

April 30, 2020

Dr. Lisa Nichols
Assistant Director for Academic Engagement
Office of Science and Technology Policy

Sent electronically to: publicaccess@ostp.eop.gov

RE: RFI Response: Public Access

Dear Dr. Nichols:

The comments below are provided on behalf of the American College of Medical Genetics and Genomics (ACMG) and our official scientific journal, *Genetics in Medicine (GIM)*. We appreciate the opportunity to provide feedback on approaches for ensuring broad public access to peer-reviewed scholarly publications, data, and code that result from federally funded scientific research.

ACMG is the only nationally recognized medical professional organization solely dedicated to improving health through the practice of medical genetics and genomics, and the only medical specialty society in the US that represents the full spectrum of medical genetics disciplines in a single organization. ACMG is the largest membership organization specifically for medical geneticists, providing education, resources, and a voice for more than 2,400 clinical and laboratory geneticists, genetic counselors, and other healthcare professionals, nearly 80% of whom are board certified in the medical genetics specialties. Part of ACMG's mission is to educate the medical community on the significant role that genetics and genomics plays, and will continue to play, in understanding, preventing, treating, and curing disease.

To help fulfill our mission, ACMG also maintains a scientific journal, *GIM*, which offers an unprecedented forum for the presentation of innovative, clinically relevant papers in contemporary genetic medicine. The journal provides cutting-edge advances in all realms of clinical genetics and official ACMG guidelines for practitioners and laboratory geneticists. It is intended to be an accessible and authoritative resource for the dissemination of medical genetics knowledge to all medical providers through

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appropriate reviews, discussions, commentaries, recommendations, standards, and guidelines.

Maintaining a high-quality, unbiased, peer-reviewed journal comes with many expenses, such as an appropriately staffed editorial office, software to support anonymized peer review, and professionals to manage the dissemination of published research through social media channels, podcasts, and news articles. If all content is made immediately freely available upon publication, and the authors aren't charged, there would be no mechanism to cover peer-review or publishing costs. Hybrid journals allow authors to choose to publish their article free of charge but place their article behind a paywall, or pay a fee to publish through open access which licenses the work to be freely accessible at the time of publication as well as allowing reuse of the work itself. *GIM* is a hybrid journal and relies heavily on subscriptions and site licenses to support the editorial office, but those revenue sources are inadequate to offset the costs for publishing articles that are made immediately accessible. Currently, additional fees (\$3500/article) are collected to support publishing open access articles. To maintain a high-quality, peer-reviewed journal in which all or most of the content is immediate open access without collection of publication fees from authors for every article, innovative funding models would be needed.

Certain models, such as the recently proposed zero embargo approach for all federally funded research, would result in vital journals like *GIM* being unable to continue publishing due to inadequate revenue sources. For ACMG, this would mean loss of our journal. Having a robust and sustainable business model for publishing *GIM* is of the upmost importance to ACMG, its members, *GIM* authors, and all of the scientists and healthcare professionals that rely on its high-quality articles.

We appreciate the Office of Science and Technology Policy's (OSTP) interest in making information and data generated by federally funded research more readily accessible to students, clinicians, businesses, entrepreneurs, researchers, technologists, and the general public who support these investments as a means to accelerate knowledge and innovation. However, exploration of new models must include careful consideration of unintended consequences that may result in blurring of low- and high-quality data or weakening of the peer-review system. Additionally, innovative funding mechanisms must be part of the consideration in order to ensure that journals are able to maintain high quality standards and continue their broader support of science and medicine.

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ACMG and *GIM* are supportive of open data sharing and allowing federally funded work to get into the public's hands as soon as possible. However, such approaches must be structured in a sustainable manner. Requiring journals to make all articles free to read without charging a fee is not economically sustainable. The current OSTP-mandated model that has demonstrated success for journals relies on a 12-month embargo for all peer-reviewed articles after which articles are freely available¹. However, authors have the options to pay an additional fee to make their article immediately available for open access. One potential solution would be to pair federal research funding with a requirement for grant recipients to include in their budget the fees associated with open access publication of their research findings. For example, the Patient-Centered Outcomes Research Institute (PCORI), a congressionally mandated nongovernmental organization that funds public health research, requires that all findings resulting from PCORI-funded research be publicly accessible. To facilitate this, their awardees can request additional funds from PCORI to cover the cost of open access publishing if needed. This model ensures that peer-reviewed data is being made available to the public as soon as possible but also funds the journal processes that are vital to for editorially independent peer review.

An alternative option would be to require recipients of federal funding to post their articles on a preprint server at the time of submission to the journal. While such data has not gone through the peer review process and could include significant flaws, it gets the information out to the public immediately while going through the journal peer review process. Further, the National Institutes of Health (NIH) could establish and maintain its own preprint service for articles that include data supported by federal funding, or at least for those that received funding directly from the NIH. A similar process has already been implemented by the Wellcome Trust as not all types of articles are accepted by other preprint servers.

In the scenarios described above, the integrity of a high-quality, editorially independent, peer review is maintained. These models also enable a process for trackable corrections, updates, and commentaries to published data. Further, they support sustainability of journals like *GIM* which is critical for advancing medicine and research, including the field of medical genetics. As OSTP considers options to increase public access to federally funded data and publications, it is imperative that journal sustainability be considered.

¹ Memorandum for the Heads of Executive Departments and Agencies: Increasing Access to the Results of Federally Funded Scientific Research. Executive Office of the President, Office of Science and Technology Policy. February 22, 2013.

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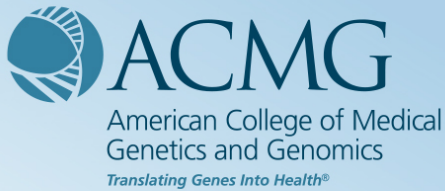
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ACMG and *GIM* appreciate the opportunity to provide information on this important topic. For additional questions, please contact Michelle McClure, PhD (ACMG Public Policy Director) or Jan Higgins, PhD (*GIM* Managing Editor).

Sincerely,

Anthony R. Gregg, MD, MBA, FACOG, FACMG
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