



November 14, 2023

To Whom it May Concern,

The American Society for Nutrition (ASN) appreciates the opportunity to provide feedback on the proposed USDA Implementation Plan to Increase Public Access to USDA-funded Research Results. Please find our responses to USDA's questions below. Founded in 1928, ASN is a non-profit scientific society with over 8,000 members in more than 100 countries working in academia, practice, government, and industry. ASN is dedicated to bringing together the world's top nutrition scientists to advance our knowledge and application of nutrition. ASN publishes leading, peer-reviewed scientific journals in the areas of nutrition and dietetics, *The American Journal of Clinical Nutrition*, *The Journal of Nutrition*, the open access review journal *Advances in Nutrition*, and the open access research journal, *Current Developments in Nutrition*.

1. **How can USDA best implement its plans to improve public access to USDA-funded research results?**

To implement USDA's public access policy, ASN recommends three overarching approaches:

- 1) Developing flexible, clear frameworks in close coordination with other agencies to reduce confusion;
- 2) Providing incentives and developing training resources particularly on data management and sharing; and,
- 3) Leveraging existing infrastructures to avoid diverting resources from critical research activities.

Continual engagement with the research community is central to the success of these three approaches. We encourage partnering with scientific societies like ASN to maximize their networking capabilities and ensure future guidance and resources address stakeholder concerns. These partnerships would favorably complement USDA's customer-centered approach outlined in the draft plan.

2. **How can USDA update or refine its policies to improve public access to USDA-funded research results?**

ASN applauds the USDA for confirming that both publications and data costs may be charged as allowable expenses in research budgets. To improve researcher understanding, we recommend describing the ways publication and data costs may be charged to research budgets, including direct and institutional support options. Creating a "Publication Costs" table outlining different approaches may be a useful tactic.

Secondly, ASN applauds the USDA plan outlining broad adoption of digital persistent identifiers (DPIs or PIDs) including DOIs and ORCIDs for funding sources, data descriptions, authors, data, and associated research products.

Finally, ASN encourages USDA to collaborate with the community to carefully consider:

- Caution on extending manuscript types, noting many manuscript types do not come from federal funding and are created outside the terms of a grant (e.g., reviews, editorials).
- Additional clarification on machine-readable deliverables, including PDF format, would be valuable.
- Data Management Plan development and implementation, noting the Federation of American Societies for Experimental Biology's [recommendations](#) for requirements and compliance reporting.
- Careful consideration of Intellectual Property rights, recognizing that researchers in the U.S. have long enjoyed full freedom of choice in publication of their research findings.

**3. How can USDA ensure equity in publication opportunities?**

The USDA's commitment to equitable publication opportunities is laudable and consistent with ASN's belief that diversity, equity, and inclusion are integral to maximizing the full potential of public access. Under the prevailing business model, researchers at large R1's typically have costs covered under existing transformative agreements paid through indirect funds and other sources, while small universities require flexibility to include costs in direct funds. To bridge this disparity and ensure researchers are not penalized for additional direct funding requests, we recommend educating agency program officers on this issue. USDA could also dedicate financial resources to support researchers facing barriers in complying with public access goals, particularly after expiration of grants, and partner with scholarly societies and others to address distribution of these resources.

**4. How can USDA monitor impacts on communities impacted by its public access policies?**

ASN appreciates the USDA's consideration of how its public access plan will impact the research ecosystem. To help monitor impacted communities, the USDA could develop range distribution graphs of publication and data fees over time, showing points by quartile, along with relevant demographic data, including the reach of an article within its field. This approach prioritizes quality over quantity, thereby preserving scientific and research integrity.

Thank you for your consideration of ASN's comments. Please contact Gwen Twillman, ASN Chief Knowledge Officer (240-428-3642; [gtwillman@nutrition.org](mailto:gtwillman@nutrition.org)) if ASN may provide additional information.

Sincerely,



Kevin Schalinske, PhD  
2023-2024 President, American Society for Nutrition