

Response to FR Doc No: 2011-28623

**American Society of Human Genetics  
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The American Society of Human Genetics appreciates the opportunity to respond to the Request for Information from the Office of Science and Technology, Executive Office of the President on “Public Access to Peer-Reviewed Scholarly Publications Resulting from Federally Funded Research”.

The American Society of Human Genetics (ASHG), founded in 1948, is the primary professional membership organization for human genetics specialists worldwide. The Society’s nearly 8,000 members are scientists, health care professionals, and others with an interest in the field of human genetics. Our members work in a wide range of settings, including universities, hospitals, research institutes, and medical laboratories.

The ASHG Mission Statement reads:

**ASHG serves research scientists, health professionals, and the public by providing forums to:**

- Share research results at annual meeting and in *The American Journal of Human Genetics*
- Advance genetic research by advocating for research support
- Enhance genetics education by preparing future professionals and informing the public
- Promote genetic services and support responsible social and scientific policies

As you can see from our mission statement, publication of *The American Journal of Human Genetics (AJHG)* is one of the primary activities of ASHG. As a highly valued and widely read publication in the rapidly advancing field of Human Genetics, ASHG takes the ownership and appropriate support of the *Journal* very seriously. This publication is a central part of our core values of sharing scientific results and is also an essential part of our Society’s operational plan.

Without presenting great detail about our publications process, we can simply assure the public that all submissions to the *AJHG* receive an initial review, and those published have been through rigorous peer-review in a well-controlled process. Our editorial office has a reputation of publishing the highest quality while making sure that articles are published as quickly as possible. Subscription to the *AJHG* is a benefit of membership, and has both on-line and print versions. The Table of Contents and abstracts are available on line and subscriptions are available to many through their institutional library.

We would like to provide some basic responses to the questions posed in the RFI:

(1) Regarding questions about new markets, archiving publications and public access to improve the productivity of the scientific enterprise and maximizing US economic growth ASHG responds:

The new markets being penetrated by our publications are mainly foreign markets, providing scientific results as a type of export of expertise. Our major new markets are the rapidly developing countries with governments investing very heavily in scientific research. Our current subscriber pays business model provides economic input into America while sharing the results of federally funded research in a timely manner. Providing immediate free access through mandating submission of material to a central database in a very tight timeframe undermines the current model that is working well, providing free access to contents of published versions the *AJHG* in a six-month period from publication. Our provision of the published versions of manuscripts to PubMed Central, ensures that the public has access to the final versions of papers, and not ones for which an author might not have updated the manuscript following acceptance (*e.g.*, changes made by copy editors or authors in reviewing galley proofs) This time frame protects the integrity of the professional system, provides access to almost any person who needs these results quickly, and supports an economic model that supports jobs and the professional society. We believe that support of this model as well as a variety of other publishing models, rather than mandates of immediate free access would be the best policy course for the federal government.

(2) With regard to intellectual property rights:

ASHG believes that the protection of intellectual property rights of individual scientists and institutions are initially the responsibility of those entities, with each assuring that publication and full access to the information does not undermine the processes put in place to protect such property. The rights to the content of any journal must be in the purview of that publisher with policies that include a reasonable time period before free access is provided by the owner of that intellectual property. The ASHG has found that a six-month period prior to deposition in a public data base (in our case PubMed Central) has provided sufficient protection for the Journal to flourish. Other groups may believe a longer period is necessary, but our model has been working for us for more than a decade. Appropriate to add anything here about the public access option to authors? We also provide a mechanism whereby authors may choose to make their manuscripts accessible to the general public during this 6 month interval by paying a modest fee. Some authors have chosen this option.

(3) In response to questions of the pros and cons of a centralized data base and federal long-term custody and stewardship of publication, ASHG believes:

We have concerns about the federal government taking control and custody of our Journal contents. It could become especially onerous for some journals to meet certain criteria (formats for example). We think that seemingly small things (like errata) could be lost and could create real issues

with the integrity of a mandatory federal system. There is in the scientific community the basic underlying belief in openness to a wide variety of ways to express views about research that is at the basis of progress in science.

- (4) Current models of cooperation between private publishing and entities providing public access are working for AJHG at this time. Our authors must disclose the sources of funding for the work presented, but the cross-checking with those sources would have to be developed in some manner.
- (5) Our current model is working well. We are concerned that more mandates for journals and hence complications for authors would diminish the will to publish quickly. This result would make the mandates the obstacles to the very access that is the goal.
- (6) The maximization of benefit to the public comes from the research moving as quickly and smoothly between bench and clinic, not from creating a burdensome system. The rapid sharing of data and results among scientists is the appropriate way to achieve the ultimate goals.
- (7) To include conference proceeding and book chapters in a regulated disclosure process would create additional barriers to the writing, editing and presentation of these materials. Much of the material in any of these sources is actually based on the original research published in the primary literature.
- (8) While many of our sister societies support a one year embargo period, the *American Journal of Human Genetics* continues successfully with our own six-month embargo period. The human genetics community is engaged in very rapidly advancing science, and our ASHG leadership has been firm about this shortened embargo period in negotiating final terms with our (initially reluctant) publisher. Our genetics community continues to lead in the development of policies and procedures that enhance and support the sharing of data and publications as well.

The American Society of Human Genetics (ASHG) is appreciative of the opportunity to comment on these important issues regarding public access to scholarly publications.

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