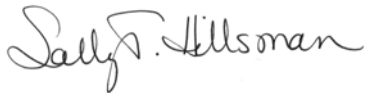
If OSTP has evidence that there are scientific audiences that do not have access to the published scholarly literature, the federal government could make funds available to purchase access for them. ASA provides such subsidies for our journals both through our publishing partners and by providing free electronic journal access to ASA members who reside in economically disadvantaged countries. Several research funders already do this including the Howard Hughes Medical Institute, The Wellcome Trust, and the Max-Planck Institutes.

ASA is dedicated to the widest possible dissemination of our publications that contain social science research. Wide dissemination benefits ASA members, the discipline of

sociology, policymakers, and the public at large. We already publish some ASA documents for mobile devices, and we are working with our journal publishing partners to develop and include appropriate metadata in our journals, such as: (1) standardized identification of federal and other funding agency information; (2) DOIs for related datasets (and supplementary information); and (3) unique author and institution name identification (e.g., the Open Researcher and Contributor ID Project (ORCID)). There may be ways in which OSTP could be a productive collaborator in this important dimension of the electronic publication of scientific knowledge.

Conclusion. The ability of the ASA to recoup our significant ongoing investments in peer reviewing, selecting, editing, publishing, and archiving scholarly journal content enables us to develop and use innovative new infrastructure (including archives and metadata) and approaches to communication. But we will not be able to continue publishing nine scholarly journals and add journals in new areas of science without the revenue that sustains our publishing program. To date, no one has found a *viable* financial alternative to subscription income. Anything that undermines this revenue source will hurt scientific communication in sociology and other social sciences.

Thank you again for the opportunity to provide OSTP with input.

A handwritten signature in cursive script that reads "Sally T. Hillsman". The signature is written in black ink and is positioned above the printed name.

Sally T. Hillsman, PhD
Executive Officer