

Feedback Submission regarding

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

Our Process of Question Development:

A group of scholarly non-profit society, press and academic publishers met in Washington DC for a full day Workshop on the implementation options for Plan S compliance. 45 individuals from 27 organizations attended the meeting (the organizations are listed at the end of this document); these not-for-profit academic publishers range broadly: from one to 50+ journals (only two cases of societies in the 50+ range, most in the 1-5 journal range); so these are typically small to medium mission-oriented academic publishing organizations.

At the Workshop, eleven different options were presented by individual attendees, and then discussed by the group. During the discussion, questions of fact and of interpretation arose which these publishing organizations will need to have answered in order to make directional decisions and make progress on policy and technical implementations.

We present these questions to Coalition S as part of its Feedback process and look forward to your answers. Answers can be sent to John Sack, sack@highwire.org, Founding Director of HighWire Press. The answers will be disseminated to the Workshop participants. (Note that our last question relates to a method of future dialog and clarification of questions and answers.)

COMPLIANCE REQUIREMENTS/RULES

- Several questions relate to Author Accepted Manuscript (AAM) publishing:
 - Are *articles* compliant if they are published by the journal as AAM on-site OA with CC BY for Plan-S-funded articles? Does immediate free access to the accepted manuscript on a journal site as a PDF satisfy article-level compliance, or does the manuscript have to be deposited in a repository? Is free access to an XML version of the *manuscript* required?
 - Is a *journal* compliant if all of its original research articles are published as AAM on the journal site OA without embargo and with CC BY as an option?
- Please confirm that a Plan S-funded author can publish in a hybrid journal if:
 - Accepted manuscript (AAM) is made OA with no embargo and a CC-BY license,
 - And/or an APC is charged but no Plan S funding is used to pay the APC.
- Can you confirm that Green OA (deposit on acceptance/publication under CC-BY) is acceptable?
- Can a journal be compliant with Plan S if it is hybrid but doesn't charge an APC?
- Will DOAJ have separate criteria for Plan S compliance from general inclusion in DOAJ?
 - Will a DOAJ-listed journal that allows CC BY NC ND be non-Plan-S compliant?
- Principle I says authors retain copyright. Are there exceptions for pharma or other institutions that retain copyright? What happens if an article has some authors who are plan-S-funded and others who aren't?
- Under what circumstances are preprints compliant?

- Do publishers need to use CLOCKSS? Are there other options for deep archiving? Will Coalition S name specific compliant archiving solutions, or name a compliance-vetting body (as DOAJ and OpenDOAR are for journals and repositories)?
- For a *journal* to be compliant, does it have to deposit manuscripts in an acceptable repository on behalf of authors, or is it acceptable to allow authors to do it themselves?

COMPLIANCE AIDS, COMPLIANCE MONITORING, ENFORCEMENT

- How will Coalition S funders monitor compliance, and who (authors, journals, institutions) will be the focus of those efforts? Will it be the responsibility of individual funders to monitor this?
 - What will Coalition S do to encourage author compliance?
 - Beyond listing in DOAJ and OpenDOAR, what will be done to validate/audit publisher/platform compliance?
 - After the initial implementation phases, what measures will be in place for long-term monitoring of compliance?
- Will there be funder-specific databases of recommended journals in which authors can publish (using any of the Plan S compliant routes), and of compliant journals, platforms and repositories?

TRANSFORMATIVE AGREEMENTS

- Will there be a standardized framework/template for transitional agreements?
- Is the German university Read & Publish DEAL with Wiley a valid Transformative Agreement for Plan S?
- Will journal transition agreements need to be negotiated/agreed upon by each journal or publisher on a funder-by-funder basis, or does cOAlition S expect to operate as a collective in these conversations?
- Will reporting be required from journals that enter into transitional agreements? If so, are details available?
- How are Transformative Agreements related to Read-and-Publish/Publish-and-Read agreements? JISC TAs appear to be specific to a geography (UK); are they? How many such TAs will need to be in place for a journal to be compliant?

APCs

- Does it matter who pays the APCs (author, institution, or other funder)?
- Does Plan S preclude payment of APCs (or other publication fees) by any non-Plan-S-funds, or by non-Plan-S-funded authors on a paper, so long as the paper itself appears on a compliant journal, platform or repository?
 - Will publication in a hybrid journal with deposition of AAM in a compliant repository (CC-BY, no embargo) be allowed if another source of APCs is used other than Plan S funds?
- For hybrid journals, will Plan-S funders not pay publication charges (even for an article that is published CC-BY)? If the Plan S funder declines to pay in such a case, would they decline standard publication charges, or just the CC-BY surcharge?

CAPS

- Are APC caps ruled out, or will the survey of APCs keep that option on the table for the future?
- Will Plan S funders place a different value on different services and levels of quality such that different APCs for different journals or different article types or different quality and service attributes be considered acceptable?

PHILOSOPHY

- The implementation guidance states that mirror journals with substantial overlap in editorial board will not be compliant unless under a Transformative Agreement to avoid business models charging for both access and publication. Given that Plan S also requires transparent information on the publishing costs and any other factors impacting the publication fees for compliant journals, including cross-subsidizing, what is the formal reason for cOAlition S not allowing mirror journals when the transparent costing and pricing demonstrates there is no cross-subsidization between compliant and non-compliant journal titles?
- Which Coalition S goals can be met **only** by a CC BY license, that can't also be met by other CC licenses (such as NC)

TRANSPARENCY

- Will cOAlition S provide further guidance on which costs can and should be included in transparent APC pricing? (E.g., how are costs for handling rejected articles included?)
- Will transparency of APC fees need to be shown at the society/publisher level, or at the individual journal level?

OTHER

- Please provide further comments about “OA conversion funding” and “help for academic societies/nonprofit publishers.” Specifically, what types of help and for how long-term?
- Could cOAlition S please provide our group with a direct contact for follow up and ongoing discussion? In the interests of cooperation, we would like to avoid long periods of waiting for simple clarifications, which could impede our capacity to engage creatively and effectively with Plan S.

WORKSHOP ATTENDEES:

Twenty-seven society & publishing organizations attended the information/exchange workshop on Plan S, on January 29 in Washington, DC, including these:

American Association for the Advancement of Science (AAAS)
American Academy of Neurology (AAN)
American Academy of Pediatrics (AAP)
American Association for Cancer Research (AACR)
American Association for Clinical Chemistry (AACC)
American Association of Immunologists (AAI)
American Diabetes Association (ADA)
American Society for Biochemistry and Molecular Biology (ASBMB)
American Society for Microbiology (ASM)
American Society for Pharmacology and Experimental Therapeutics (ASPET)
American Society of Civil Engineers (ASCE)
American Society of Nephrology (ASN)
American Society of Neuroradiology (ASNR)
American Society of Plant Biologists (ASPB)
BMJ Journals
Cold Spring Harbor Laboratory Press (CSHL)
Company of Biologists (COB)
The Endocrine Society (TES)
EMBO Press
Joule, a Canadian Medical Association company (CMA)
Proceedings of the National Academy of Sciences (PNAS)
Rockefeller University Press (RUP)
Society for Industrial and Applied Mathematics (SIAM)
Society for Neuroscience (SFN)

Submitted by

John Sack
Founding Director
HighWire Press
8 February 2019
sack@highwire.org