



November 10, 2023

Paul Wester

Director, US Department of Agriculture National Agricultural Library
10301 Baltimore Avenue
Beltsville, MD 20705

Re: Docket No. NAL-2023-0001 Notice of Stakeholder Listening Sessions Regarding Increasing Public Access to the Results of USDA-Funded Research

Comments transmitted electronically via Regulations.gov on November 10, 2023

The Federation of American Societies for Experimental Biology (FASEB) appreciates the opportunity to participate in stakeholder listening sessions regarding increasing public access to results of USDA-funded research, and to provide feedback on the proposed implementation plan. FASEB is comprised of twenty-six scientific societies representing over 110,000 biological and biomedical researchers. As nonprofit scholarly scientific societies, we advance scientific enterprise and reinvest our income in the research community. Please find our responses to USDA's questions below.

How can USDA best implement its plans to improve public access to USDA-funded research results?

To implement USDA's public access policy, FASEB recommends three overarching approaches:

- 1) Developing flexible, clear frameworks in close coordination with other agencies to reduce confusion;
- 2) Providing incentives and developing training resources particularly on data management and sharing;
- and 3) Leveraging existing infrastructures to avoid diverting resources from critical research activities.

Continual engagement with the research community is central to the success of these three approaches. We encourage partnering with scientific societies like FASEB to maximize their networking capabilities and ensure future guidance and resources address stakeholder concerns. These partnerships would favorably complement USDA's customer-centered approach outlined in the draft plan.

How can USDA update or refine its policies to improve public access to USDA-funded research results?

FASEB applauds the USDA for confirming that both publications and data costs (including data publication, submission, curation, and management) may be charged as allowable expenses in research budgets. To improve researcher understanding, we recommend describing the variety of ways publication and data costs may be charged to research budgets, including direct and institutional support options. Creating a "Publication Costs" table outlining different approaches may be a useful tactic.

Secondly, FASEB appreciates USDA allowing researchers to submit final Versions of Record if rights allow. Recognizing the burden for researchers who co-author publications that are funded by varying agencies, we encourage USDA to collaborate with scholarly societies, publishers, and infrastructure

services to reduce duplicate efforts. Leveraging existing infrastructures and publisher service options could be a cost-effective manner that ensures researchers can comply with the plan, particularly given the requirement for accepted manuscript availability on the first day of publication.

FASEB applauds the USDA plan outlining broad adoption of digital persistent identifiers (DPIs or PIDs) including DOIs and ORCIDs for funding sources, data descriptions, authors, data, and associated research products. We appreciate USDA plans to utilize Figshare as part of the infrastructure.

Finally, FASEB encourages USDA to collaborate with the community when considering these issues:

- Caution on extending manuscript types, noting many manuscript types do not come from federal funding and are created outside the terms of a grant (e.g., reviews, perspectives, editorials).
- Additional clarification on machine-readable deliverables, including PDF format, would be valuable.
- Data Management Plan development and implementation, noting FASEB's [recommendations](#) for requirements and compliance reporting.
- Careful consideration of Intellectual Property rights, recognizing that researchers in the U.S. have long enjoyed full freedom of choice in publication of their research findings.

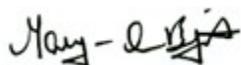
How can USDA ensure equity in publication opportunities?

The USDA's commitment to equitable publication opportunities is laudable and consistent with FASEB's belief that diversity, equity, and inclusion are integral to maximizing the full potential of public access. Under the prevailing business model, researchers at large R1's are likely to have costs covered under existing transformative agreements paid through indirect funds and other sources, while small universities require flexibility to include costs in direct funds. To bridge this disparity and ensure researchers are not penalized for additional direct funding requests, we recommend educating agency program officers on this issue. USDA could also dedicate financial resources to support researchers facing barriers in complying with public access goals and partner with scholarly societies to address distribution of these resources.

How can USDA monitor impacts on communities impacted by its public access policies?

FASEB appreciates the USDA's consideration of how its public access plan will impact the research ecosystem. One way to achieve this could be tracking the total, median, and mean number of publication and data fees over time, along with relevant demographic data. This approach prioritizes quality over quantity, thereby preserving scientific and research integrity.

Sincerely,



Mary-Ann Bjornsti, PhD
FASEB President