



May 4, 2020

Dr. Lisa Nichols  
Assistant Director for Academic Engagement  
Office of Science and Technology Policy  
Submitted via email: [OpenScience@ostp.eop.gov](mailto:OpenScience@ostp.eop.gov)

**RE: Document ID [OSTP-2020-03189](#) Request for Public Comment on Public Access to Peer-Reviewed Scholarly Publications, Data and Code Resulting From Federally Funded Research**

Dear Dr. Nichols:

We write on behalf of the University of California (UC) San Diego to respond to the Request for Public Comment on Draft Desirable Characteristics of Repositories for Managing and Sharing Data Resulting From Federally Funded Research issued on January 17, 2020.

UC San Diego is one of ten campuses in the UC system. With over \$1.3 Billion annually in funded research expenditures, UC San Diego is a major recipient of federal funding. Through our research and academic programs UC San Diego's economic impact to the San Diego community is estimated at over \$16.5 Billion and 100,000 jobs.

UC San Diego strongly values open science and open access to scholarship and is supportive of the efforts of the Office of Science and Technology Policy (OSTP) to advance work in these areas. In 2013 UC Faculty adopted an [Open Access Policy](#) and in 2018 the Academic Council endorsed the [Declaration of Rights and Principles to Transform Scholarly Communication](#). Faculty lead and direct the system's open access initiatives in partnership with the libraries, and are critical to UC's pursuit of open access transformation.

As part of this support UC San Diego faculty endorsed the signature of the OA 2020 Letter of Interest to foster "the transformation of today's scholarly journals from the current subscription (paywall) system to new open access publishing models that enable unrestricted use and re-use of scholarly outputs and assure transparency and sustainability of publishing costs (OA 2020)."

**Zero-embargo policies will accelerate the transformation to open access**

UC San Diego supports a zero-embargo policy for author accepted manuscripts and affirm that such a policy represents a measured step forward, in alignment with UC's mission to serve society and provide long-term benefits through the transmission of research and knowledge.

Science is improved through peer review and the curation of publications, data and code. High quality review and sustainable scholarship requires sustained partnerships with the societies and organizations that ensure the generation, review, publication, discoverability and preservation of high-quality science. As such, UC San Diego affirms the role of scholarly societies in scholarship and believes that active partnerships with societies during this period of transition will help scholars lead the transformation to open access. A zero-embargo policy will motivate this transition to sustainable and open scholarly publishing models.

**The sharing of published scholarship and the connected data and code is critical to support open science**

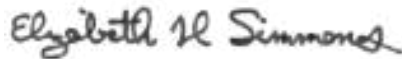
Open science is only enabled when researchers can have access to and understand the work underlying published results. By publishing the data and code used in the generation of scholarly publications researchers help advance science and increase the impact of publicly funded research. The availability of data and code is only meaningful if they are managed in such a way that enables discovery, analysis and re-use. As such UC San Diego endorses the OSTP's work to standardize characteristics for data sharing 85 FR 3085 and believes that a similar standardization process is important to foster the sharing and re-use of software code.

**Human subjects privacy is paramount in the sharing of data and code**

The effort to make science more accessible and repeatable through open access, open data and open code should not be confused with a continuing commitment to the privacy and protection of human research subjects. Recognizing that in our data-intensive environments even de-identified data cannot always protect subjects, we recommend that OSTP develop guidelines that will help federal funders and awardees design and implement practices that support open scholarship in context of the need for the privacy and protection of human subjects.

Thank you for the opportunity to comment on this topic. We look forward to OSTP's continued work in this area and will readily engage the process and policies and guidelines are developed.

Sincerely,



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