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February 8, 2019

IDSA Plan S Feedback

Response to Public Comment Period

The **Infectious Diseases Society of America (IDSA)** is a community of over 11,000 physicians, scientists and public health experts who specialize in infectious diseases. Our purpose is to improve the health of individuals, communities, and society by promoting excellence in patient care, education, research, public health, and prevention relating to infectious diseases.

Our Core Values include:

- Enhancing care of children and adults based on sound scientific evidence
- Advancing the discipline of infectious diseases as a foundation of medicine and public health
- Promoting and sharing knowledge to reduce human and societal toll from infectious diseases
- Advocating for sound and humane data-driven public policy
- Promoting collaboration and cooperation among, and services for, members and other professional colleagues

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Is there anything unclear or are there any issues that have not been addressed by the guidance document?

Aims and Scope

- How does cOAlition S propose to “ensure that young scholars have opportunities to excel and advance their careers” in a model that may limit their ability to collaborate internationally, restrict their choice of publication venue, and for which they must find funds to pay for publication fees? In practical terms, what steps are cOAlition members proposing to take to achieve this goal?
- What is the origin of the 2020 deadline? Given that the implementation guidance makes reference to several pieces of research that are only now being commissioned, but which can reasonably be expected to have considerable impact on shaping the specifics of Plan S’s implementation, this deadline is precipitous. Surely the academic community would be better served by having the results of these reviews prior to journals having to make major strategic decisions which cannot necessarily be reversed.

Plan S Compliance

- What are the “specified conditions” that will allow deposition of scholarly articles in Open Access repositories?
- How does Plan S intend to address concerns around the use of independent directories without funder oversight as the mechanism to signal compliant journals and repositories? For example, [DOAJ](#) has multiple challenges in terms of identifying reputable journals and predatory titles.
- Do you intend for DOAJ and [OpenDOAR](#) to be the only mechanism to identify compliant journals/repositories? If so, how will you address compliance in new journals that have not yet been evaluated for DOAJ?
- Will publication in a hybrid journal be supported if authors comply through depositing their article into a compliant Open Access repository immediately, provided that either the Article Processing Fee (APC) is waived or paid by non-Plan S funding sources? Wellcome Trust has stated that it supports both situations, but it is unclear whether they are supported by Plan S.
- How will you police predatory journals – i.e., journals published by for-profit companies that exploit authors, offer little to no editorial oversight or peer review, and compete unfairly with established and reputable journals through mimicking their titles and undercutting their APC rates -- that falsely claim to be Plan S compliant? Given that Plan S will through necessity stimulate the creation of many new open access titles, there seems to be considerable risk that new and existing predatory publishers and journals will take advantage of the confusion to the detriment of scholarly publishing.

Publication Costs

- How do you propose to handle the considerable variation that exists between different journals in terms of their selectivity as well as the quality of their editorial processes? This does not appear to be an area where “a fair and reasonable APC level” exists; the value that different journals add or do not add to articles supports a multitude of “fair” APCs.

- When do you expect to publish the results of your analysis into “an independent study on Open Access publication costs and fees?” This information is essential to understanding the financial viability of our journals in a Plan S world, yet the timelines proposed require us to make decisions without this information.
- How do you propose to tackle the conflict between requiring disclosure of financial information and the legal restrictions on organizations to ensure fair trade?
- Do you anticipate variation between different Plan S funders in terms of the APC standards/caps set or will this be set by cOAlition S overall and enforced across all parties?

Supporting Quality Open Access Journals and Platforms

- When do you expect the results of your gap analysis of Open Access journals/platforms by field and discipline to be made available?
- What form do you anticipate “incentives for establishing Open Access journals/platforms or flipping existing journals to Open Access” will take? Do you expect these incentives to favor large mega-journals or subject specialty titles?
- How do you propose to ensure that Plan S does not lead to a proliferation of predatory journals exploiting authors and funders?

Timeline

- How do you intend to manage compliance during the mixed situation likely to arise in 2020 with different funders, publishers, and journals at different transitional stages in terms of compliance?

Review

- Will you be gathering feedback from academic societies and publishers as part of the 2023 review?

Compliance and Sanctioning

- Compliance with existing funder policies varies considerably between disciplines and authors. Much of the progress towards compliance has historically been thanks to the efforts of publishers and self-published societies absorbing this work from authors. How do you practically expect cOAlition S members to police compliance and ensure that authors understand their compliant publication options? Do you expect journals, societies and publishers to police compliance during submission and publication on funders’ behalf?

Licensing and Rights

- How does Plan S propose to reconcile situations where papers have conflicting funder or copyright requirements? For example, content that has been funded in part by organizations requiring a government license which would be in direct conflict with the CC-BY publication requirement of Plan S.

Open Access Journals and Platforms

- Can you provide greater clarity on the peer review requirements that must be met and the level of detail required to be disclosed publicly in order to be compliant? How do you propose to police this to avoid predatory journals exploiting Plan S?
- How are you intending to define low-income and middle-income countries?
- How do you propose to assess whether related journals are “mirror/sister subscription” journals? Many high-quality open access journals started with significant editorial overlap historically in order to ensure the necessary support for a new journal from experienced and engaged individuals.

Transformative Agreements

- Do your requirements for transformative agreements relate to all agreements in place with organizations globally for that journal? Given that many agreements are multi-year and will run until after 2020, how do you expect journals to be able to comply with this requirement?

Not addressed

- What support, if any, will cOAlition S be providing to authors in order to ensure that they understand the limitations Plan S will place upon their choice of publication venue, and the different routes to compliance that are available to them, as well as the consequences of failing to comply?
- What advice does cOAlition S have for authors in terms of collaborating internationally and with non-Plan S funded authors to ensure that Plan S does not diminish global scientific collaboration and cooperation?
- Currently a large proportion of journal income globally is from library budgets in the form of journal subscriptions, while Open Access fees are often paid for by authors out of departmental funds or grant funds. If the system shifts from a large amount of library budgets supporting journals to a majority of journal revenue coming from research departments/grants directly in the form of OA fees, how does cOAlition S propose to ensure that the global research budget available to do active research is not adversely affected?

Are there other mechanisms or requirements funders should consider to foster full and immediate Open Access of research outputs?

- Full and immediate open access of research output from Plan S funders is currently possible and working well because most journals, including IDSA’s, encourage authors to opt for the immediate open access under creative commons license service with payment of an APC. The hybrid model allows the journals to publish Plan S research under an open access model and also research outputs from world-leading institutions and funding bodies that do not currently require immediate open access publishing. Similarly, hybrid journals enable authors to publish who do not have funds available to pay for publication fees. The hybrid model also enables authors to benefit from established and high quality peer-review processes. What mechanisms does Plan S

propose to address concerns from authors who are not funded about their ability to locate funds to cover APCs in a fully Open Access world? For example, the [DeltaThink report](#) indicates that only around 3-4% of content globally is funded by Plan S funders; we acknowledge that this figure has likely increased with the addition of new funders. Nonetheless, the reality remains that current funders who are Plan S members only support a small fraction of global content. However, the insistence by Plan S for publication in only fully Open Access journals will push journals to flip to full OA and thereby force authors outside of Plan S funding to pay for the APCs.

- Research outputs continue to grow annually. An important goal for our journals is to ensure only high quality and potentially influential content is published in order to best inform our community and the evolution of practice. What support or oversight are funders going to provide in terms of peer-review/content curatorship especially where financial success will be motivated by volume published. Under this schema, there is potential motivation to limit peer review and increase acceptance rates.
- What additional funds are funders going to make available to Plan S authors who do not currently have research funding?