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RE: Request for Information: Public Access to Peer-Reviewed Scholarly Publications, Data and Code Resulting From Federally Funded Research

The American Society of Civil Engineers (ASCE) is pleased to have this opportunity to comment on the Office of Science and Technology Policy's (OSTP) request for information on public access to peer-reviewed scholarly publications. ASCE endorses the principle of providing public access and enhancing dissemination of federally funded research in ways that advance public health and safety and strengthen the global quality of life. ASCE would like to commend the Administration for seeking further input from the community before acting. We are concerned that proposed changes to the current rules that allow scientific societies to meet the needs of researchers and U.S. taxpayers, while funding programs to support the scientific enterprise to keep America a global leader in research and innovation could be in jeopardy.

It is ASCE's objective to advance the science and profession of engineering to enhance the welfare of humanity. As such, among its many endeavors, ASCE is the world's largest publisher of civil engineering information—producing more than 70,000 pages of technical content each year. The ASCE Publications Division produces 34 professional journals, conference proceedings, standards, manuals of practice, technical reports, and monographs under the ASCE Press imprint. Its many other resources for practicing civil engineers include the 280,000-entry Civil Engineering Database, and the ASCE Library (ascelibrary.org), providing online access to over a million pages of journal articles and proceedings.

ASCE firmly believes that it is essential to preserve the scholarly value of the peer-reviewed version of record, which is fixed at its time of presentation without any possibility of historical rewriting - that the original work cannot be altered by the author or anyone else. ASCE further believes that learned societies, acting in accordance with their educational mission, should be able to recover their costs of investing in managing the peer review process, editing, publishing, disseminating, and maintaining an ever-growing archive in perpetuity.

Like other engineering and scientific societies, ASCE fulfills its role in the advancement of engineering by determining through the peer-review process what is worthy of publication. The "value-added" by peer review is to ensure published work is of top quality. This process allows the results to be used more effectively by scientists, decision makers, students, and other concerned constituents.

ASCE supports OSTP's mission to accelerate the dissemination of research results that are federally funded. A survey of resource needs of Civil and Environmental Engineers, conducted by ITHAK S+R and funded by ASCE, found that researchers continue to struggle with data sharing (<https://sr.ithaka.org/publications/supporting-the-changing-research-practices-of-civil-and-environmental-engineering-scholars/>). In order to encourage better data sharing among civil engineers, ASCE journals now require a data, code, and model availability statement for all papers published. Further, two journals have introduced Data Papers and another journal is moving toward encouraging replication studies.

As the GOA report emphasized, data sharing is not standard across US Federal Agencies (<https://www.gao.gov/assets/710/702847.pdf>). ASCE supports working with those researchers and agencies to develop standards for data, code, and model sharing and supports properly citing and recording the use of data. ASCE believes that FAIR Data Principles should be taught, encouraged, and applied to all research conducted.

To date, civil engineers have been reluctant to adopt open access publishing, particularly under APC models. Researchers in this discipline have also not adopted preprint practices. Again from the ITHAKA study, researchers reported their concerns for releasing technical information that has not been peer reviewed. They are also slow to cite new information, with the average peak citation being at 4.8 years, significantly longer than many other disciplines. Concerns for protecting public health and safety remains critical.

ASCE requests that the Administration study the disciplinary differences and encourage the engagement of societies, publishers, researchers, and agencies to develop specific roadmaps to meet the goals of OSTP while respecting the culture and practices of each discipline. To that end, we stand ready to work with all interested parties in a forward looking and constructive manner.

In conclusion, ASCE supports an approach that balances the goals of public access with the real-world value and costs of scholarly publishing. The goal should be to encourage the free flow of information while maintaining the "value-added" of peer review to ensure published work is of top quality. The current process allows the results to be used more effectively by scientists, decision makers, students, and other concerned constituents. Changes to the current system may have far-reaching implications to the quality and validity of scholarly publishing. That said, ASCE sees improvements to accessing data, code, and models and would welcome being a collaborator on reaching those goals.

If you have any questions, or if ASCE can be of further assistance, please do not hesitate to contact Martin Hight, ASCE's Senior Manager of Government Relations at mhight@asce.org or 202-789-7843.