American Society for Investigative Pathology
Investigating the Pathogenesis of Disease

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ASIP Response to OSTP Request for Information (FR Doc. 2011-28623): Public Access to Peer-Reviewed Scholarly Publications Resulting from Federally Funded Research

To:
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ASIP Response to OSTP Request for Information (FR Doc. 2011-28623): Public Access to Peer-Reviewed Scholarly Publications Resulting from Federally Funded Research

The American Society for Investigative Pathology (ASIP), a nonprofit educational 501(c) 3 society, publishes *The American Journal of Pathology* (AJP) and co-publishes *The Journal of Molecular Diagnostics* (JMD) with the Association for Molecular Pathology (AMP), which is also a 501(c) 3 society. AJP has been published for over 100 years and was commercially managed until 1992, at which point ASIP assumed the role of self-publisher until last year. JMD was founded in 1998 as a self-published journal, which was a joint venture between ASIP and AMP. We have the experience of successfully managing both journals during revolutionary change, including the commercialization of the internet, web-based journal distribution, online Continuing Medical Education associated with the journals, electronically managed peer review, digital file-based production workflows, programming language changes from SGML and HTML to the NLM-DTD, and user-driven features and functionality only possible through the development of electronic tools and internet accessibility.

As a small biomedical society, ASIP faced significant challenges to continue self-publishing two high-profile pathology journals through this turbulent period. We have 6 staff members working full-time for the journals to manage peer-review and production, and had 5 executive staff members contributing a combined total of 2.3 FTEs to manage the day-to-day business and strategic planning for the journals' access and visibility, content and user value, and financial viability. AJP has been the #1 or #2 journal in Pathology (according to ISI rankings) for all of the years during which ASIP self-published. JMD has climbed steadily up the ISI rankings since 2000 and is now #14 in Pathology among 69 journals. We believe our journals are run efficiently and effectively and their institutional pricing is reasonable. In fact, the journal prices were not raised for the three-year period 2008-2010, in part to rule out price as a factor in analyzing subscription renewals. Yet subscription renewals declined precipitously in recent years- a period of time coincident with the free access embargo policy of AJP being reduced from 12 months to 6 months. As a consequence, ASIP moved its free access embargo on AJP from 6 months to 12 months in 2009 (the embargo for JMD was and remains 12 months), on both the official journal site and on the PubMed Central archive. Two years after returning to the 12-month embargo period, AJP subscriptions have now started to increase.

Also as a consequence of declining subscription revenue and staggering demand for more specialized mobile access and enhanced online features, ASIP contracted with Elsevier in late 2010 to manage the journals' business operations. This decision to no longer self-publish came after long and hard consideration by ASIP's leadership and review of a variety of proposals from commercial publishers.

In responding to the eight sets of questions submitted for response by OSTP, ASIP would like to first state that we believe our Society, as the publisher of the journals, is the best guarantor and

guardian of the scientific literature published in our journals. We generally do not support the growth and proliferation of national repositories that are redundant of the content we already provide on our website and in print. We also believe that our system of a mixed model of revenue is the best model, because it gives authors and libraries the economical ability to publish in and access the journals. Through the member benefits ASIP offers and reasonable page and color charges, authors can pay considerably less to publish in our journals than they would pay for Open Access fees to publish in most Open Access journals. Our annual institutional subscription rates have been consistently lower than our competitors and the average price per article is less than $2.00. Therefore, we take issue with many of the assumptions made by OSTP in their questions and ask that you keep an open mind toward the traditional publishing model and toward working with ALL publishers, including those of us who have not moved away from that model.

(1) Are there steps that agencies could take to grow existing and new markets related to the access and analysis of peer-reviewed publications that result from federally funded scientific research? How can policies for archiving publications and making them publically accessible be used to grow the economy and improve the productivity of the scientific enterprise? What are the relative costs and benefits of such policies? What type of access to these publications is required to maximize U.S. economic growth and improve the productivity of the American scientific enterprise?

As referenced in the Association of Learned and Professional Society Publishers' response, we agree with their following comments:

Scholarly publishing is an international enterprise, with around 1.5 million articles published annually[1]. U.S. researchers dominate this output with a 29% share of the total.

Current markets for peer-reviewed publications exist globally and publishers have invested heavily to ensure that there are many channels of access to publications. The markets are already well-served and a recent survey from the Publishing Research Consortium found that 97% of researchers in North America have very or fairly easy access to research journals[2]. This study also demonstrated that North America enjoys one of the best 'access to information' versus 'importance of that information', profiles of any of the regions investigated.

Publishers have recognized the needs of the myriad communities they serve and have responded appropriately, leading the way with technical tools and services to enhance the access, usability and analysis of published research, collaborating widely with various stakeholders in the process.

[1] http://www.stm-assoc.org/industry-statistics/the-stm-report/

Publishers provide free or very low cost access to universities and colleges, research institutes, schools, hospitals, governmental offices and national libraries in the lowest gross national income per capita countries throughout the world through self-initiated systems.

It is clear that publishers are keen to ensure that the needs of different markets in accessing scholarly information are met appropriately and are keen to do so in collaboration with other stakeholders. Publishers are keen to engage with the U.S. Government to address the further gaps it has identified in public access. It would be useful for agencies to detail the particular needs of such user groups and to collaborate with publishers to establish the most efficient and appropriate ways in which to address those needs.

The need for archiving digital information has been recognized by publishers, librarians, funders and researchers. Collaborative projects already exist to ensure the long term preservation of scholarly information through initiatives such as Portico[3], LOCKSS[4], CLOCKSS[5] and the National Library of the Netherlands (Koninklijke Bibliotheek) eDepot[6].

Very careful consideration needs to be given to archiving and public access policies, if these are to be tied to growth in the U.S. economy and improving output of the U.S. scientific enterprise. Public access cannot be restricted to one local region. Ensuring public access to publications resulting from federally-funded research will result in global access, therefore benefiting researchers and other users all over the world (and potentially also their economies), not just the U.S. This removes any competitive advantage for the U.S. economy and research output. Furthermore, ASIP would go so far as to say that free global access puts the U.S. at a relative disadvantage since the proportion of research output by the U.S. surpasses all other countries, and all research articles made available through open access are equally available to all countries.

Data from the National Institutes of Health reports that more than half of all PubMed Central users are from outside the U.S. This repository is therefore reducing the export market for the U.S. publishing industry which, in total, employs around 50,000 people and contributes about $3.5 billion to the U.S. balance of trade.

(2) What specific steps can be taken to protect the intellectual property interests of publishers, scientists, Federal agencies, and other stakeholders involved with the publication and dissemination of peer-reviewed scholarly publications resulting from federally funded scientific research? Conversely, are there policies that should not be adopted with respect to public access to peer-reviewed scholarly publications so as not to undermine any intellectual property rights of publishers, scientists, Federal agencies, and other stakeholders?

[3] http://www.portico.org/digital-preservation/
[4] http://www.lockss.org/lockss/Home
[5] http://www.clockss.org/clockss/Home
[6] http://www.kb.nl/index-en.html

As referenced in the Association of Learned and Professional Society Publishers' response, we agree with their following comments:

The U.S. government is clearly aware that allowing global public access to the peer-reviewed published output from federally-funded research has the potential to open such content to piracy and other unauthorized dissemination.

Such piracy undermines the income that scholarly publishers require to continue their investment in the aforementioned projects, tools and collaborations for the benefit of the scholarly community.

The most efficient way to ensure appropriate protection of intellectual property interests of all stakeholders would be to make the final Research Report freely available. This would allow a rapid and very broad dissemination of the research results obtained directly from federal funding. This would also facilitate such reporting to be tied back to the original grant made by the federal agency. Final project reports could also be linked to the peer-reviewed published research, available online whether free, via rental, or for full purchase as the publisher business model dictates.

Like ALPSP, ASIP is not in favor of mandated deposit to centralized open repositories. In addition to significant concerns about long-term sustainability and piracy, open repositories have deleterious effects on the publishing model; for example, NIH does not currently provide publishers with full, detailed usage statistics from PubMed Central, which means publishers are unable to supply libraries with the complete picture with regard to their institution's use of a wide range of journals. Such usage data is crucial in determining renewals and while this situation persists, subscriptions are being cancelled based on incomplete usage data.

(3) What are the pros and cons of centralized and decentralized approaches to managing public access to peer-reviewed scholarly publications that result from federally funded research in terms of interoperability, search, development of analytic tools, and other scientific and commercial opportunities? Are there reasons why a Federal agency (or agencies) should maintain custody of all published content, and are there ways that the government can ensure long-term stewardship if content is distributed across multiple private sources?

As referenced in the Association of Learned and Professional Society Publishers' response, we agree with their following comments:

Studies have demonstrated that researchers prefer to access the publisher-created Version of Record (VoR) from a peer-reviewed journal as the authoritative, definitive version, over versions in subject or institutional repositories[7],[8].

[7] http://www.peerproject.eu/reports/ D4.2 PEER Behavioural Research – Final Report
[8] http://www.publishingresearch.net/projects.htm Research Publication Characteristics and Their Relative Values

In an interconnected age, with current and ever-improving technology, centralization is not required and moreover, requires unnecessary duplication of effort at considerable expense. Indeed the report from the Scholarly Publishing Roundtable in January 2010[9] recommended decentralization to achieve the interoperability needed to "enhance the impact of the scholarly literature and ignite the generation of new knowledge".

Publishers have gone to considerable lengths in developing tools to ensure interoperability between different access systems. For example the Digital Object Identifier (DOI[10]) system, to provide persistent identification of digital objects, the CrossRef [11] organization and its various ongoing projects aimed at connecting users with primary research content and the Open Research and Contributor ID (ORCID[12]) initiative, to solve author name ambiguity in scholarly communications and latterly resolving institutional naming ambiguity.

Publishers are also continuing to invest in the development of discipline-specific tools to enable users to interact with and analyze specialized content. Such tools would be lost with centralization.

Publishers are continuing to invest in metadata standards, which improve the ease with which relevant articles can be discovered. With such excellent standards, search tools are all that is required to connect users with the most appropriate content for their needs, and importantly to the VoR. Such metadata standards include those developed by EDItEUR[13], IDEAlliance (PRISM)[14] and NISO[15] (see also paragraphs 33 and 34 below).

(4) Are there models or new ideas for public-private partnerships that take advantage of existing publisher archives and encourage innovation in accessibility and interoperability, while ensuring long-term stewardship of the results of federally funded research?

As referenced in the Association of Learned and Professional Society Publishers' response, we agree with their following comments:

In addition to the many public-private partnerships already mentioned, publishers are keen to engage further with Government and its agencies. Proposals have already been put to NSF for collaborative projects to enhance the public access, utility and preservation of publications resulting from federally-funded research.

[9] http://www.aau.edu/WorkArea/DownloadAsset.aspx?id=10044
[10] http://www.doi.org
[11] http://www.crossref.org
[12] http://orcid.org
[13] http://www.editeur.org/
[14] http://www.idealliance.org/specifications/prism/
[15] http://www.niso.org/standards/

Such proposals include standardizing the collection, display and use of metadata to indicate the federal grant supporting the research from which a scholarly publication derived and potential linking back to the Federal Agency website. A further example is the proposal for a project to understand the requirements for and benefits derived from content mining and to establish a methodology for overcoming current barriers, such that publishers can facilitate such content mining with sustainable business models. These are just two of the proposals under discussion with the NSF.

(5) What steps can be taken by Federal agencies, publishers, and/or scholarly and professional societies to encourage interoperable search, discovery, and analysis capacity across disciplines and archives? What are the minimum core metadata for scholarly publications that must be made available to the public to allow such capabilities? How should Federal agencies make certain that such minimum core metadata associated with peer-reviewed publications resulting from federally funded scientific research are publicly available to ensure that these publications can be easily found and linked to Federal science funding?

As referenced in the Association of Learned and Professional Society Publishers' response, we agree with their following comments:

As already mentioned above, publishers are already undertaking a project with CrossRef and the Department of Energy (DoE) to standardize the way funding information is collected publishers and included in article metadata. This would enable Federal agencies to easily obtain information about publications resulting from federally-funded research.

Such collaborative projects enable cost-effective standardization across all Federal agencies and publishers.

Metadata allows users to discover information and find related information without the requirement of accessing the full text. Two initiatives are important in this regard.

The Dublin Core Metadata Initiative[16] provides key specifications and best practice regarding the use of metadata for the description of various digital resources (including books and journal articles). It enables interoperability of different applications and vocabularies and optimizes the metadata for searching.

CrossRef[11] provides a cross-publisher linking network. This allows readers to easily link to other resources of interest on other publisher platforms. This works seamlessly through DOIs and metadata which are embedded in articles and other content as part of the value-added publication process.

[16] http://dublincore.org/

(6) How can Federal agencies that fund science maximize the benefit of public access policies to U.S. taxpayers, and their investment in the peer-reviewed literature, while minimizing burden and costs for stakeholders, including awardee institutions, scientists, publishers, Federal agencies, and libraries?

As referenced in the Association of Learned and Professional Society Publishers' response, we agree with their following comments:

Federal agencies funding scientific research should maximize the products that they invest in, that is the research reports required by Federal agencies from the research scientist. Some already make such research reports available (e.g. the DoE Information Bridge[17]), but others do not. Making all such reports freely available would solve the "public access" issue.

Federal agencies do not invest in peer-reviewed journals. Publishers add significant value to peer-reviewed publications and this is reflected in researcher preference for the VoR[7,8]. Publishers should then be at liberty to employ appropriate business models by which they may recover their investment and to reinvest.

(7) Besides scholarly journal articles, should other types of peer-reviewed publications resulting from federally funded research, such as book chapters and conference proceedings, be covered by these public access policies?

As referenced in the Association of Learned and Professional Society Publishers' response, we agree with their following comments:

No. Publishers invest considerably in all types of content they produce to add value to the scholarly and academic community that utilize them. Such publications should not be appropriated without rightsholder permission and compensation. To behave otherwise would compromise the sustainability of high quality publication, dissemination and preservation of the research results.

(8) What is the appropriate embargo period after publication before the public is granted free access to the full content of peer-reviewed scholarly publications resulting from federally funded research? Please describe the empirical basis for the recommended embargo period. Analyses that weigh public and private benefits and account for external market factors, such as competition, price changes, library budgets, and other factors, will be particularly useful. Are there evidence-based arguments that can be made that the delay period should be different for specific disciplines or types of publications?

As referenced in the Association of Learned and Professional Society Publishers' response, we agree with their following comments:

[17] http://www.osti.gov/bridge/

There is no single "appropriate" embargo period. Federal agencies should not impose inappropriate embargo periods on non-federally funded businesses. Individual publisher business models are not arbitrary, but are carefully calibrated to meet the needs of the market. For example, of ASIP's two journals, AJP is published monthly and JMD is published bimonthly. As referenced above (page 2), the embargo for both of our journals was one year for several years. We experimented with decreasing the AJP embargo period from 12 months to 6 months. (Because JMD is published bimonthly, we fortunately and conservatively did not change its 12-month embargo period.) We experienced a precipitous decline in AJP institutional subscriptions within one year of our decision to shorten the embargo period to 6 months. After analysis and policy correction in 2009, we experienced our first increase in institutional subscriptions in 2011, proving to us that for AJP, a 6-month embargo period is too short and endangers the fiscal stability of our journal.

The most common current embargoes range from zero, for gold Open Access material, to 12 months, as a result of the NIH-mandate. Publishers, however, should be able to set their own appropriate embargo, depending on the material they publish and the market for which they publish, and this may be more or less than 12 months. Flexibility is particularly important for journals that publish less frequently than monthly.

An indication of the length of usage an article in a given discipline received, the journal half-life forms a useful measure. For example, the American Physiological Society reports journal half-life from 4.3 to over 10 years[18]. The quarterly journals of the American Anthropological Association also have a cited half-life of over 10 years and 90% of downloads occur 12 months after the date of publication. In mathematics papers published in 2009, 50% of citations were found to be to papers originally published before 1999, with 20% of citations to papers published before 1985[19].

Imposing mandates on the potential to recover investment from such usage further undermines publishers' ability to continue to innovate and add value for the benefit of the scholarly and academic community.

In the current economic climate, recovering investment is all too important. Journal budgets are being squeezed and foreshortening the length of time a publisher is able to recoup their investment has the potential to seriously damage publishers and therefore the overall economy.

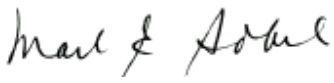
As already referred to, the lack of transparency demonstrated by NIH has the potential to undermining the entire system. Librarians utilize usage statistics as part of their considerations

[18] http://www.the-aps.org/publications/journals/info/impact_factors.htm
[19] http://www.msri.org/attachments/workshops/587/MSRIfinalreport.pdf Donald E McClure (2011) Dynamics of Mathematics Journals, 2000 to 2009

for journal renewals. Whilst publishers have worked with NIH to assist authors in fulfilling their mandated deposit, NIH has been unwilling to provide publishers with usage statistics, which would allow publishers to provide a more accurate picture to librarians of the usage of journals by their faculty. (Note: This is the fundamental reason why ASIP pulled out of its PMC publishing agreement at the end of 2011.)

In closing, we primarily and resoundingly disagree with the assumption that free access in any way facilitates economic advantage for the U.S. If anything, it facilitates the success of other countries – like China – which are not participating on public archiving initiatives. In the current economic situation in the U.S., where even graduate medical education funding (through CMS) is seriously in jeopardy of being cut by 40%, we encourage OSTP to consider a world where federal archives can no longer be funded by taxpayer dollars and can no longer exist. So little distinctive functionality has been gained by duplicative archiving on PMC that one should ask why the NIH mandate cannot exist without PMC. In this case, NIH's role would be to police compliance with the mandate. More emphasis could be placed where it should be on development of interoperable standards and functionality between publisher archives of both research and data. Further, we invite OSTP (as we previously have) to privately and comprehensively review our journal operations to more accurately gauge the effects of the NIH policy on a typical scholarly society. We would welcome inclusion of our leadership in high-level discussion of how to transition more medical research into clinical success stories and commensurate innovation and competitiveness.

Sincerely yours,



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