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May 5, 2020

Dr. Lisa Nichols, Assistant Director for Academic Engagement
Office of Science and Technology Policy
Executive Office of the President
Eisenhower Executive Office Building
1650 Pennsylvania Avenue
Washington, DC 20504
Sent via email to: publicaccess@ostp.eop.gov

Dear Dr. Nichols,

On behalf of the Population Association of America (PAA) (www.populationassociation.org), I am writing in response to the Office of Science and Technology Policy's (OSTP) *Request for Information: Public Access to Peer-Reviewed Scholarly Publications, Data and Code Resulting From Federally Funded Research*. We appreciate the opportunity to respond to questions that the RFI posed regarding public access to federally funded research.

PAA represents over 3,000 population scientists, including demographers, economists, and sociologists, who study the implications of population change. Our journal, *Demography*, which has been in publication since 1964, is the premier peer-reviewed academic journal covering issues related to population and demography. *Demography*, however, is not the only mechanism by which our field shares significant findings. Population scientists embrace data sharing as a core principle and make data, particularly from federally funded, large-scale datasets, such as Health and Retirement Study, Fragile Families and Child Well Being Study, and Panel Study of Income Dynamics, readily accessible to the public. Our organization has cooperated with earlier efforts to enhance public access to federally funded research findings. And this commitment continues: PAA is eager to work with OSTP to further improve public access to federally funded research, provided practical as well as scientific equity issues are addressed.

But along with a commitment to public access, PAA is also committed to rigorous scientific peer review. Strong peer review is a central feature of the American scientific research enterprise and without doubt has been an essential ingredient in the production of outstanding science by U.S. universities and research organizations. The editorial board of PAA's journal *Demography* adheres to strict standards to ensure the publication of outstanding peer reviewed population research findings. *Demography* provides a platform for not only publishing research conducted by population scientists, including early stage investigators, but also for making population research findings readily available to scholars at all research institutions, including underserved institutions.

Strong peer review comes with financial cost: rigorous scientific peer review requires an editorship that possesses the resources for the time and effort demanded by peer review (and, further, the eventual production of journal articles). In the case of the journal

of our association, *Demography*, the annual costs of editorship and production are on the order of \$200,000. Our current “business model” is to cover this cost with the royalties returned from the publisher (Springer). Once immediate open access to federally funded publications is required, we anticipate these royalties will sharply decline or disappear altogether.

The main point is simply this: in order to protect rigorous peer review as a bedrock principle of science in the U.S., we are cautioning against an abrupt transition to immediate access. Even under the best circumstances, it would be difficult for PAA to move quickly towards a new business and revenue model. It is especially difficult now: like most every scientific association, PAA was compelled to cancel its 2020 annual meeting due to the COVID pandemic. This significantly depleted our financial reserves. During these unprecedented difficult circumstances, it is hard to see how we could quickly conform to a new publishing embargo policy affecting almost half of the articles that *Demography* publishes. Surely practical fiscal considerations must be factored into any decision that the Administration makes regarding policies affecting enhanced public access to federally funded publications, data, and code. The viability of scientific associations such as the Population Association of America is at stake.

The OSTP RFI posed several questions that our response inherently addresses. Direct responses to these questions, nonetheless, are listed below.

- *What current limitations exist to the effective communication of research outputs (publications, data, and code) and how might communications evolve to accelerate public access while advancing the quality of scientific research? What are the barriers to and opportunities for change?*

We do not believe the dual problems of communication of findings from federally sponsored research and access to pertinent research materials is as severe as this question implies. Communication of important findings is typically immediate and ubiquitous, through traditional media and social media. As for barriers that scientists face in accessing the research of other scientists, scientists based in academic and non-academic institutions have immediate access to scientific journals through institutional subscriptions. To the extent genuine barriers exist, it should be noted that in addition to practical, financial barriers, there are technical and ethical barriers that inhibit the acceleration of public access to federally funded publications, data, and code. PAA’s [response](#) to a related OSTP RFI addresses these barriers in greater detail.

- *What more can Federal agencies do to make tax-payer funded research results, including peer-reviewed author manuscripts, data, and code funded by the Federal Government, freely and publicly accessible in a way that minimizes delay, maximizes access, and enhances usability? How can the Federal Government engage with other sectors to achieve these goals?*

PAA believes that the model used by the National Institutes of Health (NIH) to make federal funded research findings available to the public through PubMed Central is a proven model that



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can be replicated across other federal agencies. PubMed Central is a free full-text archive of biomedical and life sciences journal literature at the NIH's National Library of Medicine. All NIH sponsored research is published in PubMed Central after a 12-month embargo. Likewise, the process NIH used to develop and implement its access policy should be considered as a framework for considering changes across the federal government.

• How would American science leadership and American competitiveness benefit from immediate access to these resources? What are potential challenges and effective approaches for overcoming them? Analyses that weigh the trade-offs of different approaches and models, especially those that provide data, will be particularly helpful.

Our response addresses this issue, but it is important to clarify that while making federally funded research findings immediately accessible sounds beneficial, it must be coupled with a maintaining of rigorous scientific peer review (with its attendant financial costs), as we argued above. This will ensure that published research is scientifically sound and worthy of consideration by other scientists as well as non-scientists. PAA makes one article per issue of *Demography* immediately available to the public, while, as our letter states, population scientists routinely make data from their federally funded surveys available to the public. The NIH is adopting policies, in part informed by the population research community, requiring grantees to make their data accessible to the public. These are approaches that PAA encourages OSTP to examine as it develops revised policies and practices.

Thank you for considering the views of the Population Association of America. Population scientists look forward to working with OSTP as you consider the many challenges a revised public access policy raises.

Sincerely,

A handwritten signature in black ink, appearing to read 'Eileen Crimmins', written in a cursive style.

Eileen Crimmins,
PAA President