April 10, 2020

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

FROM: Marta Margeta, MD, PhD, Chair, and Keith Mostov, MD PhD, Vice Chair, UCSF Committee on Library and Scholarly Communication

CC: Todd Giedt, Executive Director, UCSF Academic Senate


Dear Dr. Nichols:

We write on behalf of the University of California, San Francisco (UCSF)’s Committee on Library and Scholarly Communication with regard to the Request for Information (RFI): Public Access to Peer-Reviewed Scholarly Publications, Data and Code Resulting From Federally Funded Research, issued on February 19, 2020.

UCSF has long been a leader in supporting open access. In May 2012, the UCSF Academic Senate unanimously adopted a faculty open access policy, becoming the largest scientific institution in the nation and among the first public universities to do so. With UCSF leadership, the systemwide Academic Council adopted the 2013 Academic Senate Open Access Policy that endorsed the Declaration of Rights and Principles to Transform Scholarly Communication. UCSF and UC faculty remain deeply engaged in directing systemwide open access initiatives in partnership with the UC Libraries.

UCSF’s Committee on Library and Scholarly Communication strongly supports the provision of “broad public access to the peer-reviewed scholarly publications, data, and code that result from federally funded scientific research” through a zero-embargo policy for the author’s accepted manuscripts. Such a policy would represent a significant step toward eliminating the barriers created by the paywall of subscription journals, allowing for the free flow of scholarly information, the vast majority of which is supported through public and philanthropic funding. Immediate online access to the research funded and published with federal support is fundamental to fulfilling the full potential of public investment in science. As critical leaders in open access transformation, UCSF faculty affirm the benefits to society that will result from this policy, supporting the UCSF mission of advancing health worldwide.

Transformation of the scholarly ecosystem will undoubtedly bring disruption to scholarly societies, many of which depend on subscription revenue to support their activities. In collaboration with the UCSF Library, UCSF faculty are committed to supporting societies in making a successful transition to open access. The adoption of a zero-embargo policy will push societies and their publishers to develop open and sustainable scholarly publishing models.
Sincerely,

Marta Margeta, MD, PhD, Chair
Keith Mostov, MD, PhD, Vice Chair

Committee on Library & Scholarly Communication, 2019-2020

Annette Carley, RN, DNP, NP, School of Nursing
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