

## **ASN Response to NIH Request for Information on the NIH Plan to Enhance Public Access to the Results of NIH-Supported Research**

### **1. How to best ensure equity in publication opportunities for NIH-supported investigators.**

The NIH Public Access Plan aims to maintain the existing broad discretion for researchers and authors to choose how and where to publish their results. Consistent with current practice, the NIH Public Access Plan allows the submission of final published articles to PubMed Central (PMC) (in cases where a formal agreement is in place) to minimize the compliance burden on NIH-supported researchers and also maintains the flexibility of NIH-supported researchers to submit the final peer-reviewed manuscript. NIH seeks information on additional steps it might consider taking to ensure that proposed changes to implementation of the NIH Public Access Policy do not create new inequities in publishing opportunities or reinforce existing ones.

*The American Society for Nutrition (ASN) broadly supports the efforts of NIH to develop educational materials and standards to improve article accessibility and PubMed Central procedures for processing.*

*Increasing diversity, equity and inclusion in nutrition and related sciences is a strategic priority for ASN. ASN allocates publication waivers for underrepresented and early career scientists. NIH could further its goals by dedicating publication resources for underrepresented scientists and the scientific societies that support them.*

*ASN also encourages NIH to follow a model like that of the Bill and Melinda Gates Foundation for coverage of publishing fees. The Gates Foundation uses a central budget to pay for article processing charges and publisher fees. Grantees do not have to use funds out of their research budget or seek reimbursement from the Foundation. Instead, invoices are directed to the Foundation for payment from the central budget directly to the publisher or service provider. The Gates Foundation supports publication of research funded, in part or whole, by the Foundation and only requires a valid Gates grant number. The central budget covers open access publishing fees and additional publishing costs such as page charges. The grantee is responsible for managing any publisher agreements and covering any additional costs beyond these fees. It is ASN's understanding that fees are paid at any point in time from this central budget, even after the end of a grant funding period.*

### **2. Steps for improving equity in access and accessibility of publications.**

Removal of the currently allowable 12-month embargo period for NIH-supported publications will improve access to these research products for all. As noted in the NIH Public Access Plan, NIH also plans to continue making articles available in human and machine-readable forms to support automated text processing. NIH will also seek ways to improve the accessibility of publications via assistive devices. NIH welcomes input on other steps that could be taken to improve equity in access to publications by diverse communities of users, including researchers, clinicians and public health officials, students and educators, and other members of the public.

*ASN is committed to the translation of science to a variety of audiences – researchers, clinicians, policymakers, public health professionals and lay audiences. Sample tactics include blog posts, statements of significance, press releases and outreach to traditional and social media, as well as journal features such as Great Debates in Nutrition, Nutrition for the Clinician, and AJCN in Press podcast. Training researchers to properly communicate their science also is an ASN priority.*

*Financial support for activities to translate science and improve equity in access is lacking. NIH funding to help scientific societies continue and increase these efforts will help ensure their sustainability.*

### **3. Methods for monitoring evolving costs and impacts on affected communities.**

NIH proposes to actively monitor trends in publication fees and policies to ensure that they remain reasonable and equitable. NIH seeks information on effective approaches for monitoring trends in publication fees and equity in publication opportunities.

*Scientific research societies that publish scholarly journals, such as ASN, invest the income from their journals back into the scientific research community by supporting professional development and educational opportunities, including training for the next generation of scientists, meetings, and awards. ASN encourages NIH to consider additional support for the scientific research community in the form of professional development activities, particularly those helping early-career and underrepresented researchers prepare and support scholarly publications, such as training young professionals to serve as peer reviewers.*

*Income from publications also funds editorial expenses that ensure a rigorous and fair peer review process, foster scientific integrity and trust in science, and furthers science advancement.*

*Activities that monitor evolving publication costs must also consider and evaluate any negative consequences on organizations that prioritize rigor and reproducibility of science over publication volumes. For example, the American Society for Nutrition funds the following activities to ensure a peer review robust process: compliance with industry and ethical standards in the conduct and reporting of research; compensation of editors to oversee peer review, a Statistical Review Board to confirm data analysis, and senior-level staff to monitor trends; plagiarism screening; management of ethical investigations; and other best practices.*

### **4. Early input on considerations to increase findability and transparency of research.**

Section IV of the NIH Public Access Plan is a first step in developing the NIH's updated plan for persistent identifiers (PIDs) and metadata, which will be submitted to OSTP by December 31, 2024. NIH seeks suggestions on any specific issues that should be considered in efforts to improve use of PIDs and metadata, including information about experiences institutions and researchers have had with adoption of different identifiers.