

## **FASEB Response to “Enhanced Public Access to NIH Research Information”**

The NIH draft policy, “Enhanced Public Access to NIH Research Information”, appearing in the *NIH Guide to Grants and Contracts* on September 3, 2004 ([Notice Number NOT-OD-04-064](#)) and the *Federal Register* on September 17, 2004 ([Volume 69, Number 180, page 56074](#)), has been the subject of extensive discussion in our community. All scientists share its general intent, the improved dissemination of research findings. The 65,000 researchers represented by the Federation of American Societies for Experimental Biology (FASEB) and its 22 societies want the widest possible distribution of their papers and the most efficient means to stay informed.

All FASEB societies carefully reviewed the NIH proposal on this critical issue for biomedical science. Individual FASEB societies will be affected differently by the proposed policy, and all of them will be responding from their own perspectives. No FASEB society felt that the plan represented the best approach to achieving the above goal and collectively shared an objection to the intrusion of the federal government into the publishing of scientific information.

It is the view of the Federation that the NIH proposal for enhanced public access to scientific information is unacceptable for the following reasons. We sincerely believe that the proposed changes are inferior to innovations for enhanced access and archiving that publishers currently offer. Scholarly publishers have historically volunteered the content of their journals without cost to individual readers and continue to do so; most publishers make abstracts of articles in their journals available free immediately, and many publishers make their entire journals (including full text articles) available after 12 months or sooner. FASEB is proud that its member societies are in the forefront of these activities, and believes that the NIH should work collaboratively with the publishers to encourage and promote this effort.

No budget has been presented for this proposal and we remain concerned that the costs to NIH for developing and maintaining this system will be significant. This cost, plus increased publication costs to authors, will reduce funding available for research. Changes of the magnitude being proposed should not be undertaken without thorough analyses of their potential impact and consideration of more efficient alternatives.

PubMed Central is now unable to keep up with the current volume of publications. Many FASEB societies have little confidence that PubMed Central will be able to handle a huge influx of additional manuscripts. Furthermore, by creating a secondary source of information, the proposal will lead to confusion over the official publication of record. Uncertainties regarding what will be included in the NIH archive will cause confusion for authors and potentially misinform readers.

The proposed policy is unnecessary. Hypertext links to publishers' web sites would provide better search capabilities and more comprehensive archive accessibility at significantly lower cost to the federal government. One justification for this initiative is to facilitate improved portfolio management for the NIH. Indeed, better linking of research breakthroughs to grant support would be another worthwhile objective. However, we do not understand why a separate database that resides at NIH is necessary in order to accomplish these goals.

The long-term consequences of this initiative have created an environment of confusion and concern. It is FASEB's recommendation that the proposal be withdrawn and that future NIH efforts focus on ways for society publishers to work with NIH to develop a sound, voluntary plan. FASEB is willing to discuss reasonable ideas for enhanced access and portfolio management. We share a desire to maintain the public's trust in biomedical research and look forward to working cooperatively with NIH toward these important goals.