



Society for Research in Child Development

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May 6, 2020

VIA 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 Society for Research in Child Development (SRCD) is grateful for the opportunity to respond to this request for information. We are pleased to be able to share with you both our commitment to public access and openness and our concerns with a proposed federal mandate to abruptly shift policies and standards for federally funded research in ways that may have unanticipated detrimental consequences for the scientific enterprise as well as public impact.

The Society for Research in Child Development (SRCD) was founded by the National Academies of Science in 1933 to stimulate and support research on child development and encourage application of research findings. SRCD is an international, interdisciplinary community of over 5,500 members dedicated to its core mission of advancing the developmental sciences and promoting the use of developmental research to improve the human lives. Our members are scholars, students, and evidence-based policymakers who are dedicated to using scientific approaches to study children and families, and to utilizing scientific evidence to optimize child well-being. SRCD publishes four journals including the premier journal in the field, *Child Development*, as well as *Child Development Perspectives*, *Monographs of the Society for Research in Child Development*, and *Social Policy Reports*.

SRCD is dedicated to optimizing scientific innovation through publication and dissemination via the highest quality peer-reviewed journal publication process, and is committed to the open exchange of information as a key ingredient to advancing scholarly innovation and evidence-based practice and policy. However, it is critical that these goals are supported in ways that 1) are maximally inclusive, 2) recognize and respect the complexity of the publication enterprise ecosystem, 3) protect opportunities for those not directly supported by U.S. federal funding to

contribute to scholarly innovation, and 4) increase accessibility to the public by translating and disseminating the outcomes of research in meaningful and useful ways.

SRCD fully embraces a commitment to openness and strongly suggests that solutions be re-focused to more optimally achieve the goals outlined in the proposed executive order, and avoid unintended negative consequences for the scientific enterprise and ultimately, for the downstream consumers of the science –citizens of the U.S. and the global community. We are specifically concerned with the proposed zero-day embargo policy for federally funded research as a remedy to the need for increased public access. We suggest that A) this embargo will introduce significant barriers to publication and dissemination of research and at the same time, B) this approach fails to meet the intended goal of offering enhanced public access to interpretable and usable information about the science that is being supported by federal funding.

We have outlined the basis for our concerns in greater detail below but would also like to note that our organization is currently deeply engaged in efforts to respond to the COVID-19 pandemic, and we are concerned that adapting to a significant new regulatory act will distract from and undercut our capacity to respond to the current crisis. Our efforts have focused on the catastrophic consequences of the current pandemic on our community's (and indeed all behavioral science researchers') capacity to collect data from human participants. Especially for research on children and families, the lack of direct access to individual research participants has ground to a halt many of our members' research programs. Much of the study of children does not readily lend itself to more remote solutions. Our response to COVID-19 has also focused on translating child development research to the external community including parents, policymakers, and practitioners who have been adversely affected by the pandemic.

As you know, the scholarly publication enterprise is a complex system involving authors, institutions, reviewers, editors, funders, scientific societies, and publishers. The global scientific enterprise involves researchers operating within diverse contexts and regulatory environments and represents researchers supported by diverse funding sources both federal and private. In many cases, for researchers within the social and behavioral sciences, original research can be conducted with little to no external funding based on volunteer participants and research assistants, which significantly reduces barriers to publication for those in our field who are early career scholars, those from underrepresented groups, those from under-resourced institutions, and those from non-research-intensive institutions. Our science is healthier, more innovative, and more generalizable when all sectors of the scientific community have shared access to scholarly publication platforms.

Unintended Consequences of a Zero-Day Embargo Policy

There is a strong interest in science in general, and a growing commitment in the social and behavioral sciences in particular, to increase access both within and outside of the scholarly community to research. This commitment to openness is resulting in deliberate and innovative change and evolution of the scientific publication enterprise –in other words, market pressures

by scientists and institutions are driving commercial publishers and scholarly societies to explore new models and alternative approaches that sustain the fundamental curation and dissemination functions of scientific publishing. However, approaches that are straightforward and easily accommodate zero-day embargoes for some sciences would introduce significant barriers to open dissemination of science for others. Specifically, the prevailing model for Open Access (OA) is one that shifts financing of the curation (including peer-review and editing), production, and dissemination costs for a scientific journal from subscription revenue to Article Processing Charges (APCs). For fields such as Chemistry and Biology where research cannot be conducted without significant external funding, APCs can be folded into grant budgets, so an APC-based model can be easily accommodated. For other fields including the Social and Behavioral Sciences, Mathematics, and Theoretical Physics, this solution does not scale. This is true for a significant majority of Child Development research.

Federal funding allocations to developmental scientists (and the social and behavioral sciences in general) are much smaller than for the physical and natural sciences, limiting available resources to pay APCs. Further, less than half of the research published in SRCD journals is funded by federal sources, and less than 15% is currently being published OA through payment of APCs. Put simply, our scholarly community is not poised to shift to a Gold Open Access (OA) model. Nonetheless, publishers anticipate implementation of a zero-day embargo to require an abrupt shift from a mix of subscription and APC revenues to predominantly APC-based models. This would have catastrophic implications for research communities like ours, preventing the majority of our scholars from being able to afford to publish their research. Thus, we are concerned that the proposed policy would **disproportionately burden scholars from the social-behavioral sciences**, would **privilege access to publication for a narrow subset of our community** who have sufficient federal funding to subsidize publication of their work, would **seriously compromise the robustness of our sciences**, and would **compromise the research careers** of many of our members. The proposed Executive Order does not allow time and opportunity for research-industry partnership to continue to evolve new models that accommodate and address these concerns based on market concerns and pressures, upending the existing publishing models without provision of infrastructure or support for an appropriate and constructive alternative approach.

Alternative (nearly cost-free) models of OA are ones that eliminate the careful controls that protect the integrity of our sciences such as a systematic peer-review and curation process. Driving the market in this direction would have economic implications for publishers and scientific societies but, more importantly, would compromise curation and quality-control measures and reduce the public's capacity to identify and utilize the most robust and reliable science.

Public Access Requires Translation

Separate from our concerns about the compromising effect of a zero-day embargo on the conduct and scholarly dissemination of science, we are concerned that increasing direct access to research products and data is not actually an effective solution to the problem of enhancing public access. Scientific data and scholarly publications are specialized for sharing among

scientists. The science communication enterprise is dedicated to the goal of translating science for public consumption and requires a very different specialized skill set to ensure that data, theory, and implications are framed in ways that the public can understand. Current publications models are not well-suited for public consumption, nor are scientists consistently well-trained at providing effective translation via abstracts, public summaries, etc.

Not only does effective public access require translation, it requires *targeted* translation for specific consumer audiences. For example, research translation priorities and framing of child development research must differ in significant ways for parents and caregivers versus practitioners (such as teachers, nurses, and social workers) versus policymakers. For none of these audiences will increasing direct access to the original data files or scholarly publications accomplish the desired goal. We encourage the OSTP to establish guidelines, processes, and mechanisms for supporting funding agencies' capacity to build out and grow communication avenues and platforms that provide direct and targeted translation. We urge OSTP to be guided by available data regarding the impact of PubMed access on the public to substantiate the argument that increasing direct access does not increase public consumption –low uptake and application by the public of available (12-month embargoed) evidence speaks to our concern that increasing direct access is a suboptimal solution to the important issue of increased accessibility.

Conclusions

We applaud and support OSTP's commitment to the goal of increased public access but urge that solutions be generated that do not disrupt or impede the scientific community's capacity to publish cutting-edge work, and that enhance the public's capacity to make good use of the research that taxpayers are subsidizing. We are eager to work together to support the advancement of research in child development and effective translation of its implications to the public. We look forward to working in partnership with OSTP and our sister scientific societies 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,

A handwritten signature in black ink, appearing to read 'Laura Namy', with a stylized flourish at the end.

Laura L. Namy, Ph.D.
Executive Director