NIH Public Access Policy

The NIH Public Access Policy ensures that the public has access to the published results of NIH funded research.

http://guides.lib.uiowa.edu/content.php?pid=6167&sid=43827

Frequently Asked Questions

Here are a collection of questions posed during the Hardin Library NIH Public Access Policy classes. Excerpts are taken from the NIH FAQ (http://publicaccess.nih.gov/FAQ.html) unless otherwise indicated.

Are contracts covered, or only grants?

The following sources of funding are subject to the policy:
1. Directly funded by an NIH grant or cooperative agreement active in Fiscal Year 2008 (October 1, 2007; September 30, 2008) or beyond.
2. Directly funded by a contract signed on or after April 7, 2008.
3. Directly funded by the NIH Intramural Program.
4. If NIH pays your salary.

If two Principal Investigators from two different grants collaborate, how is the submission process altered?

My article has multiple authors and/or is funded from multiple NIH sources. Who should submit the article?

Any author may submit the article, but each Principal Investigator and Institution is responsible for ensuring that the terms and conditions of their award are met. An article need only be submitted once to the NIH Manuscript Submission system. Authors will be notified during the submission process if they try to submit an article that has already been submitted.

Articles can be assigned multiple NIH award numbers during submission. They can also be linked to an award electronically via the Commons when completing an electronic Progress Report, or listed as arising from any NIH award in writing when submitting an application, proposal or progress report.

How do you submit the copyright addenda when the entire article submission process is electronic?

Those details will need to work out with the individual publisher.

What are the consequences, if any, of post submission modifications of the abstract, title, body, etc. by the publisher?

Final peer-reviewed article. The investigator's final manuscript of a peer-reviewed article accepted for journal publication, including all modifications from the peer review process.

Final published article. The journal's authoritative copy of the article, including all modifications from the publishing peer review process, typesetting and stylistic edits, and formatting changes.

The final editing changes made by the publisher will not be reflected in the PubMed Central version. The final peer-reviewed manuscript is what appears in PubMed Central. At the top of each author manuscript in PMC it says something like:

Published in final edited form as

Brain Res. 2008 February 15; 1242:28–36.

How are grant numbers to be submitted and cited when each number refers to a different year or the same grant or an extension of a grant?

In this situation, you need only attach your manuscript to the most recent funding year.

If I ran an NIH funded center, and an NIH funded investigator in my center publishes an article, do I have to approve the submission?

Only direct funding is applicable.


Do articles submitted to PubMed Central appear in the PMC database in abbreviated form before the embargo period?

PubMed Central will not display an article until after the embargo period has lapsed. To cite articles still in process, use the NWWG ID number located within the submission system.

Hardin Library staff submit the information to PubMed Central on behalf of the PI, how
FAQs – Questions Posed by WU Faculty

The following are sample questions from the WU community about the NIH Public Access Policy. For more questions related to the NIH Public Access Policy, please see the NIH Public Access Frequently Asked Questions and the NIH Manuscript Submission System Frequently Asked Questions.

Compliance

When is compliance required?

The NIH Policy applies to any manuscript that:

- Is peer-reviewed and accepted for publication in a journal on or after April 7, 2008

And arises from:

- Any direct funding from an NIH grant or cooperative agreement active in Fiscal Year 2008 or beyond, or;
- Any direct funding from an NIH contract signed on or after April 7, 2008, or;
- Any direct funding from the NIH Intramural Program, or;
- An NIH employee.

“Directly funded” means costs that can be specifically identified with a particular project or activity. See NIH Grants Policy Statement, Rev. 12/2003.

(Source: http://publicaccess.nih.gov/FAQ.html)

I generated data in a FY2008 NIH grant and it is now 2010 and my grant is no longer current but I am publishing a paper that includes this data. Do I still need to comply with the policy?

The activity or research took place during the FY2008 grant period. The NIH Public Access Policy applies to all peer-reviewed journal articles that arise from the NIH intramural program or any amount of direct costs funded by NIH, regardless of the source or amount of other funding.

I am a T32 funded for FY2008 and have additional sources of grant funding including some from NSF – do I still need to comply?

The NIH Public Access Policy applies to all peer-reviewed journal articles that arise from the NIH intramural program or any amount of direct costs funded by NIH, regardless of the source or amount of other funding.

My journal publisher makes the final published version available on the journal web site. Is this compliance?

No

I’m in the process of submitting a manuscript that was a part of my dissertation at XYZ University. All of the data used in my manuscript was collected and analyzed at XYZ University in 2006. I wrote the manuscript while being funded
under a FY2008 T32 grant. Do I need to comply with NIH Public Access Policy?

Yes.

Compliance Scenario:
Dr. Smith is working off an industry sponsored grant to conduct clinical research of an investigational drug. As part of the research plan Dr. Smith uses the services of the Cardiovascular Magnetic Resonance (CMR) Laboratory which is a core facility that is funded by the NIH and is located on campus. Dr. Smith uses some of his industry sponsored grant funding to pay the CMR lab for the Doppler echocardiograms he needs as part of his research. Dr. Smith then publishes the results of his INDUSTRY sponsored research as an article in a leading research journal.

Answer:
If a manuscript arises from direct funds from or any other NIH funding, which is the case with Dr. Smith, his/her manuscript may fall under the NIH Public Access Policy.

To what papers does the NIH Public Access Policy apply?
The Policy applies to any manuscript that:

- Is peer-reviewed;
- And, is accepted for publication in a journal on or after April 7, 2008;
- And, arises from:
  - Any direct funding* from an NIH grant or cooperative agreement active in Fiscal Year 2008 or beyond; or,
  - Any direct funding from an NIH contract signed on or after April 7, 2008; or,
  - Any direct funding from the NIH Intramural Program; or,
- An NIH employee.

* “Directly” funded means costs that can be specifically identified with a particular project or activity. See NIH Grants Policy Statement, Rev. 15/2007

Please note, authors may submit final peer-reviewed manuscripts accepted before April 7, 2008 that arise from NIH funds, if they have appropriate copyright permission.

Should you need additional assistance and/or clarification, please contact John Michnowicz, Director, Grants and Contracts.

Manuscripts

What publications fall under the policy?
The Policy applies to all peer-reviewed journal articles, including research reports and reviews. The Policy does not apply to non-peer-reviewed materials such as correspondence, book chapters, and editorials.

I wrote a chapter for a series. Does this apply?
The Policy applies to all peer-reviewed journal articles, including research reports and reviews. The Policy does not apply to non-peer-reviewed materials such as correspondence, book chapters, and editorials.

What is the meaning of: “submit an electronic version of the final, peer-reviewed manuscript upon acceptance for publication”? Specifically, do they want the typescript (which is the only version which exists at the time of acceptance), or an electronic version of the reprint?

NIH defines the final peer-reviewed manuscript as the Investigator’s final manuscript of a peer-reviewed article accepted for journal publication, including all modifications from the peer review process.

Can I submit the galley proof instead of my peer-reviewed manuscript?

No.

Securing the Right to Comply

How do I confirm the right to comply?
The first step for compliance is to check the NIH Journal List. There are many journal publishers that cooperate with NIH and submit the final published version to PMC on behalf of authors. If authors publish in one of these journals, no further action is
required for compliance except to cite the PMCID reference number in future NIH applications, proposals and progress reports.

If the journal is not on the NIH Journal List:

- Review the publisher copyright agreement form.
- Review the “Instructions for Authors” or “NIH Public Access Policy Information” sections on the journal web site.

If there is no clause on the publisher copyright agreement form or information on the journal web site, contact the journal publisher or Editor in Chief of the journal and ask for clarification of their policies for NIH-funded authors per NIH Public Access Policy.

Submittal Process

Can I request direct costs to pay for a person on my staff to deal with compliance with the policy and third party submitter services? Will NIH allow this as a direct cost?

This is an administrative support function, so it is not generally allowable for direct costs.

Can I note multiple grant numbers on a single submission?

Yes. Articles can be assigned multiple NIH award numbers during submission. They can also be linked to an award electronically via the Commons when completing an electronic Progress Report, or listed as arising from any NIH award in writing when submitting an application, proposal or progress report.

Can the PI appoint anyone to act as a third party submitter?

Yes.

Review Process

I am a non-author PI and I want to be designated as the reviewer for a manuscript under my award. Can a non-author PI be designated as the reviewer?

Only authors to a manuscript can complete the approval process.

There are multiple NIH awards and multiple PIs for a single manuscript. Which PI from which award will receive a notice from NIHMS that a manuscript has been linked to their award?

All PIs are sent an email from NIHMS notifying them when a manuscript affiliated with their award has been posted to PMAC. This email will also include the PMCID.

PMCID

Where can I find my PMCID reference number?

The PMCID reference number can be found in PubMed and PubMed Central.

In PubMed:

Here is a sample PubMed record using the “Summary” display. Note that this display notes the PMCID which is a unique identifier number assigned to each publication as it is added to PubMed. This is not the same as the PMCID.
To locate the PMCID reference number, change the Display to “AbstractPlus.”

Once on the AbstractPlus display, you will find the PMCID under the citation/abstract on the right side.
WASHINGTON UNIVERSITY IN ST. LOUIS
NIH Public Access Policy FAQs
http://becker.wustl.edu/services/scholarly/faqs.html

In PubMed Central:
The PMCID reference number is noted on the search results page.

For more information see How to Locate and Cite the PMCID

Does the PMCID need to be noted in the literature cited section and the publication list?

As of May 25, 2008, NIH applications, proposals, and progress reports must include the PubMed Central reference number when citing an article that falls under the policy and is authored or co-authored by the investigator, or arose from the investigator’s NIH award. This policy includes applications submitted to the NIH for the May 25, 2008 due date and subsequent due dates.

See Reminder Concerning Grantee Compliance with Public Access Policy and Related NIH Monitoring Activities for more information on where to cite the PMCID.
Is it possible to download the PMCId directly to Reference Manager or Endnote?

Yes. The PMCId is noted in the field tag of the Medline display. PMC. The PubMed filter can be modified to include the PMC tag and import the data to bibliographic citation software.

For more details, see:
- How to Locate and Cite the PMCId
- PMCId Display in PubMed AbstractPlus
- Modifying EndNote to Include the PMCId

When does the PMCId reference number get assigned?

The PMCId is assigned after NIHMS performs its last set of quality assurance checks and after the PI or author has completed the approval process.

Is citing the PMCId reference number retroactive? Do I have to go back and submit all my previously published NIH-funded publications to get a PMCId in order to comply with the NIH Policy?

No. Citing the PMCId is required only for those articles that fall under the NIH Public Access Policy.

Demonstration of Compliance

What should be done if a PI or author omitted NIH grant award information for a paper (submitted to PMC in compliance with the NIH Public Access Policy) that is already in PubMed Central and has a PIDC? Can grant awards be added retroactively to a manuscript? Is there a manual means of entering or correcting grant award information or should the PI or author contact the NIHMS help desk and explain the situation?

PIs should go to the NIH Manuscript Submission system and log in using the eRA Commons route. There is a Grants Reporting link in the upper right hand of the NIHMS screen. Select the Grants Reporting link and this will lead to a page with four tabs to select from:
1. Click the “Add from PubMed” tab
2. Do a search using “lastname, firstname” and click the search button. You will also see suggestions you can search on underneath the search box. Click on a link to do an automatic search.
3. A list of manuscripts will appear on the screen.
4. To the right of the screen, you will see the word “Add.”
5. Click “Add” and you will see a list of your grants come up.
6. Check the box to the left of your grant(s) that funded the manuscript. Repeat this action for all the manuscripts.
7. When you are done, click “Update.”
8. If you click the publication number for a manuscript, it will take you to the PubMed citation for that manuscript.
9. If you click the PMCId number for a manuscript, it will take you to the PMC full text manuscript.
10. This will update all your manuscript information.

Does NIH specify a specific timeframe for PIs respond to an email inquiry from a NIH Program Officer seeking documentation of compliance?

There are no standards on response times, but it is highly recommended to respond as soon as possible. PIs should copy their Institutional Business Officer when responding back to the NIH Program Officer.

Institutional Business Officer Information:
- WUSM Campus: Grants and Contracts (gcts@monsats.wustl.edu)
- DANFORTH Campus: Office of Research (research@monsats.wustl.edu)

“The documentation provided is in response to your email dated (insert date here). Our Institutional Business Official (IBO) is being copied utilizing the office’s generic email, (i.e., gcts@monsats.wustl.edu OR research@monsats.wustl.edu).”


What should I do if a publisher has not yet submitted my manuscript per copyright agreement? I am required to note documentation of compliance for a work in a progress report and do not have a NIHMS ID or a PMCId yet. The
work was published in a journal that is not on the NIH list Journals That Submit All NIH-Funded Final Published Articles to PubMed Central, nor did I make arrangements with a publisher on this list: Publishers that Will Deposit a Specific Final Published Article in PubMed Central on Request.

All authors for this work should logon to the NIH Manuscript Submission system (NIHMS) and log in using the eRA Commons route. If the manuscript has been submitted by the publisher, the manuscript will be awaiting review. The authors should complete the review process and note the NIHMS ID reference number. The NIHMS ID should be used as documentation of compliance with the NIH Policy until the PMCID is assigned. If the manuscript is not awaiting review, then the author and/or institution should contact the publisher and seek clarification on the submission status of the work. Contact Cathy Sarli for more information on how to seek clarification on the submission status of a work.

When PIs are responding to an email inquiry from a NIH Program Officer seeking documentation of compliance for applicable citations as noted in a progress report, application or proposal, can the PIs use the “PMC Journal – In Process” or the NIHMS ID if the PMCID is not available yet? Or does NIH prefer that PIs respond when they have the PMCIDS for the citations in question that do apply under the policy?

The “PMC Journal – In Process” and the NIHMS ID are intended to be used as temporary means of documentation until the PMCID is available. PIs should not wait for the PMCID to become available before they respond to emails from a NIH Program Officer.

First, the PIs should confirm that the citation in question is applicable under the NIH Policy. See Public Access Frequently Asked Questions. If the citation in question is applicable and there is no PMCID assigned yet, PIs should determine whether they can use the “PMC Journal – In Process” or the NIHMS ID as documentation of compliance.

See Cite the PMCID and How to Demonstrate Compliance with the NIH Public Access Policy for more information on when to use “PMC Journal – In Process” or the NIHMS ID as documentation of compliance.

General

Can I submit works to PMC that predate the NIH policy, even from before 2005? Meaning, if I published a manuscript in 2001 can I submit this to PMC?

If the author has retained the right to comply, or if the publisher grants permission to do so, or if the author is a governmental employee, then previously published works may be submitted to PMC.

Are all NIH-funded publications added to PubMed Central also being indexed in MEDLINE regardless of journal indexing status?

Yes. These publications are noted with [PubMed - author manuscript in PMC]

Does NIH reimburse direct costs related to article processing fees or open access fees?

Yes. The NIH will reimburse publication costs, including author fees, for grants and contracts on three conditions: (1) such costs incurred are actual, allowable, and reasonable to advance the objectives of the award; (2) costs are charged consistently regardless of the source of support; (3) all other applicable rules on allowability of costs are met.

How can a PI (for a Trainee grant) ensure that all of their trainees have entered the correct grant award information for a manuscript that the PI is not an author of?

If the trainee added the NIH award information to a manuscript, the PI will receive an email from the NIH Manuscript Submission system (NIHMS) notifying them of a submission and the PMCID.

Recommendations:

PIs should advise (and remind periodically) all trainees that they must note the applicable NIH award for all manuscripts that resulted from support from the PI’s NIH award.

PIs can create author alerts for each trainee using databases such as PubMed, SCOPUS or Web of Knowledge/Science. PIs will be “alerted” each time a new publication authored by a trainee is added to a database. The PIs can keep track of publications by their trainees and compare these with the notifications from NIHMS informing the PI of a submission and the PMCID. If no corresponding notification is forthcoming from NIHMS for a specific publication by a trainee that was generated from that PI’s award, the PI can retroactively add the grant award information.

See Demonstration of Compliance for information about how to retroactively add grant award information.