



February 26, 2024

VIA: Regulations.gov: NAL-2024-0001-0001

Cynthia Parr
National Agricultural Library
10301 Baltimore Ave #115,
Beltsville, MD 20705

Re: Response to the *Implementation Plan to Increase Public Access to USDA-Funded Research Results*

Dear Dr. Parr,

The Association of Public and Land-grant Universities (APLU) and the Board on Agriculture Assembly (BAA) appreciate the opportunity to provide comments to inform the *Implementation Plan to Increase Public Access to USDA-Funded Research Results*.

APLU is a membership organization that fosters a community of university leaders collectively working to advance the mission of public research universities. The association's U.S membership consists of more than 230 public research universities, land-grant institutions, state university systems, and affiliated organizations spanning all 50 states, the District of Columbia, and six U.S. territories. The association and its members collectively focus on increasing access, equity, completion, and workforce readiness; promoting pathbreaking scientific research; and bolstering economic and community engagement. Annually, its U.S. member campuses enroll 4.5 million undergraduates and 1.3 million graduate students, award 1.3 million degrees, employ 1.2 million faculty and staff, and conduct \$48.5 billion in university-based research.

The Board on Agriculture Assembly (BAA) is a unit within APLU. The purpose of the BAA is the promotion of agriculture in all its phases (food, environment, agriculture, natural resources, and international) in the state universities and land-grant colleges of the states, the District of Columbia, the Commonwealth of Puerto Rico, the territories of the Pacific, and the U. S. Virgin Islands.

Public research universities are committed to sharing their research findings, whenever possible, with the public as this is essential to ensure rigorous science and to maximize the impact of scholarship. To assist our member institutions in developing responses to public access policies, APLU, with the Association of American Universities (AAU) and supported by grants from the National Science Foundation (NSF#1837847 and #1939279) as well as the National Institutes of Health, convened workshops engaging researchers, senior research officials, librarians, chief information officers, and advocacy groups on advancing public access to research data and publications. These collaborative dialogues played a pivotal role in shaping our responses to this RFI from USDA and informing our input regarding public access strategies for NIH, NASA, NIST, and NSF.



APLU appreciates the clarity in DR 1020-006

USDA's [DR 1020-006](#) on *Public Access to Scholarly Publications and Digital Scientific Research Data* defines key concepts, including digital scientific research data assets. It describes the roles and responsibilities of different stakeholders and policy exceptions. APLU encourages other federal agencies to review this document for its definitions, clarity, and completeness.

APLU appreciates flexibility in where and how to publish

In USDA's *Implementation Plan to Increase Public Access to USDA-Funded Research Results*, APLU appreciates that the Plan allows researchers to share the peer-reviewed, accepted manuscripts and that the Plan allows for reasonable publication costs, including submission, curation, and management of data, to be included in the grant.

APLU appreciates USDA's investments in PubAg and Ag Data Commons

We commend USDA's investments in PubAg and Ag Data Commons and the intention to sustain the operations, maintenance, and enhancement of these repositories over time. Providing these agricultural data repositories advances public access and reduces researcher burdens. These investments help support researchers with limited resources to participate fully.

APLU supports USDA's harmonized definition of scientific research data in DR 1020-006

APLU appreciates that USDA's definition of scientific data is harmonized with OSTP's, which defines scientific data as that which underlies peer-reviewed scholarly publications resulting from federally funded research. Specifically, APLU supports USDA's definition in DR 1020-006, which defines a Digital Scientific Research Data Asset as:

A digitally formatted data asset resulting from unclassified scientific research supported wholly or in part by the USDA. The digital recorded factual material commonly accepted in the scientific community as necessary to validate scientific research findings includes data used to support scholarly publications, but does not include laboratory notebooks, preliminary analyses, draft manuscripts, plans for future scientific research, peer review reports, communications with colleagues, or physical objects, such as laboratory specimens. Data assets arising from routine analysis in support of program operations are not considered digital scientific research data assets, even if they are related to intramural or extramural scientific research supported by the USDA.

This definition of data creates clarity for researchers and institutions in determining what data must be shared.

APLU recommends the Plan clarify that data is digital scientific research data in Section 2.3

In Section 2.3 Policy for Data Management Planning and Digital Scientific Research Data in USDA's Implementation Plan, APLU recommends USDA clarify the current language in the following way:

USDA will make digital scientific research data assets associated with scholarly publications covered by the public access policy publicly accessible immediately, simultaneous with the article publication. USDA also will continue to require [**digital scientific research data assets**]



not associated with scholarly publications [**and as outlined in DR1020-006**] to be made available by the end of the period of performance of the award. "

These additions will clarify that the Plan is following the DR 1020-006 regulation and that the Plan does not require that any and all data, even that which is from laboratory notebooks or "routine analysis of program operations," must be shared by the end of the award.

APLU recommends clarifying mechanisms to comply after the award period

USDA's Plan should address how institutions and investigators may share research outcomes that are finalized after the close-out of the award when funds are no longer available. The lack of funds could impede researchers from sharing their findings in peer-reviewed academic journals, leading to reduced visibility and the potential marginalization of researchers from emerging research institutions. To ensure equitable dissemination, we suggest USDA explore options to 1) permit pre-payment of publication expenses, 2) allow institutions to retain allocated publication funds post-award for these required dissemination activities, or 3) provide supplementary funding for publication costs.

APLU recommends adding Senior Research Officers and Deans of Agriculture to Section 4.1

Given that federal grants and contracts are made with the institutions, we recommend that USDA identify as important community partners, senior research officers and deans of agriculture.

Thank you for providing the opportunity for the community to respond to the *Implementation Plan to Increase Public access to USDA-Funded Research Results*. APLU welcomes the opportunity to further be a resource.

Sincerely,

Kacy Redd, PhD
Associate Vice President, Research & STEM Education,
Association of Public and Land-grant Universities