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RESEARCH
ADMINISTRATORS

NOV 13, 2025



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Research. Education. Development.

Free, Immediate, and Equitable Access

Federal Public Access Updates and Publishers' Response

Presenters

- ❖ Cameron Cook, Head of Research Data & Digital Scholarship Strategy, UW-Madison Libraries (cameron.cook@wisc.edu) - **Data**
- ❖ Carrie Nelson, Head of Scholarly Communication, UW-Madison Libraries (carrie.nelson@wisc.edu) - **Publishers**
- ❖ Ryan Schryver, Compliance Lead, Public Access Service, UW-Madison Libraries (ryan.schryver@wisc.edu) - **Publications**

Federal Public Access Policy (Reminder)

What is public access policy?

- Term & Condition for receiving federal awards and contracts
- Impacts peer-reviewed journal publications and data derived from research supported by federal awards
- Author accepted manuscripts must be deposited in funders' repositories; data deposited in appropriate repositories
- Non-compliance may impact PI's current or future award funding

Isn't it the same as open access?

Public access requires the submission of publications to the funders' repositories; data can be made open or restricted

What is the compliance process?

1. The PI must ensure that the manuscript associated with their award is submitted to the funder's repository
2. Demonstrate compliance on the PI's annual progress report

Publications



Federal Public Access Updates

Nelson Memo (August 2022) – Universal Effective Date: December 31, 2025

2013 Public Access Policy	2022 Public Access Policy
Federal R&D Funders = \$100 million+	All federal R&D funders
Embargo Period: 0-12 months from official publication date before scholarly work is fully accessible in funder repository	No Embargo Period: Scholarly works fully accessible in funder repositories on their official publication dates
<ul style="list-style-type: none">• Compliance required within 12 months of official publication date	<ul style="list-style-type: none">• Compliance required by official publication date
<ul style="list-style-type: none">• Official publication date: based on first print date for hybrid; first online date for electronic	<ul style="list-style-type: none">• Official publication date is first full and complete iteration of edited text (digital or print)
<ul style="list-style-type: none">• Noncompliance: Past 12 months from official publication date	<ul style="list-style-type: none">• Noncompliance: Past official publication date
<ul style="list-style-type: none">• Submit accepted manuscript to funder	<ul style="list-style-type: none">• Submit accepted manuscript to funder

Funder Updates - NIH

- Manuscripts accepted for publication on or after July 1, 2025, should use the 2024 policy.
- Manuscripts accepted for publication between April 7, 2008, and June 30, 2025, should follow the 2008 policy.
- An author accepted manuscript should be submitted to PubMed Central on acceptance and before its official publication date, which is the date the final, edited work is first made available in a print or electronic format.
- The full text of the manuscript will be made publicly available without embargo on its official date of publication.

Funder Updates - DOE

- Scholarly works published on or after October 1, 2024, should be submitted to the DOE's PAGES repository via the E-Link manuscript submission system by the work's official publication date.
- Scholarly works published before the October 1 date should be submitted as soon as possible.
- The policy was fully implemented on October 1, 2025, for all scholarly works.
- Submit on acceptance!

Publication Costs

- Most funders continue to allow use of award funding for APC's, OA charges, etc.
- According to NIH Policy and Guidance documents associated with the updates, additional **unallowable** publication costs:
 - Fees for submission to PMC
 - Costs for which the institution already pays a fee that would cover the publication, such as a fee to publish in a journal already part of “read-and-publish” agreement
 - Costs that are *charged differently* because the author is subject to NIH's Public Access Policy
 - Publication costs incurred after the closeout of the award

§ 200.461 Publication and printing costs.

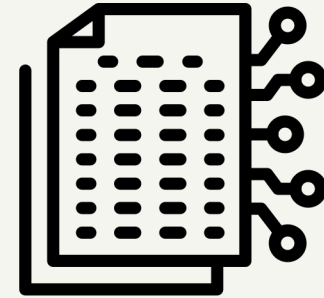
- (a) Publication costs for electronic and print media, including distribution, promotion, and general handling, are allowable. These costs should be allocated as indirect costs to all benefiting activities of the recipient or subrecipient if they are not identifiable with a particular cost objective.
- (b) Page charges, article processing charges (APCs), or similar fees such as open access fees for professional journal publications and other peer-reviewed publications resulting from a Federal award are allowable where:
 - (1) The publications report work supported by the Federal Government; and
 - (2) The charges are levied impartially on all items published by the journal, whether or not under a Federal award.
 - (3) The recipient or subrecipient may charge the Federal award during closeout for the costs of publication or sharing of research results if the costs were not incurred during the period of performance of the Federal award. These costs must be charged to the final budget period of the award unless otherwise specified by the Federal agency.

CFR Title 2—Federal Financial Assistance

Publication Compliance Best Practices

- Submit to NIHMS on acceptance (**BuckySubmit:** <https://pas.wisc.edu/buckysubmit>)
- Keep accepted manuscripts on hand – fastest way to become compliant
- Be aware of journal/publisher author agreements that may contradict federal policy
- Know if journal or publisher will submit for you (PAS: publicaccess@wisc.edu)

Data & Standards



2022 OSTP Memo Policy – DMSPs

Many major funders have policies out and in effect, but there is still some flux

Agencies with Updated Policies in Effect

AHRQ | CDC | Ed | DOE | EPA | FDA | IMLS | NASA SMD | NEH | NIH | Smithsonian

Agencies with Updated Policies Published but not yet in Effect

ACF | ACL | Census | CMS | CPSC

Agencies Without Updated Policies Published

DOD | DOT | DHS | FWS | NIJ | NIST | NOAA | NSF | SSA | USAID | USDA | USGS | VA

PAPPG in
draft

Things to note:

- Agencies are coalescing around 'Data Management & Sharing Plans' (DMSPs) language
- Emphasis on using repositories that meet the federal characteristics
- DMSPs may be more detailed depending on the agency (e.g. DOE), some will look the same (like NIH).
- Accelerated sharing timeline – at time of publication for data underlying publications and findings.
 - Encouraged to share more than that if researchers would like to

For many researchers, nothing will look too different

Timelines and policies are a little funny currently –

- for instance NSF website states this is in effect, but the PAPPG isn't finalized and details are not available



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data management plans

personal consultations

education & training

researchdata.wisc.edu & @UWMadRsSchSvcs

University of Wisconsin–Madison (wisc.edu)

 University of Wisconsin–Madison (wisc.edu) Research Data Services*** What research project are you planning?***** Select the primary research organization**

Research organization

*** Select the primary funding organization**

Funder

DMPTool

dmptool.org

[Project Details](#)[Collaborators](#)[Write Plan](#)[Research outputs](#)[Request feedback](#)[Finalize](#)[Download](#)

This plan is based on the "NIH-GEN DMSP (2023) " template provided by National Institutes of Health (nih.gov) - (ver: 8, pub: 2023-01-24).

[expand all](#) | [collapse all](#)

0/12

[+ Data Type \(0 / 3\)](#)

+

[+ Related Tools, Software and/or Code \(0 / 1\)](#)

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[+ Standards \(0 / 1\)](#)

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[+ Data Preservation, Access, and Associated Timelines \(0 / 3\)](#)

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[+ Access, Distribution, or Reuse Considerations \(0 / 3\)](#)

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[+ Oversight of Data Management and Sharing \(0 / 1\)](#)

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Gold Standard Science

Released in summer 2025

- 9 tenets of research conduct

Agencies had to respond with plan/report

- Out now
- Some agency reports note that DMSPs and public access requirements already fulfill the purposes of the 9 tenets
- Reports focus more on agency activities:
 - adjustments to resources and trainings for research integrity,
 - improving monitoring and reporting,
 - improving review and conflict of interest management,
 - and things like null results recognition.

Key takeaways

Our institution has been conducting gold standard science throughout our history and will continue to do so!

Working with OVCR on some web resources for researchers

- Will have information on how to identify & be able to speak to gold standard science practices
- Campus resources that support meeting the 9 tenets
- To be released early 2026!

If things change and it does impact public access policy – we'll let you know!

Publishers' Response



Publishing Under New Requirements

Publisher responses to zero-embargo have varied.

- some are allowing deposit of the Author Accepted Manuscript (AAM) without embargo
- some continue to require authors to agree not to share the AAM without an embargo unless publishing open access
- some are experimenting with other models (ACS)

Publishers and funders are adjusting expectations as this evolves, so stay tuned.

Advising Authors

- First and foremost, ensure compliance with manuscript deposit requirements as outlined by the [Public Access Service](#).
- Consult with publishers to find out if their publication agreements allow deposit of the AAM immediately upon publication.
- If necessary, use research funds to cover open access publishing fees or APCs **not fees for the right to deposit your AAM in a repository**

Advising Authors

- Consider choosing a publisher that allows for immediate deposit of the AAM in a repository.
 - Traditional publishers that agree to no embargo (Sage and AAAS)
 - “Diamond” Open Access Publishers
 - Publishers that have agreements with the libraries to have publishing fees covered or subsidized. [Library Support for OA Publishing](#).
- Contact the libraries for help.

What Next?

- The relationship between publication agreements and federal policy continues to evolve.
 - Under what circumstances will agencies allow publishing fees to be covered by grant funds?
 - Under what circumstances can publishers set limits on sharing of AAMs?
- We need to keep strong communication lines open among RSP, Campus Legal, and libraries as we track changes and decide how to advise researchers.



Thanks!

Questions?

