From:	Howard Ratner <hratner@chorusaccess.org>
Sent:	Friday, August 21, 2015 10:18 AM
To:	public-access
Cc:	Sharpless, Katherine E.
Subject:	National Institute of Standards and Technology Plan for Providing Public Access to the Results of Federally Funded Research
Attachments:	CHORUS NIST RFI 081715.pdf; ATT00001.txt

Dear Katherine,

I am submitting the attached letter on behalf of CHORUS (Clearinghouse for the Open Research of the United States). We appreciate this opportunity to respond to the Request for Comments on the NIST Public Access Plan.

Like NIST, CHORUS is committed to delivering a public-access solution that avoids duplication of effort, minimizes administrative costs, and maximizes compliance. We look forward to continuing our collaboration with NIST in a pilot project to achieve these important objectives.

Thank you for your consideration.

All the best.

-- Howard

August 21, 2015

Katherine Sharpless
National Institute of Standards and Technology (NIST)
100 Bureau Drive Stop 4701
Gaithersburg, MD 20899-4701

RE: National Institute of Standards and Technology Plan for Providing Public Access to the Results of Federally Funded Research

CHORUS (Clearinghouse for the Open Research of the United States), a US 501(c)(3) non-profit organization, appreciates this opportunity to respond to the Request for Comments on the NIST Public Access Plan.

By leveraging existing infrastructure, tools, and services that support access, sharing, discoverability, reporting, and preservation, CHORUS helps research funders effectively and sustainably facilitate public access. CHORUS members and signatories collectively produce the vast majority of published peer-reviewed journal articles. We currently track an estimated 9,000 journals that our members collectively publish and monitor over 135,000 articles reporting on funded research for public access and long-term availability, more than 30,000 of which are already freely accessible to the public. CHORUS reports this data via 24 agency dashboards, which also provide access to each article we monitor. CHORUS has made excellent progress working with funding agencies to support their approach to providing public access. The US Department of Energy and Smithsonian Institution have signed participation agreements with CHORUS, and the NSF, NASA, NOAA have all directly mentioned CHORUS in their plans. We are in active negotiations with and, in some cases, are pursuing pilot projects with eight other U.S. federal agencies.

Like NIST, CHORUS is committed to delivering a public-access solution that avoids duplication of effort, minimizes administrative costs, and maximizes compliance. We look forward to continuing our collaboration with NIST in a pilot project to achieve these important objectives.

What are the biggest challenges to implementing a public access policy, and how can these challenges be addressed?

As NIST develops and implements its public-access policy, it will be critical to ensure that its policy achieves the goal of expanding public access without imposing undue administrative burden and costs on taxpayers and researchers. We applaud NIST's recognition of this challenge and ongoing commitment to engage in "full and open consultation and cooperation with stakeholders," "create flexible approaches" to accommodate the range of research and diversity of stakeholders, "plan for change," and adopt "evolvable solutions" that respond to new needs and digital technologies, and develop processes for the "continual update and evaluation" of policies to ensure effectiveness and relevance while also weighing the "costs and administrative burden." The CHORUS-NIST collaboration is guided by these principles and represents a unique and important opportunity to leverage innovative technologies to better serve the public need. We greatly appreciate the openness of NIST leadership to partnering for the public benefit.

NIST has also indicated that it will require its funded investigators submit an electronic version of final peer-reviewed journal manuscripts to PubMed Central (PMC) upon acceptance for publication. We are hopeful that NIST can help to actively support robust public-private partnership and to engender a more open collaboration around public access policy and policy implementation than is currently the case between PMC and the publishing community. One way would be to work with NIH to embrace open international standards – particularly DOIs, CrossRef's FundRef, ORCID, and COUNTER usage statistics – to improve interoperability between its PMC infrastructure and other platforms on which versions of the same articles appear. In our unique role as a non-profit organization set up to provide agencies and publishers with a sustainable solution to delivering public access to published articles reporting on federally funded research, CHORUS is well-placed to help facilitate and support this richer engagement among NIST, NIH, and the full range of other stakeholders, including libraries, universities, scholarly societies, and research organizations.

What are the best practices (from academia, industry, and other stakeholder communities) in managing public access of data? How can NIST improve its plan to provide greater public access to NIST data?

CHORUS supports NIST's efforts to encourage researchers to make their research data freely available, with easily discoverable reuse restrictions. CHORUS engages with stakeholders to develop tools and services to support researchers with data management, and to help funding bodies with compliance tracking. We would welcome the opportunity to collaborate with NIST and other stakeholders – national and international, and across all disciplines and sectors – to leverage existing systems, experience, and expertise, in order to ensure minimal duplication of effort and maximum efficiency.

In particular, the need to develop – and continue to develop – data standards is critical. We strongly encourage NIST to actively partner with the organizations already overseeing the development and management of these standards and to recommend and deploy existing tools such as DOIs, FundRef, and ORCID to grant recipients for their data management. CHORUS would be very interested in working with the NIST, publishers, data-archive managers, and other stakeholders on developing a data-validation system, as well as mechanisms to connect articles and related datasets, for example, via developing publishers' systems to enable authors to submit their data to an appropriate archive and simultaneously link this to an article. I work with the CrossRef–DataCite Pilot, SHARE, and the RDA-WDS Publishing Data Services Working Group, and CHORUS is in discussions with the RMap Project, Dataverse, Figshare, and Dryad.

Sincerely,

Howard Ratner
Executive Director, CHORUS / CHOR, Inc.
h.ratner@chorusaccess.org
917-251-9235