



American Association of Physicists in Medicine

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Office of the President

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January 12, 2012

Ted Wackler
Deputy Chief of Staff
Office of Science and Technology Policy
Executive Office of the President
725 17th Street Room 5228
Washington, DC 20502

Re: Response to November 4, 2011, Federal Register Notice of Request for Information, Office Of Science And Technology Policy, “Public Access to Peer-Reviewed Scholarly Publications Resulting From Federally Funded Research; FR Doc No: 2011-28623” [76 FR 68518, dated November 4, 2011]

Dear Dr. Wackler:

The American Association of Physicists in Medicine¹ (AAPM) is pleased to respond to the Request for Information (RFI), regarding “Public Access to Peer-Reviewed Scholarly Publications Resulting from Federally Funded Research.” AAPM appreciates the extension to the public comment period to January 12, 2012.

Medical Physics is the official scientific journal of the AAPM. The journal is published through an agreement with the American Institute of Physics (AIP), which submitted a response to the request for information (AIP Comments dated December 22, 2011). The AAPM fully supports the AIP’s response and wishes to expand on several points related specifically to Medical Physics and the medical physics community it serves.

About AAPM

The AAPM is a scientific, educational, and professional nonprofit organization dedicated to the applications of physics to medicine through research, education, and clinical service. The

¹ The American Association of Physicists in Medicine (AAPM) is the premier organization in medical physics; a broadly-based scientific and professional discipline encompassing physics principles and applications in biology and medicine whose mission is to advance the science, education and professional practice of medical physics. Medical physicists contribute to the effectiveness of radiological imaging procedures by assuring radiation safety and helping to develop improved imaging techniques (e.g., mammography, CT, MR, ultrasound). They contribute to development of therapeutic techniques (e.g., prostate implants, stereotactic radiosurgery), collaborate with radiation oncologists to design treatment plans, and monitor equipment and procedures to insure that cancer patients receive the prescribed dose of radiation to the correct location. Medical physicists are responsible for ensuring that imaging and therapy facilities meet the rules and regulations of the U.S. Nuclear Regulatory Commission (NRC) and various State regulatory agencies. AAPM represents over 7,500 medical physicists.

AAPM's membership comprises nearly 8,000 medical physicists, most of whom specialize in the applications of physics to acquire diagnostic information (such as medical images) or to enable therapeutic intervention (such as radiation therapy for cancer). Many of AAPM's members are actively engaged in clinical practices serving patient populations. In this engagement, quality and safety of medical procedures are the responsibility of medical physicists.

Role of the Medical Physics Journal in AAPM

The journal Medical Physics is, in many ways, the lifeblood of the AAPM. It is a scholarly communications vehicle for medical physicists worldwide that describes important research findings through scientific papers, informs clinical practice through special reports, and provides discussions of scientific and educational issues facing medical physics through journal features such as Point/Counterpoint columns, Vision 20/20 and review articles, Medical Physics Letters, editorials and correspondence.

The journal is also an important component of the economic vitality of the AAPM. In addition to membership dues and income generated by AAPM meetings, the journal is a key source of revenue for the organization. Like many nonprofit organizations, the AAPM operates in a careful balance of income, services and volunteer efforts.

Making the Medical Physics Journal Happen

The AAPM relies on a large and complex community to create, improve, and distribute Medical Physics to the worldwide community of medical physicists. The process involves hundreds of volunteer reviewers, an editorial board of more than 50 members, a business management committee, a full-time editor, two deputy editors, and several professional staff members working with the AAPM's partner team at AIP. This effort is sustained by the AAPM through revenue generated by the journal and other sources. In addition, there are substantial costs associated with composing, printing and distributing (even electronically) Medical Physics. All of these expenses and efforts would have to be curtailed to a corresponding degree if revenue to the AAPM were diminished.

Implications of Free Public Access to Medical Physics

The AAPM is sympathetic to the desire to make the findings of publicly funded research available to the public without charge. The AAPM agrees that some level of access to Medical Physics articles is consistent with that desire. At the same time, the AAPM wishes to avoid unintended consequences that could negatively impact the journal, its ability to disseminate high-quality scientific findings (vetted through a peer-review process) to the national and international medical physics communities, and its ability to help sustain the financial viability of the AAPM. One of the major reasons that medical physicists join the AAPM is to gain immediate access to scientific articles and other informative features of Medical Physics that are published both electronically and in print. Immediate access is essential to progress in medical physics research and important to improving the quality and safety of clinical procedures in which medical physicists are involved. Not all research described in Medical Physics is funded by federal sources, but a considerable fraction is. Making articles in Medical Physics freely accessible to everyone immediately upon publication would substantially diminish the incentive to join the AAPM. This consequence would drastically reduce the revenue AAPM has available to support the work of councils, committees and task groups, much of which ultimately yields scientific papers and technical reports published in Medical Physics. The consequences of this diminished revenue would be a reduction in the guidance available to medical physicists to advance research

AAPM Response to 76 FR 68518
January 12, 2012

and to improve the quality and safety of clinical procedures.

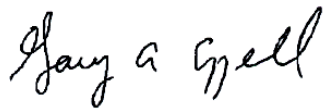
The AAPM believes it is in the best interest of all stakeholders, including the public, to establish a balance between providing free public access to research information and protecting the viability of scientific organizations such as the AAPM that serve as a major source of the information. This balance could be preserved by providing a 1-year latency period between publication of scientific articles in Medical Physics and making those articles publicly accessible. This latency period would enable the AAPM to sustain its commitment to adding value to the practice of medicine through advancing research and improving the quality and safety of health care.

Summary

The AAPM urges a bit of caution to those charged with developing public-access policy to ensure that the AAPM is able to sustain its commitment to research, quality and safety. The AAPM believes it is in the best interests of the public to provide a one-year latency period between publication and public access of articles in Medical Physics in order to maintain an economically sound AAPM that can continue its contributions to medical research and healthcare quality and safety.

Thank you for your consideration. If you have questions, please contact Lynne Fairbent, AAPM's Manager of Legislative and Regulatory Affairs, at 301-209-3364 or via email: lynne@aapm.org.

Sincerely,

A handwritten signature in black ink that reads "Gary A. Ezzell". The signature is written in a cursive, flowing style.

Gary A. Ezzell, Ph.D., FAAPM