



American Society of Agronomy • Crop Science Society of America • Soil Science Society of America

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May 6, 2020

To: Lisa Nichols, Assistant Director for Academic Engagement, OSTP,

Email: publicaccess@ostp.eop.gov

Re: RFI Response: Public Access to Peer-Reviewed Scholarly Publications, Data and Code Resulting From Federally Funded Research

Dear Dr. Nichols:

The American Society of Agronomy (ASA), Crop Science Society of America (CSSA), and Soil Science Society of America (SSSA) represent more than 8,000 scientists and students. We publish 13 scholarly research journals: six Gold Open Access and seven hybrid titles offering an Open Access option. The societies also support 13,500 Certified Crop Advisers, and more than 700 Certified Professional Soil Scientists. Thank you for the opportunity to provide comments on public access to peer reviewed scholarly publications.

We are concerned that the Office of Science and Technology Policy (OSTP) is considering a policy that would reduce the current 12-month embargo for peer-reviewed publications reporting on federally funded research. Such a policy change could have severe impacts on many professional societies' abilities to invest in publishing and dissemination of peer-reviewed articles and in supporting the U.S. research community through education and other vital professional activities. This change could undermine the government's goals to maximize the impact and accountability of the federal research investment.

Publishers make substantial investments in the coordination of peer review, editing, and long-term stewardship that are essential to maintaining the high quality and integrity of our scholarly publications. These services must remain available to ensure continued opportunities to publish in internationally respected scientific journals. The current 12-month embargo period provides a solid mechanism to publishers and scientific organizations who are engaged in high-quality publishing to recoup these investments.

Publishers contribute creative innovation to the development ecosystem. Development of transformational Open Access agreements are moving the scientific community closer to open science goals. Nonprofit society publishers are at the forefront of disseminating research and the transformation of data into action. These member society publishers provide services beyond just publishing research, including developing the next generation of scientists through support of their communities with educational programs, certifications, and public communication.

We encourage agencies to consider new policies strongly supporting continued publisher innovation and partnerships to ensure long-term preservation and accessibility to federally

funded research. For example, publishers can facilitate easy public searching and efficient access. With creative Silicon Valley partners using cutting edge machine-learning tools, publishers can ensure that the public can locate, read, download, and analyze data and related articles for every type of research conducted or sponsored by an agency and its partners.

OSTP's current open science policies are shifting the publishing community closer to open science goals without causing disruptions to the marketplace. A swift move to zero embargo will undermine the progress that has been made over several years. We understand that open science is a priority of OSTP, and we hope to continue development of new opportunities and partnerships to test ideas without unintended consequences.

To increase access to federally-funded published research and digital scientific data, agencies investing in research and development must have well-defined and uniform policies to support increased access. If OSTP pursues a no embargo policy, many researchers will be forced into a pay-to-publish Open Access model. With no additional money appropriated for publishing costs, researcher reliance on existing grant funds for publishing fees would result in a significant diversion of money away from research. This could slow the communication of research results and diminish the objective of the initiative.

Without an embargo period, opportunities to publish in high quality peer-reviewed journals may decline and costs to researchers could increase significantly. In this case, more authors may choose self-publication. This could result in the erosion of the high level of quality assurance afforded by the publisher-managed peer-review system and lead to a lack of credibility in scientific literature. The scientific community has witnessed this very occurrence in the recent proliferation of inexpensive open access journals that contain material of little scientific rigor.

We urge you not to disrupt our ability to support the advancement of research in agronomy, crop, and soil science. We look forward to working together to identify solutions that foster creativity and advance the goals of open science without undermining the communication of research findings and analyses through peer-reviewed journals.

Sincerely,

A handwritten signature in black ink, appearing to read 'Nick Goeser', with a stylized, cursive script.

Nick Goeser, CEO