



April 30, 2020

BY ELECTRONIC SUBMISSION

Dr. Kelvin K. Droegemeier  
Director, Office of Science and Technology Policy  
Eisenhower Executive Office Building  
1650 Pennsylvania Avenue, NW  
Washington, DC 20504

**Response to OSTP Request for Information – FR Doc. 2020-06622 – “Public Access to Peer-Reviewed Scholarly Publications, Data and Code Resulting From Federally Funded Research”**

Dear Dr. Droegemeier,

The American Association for Anatomy (AAA) is grateful for the opportunity to respond to this request for information. In particular, we write to caution OSTP against adopting a policy mandating the free distribution of peer-reviewed manuscripts earlier than one year after publication.

AAA is one of the oldest scientific membership organizations in the United States, founded in 1888. Our mission is to advance anatomical science through research, education, and professional development for those in the anatomy community who teach in medical, dental, allied health, and university environments. AAA disseminates a broad variety of scientific knowledge and research in 3 different journals we publish; *The Anatomical Record* publishes new discoveries in the morphological aspects of molecular, cellular, systems, and evolutionary biology. The journal focuses on major new findings in the anatomical consequences of gene disruption, activation, or over expression upon cell, tissue, or organ architecture and recognizes the importance of descriptive studies in contemporary research, particularly when framed in the context of experimental models or questions. *Developmental Dynamics* provides an international forum for publishing novel discoveries, using any model system, that advances our understanding of development, morphology, form and function, evolution, disease, stem cells, repair and regeneration. *Anatomical Sciences Education* provides an international forum for the exchange of ideas, opinions, innovations and research on topics related to education in the anatomical sciences of gross anatomy, embryology, histology, and neurosciences at all levels of anatomical sciences education including, undergraduate, graduate, post-graduate, allied health, medical (both allopathic and osteopathic), and dental. Each journal provides quality research to help the broader anatomy community stay abreast of developments to help better educate students as well as contribute to new discoveries for medical therapies and advances in how we understand the human form.

Ultimately, we strive to support the progress of science by producing and broadly disseminating the highest quality peer-reviewed journals possible. Publishers and societies have worked to strengthen scholarly communication and promote open science. However, it is critical that these efforts take place within a framework that respects intellectual property rights and our ability to

invest in high-quality publications, and that does not hinder researchers from communicating their discoveries.

As you are aware, federal agencies currently require that peer-reviewed manuscripts be made freely available online—within one year of publication—if they discuss research funded at least in part by a government grant.<sup>1</sup> This policy represents a significant compromise that balances our shared goals of providing broad access with the need for our organization to recoup the substantial investments we make in the peer-review, editing, publication, distribution, and long-term stewardship of these articles. This one-year compromise contrasts with the length of a full copyright term of life-of-the-author plus 70 years. Importantly, this compromise reflects Congress’ guidance (in the authorizing legislation for the current policy) that the Administration must “take into consideration the role that scientific publishers play in the peer review process in ensuring the integrity of the record of scientific research, including the investments and added value that they make.”<sup>2</sup>

Reducing or eliminating the current one-year embargo would significantly jeopardize our organization’s ability to invest in producing the high-quality peer-reviewed journals that our readers in the anatomy community rely on. In so doing, such a policy would contravene Congress’ clear guidance to take our role and investments into consideration. Furthermore, such a policy would directly result in a reduction in either the quantity or quality (or more likely, both) of peer-reviewed journal articles produced by hundreds of organizations like ours.

This would not only be harmful to the research enterprise, it would also be harmful to the scientists, medical professionals, and students who are the ultimate beneficiaries of the scholarly journals we produce.

We urge you not to disrupt our ability to support the advancement of research in anatomical sciences, and we look forward to working together to identify solutions that advance the goals of open science without undermining the communication of research findings and analyses through peer-reviewed journals.

Thank you again for the opportunity to submit these comments.

Sincerely,



D. Rick Sumner, PhD  
President, American Association for Anatomy  
Professor and Chair, Department of Cell & Molecular Medicine  
Rush University Medical Center

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<sup>1</sup>These policies were developed pursuant to OSTP’s requirement that agencies “shall use a twelve-month post-publication embargo period as a guideline for making research papers publicly available . . .” See OSTP Memorandum on “Increasing Access to the Results of Federally Funded Scientific Research” (Feb. 22, 2013).

<sup>2</sup> America COMPETES Reauthorization Act of 2010, Section 103(b)(9), *available at*: <https://www.congress.gov/111/plaws/publ358/PLAW-111publ358.pdf>.