
April 24, 2023

Office of the Director
National Institutes of Health
U.S. Department of Health and Human Services
9000 Rockville Pike
Bethesda, Maryland 20892

Re: Request for Information on the NIH Plan to Enhance Public Access to the Results of NIH-Supported Research (NOT-OD-23-091)

As editors of the peer-reviewed journal *Women's Health Issues*, we appreciate the opportunity to comment in response to "Request for Information on the NIH Plan to Enhance Public Access to the Results of NIH-Supported Research" (NOT-OD-23-091). We applaud NIH for taking steps to make agency-funded research findings immediately available to the public and recommend that NIH revise its draft policy in recognition of 1) the value that journals provide and the financial support they need to do so and 2) the common practice of generating numerous publications from a single dataset.

Women's Health Issues (WHI) is the peer-reviewed journal of the Jacobs Institute of Women's Health, which is based at the Milken Institute School of Public Health at the George Washington University. WHI is dedicated to improving the health and health care of all women throughout the lifespan and in diverse communities. The journal seeks to inform health services researchers, health care and public health professionals, social scientists, policymakers, and others concerned with women's health. WHI is published by Elsevier and has an impact factor of 3.053 and CiteScore of 4.2.

Our Journal's Operations

We consider our journal's mission to include supporting the development of early-career and emerging researchers. Such researchers often conduct secondary analyses of datasets their mentors have collected, and their manuscripts often require substantial revision before they are ready to publish. While our volunteer peer reviewers provide extensive constructive comments on the substance of manuscripts, our editorial team members also devote considerable effort to helping authors edit their work for clarity, precision, and readability. It is not unusual for us to spend three to four hours writing up recommendations on a single manuscript (after it has already undergone a round of revisions in

response to peer-review comments), and we do so in a manner intended to help the authors learn from the experience and improve their future writing. Of course, it is not the case that all manuscripts from early-career researchers require such intensive editing, and some manuscripts from established researchers also require extensive revision; regardless of the author's stature, we aim to help them publish polished work. Our team also proofreads typeset articles prior to final publication to catch the inevitable typographical errors that could mar the quality of published work.

Elsevier's copyeditors and typesetters also contribute to the quality of published manuscripts. In particular, they identify discrepancies between in-text citations and reference lists and thereby help authors reference others' work appropriately. By handling numerous logistical elements, from the manuscript submission system to the online posting of articles, Elsevier leaves our editorial team free to focus on working with authors to solicit, receive expert feedback on, revise, and publish high-quality research.

Financial Realities

Like many smaller journals, we operate with a small editorial staff (one part-time editor-in-chief, one part-time managing editor, and one part-time editorial assistant) and often struggle to afford our personnel costs. We are dependent on annual editorial stipend and royalty payments from Elsevier, which are calculated based on subscriptions, article downloads, and sale of Open Access licenses (for which Elsevier currently charges \$3,360 per article). At the moment, our journal does not charge publication fees, and this allows us to accept submissions from authors who do not have grant funding for the work they publish with us; we receive many submissions from doctoral students and postdocs publishing their dissertation research, and from junior faculty members seeking new grant funding.

If institutions drop Elsevier journal subscriptions because much of the material they seek to access is available for free in public repositories, our revenue from Elsevier is likely to decline and we will find it difficult, if not impossible, to continue publishing manuscripts that require substantial editorial involvement prior to publication. If many journals make this kind of calculation, early-career researchers and others who have not had the benefit of past writing instruction will likely find it harder to publish and advance their careers.

A possible response to the new policy, and one our journal will have to consider if NIH adopts the draft policy without modification, is to begin charging all authors to publish in *WHI*. Such a move would prevent us from providing equitable publication opportunities to those without grant funding, but it might become necessary for our financial survival. We anticipate that many other journals would make similar calculations, which would lead to a sharp reduction in publishing opportunities for researchers

who lack grant funding — a group disproportionately composed of early-career authors and those from marginalized racial and ethnic groups.¹

Recommendations

Our reading of section III.A.3 of NIH's draft policy suggests that all NIH-funded authors will have to deposit their accepted manuscripts in PubMed Central (PMC) and that PMC will make them available as soon as they are published. To ensure journals' ability to survive while still welcoming submissions from early-career researchers, we recommend that NIH add to III.A.3 another avenue for policy compliance besides depositing the manuscript with PMC: publication under an Open Access license. Sales of optional Open Access licenses could replace revenue lost as institutions drop subscriptions and allow journals to continue accepting submissions regardless of authors' ability to pay publication fees.

The draft policy's statement that NIH will continue to allow reasonable publication costs for all NIH-supported or authored scholarly publications is welcome, but it is not clear that it would allow for the use of NIH grant funds to purchase optional Open Access licenses from journals such as ours that do not charge publication fees as a standard practice. This merits clarification. As noted above, we would like for NIH-funded authors to be able to publish with *WHI* and use their grant funds to purchase optional Open Access licenses as an alternative to having their work made available at PMC upon publication.

In addition, we ask that NIH recognize the number and timing of publications that use NIH data and consider additional or enhanced mechanisms to allow those who conduct later secondary analyses to use grant funds to purchase Open Access licenses. NIH-supported investigators often use grant funding to support the publications answering the grant's primary research questions, but their grants can end or be exhausted before doctoral students and other junior colleagues publish secondary findings from the same dataset. We recommend both that 1) NIH encourage investigators to include the purchase of numerous Open Access licenses in their budgets without reducing funding in other areas to allow for it and 2) NIH establish a mechanism by which authors can request such funding from NIH after a grant has ended.

Journals and their publishers perform important services to help authors publish high-quality work that advances knowledge in their topic areas. We agree that the public should have immediate access to government-funded research, but we fear that implementation of NIH's draft policy will lead to a sharp reduction in funding for the services journals provide. *Women's Health Issues* would like to continue welcoming publications from early-career and unfunded authors, but we will be unable to continue our

¹ Taffe MA & Gilpin NW. (2021). Racial inequity in grant funding from the US National Institutes of Health. *eLife*, doi: 10.7554/eLife.65697.

current practices if our funding drops. A revised policy incorporating the above recommendations would better balance the public's right to access with journals' need for financial sustainability and the goal of ensuring equitable publication opportunities for a diverse group of researchers.

Thank you for this opportunity to comment in response to the RFI. If you have any questions, please contact WHI managing editor Liz Borkowski at 202-994-0034 or borkowsk@gwu.edu.

Sincerely,

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