

# Addressing Procurement Issues with Paying Publishing Charges and Signing Copyright Forms

## Background

When a Southern Research Station (SRS) employee submits a manuscript to a journal or similar outlet, they are potentially committing the federal government to pay publishing charges. For an SRS employee to do so ***without prior authorization*** is a violation of Federal Acquisition Regulations (FAR). SRS employees must understand that publishing charges (open access fees, page charges, color charges, article processing fees, etc.) **for journals (or other comparable outlets such as book chapters) are considered a “non-recurring service” (not materials or supplies) and therefore have a micro purchasing limit of \$2,500 per transaction and BOC 2570 or 2580.** According to FAR, any procurement for a non-recurring service exceeding the \$2,500 threshold **must** be pre-planned and made by a warranted member of the Contracting staff, not by a micro purchase cardholder.

## SRS Solution

Based on the model currently employed by the Forest Products Lab (FPL), we propose the following 5-step solution, which takes into account the organizational structure of SRS:

### STEP 1: AUTHOR DETERMINES IF PUBLICATION CHARGES WILL ARISE

- a) If the paper is destined for an outlet with no publication charges, the author may continue with the process by completing a [Manuscript Approval and Processing form \(FS-1600-1\)](#), including its signature by the appropriate Designated Responsible Official (DRO), and proceed to STEP 5.
- b) If the manuscript is to be submitted to an outlet with publication charges (this includes most refereed journals), the author will proceed with STEPS 2-4.

### STEP 2: DEVELOP COST ESTIMATES

- a) For your preferred publication outlet, estimate the maximum cost of publication and determine if this outlet accepts credit card payment for their charges.
- b) Develop a prioritized listing of alternative outlet(s) and their maximum estimated publication costs in case the preferred outlet rejects the submission.
- c) If only one outlet is specified and the manuscript is rejected, and the author intends to resubmit the manuscript to an outlet with publication charges, the author must repeat STEPS 2-4 prior to resubmitting.

### STEP 3: COMPLETE CERTIFICATION WORKSHEET

- a) Using the information gathered in steps 2a and 2b, complete an [SRS Publication Cost Certification Worksheet](#), sign this Worksheet, and route accordingly.
- b) If the maximum estimated cost is less than \$2,500 and the journal accepts credit card payments, the completed and fully signed Worksheet serves as the notice of the possibility of page charges and the Station's confirmation and concurrence, and submission to the publication outlet may proceed.
- c) If the maximum estimated cost exceeds \$2,500 OR the journal does not accept credit card payments, send the prioritized publisher listing and completed/signed SRS Publication Cost Certification Worksheet to Contracting ([Keith Friot](#)), complying with guidance provided by

Contracting before submission to any publisher. Communication specific to the steps required by Contracting at this point should occur between the Contracting official and the BMA.

STEP 4: SUBMIT MANUSCRIPT TO OUTLET FOR THEIR EVALUTION/ACCEPTANCE

- a) If the manuscript is rejected by your first choice, you can submit to the next journal on the list of alternatives you developed earlier; if you choose to go to a different publication venue, this certification process may need to be reinitiated.

STEP 5: FINALIZING PUBLICATION PROCESS

- a) Upon acceptance of the manuscript, send any invoice Station Lead BMA, your unit/Center BMA or Card Holder for payment when costs are less than \$2,500. If the planned charges exceed \$2,500, send the invoice to the Station Lead BMA, your BMA, and **Contracting**, if the charge was previously identified on the *SRS Publishing Charge Certification Worksheet*. Unit will need to submit an IAS requisition to process the payment.
- b) Upon acceptance, it is the author's responsibility to sign copyright forms and affirm any statements required by the journal (e.g., this manuscript is original, the data presented in this manuscript is accurate, etc.). Note that authors are not transferring a copyright to the publication outlet because our work on official time is in the public domain. Most journals have a copyright statement specific to US government workers. If there are any questions related to the copyright, contact Pearley Simmons or Michael Robinson prior to signing any copyright agreement.