AADOCR
American Association for Dental, Oral, and Craniofacial Research

April 24, 2023

Lyric Jorgenson, PhD
Acting Director, Office of Science Policy
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Re: National Institute of Health Office of Science Policy Request for Information on the NIH Plan to Enhance Public Access to the Results of NIH-Supported Research.

via website: https://osp.od.nih.gov/nih-plan-to-enhance-public-access-to-the-results-of-nih-supported-research/

The American Association for Dental, Oral, and Craniofacial Research (AADOCR) is the leading professional community for multidisciplinary scientists who advance dental, oral, and craniofacial research. We appreciate the opportunity to share our thoughts on the request for information on the National Institutes of Health (NIH) plan to enhance public access to the results of NIH-supported research. AADOCR recognizes and applauds the NIH's efforts toward providing public access to scholarly publications and data resulting from the research it supports. Further, the AADOCR commends the White House's Office of Science and Technology Policy (OSTP) efforts to ensure free, immediate, and equitable access to federally funded research in a manner that maintains scientific integrity and reproducibility of research. To respond to this request for comments, AADOCR engaged its Science Information Committee and its Board of Directors.

Increasing access to publications and data resulting from federally funded research offers many benefits to the scientific community and the public. However, there are costs associated with reviewing, editing, and publishing manuscripts that will need to be financed[1].There are concerns that the publication costs from longstanding print journals may rise quickly and significantly for open-access articles. Publishing open access articles involves an open access publication fee (APC) which varies per journal[2]. Over the past few years, the cost for this option has increased rapidly. Significant fees for publication are now becoming normalized (apart from COVID-related articles). Several journals, such as *Cell*, *eLife*, *Anatomical Record*, and *Nature Neuroscience*, have notably increased their APC with costs reaching up to ~$12,000 USD per manuscript[3]. Budgeting $12-15,000 per year within a grant would be a substantial cost for investigators and may potentially affect the output of a researcher if they quickly exceed their publication allotment.

These high publication costs are especially challenging for early-career researchers who may feel greater pressure to publish their research more frequently, researchers within smaller institutions or organizations with limited resources, Historically Black Colleges and Universities, researchers who do not qualify or are not selected for grants to assist with APCs, and those utilizing micro or seed grants. Researchers at institutions with a student body < 10,000 students were three times as likely to find it very difficult to obtain funds for APCs as their counterparts at larger institutions, adjusting for gender, race, and length of time conducting research[4]. These prohibitive financial barriers may result in meaningful research going unpublished. Therefore, ***AADOCR supports a subsidized approach to the publication of open access articles*** where the funding institutions absorb a larger percentage of the APCs required to increase access to the articles. This will ensure that the NIH's Public Access Plan does not result in scientists bearing the brunt of publishing costs through substantially higher fees passed on to them by journals.

AADOCR also supports a federally managed public registry for NIH funded studies to provide access to the results/data from these studies. The format of this registry may be similar to clinicaltrials.gov, and accessible to the general public. The public registry should provide a platform for all NIH funded researchers to deposit their results including unpublished negative data. Researchers will be required to include all experimental details and will be helpful to increase findability and transparency of research. It will also be helpful to include progress reports on available grants to ensure that analyses of studies without publications are publicly available. Although there is currently a Grantome interface, there are several challenges associated with that platform including difficulty navigating the interface (large number of unrelated or unwanted results), difficulty updating the result/publication section, and inability to include the researchers' website or data sharing links.

Steps for improving equity in access and accessibility of publications

AADOCR supports reducing the knowledge gaps that exist with researchers and publication availability and access. Sharing information about publication availability with researchers/universities, organizations, and schools to increase awareness that these resources are available freely to them is critical to improving equity. Additionally, streamlining the NIH grant process and better publicizing mechanisms to access NIH funding that can substantially support APCs or waive publishing fees will benefit smaller institutions or early-career researchers without large grants.

Researchers from underserved populations, including early career researchers, those from historically excluded backgrounds, and those at less research-intensive institutions, do not have assured access to open access publication funds. Research has also shown gender disparities in funding for APCs as females were three times as likely to use grant funds to pay for APCs when compared to their male counterparts[4].

This diversion of funds comes at the expense of other career advancement options such as professional development, equipment, and materials. This continues to further perpetuate disparity gaps in the biomedical workforce. Therefore, **AADOCR supports NIH dedicating publishing resources for researchers from underrepresented populations** and providing guidance to program officers on addressing equity in publication opportunities.

Early input on considerations to increase findability and transparency of research
AADOCR supports providing an option to filter the search by grant funding / IC / mechanism. This provides a utility to search by researcher and identify which publications are from the funded grants in PubMed or other biomedical literature search engines.

Support international collaboration and interoperability
AADOCR encourages NIH to support the compatibility of research platforms with existing global frameworks for sharing scientific knowledge and use common standards that are consistent with existing projects. For example, non-commercial open access platforms in Latin America, such as Redalyc, SciELO and AmeliCA, have provided software applications, interoperability, and discoverability to researchers. Similar platforms exist in Europe as well (e.g. Open Research Europe). The NIH should also take steps to encourage public-private collaboration to enhance interoperability between their platforms, reduce duplication of existing mechanisms, and allow for the repurposing of data for collaborative research.

AADOCR appreciates the opportunity to provide comments on the request for information on the NIH plan to Enhance Public Access to the results of NIH-supported research. AADOCR stands ready to work with NIDCR to flesh out mechanisms through which public access to publications and dental, oral, and craniofacial data can be increased.

If you have any further questions, please contact Dr. Makyba Charles-Ayinde, Director of Science Policy, at mcayinde@iadr.org.

Sincerely,

Christopher H. Fox, DMD, DMSc
Chief Executive Officer

Alexandre Viera, DDS, MS, PhD
President

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