

STEPS FOR RETROACTIVE COMPLIANCE OF WORKS UNDER THE NIH PUBLIC ACCESS POLICY

Retroactive compliance refers to the process of determining the compliance status per [NIH Public Access Policy](#) for works that are considered as non-compliant per [My Bibliography](#), the [Public Access Compliance Monitor](#) (PACM), or other source.

More information: <http://beckerguides.wustl.edu/nihpolicy>



Confirm that the work is in a NCBI [My Bibliography](#) account belonging to an author or a Principal Investigator (PI) **before starting** the retroactive compliance process steps. The following steps are based on the work has been added to a [My Bibliography](#) account.

1. Is the work applicable per [NIH Public Access Policy](#) criteria? See [Applicability](#) criteria. **YES** to all **three criteria** means that the work is applicable. If you are not able to locate the date of acceptance for a work or are if you are not sure the work was published in a journal, contact [Cathy Sarli](#) or [Amy Suiter](#).
2. If the work is **not** applicable, note **N/A** on My Bibliography using the “Edit Status” [function](#). See [My Bibliography](#) for guidance.
3. If the work is applicable, is “**PMC Journal – In Process**” noted in My Bibliography?

If “**PMC Journal – In Process**” is noted:

This means that the work was published in a Submission Method A or B journal, and will be submitted to PMC around the time of publication with a PMCID available within 90 days post-publication.



Is there a RED dot next to the work in My Bibliography?

If yes, check the [Submission Method A](#) journal list. Confirm that the journal is on the Submission Method A list and that the work was published within the Start and End dates as noted. If yes, contact the journal to clarify the submission status of the work to PMC and if no PMCID within two weeks, contact [NIH](#) to report the non-compliant status of the work.

If the journal is not on the [Submission Method A](#) journal list, this means that the work was published in a journal offering a Submission Method B option and the author should contact the journal to clarify the submission status of the work to PMC.



Is there a YELLOW dot next to the work in My Bibliography?

If yes, this means that the work is within the 90 days post-publication window per PMCID requirement. Track this work weekly to confirm that a PMCID is assigned within 90 days post-publication.

4. If the work is applicable, is there a **NIHMSID** noted in My Bibliography?

If a **NIHMSID** is noted:

This means that the work was published in a Submission Method C or D journal and has been submitted to NIHMS for processing and assignment of a PMCID.

NIHMS=National Institutes of Health Manuscript Submission system
NIHMSID= National Institutes of Health Manuscript Submission system identifier number
PACM=Public Access Compliance Monitor
PACR=Public Access Compliance Monitor Authorized User
PMC=PubMed Central
PMCID=PubMed Central identifier number
PMID=PubMed identifier number

A PMCID is required within 90 days post-publication of a work.



Is there a RED dot next to the work in My Bibliography?

If yes, search the [NIH Manuscript Submission system](#) (NIHMS) using the NIHMSID for the work to clarify the processing status of the work (NOTE: a [NCBI account](#) is required to access NIHMS). If no information is available, contact the [NIHMS Help Desk](#) to clarify the status of the work and to find out which author has been assigned as the responsible author for the NIHMS approval tasks. Include the full citation including the PMID for the work. NIHMS will provide the current processing status of the work and the name of the responsible author for the NIHMS approval steps.

Sample language to the [NIHMS Help Desk](#):

Please advise as to the processing status of the following work and which author has been assigned as the responsible author for the NIHMS approval steps.

[INSERT CITATION TO THE WORK, PMID AND NIHMSID (if known)].

If the responsible author is not timely completing the NIHMS approval steps required for a PMCID, any other author can be assigned as the responsible author. This is done by sending an email to the [NIHMS Help Desk](#).

Sample language to the [NIHMS Help Desk](#):

*Please assign **[INSERT NAME AND EMAIL ADDRESS]** as the responsible author for the NIHMS approval steps for the following work per NIH Public Access Policy: **[INSERT CITATION TO THE WORK AND PMID AND NIHMSID (if known)]**.*

Another option is to search the [Public Access Compliance Monitor](#) (PACM) using the PMID for the work.

PACM is a database of articles that NIH believes a particular grantee institution is responsible for under the terms of the NIH Public Access Policy. It may or may not contain all applicable works and some works may be exempt from the NIH Policy. Each department, division or program on campus has a designated PACR who is able to run reports on PACM. Please contact **Laura Langton** langton@wustl.edu to find out who the designated PACR is for your group.

PACM will provide more detailed information as to the processing status of the work and also note who the responsible author is for completing the NIHMS approval tasks required for assignment of a PMCID. If you need a specific work searched in PACM, please contact the PACR for your group or [Cathy Sarli](#) or [Amy Suiter](#). A PACR is a person designated as the authorized delegate to access PACM.

In most cases, a non-compliant work with a NIHMSID is stalled in NIHMS due to the responsible author not timely completing the NIHMS approval steps. A PMCID is required within 90 days

post-publication. There may also be an instance where a NIHMSID is available but no manuscript files were submitted. This means that someone started the NIHMS submission process but did not submit the manuscript files, also called an “empty record.” Authors should confirm that the work was published in a Submission Method C journal before submitting files for an empty record.



Is there a YELLOW dot next to the work in My Bibliography?

If yes, this means that the work is within the 90 days post-publication window per PMCID requirement. Track this work weekly to confirm that a PMCID is assigned within 90 days post-publication.

5. If the work is applicable and there is no “**PMC Journal – In Process**” or a **NIHMSID**, this means one of the following:

- 1) The work was published in a journal offering a **Submission Method B** option and has not been noted as such in My Bibliography by one of the authors.
- 2) The work was published in a **Submission Method C** journal and the authors have not yet self-submitted the work or assigned a third party to do so.

- 3) The work was published in a **Submission Method D** journal and has been submitted to NIHMS by the journal but the responsible author for the NIHMS approval tasks (by default: the corresponding author) has not yet approved the submission as made by the journal.
- 4) The work was published in a **Submission Method D** journal and has not been submitted to NIHMS by the journal.

These scenarios require investigation to determine the Submission Method of the journal the work was published in to start the compliance process. If available, a review of the copyright transfer agreement signed by the authors for the work might help determine the Submission Method of the journal. If the copyright transfer agreement is not available, see [Finding Journal Policies for Submission Methods](#) for guidance on how to find journal policies for NIH-funded authors and journal contact information. If no information can be located, authors will need to contact the journal for clarification as to policies for NIH-funded authors.

Sample language to send to the journal:

Please advise as to your policies for NIH-funded authors who are required to comply with the NIH Public Access Policy.

If the authors paid a journal to have their work published as a **Submission Method B** option, they should note the work as being a Submission Method B using the [My Bibliography](#) "Edit Status" [function](#) and follow-up with the journal to clarify the submission status of the work.

If the journal is a **Submission Method C** journal, one of the authors should self-submit the work to NIHMS or assign a third party to submit the work. See [NIHMS Submission Help for Principal Investigators and None-PI Submitters](#) for guidance on how to submit the work to NIHMS or contact [Cathy Sarli](#) to arrange for a submission to be made. See [Becker Library Submission Services](#).

A NIHMSID is not available in My Bibliography until the responsible author has completed the first of two NIHMS approval steps.

If the journal is a **Submission Method D** journal, the first step is to confirm that the work was submitted to NIHMS by the journal. Contact the [NIHMS Help Desk](#) to clarify the submission status of the work and which author has been assigned as the responsible author for the NIHMS approval tasks.

Sample language to the [NIHMS Help Desk](#):

Please advise if the following work has been submitted to NIHMS and if so, which author has been assigned as the responsible author for the NIHMS approval steps for the following work per NIH Public Access Policy: [INSERT CITATION TO THE WORK AND PMID].

NIHMS will provide the current processing status of the work and the name of the responsible author for the NIHMS approval steps.

If the work has been submitted to NIHMS:

Contact the responsible author and ask them to log-in to [NIHMS](#) to complete the first NIHMS approval step to start the processing required for assignment of a PMCID.

If the responsible author does not timely complete the NIHMS approval steps required for a PMCID, any other author to the work can be assigned as the responsible author. This is done by sending an email to the [NIHMS Help Desk](#).

Sample language to the [NIHMS Help Desk](#):

Please assign [INSERT NAME AND EMAIL ADDRESS] as the responsible author for the NIHMS approval steps for the following work per NIH Public Access Policy: [INSERT CITATION TO THE WORK AND PMID].

If the work has NOT been submitted to NIHMS:

Contact the journal to clarify the submission status of the work. Check the journal website for contact information. See [Finding Journal Policies for Submission Methods](#) for guidance on how to find journal contact information.

Sample language to send to Method D journals:

Please advise as to the submission status of the following work per NIH Public Access Policy:

[INSERT FULL CITATION TO THE WORK INCLUDING THE PMID AND DOI].

*This work is applicable under the NIH Public Access Policy and according to your policy as noted on **[INSERT URL TO JOURNAL POLICY]** the journal will submit works to PubMed Central (PMC) on behalf of NIH-funded authors. To date, the work has not been submitted to the NIH Manuscript Submission system (NIHMS) in preparation for posting to PMC. The authors are unable to demonstrate compliance with the NIH Policy until the work is submitted.*

Retain
copies of
emails sent
to a journal
publisher.

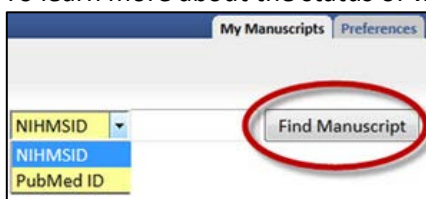
If no response from the journal after two emails or if the journal does not provide sufficient information as to the submission status, please contact [Cathy Sarli](#) to obtain a statement to send to journals that are not timely submitting or responding to emails. The statement triggers the right of authors to self-submit the work via **Submission Method C** if no response from the journal.

SHORTCUT STEPS

Find the work in [PubMed](#). Does the work have a PMCID noted on the record page below the abstract? If not, note the PMID to use for further searching.

Add the PMID of a work to the [PMID-PMCID Converter tool](#) to see if the work has a NIHMSID or a PMCID. The [PMID-PMCID Converter tool](#) is often updated sooner than PubMed.

Add the PMID or NIHMSID to [NIHMS](#) using the “Find Manuscript” tool (NOTE: a [NCBI account](#) is required to access NIHMS). To learn more about the status of works, see [Glossary of NIHMS](#) terms.



Add the PMID of the work to [PACM](#) using the “Search by PMID” tool. If you do not have access to PACM, contact [Cathy Sarli](#) or [Amy Suiter](#).



PACM will provide following information:

- Compliance status of a work
- Method A journal
- NIHMSID (if available)
- Name of the author responsible for the NIHMS approval steps
- Date of a submission of a work to NIHMS
- Processing status of a work in NIHMS
- PMCID (if available)

<http://beckerguides.wustl.edu/nihpolicy>

Questions? Contact Cathy Sarli: sarlic@wustl.edu or Amy Suiter: suitera@wustl.edu