

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](mailto: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

RE: Docket ID [OSTP-2020-0004](#) Request for Information: Public Access to Peer-Reviewed  
Scholarly Publications, Data and Code Resulting From Federally Funded Research (RFI  
Response: Public Access)

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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

Charles Hart, PhD, School of Pharmacy

Arthur Hill, MD, School of Medicine

Cristin Kearns, DDS, MBA, School of Dentistry

Bridget O'Brien, PhD, School of Medicine

Bryan Marsh, Graduate Student in Developmental and Stem Cell Biology

Min-Lin Fang, MLIS, Ex Officio, Representative of the Librarians Association of the University of California

Christopher Shaffer, MLIS, Ex Officio, University Librarian