



American Society of Transplant Surgeons®

April 6, 2020

Lisa Nichols
Assistant Director for Academic Engagement
Office of Science and Technology Policy
1650 Pennsylvania Ave NW
Washington, DC 20504
publicaccess@ostp.eop.gov

Re: 85 FR 9488; Request for Information: Public Access to Peer-Reviewed Scholarly Publications, Data and Code Resulting from Federally Funded Research

Dear Assistant Director Nichols:

On behalf of the American Society of Transplant Surgeons (ASTS), I am pleased to have the opportunity to comment on the Office of Science and Technology Policy Request for Information. ASTS is a medical specialty society representing approximately 1,900 professionals dedicated to excellence in transplantation surgery. Our mission is to advance the art and science of transplant surgery through patient care, research, education, and advocacy.

Together with the American Society of Transplantation (AST), we publish the American Journal of Transplantation, which disseminates peer-reviewed, cutting-edge basic, clinical, and translational scientific research regarding solid organ transplantation. It plays a key role in advancing this life-saving field.

ASTS supports the ideals of making research data widely available where appropriate. However, lowering the current 12-month embargo could severely impact our ability to invest in publishing and disseminating peer-reviewed articles, actually impeding the goals of advancing American innovation and competitiveness.

Such a model would force researchers to pay to publish; however, existing grants do not usually cover such costs, so these funds would take away from those available to support actual research. This could slow the pace of research in the United States.

ASTS hopes to find opportunities to partner with OSTP on developing ways to make research more widely available while avoiding unintended consequences. If you have any questions, please contact Executive Director Dan Garrett at Daniel.garrett@asts.org or 703-414-7870.

Sincerely yours,

Lloyd E. Ratner, MD, MPH

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American Society of Transplant Surgeons

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American Transplant Congress

May 30 – June 3, 2020 Philadelphia, Pennsylvania