



American Society for Nutrition
Excellence in Nutrition Research and Practice

January 6, 2016

United States Department of Agriculture
National Institute of Food and Agriculture
C/o Paul Tanger, Institute of Food Production and Sustainability
1400 Independence Avenue SW, Stop 2240
Washington, DC 20250-2201

The American Society for Nutrition (ASN) appreciates the opportunity to provide comments to the U.S. Department of Agriculture (USDA) as the Agency works to finalize its policy to increase public access to the results of USDA-supported scholarly publications and scientific data. Founded in 1928, ASN is a nonprofit scientific society with more than 5,000 members in more than 75 countries working in academia, clinical practice, government and industry. ASN is dedicated to bringing together the world's top nutrition research scientists to advance our knowledge and application of nutrition. ASN publishes the two leading, peer-reviewed scientific journals in the areas of nutrition science and dietetics, *The American Journal for Clinical Nutrition (AJCN)* and *The Journal of Nutrition (JN)*, and the review journal *Advances in Nutrition*.

ASN supports free-of-charge public access to scholarly publications and scientific data that stimulates innovation, and a clear, coordinated policy from USDA to increase such access. ASN voluntarily has taken the following significant steps to accomplish this:

- Since 1997, the Society has included free access to the online journal collection as a membership benefit.
- ASN has offered free public access to articles 12 months after publication on its website since 2000.
- ASN's entire journal collection, including over 110 years of archival content, has been online through Stanford University's High Wire Press since 2006. Approximately 98% of online journal content is freely accessible to both subscribers and non-subscribers.
- The content of all ASN journals is indexed in the National Library of Medicine PubMed/Medline database, and articles resulting from National Institutes of Health (NIH)-funded research are accessible from the online NIH open access repository PubMed Central after an embargo period of 12 months.

ASN supports the 12-month post-publication embargo period that USDA has adopted in its Implementation Plan to Increase Public Access to Results of USDA-funded Scientific Research. However, the implementation plan states that USDA will ensure easy search and download of scholarly publications resulting from USDA funds without charge *no later than* 12 months following publication (emphasis added). ASN requests that the USDA public access policy include language to indicate that USDA respects publisher embargo policies, up to a 12-month embargo after publication.

A shorter embargo period in public access policies devalues journal subscriptions, and therefore subscription revenue which many publishers rely heavily on to support publishing operations, including the costs of collecting, reviewing, editing, composing, disseminating, and archiving manuscripts. Two 2006 articles, "[Self-Archiving and Journal Subscriptions: Co-existence or Competition?](#)" and "The Association of Learned and Professional Society Publishers ([ALPSP](#)) [Survey of Librarians on Factors in Journal Cancellation](#)" demonstrated that an embargo period of 6 months or less would increase the likelihood that librarians may decide to cancel a journal subscription. A shorter embargo period can also more easily compromise the business models of small publishers, including many not-for-profit publishers, who publish scientific journals on a bimonthly or quarterly basis only.

While ASN supports efforts to expand public access to scholarly publications, ASN believes it's a duplication of efforts for multiple Federal agencies to establish separate repositories. If there are to be multiple repositories, ASN encourages that they be interoperable with a central portal to query and submit research articles, thus minimizing some burden from the scientific community, including researchers. ASN appreciates USDA's efforts to partner with appropriate scholarly publication archives across the federal, academic, and business communities, and encourages USDA to partner with [CHORUS](#) to implement a cost-effective protocol to optimize discovery of articles through common search engines and the CHORUS search application. CHORUS recently signed agreements with the National Science Foundation (NSF) and the U.S. Geological Survey (USGS) to advance public access plans implemented by those agencies. ASN supports public-private collaboration to avoid unnecessary duplication of existing mechanisms.

ASN congratulates USDA for working with publishers to establish automatic article ingestion, preprocessing, and access directly from the article of record in the journal when possible. We anticipate that USDA's quality assurance mechanisms will ensure that PubAg avoids publication of multiple versions of the same manuscript which could confuse, and in some cases even corrupt, the scientific record. PubAg should link to the published research article on the publisher's site whenever possible, rather than post a duplicate copy in a repository.

It is important for USDA to ensure that attribution to authors, journals, and original publishers is maintained, as well as each researcher's ORCID (persistent digital identifier) as applicable. ASN supports policies that allow publishers to retain copyright while giving privileges to authors. ASN also supports clearly identifying copyright holders in open access databases and repositories such as PubAg. ASN does not support blanket requirements in grant contracts which have the potential to deny authors and publishers the benefits of their copyrights, such as how and in what form their works are distributed.

ASN looks forward to the opportunity to assist USDA as it works to finalize its policy to increase public access to USDA-supported scholarly publications and scientific data. Please contact Karen King, Vice President for Publications, at 301.634.7053 or kingk@nutrition.org if ASN may provide further assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "Patrick J. Stover". The signature is written in a cursive style with a horizontal line extending to the right.

Patrick J. Stover, Ph.D.
2015-2016 President