GW

Helping Principal Investigators Comply with the NIH Public Access Policy

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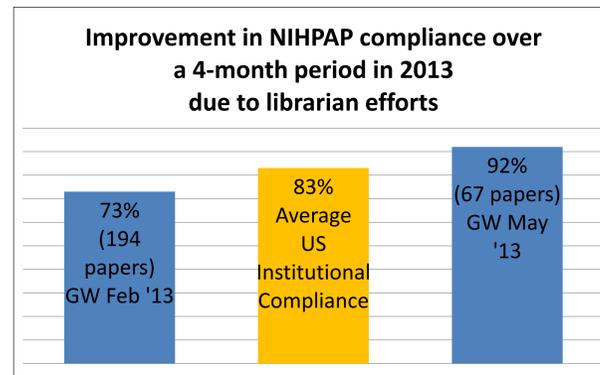
Introduction

Recognizing the consequences of non-compliance with the NIH Public Access Policy (NIHPAP), Himmelfarb Health Sciences Library worked to identify NIHPAP non-compliant papers by GW faculty authors and help Principal Investigators (PI's) and their delegates get them into PubMed Central (PMC).

Methods

- Worked with the Office of the Vice-President for Research (OVPR) to:
  - Refer to the library faculty who needed assistance with NIHPAP compliance.
  - Have OVPR email every GW Associate Dean for Research about the issue.
  - Add NIHPAP to the compliance checklist for OVPR kick-off meetings with PI's.
  - Request an NIH eRA Commons account with PACR role permissions for a librarian to be able to access the Public Access Compliance Monitor (PACM) database.
- Used a Medline alert to trigger an email to GW faculty author's with NIH funding, recording the name & date sent on a spreadsheet to create a paper trail in case of an NIH audit.
- Created NIHPAP compliance libguide http://libguides.gwumc.edu/NIHcompliance.
- Set up a shared email account & schedule for daily monitoring by a librarian.
- Presentations/office visits to the GW Biostatistics Center (prolific co-authors), and the CTSI steering committee at Children's National Medical Center with >700 GW-affiliated researchers.
- Identified "multiple offenders" with the largest number of post-April 2008 non-compliant papers using the PACM database – we targeted compliance efforts on those PI's.
- Prior to an office visit we used the Sherpa/Romeo Directory to identify those papers a publisher can/will upload on request & made the request on behalf of the PI.

Results

- During the first 4 months after the PACM database became available we improved GW's compliance rate from 73% (194) to 92% (67). For comparison the average institutional compliance rate is estimated to be in the low-mid 80's% (source Neil Thakur, NIH, 8/19/14).
- 10% of non-compliant PI's were responsible for half of the non-compliant papers.
- PI's proactively contacted OVPR/the Library when advised by NIH their grant renewal would be held up until they came into compliance with NIHPAP.
- PI's who were not facing NIH grant renewal responded more positively when contacted by a personal office visit from a librarian instead of email.
- PI delegates who were departmental secretaries were hesitant to monitor faculty publications until they received My NCBI bibliography training from a librarian and assurance of ongoing advice/support.
- PI's were generally hostile to the notion of paying publishers an additional Open Access fee (Submission Method B) to upload papers to PubMed Central.

Improvement in NIHPAP compliance over a 4-month period in 2013 due to librarian efforts

73% (194 papers) GW Feb '13 | 83% Average US Institutional Compliance | 92% (67 papers) GW May '13
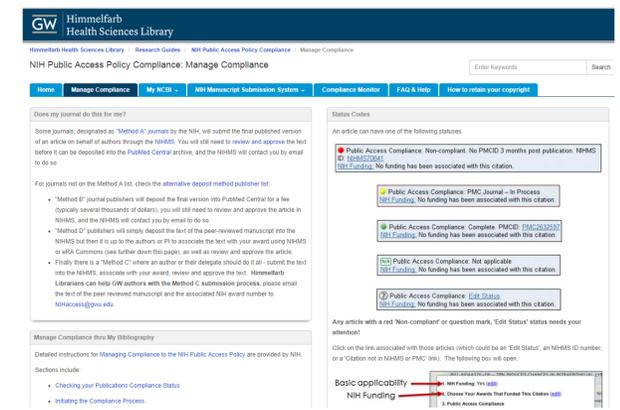
Conclusions

- Your first priority should be to help those PI's who face imminent NIH grant renewal.
- Work with your institution's research compliance staff.
- Use the PACM database to identify "multiple offenders".
- Use the Sherpa/Romeo database to identify and contact publishers prior to your office visit with the PI. Where possible arrange to have some papers uploaded to the NIH Manuscript Submission system (NIHMS) for the PI to login and approve the deposit so they can see immediate progress.
- Encourage PI's to log into My NCBI with their eRA Commons login – they will have been assigned by default a My NCBI account ending @eracommons and the bibliography should list noncompliant papers that show up on their Research Performance Progress Report (RPPR) or Continuation Progress Report (PHS 2590).
- Encourage PI's to use their own departmental staff to delegate ongoing monitoring of their My NCBI bibliography, and be prepared to train delegates on how to add publications to a My NCBI bibliography and associate grant funding with them.
- Publishers may prove to be cooperative or uncooperative – Submission Method D publishers may be very particular about who handles the deposit e.g. Taylor & Francis insist only they may upload articles to the NIHMS, while Elsevier refused to upload a book chapter to the NIHMS because it was published in a series book - the NIH position is that if it is indexed in Medline, and has a journal impact factor, book series are considered "journals" subject to NIHPAP.
- Some papers will remain noncompliant in the PACM database when faculty move institution or have died.
- Advocate use of the SPARC addendum to retain copyright but expect pushback from both young faculty authors who are concerned about getting accepted/published or older faculty who are journal editors themselves.

Useful resources

- NIH training & advice
  Website http://publicaccess.nih.gov
  Email PublicAccess@nih.gov

- Public Access Compliance Monitor (PACM) database
  http://www.pubmedcentral.nih.gov/utils/pacm

- Sherpa/Romeo database http://www.sherpa.ac.uk/romeo

- Libguides community, search for NIH Public Access Policy
  http://libguides.com/community.php

- SPARC addendum
  http://www.sparc.arl.org/resources/authors/addendum

- AAHSL-NIHcompliance listserv
  Ask your library director to email office@aahsl.org to request you be added to the listserv

- Your institution's Office for Research

- Publishers

Himmelfarb Library NIHPAP Compliance Libguide
http://libguides.gwumc.edu/NIHcompliance

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