

GUIDANCE FOR SUBMITTING COMMENTS TO THE WHITE HOUSE RFI ON OPEN ACCESS TO PUBLICLY FUNDED RESEARCH OUTPUTS

The White House Office of Science and Technology Policy (OSTP) has opened an [RFI](#) on increasing public access to unclassified research publications, digital scientific data and code resulting from federally funded scientific research. **All** are urged to respond to this pivotal opportunity. Your input will be critical in helping the administration to form a balanced view of stakeholders' interest in opening up access to publicly funded research. The RFI is quite short – just three questions, and responses are limited to a maximum of five pages total. Comments are due on **April 6, 2020** and should be emailed directly to publicaccess@ostp.eop.gov

The following document provides some *suggested* starting points help you think about crafting your response. *Please* feel free to customize any way you like, and especially to add your own personal experiences and views – it's important that the White House hears how Open Access would specifically benefit **you**. These are just meant as a starting point for you!

SUGGESTED GUIDANCE FOR RESPONDING:

Remember: Responses should be in 12 point or larger font, include page numbers, and be no longer than 5 pages total.

1. Thank OSTP for taking a deep interest in this issue, and for taking time to consult with stakeholders. The U.S. government spends billions of taxpayer dollars every year to fund research, and the public has a right to access and use those results.

2. State who you are, and note any organization you are representing. If you are writing as an individual, you can say “ I am writing today as (a student, a parent, a patient, a business owner, an American taxpayer, etc.)...”

3. Address Question Number 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?”

This is your chance to remind the White House why YOU care about this issue!

- Explain why you (as a patients advocate, researchers, member of the public etc.) particularly care about expanding access to research outputs. Tell your own story!
- Reinforce that lack of access is a real issue. You can focus primarily on articles if that is what you are most concerned with, or you can address articles, data and code.
- The first thing that most people do when they or a family is faced with a health crisis is to go online and search for the latest and best information available. Much of this information is in the form of articles in scientific journals.

- Our tax dollars paid for the research that these articles report on, but the only way for us to see the results is to through subscriptions to prohibitively expensive journals, or to pay upwards of \$30 an article for 24-hour pay-per-view access.
 - This creates a situation where only those who can afford to pay get access to the results of research they have helped to fund.
- Scientists routinely hold onto to their data for years without sharing it while they wait for papers to be published.
- Even when they do want to share it, it is often in proprietary formats or on proprietary sites that make it impossible to use. Even the basic data needed to verify or reproduce the results of articles published in peer-reviewed journals is too often unavailable.
 - This slows down research – wasting valuable time we need to get to new treatments, therapies, cures.
 - This makes interdisciplinary research difficult
 - This erodes trust in scientific research
 - This limits the value of our investment in science, etc.
- If you are writing as an individual, talk about your experiences with locating articles you might want, but have to pay each time to read.
- If you are a student, note that when you graduate, your library card expires and you very suddenly lose access to critical materials.
- Describe if you have experience with creating “work-arounds,” i.e. going directly to an author to get article, borrowing copies from friends, etc. just to do your work
 - We are in a situation where we do research on what we have access to, rather than what we might need to know.
 - We also now have to teach our students based on what we access to, rather than what they might need to know.

4. Address Question #2: *“What can Federal agencies do to make taxpayer 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 federal government should implement a strong national policy to ensure that all taxpayers finally get immediate, barrier-free access to the full results of the scientific research that their tax dollars have funded. This policy should require:
- All final peer-reviewed articles reporting on taxpayer funded research should be made freely available online to the public immediately upon publication in a peer-reviewed journal;

- Access to the underlying data and tools needed to validate the results of these papers (e.g. software or software code,) should also be made available.
- All other data should be made available to under findable, accessible, interoperable and reusable (FAIR) terms and conditions.
- Articles should be made available formats that support text/data mining and computational analysis..
- Articles should carry an open license or be published as part of the public domain so that they can be easily shared and fully used.

If you can, note how such policy would benefit you and/or your organization.

- Will it make it easier for you to do your job? Your research? For researchers in fields you care about to make faster progress?
- Will you have access to more material? What can you imagine doing once this new material is accessible? Will better access make you more likely to use it? To share it with health care providers?
- Will access help you make decisions about issues pertaining to your health? Your family's health?
- For **organizations** : Note that you are eager to engage with federal agencies and other stakeholders to explore new opportunities to leverage these open taxpayer-funded research outputs.

5. Address Question #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?”*

- America can't play a leadership role in science if our scientists routinely cannot access critical research articles and data.
 - Examples. Not even the most well funded campus libraries – including Harvard – can afford to subscribe to all of the journals that their researchers need.; and the situation is worse for researchers in smaller and less well-funded institutions across the country. We can't conduct cutting edge research and we can't train cutting edge scientists this way.
 - Researchers outside of the university environment - in disease specific research organizations and foundations – struggle even more. Provide example from your experience.
 - An Open Access policy will allow more users to stay abreast of cutting-edge ideas, and generate new uses and applications for research, ensuring that U.S.

higher education institutions provide the best possible education to all students.

- An Open Access policy would empower startup ventures, and small- and medium-sized businesses to deploy a research and development strategy that keeps them on the cutting edge of new ideas and knowledge, so that they can translate these ideas quickly into
- It is critical that federally funded research outputs be made available in open and machine-readable formats in order to generate breakthroughs in AI and related technologies. “AI readiness” is a critical national priority, and an Open Access would ensure that our scientific research outputs were optimized to meet this challenge.
- America is being left behind as other countries adopt immediate Open Access policies that allow them to accelerate their scientific research programs. Ensuring open access to the results of publicly funded research is now a cornerstone of innovation and competitiveness policies around the World.
 - In 2018, major national research funders across Europe introduced “Plan S” to make all scientific works freely available as soon as they are published, and private foundations (including the Gates Foundation, the Wellcome Trust and others) already fully deploying an immediate, open access policy.
- A National Open Access policy can be realized in a cost-effective manner. By implementing a repository-based Open Access policy, the U.S. can gain the benefits of broadening access to its taxpayer funded research outputs without breaking the bank.

6. In closing, be sure to **thank OSTP** again for facilitating a robust discussion of this important issue, and **encourage them to follow through** by implementing a strong immediate open access policy for the results of publicly funded research.