May 4, 2020

Lisa Nichols, PhD
Assistant Director for Academic Engagement
Office of Science and Technology Policy (OSTP)
1650 Pennsylvania Avenue, NW
Washington, DC 20504

Submitted via email to: publicaccess@ostp.eop.gov

RE: Request for Information on Public Access to Peer-Reviewed Scholarly Publications, Data and Code Resulting from Federally Funded Research [985 FR 9488]

Dear Dr. Nichols:

The American Society of Hematology (ASH) appreciates the opportunity to provide comments on the Request for Information (RFI) on Public Access to Peer-Reviewed Scholarly Publications, Data and Code Resulting from Federally Funded Research.

ASH represents more than 18,000 clinicians and scientists worldwide, who are committed to the study and treatment of blood and blood-related diseases. These disorders encompass malignant hematologic disorders such as leukemia, lymphoma, and multiple myeloma, as well as non-malignant conditions such as sickle cell disease, thalassemia, bone marrow failure, venous thromboembolism, and hemophilia. In addition, hematologists are pioneers in demonstrating the potential of treating various hematologic diseases and continue to be innovators in the field of stem cell biology, regenerative medicine, transfusion medicine, and gene therapy. ASH membership is comprised of basic, translational, and clinical scientists, as well as physicians providing care to patients.

ASH supports a high-quality, peer review system for our two journals, Blood and Blood Advances, and our annual meeting periodical, Hematology ASH Education Program, and is pleased to offer its perspectives on the following topics noted by OSTP in its RFI.

1. 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?

The Society has seen no evidence that there is any limitation to the effective communication of research results and key papers from ASH’s publications. Because of ASH’s investment in its peer review, production systems, state-of-the-art website platforms and distribution channels, Blood was cited over 161,827 times in 2018, and ranked #1 in hematology in Google Scholar and Journal Citation Report.

The Society’s flagship journal, Blood, has been at the forefront of electronic publishing since 1997, when the journal first went online. Earlier full-text content that is archived reaches back to the first issue published in 1946. It is important
to note that the entire back content of *Blood* is freely accessible to users worldwide: everything that is one year old or older has full and free public access.

Moreover, some of the most relevant content in *Blood*, as well as everything in *Blood Advances*, is accessible to the public at the moment of publication: clinical care guidelines are made freely available immediately, as are important, practice-changing research discoveries that improve our nation’s health. Furthermore, if patients request access to breakthrough studies related to their blood disease, we also provide this resource to them immediately, at no charge. In addition, the content in our annual meeting periodical, *Hematology ASH Education Program*, will be made freely available online as part of the upcoming 2020 annual meeting.

As stated previously, given that 99% of our journal content is already publicly available, ASH does not believe that there are any limitations to accessing publication content, including data. This content can be “free and open to the public” predominantly because journal revenue from subscriptions, advertising, and licensing of the intellectual content supports these features. Any alterations to the current 12-month embargo policy, however, would make it difficult for ASH to maintain its strong peer review and curation system, impacting the Society’s commitment to research integrity and authenticity. The Society balances optimal free public access with responsible management of financial resources. We feel that our approach of using a combination of revenue streams—subscription income, membership dues, advertising revenue, commercial reprints, and limited author fees—constitutes a reliable and sustainable business approach to publishing and is preferable to a solely “author-pay” model.

The Society’s robust peer review and curation system plays a formative role connecting and fostering communities of research, scholarship, and practice. ASH publications are owned, edited, and managed by the hematology community that we support. ASH editors provide important oversight, ensuring that data are original, and conclusions are valid, all to help reproducibility to further the research. The support structure for publishing these high-quality journals requires 30+ editors, 160+ editorial board members, 3,725 reviewers, and 22 staff. This investment made by ASH allows us to develop manuscripts that improve the efficacy and accessibility of the research in support of patient care and treatment. Each submitted paper is reviewed by the Editor-in-Chief and on average, manuscripts published in the journals receive three reviewers that can lead to multiple revisions in support of accurate representation of the research.

To help accelerate public access, the journals’ content – the papers along with supplemental data – are published on state-of-the-art platforms, disseminated to the community via email alerts, social media, press releases, and pushed to various indexing services like PubMed Central, and podcasts.

2. *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?*

As noted above, the Society supports public access to important, practice-changing research discoveries that improve our nation’s health. Our business model allows for certain
circumstances that warrant open access to articles that summarize important advances that build a bridge to clinical content or in response to patient requests for breakthrough studies related to their blood disease.

The analysis and presentation of the research is not funded by the Federal government. ASH fully funds the curation process, including peer review, the investment in the editorial process including the identification of experts in the field, and the submission and distribution platforms required to disseminate the research to the community. Because of ASH’s continued investment for more than 70 years, researchers trust the Blood brand and its association with high quality, which in turn accelerates research by allowing the investigators to focus on validated results.

ASH’s robust peer review system, as well as curation, publication, distribution, and long-term stewardship of research articles requires resources at no cost to taxpayers. Peer review allows the assessment of research findings by the leading researchers in the community, which can influence important details such as drug dosage. Not being able to fund a robust peer review system could ultimately endanger public health and patient care. Further, eliminating the current 12-month embargo would force the Society to shift the cost of maintaining its peer review and publishing services to authors, researchers, and institutions that are dependent on taxpayer financing for much of their scientific work. The Society is concerned that if the current embargo is eliminated, the author then would be responsible for paying increased article processing charges, which could greatly impact the amount of federal funding used on research. A strong peer review process to ensure quality, discoverable, and reproducible research, requires significant financial resources. A shift in this ecosystem may negatively impact the ability to collaborate with international investigators who may not have access to necessary funding.

For more than ten years for Blood and since Blood Advances’ inception in 2016, supplemental data from federally funded research is already made publicly available upon the acceptance of a paper from ASH’s journals. As previously stated in ASH’s response to OSTP in its Request for Public Comment on Draft Desirable Characteristics of Repositories for Managing and Sharing Data Resulting from Federally Funded Research (FR Doc. 2020-00689), as well as in ASH’s response to the National Institutes of Health Request for Public Comments on DRAFT NIH Policy for Data Management and Sharing and Supplemental DRAFT Guidance, ASH’s journals, Blood and Blood Advances currently mandate that datasets be accessible by reviewers and editors at the time of paper submission and must be publicly available as of the date of publication. We support efforts to improve the consistency of information that Federal Agencies provide to scientists on the long-term preservation of data resulting from federally funded research, along with the effort to improve and support the discoverability, management, and sharing of data.

If access to data generated by federally funded research is done appropriately, it will enhance research transparency and accuracy, as well as foster the reproducibility and reliability of the data. More importantly, it will provide an opportunity to analyze data in new ways that might further enhance scientific discovery and promote collaborative interactions.
3. 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.

The U.S. leads the world in hematologic discovery and our journals are the record of that discovery; the intellectual property value is considerable. Undermining the distribution of copyrighted scholarly articles significantly devalues scholarly authors’ intellectual property rights in their articles. Under a full open access policy with no embargo period, research articles would be freely available as soon as they are published, and copyright protection removed. Removing copyright protection equates to giving U.S. intellectual property away. These property rights are designed to further free market transactions that contribute greatly to the U.S. economy. Allowing open access articles without the protection of copyright devalues the American science leadership enterprise and erodes our international competitive edge. Any change to the current model, as mandated by the 2013 Holdren memo, would render these critical property rights near-worthless and would essentially give away the government’s financial investment into therapies and cures for cancer and other diseases and disorders. This would be detrimental to the scientific enterprise; proposals that remove copyright protection (as for example by encouraging CC-BY) give permission for the taking of US intellectual property by any commercial entity, anywhere, for any purpose.

We are also concerned that the reliance on preprints may negatively impact scientific advancements because it does not embrace the value of peer review and allows scientists to work without protection against potentially erroneous information.

Again, ASH appreciates the opportunity to provide comments on public access to peer-reviewed scholarly publications, data and code resulting from federally funded research. Please use Suzanne Leous, ASH Chief Policy Officer, as your point of contact at sleous@hematology.org or 202-292-0258, if you require additional information from the Society on this matter.

Sincerely,

Stephanie J. Lee, MD, MPH
President