



July 20, 2015

Suzanne Plimpton
Reports Clearance Officer
National Science Foundation
4201 Wilson Blvd., Rm. 1265
Arlington, VA 22230
splimpto@nsf.gov

Re: Comment Request: National Science Foundation Proposal/Award; Information—NSF Proposal and Award Policies and Procedures Guide (Federal Register Doc. 2015-12086)

Dear Ms. Plimpton,

CHORUS (Clearinghouse for the Open Research of the United States), a US 501(c)(3) non-profit organization, respectfully offers the following comments on the National Science Foundation's ("NSF") revisions to the Proposal and Award Policies and Procedures Guide ("PAPPG"), and the NSF's Public Access Plan ("the Plan") as implemented through the PAPPG.

Like NSF, CHORUS is committed to delivering a sustainable, cost-effective public-access solution for content and data reporting on funded research, which avoids duplication of effort, minimizes administrative costs, and maximizes compliance. We are pleased to note that the Plan voices a strong commitment to ongoing consultation and collaboration with the diverse array of stakeholders in the scholarly communications community. That commitment has been evident in CHORUS' discussions with NSF over the past two years and we look forward to continuing to work with the NSF and other stakeholders to achieve our shared goal.

We applaud the Plan's flexible, incremental process and its emphasis on employing existing resources where possible; this clearly communicates that the NSF recognizes and wants to minimize the impact on the scholarly communication ecosystem as it seeks to provide sustainable public access. In moving ahead, we urge NSF to continue to maintain and develop public-private partnerships. Such efforts will help the NSF contain costs, reduce the burden on researchers and their institutions, and ensure sustainable, broad public access to scholarly communication.

We are pleased that the Plan mentions that NSF is exploring the potential of CHORUS, as we have much to offer: CHORUS yields significant cost-saving opportunities by leveraging the established practices and valuable resources of researchers and publishers. Our distributed approach knits together existing tools, services, and infrastructure, and maximizes their use to facilitate sustainable public access, sharing, discoverability, reporting, and preservation of content reporting on funded research.

CHORUS' 33 members and 117 signatories collectively produce the vast majority of published peer-reviewed journal articles. We are currently tracking more than 9,000 journals and monitor more than

117,000 articles reporting on research funded by 24 funding agencies, numbers that are increasing daily. We are auditing them for public access and long-term availability, with a current count of more than 26,000 articles that are already freely accessible to the public, even before any articles are required to be available under agency plans. CHORUS reports this data on our website via [dashboards](#), which also provide [access to each article](#) we monitor. The [NSF dashboard](#) shows that CHORUS includes more than 42,000 articles reporting on research funded by the NSF, of which over ¼ are verified as publicly accessible. We are working closely with a number of funding agencies to support their unique approaches to providing public access, and look forward to working with NSF on additional opportunities for collaboration, both with respect to linking to publications and to providing access to data.

CHORUS is involved with a number of initiatives (the CrossRef–DataCite Pilot, SHARE, and the RDA-WDS Publishing Data Services Working Group, and potentially, the RMap Project, Dataverse, Figshare, and Dryad) to investigate tools and services that support researchers with their data management plans and help funding bodies with compliance tracking. We believe the need to develop and evolve data standards is critical. We therefore strongly encourage NSF to actively partner with some or all of these organizations, which are already overseeing the development of standards that deploy existing tools (e.g., DOIs, CrossRef’s FundRef, and ORCID).

CHORUS is very interested in working with NSF and other funding agencies, publishers, data archive managers, and other stakeholders on developing 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.

Thank you for the opportunity to comment on the Plan. We look forward to furthering our collaboration to advance public access to content and data reporting on funded research.

Sincerely,

A handwritten signature in black ink, appearing to read "Howard Ratner", with a stylized flourish at the end.

Howard Ratner
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