



August 19, 2024

NIH Office of Science Policy  
National Institutes of Health  
6705 Rockledge Dr #750  
Bethesda, MD 20817

**Re: Request for Information on the National Institutes of Health Draft Public Access Policy**

Submitted electronically at: <https://osp.od.nih.gov/comment-form-national-institutes-of-health-draft-public-access-policy/>

Dear National Institutes of Health Office of Science Policy,

The Alliance for Nursing Informatics (ANI) appreciates the opportunity to comment as nursing stakeholders on the National Institutes of Health (NIH) Request for Information on the NIH Draft Public Access Policy.

[The Alliance for Nursing Informatics](#) (ANI), co-sponsored by AMIA and HIMSS, advances nursing informatics leadership, practice, education, policy, and research through a unified voice of nursing informatics organizations. We transform health and healthcare through nursing informatics and innovation. ANI is a collaboration of organizations representing more than 25,000 nurse informaticists and bringing together 28 distinct nursing informatics groups globally. ANI crosses academia, practice, industry, and nursing specialty boundaries and collaborates with the more than 4 million nurses in practice today.

We fully support the goals of the NIH Plan to Enhance Public Access to the Results of NIH-Supported Research, aligning with the U.S. Government's directive for "Ensuring Free, Immediate, and Equitable Access to Federally Funded Research." As nurses, we also recognize the ability for patients, families, and members of the public to have equitable access to published findings resulting from NIH funding enables them to better understand and address the most critical public health concerns facing their communities. We appreciate NIH goals for responsible stewardship of the Nation's investment in biomedical research by improving transparency and accessibility of taxpayer-funded research.

We acknowledge the central role patients and the public play in health care and health research and support the removal of the currently allowable 12-month embargo period before public availability. We provide the following recommendations for your consideration:

- While we support the elements of the plan that are designed to accelerate public access to scholarly publications, we are concerned about the potential misunderstandings for

patients and families that might arise due to the complex language used in these publications. To improve public understanding of scientific articles, we propose that NIH consider offering a plain-language version of abstracts that could be developed using generative artificial intelligence and be included on sites such as PubMed. Use of these abstracts could facilitate accurate communication of scientific results. We also support the continued practices to make content in PubMed Central available in accessible and machine-readable formats and through assistive devices, as well as the continued development of related press releases that offer lay-friendly language.

- We applaud the attention to publication costs and the free pathway to compliance. However, we would like a method for authors and institutions to report any violations by journals or others as the downstream effects become more readily apparent.

Thank you for the opportunity to comment on the NIH Draft Public Access Policy.

Sincerely,



Susan Hull, MSN, NI-BC, NEA-BC, FAMIA  
ANI Co-chair



Nancy Beale, Ph.D., RN, NI-BC, FAMIA  
ANI Co-chair

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