



<http://www.ala.org/ala/mgrps/divs/acrl/issues/scholcomm/ostpcomments.cfm>

January 12, 2010

Executive Office of the President
Office of Science and Technology Policy
Attn: Open Government Recommendations
725 17th Street
Washington, DC 20502
Via e-mail: publicaccess@ostp.gov

The American Library Association (ALA) and the Association of College and Research Libraries (ACRL) write in response to the request for information issued December 9, 2009, by the Office of Science and Technology Policy (OSTP) regarding public access policies for science and technology funding agencies across the federal government. The ALA is a nonprofit professional organization of more than 65,000 librarians, library trustees, and other friends of libraries dedicated to providing and improving library services and promoting the public interest in a free and open information society. ACRL, the largest division of ALA, is dedicated to enhancing the ability of academic library and information professionals to serve the information needs of the higher education community and to improving learning, teaching, and research. Both the ALA and ACRL publish scholarly, peer-reviewed journals in the field of library and information science.

The ALA and ACRL appreciate the opportunity to comment on increasing public access to scholarly publications resulting from federally funded research. Many of our individual members and their libraries will also submit detailed comments on the OSTP blog. The ALA and ACRL have long believed that ensuring public access to the fruits of federally funded research is a logical, feasible, and widely beneficial goal. The National Institutes of Health's (NIH) Public Access Policy, as enacted, provides a tremendous public benefit and accelerates the advancement and practical application of, and access to, knowledge. It is entirely in keeping with the missions of all types of libraries, especially public, college, and university libraries. Both the ALA and ACRL have endorsed "The Federal Research Public Access Act of 2009" (S. 1373) noting, "It reflects ALA policy regarding access to federal government information by providing for the long-term preservation of, and no-fee public access to, government-sponsored, taxpayer funded, published research findings."

We understand you are not looking for sweeping philosophical statements about the benefits of public access policies, but rather for specific information and evidence to support recommendations on implementation, features and technology, and management. In that spirit, the ALA and ACRL offer the following comments.

1. **Which Agencies.** All federal agencies funding significant research should adopt public access policies. This is important in a wide variety of disciplines, as new research in many fields can have an immediate impact on the public good. It is also necessary to establish consistent expectations and conditions for the

- management of grants and resulting output, saving institutions and principal investigators valuable time.
2. **Mandatory.** Based on the initial experience of low manuscript deposit rates under a voluntary NIH Public Access Policy, mandatory policies are necessary to ensure compliance and routine uptake of such submissions.
 3. **Earlier Access.** We urge a short embargo period and recommend a 6-month maximum to bring U.S. policy into alignment with policies already in place in Canada, the United Kingdom, and the European Union. This would better reflect the rapid pace of research in the science and technology fields and would enable more timely use of research results.
 4. **Version.** While the final published version of an article is preferred, we consider the authors' peer-reviewed manuscript to be an acceptable substitute, as long as it is clearly noted as such, and includes the publication citation and a link to the final published article. Research funders and journal publishers commonly provide broad access to authors' manuscripts prior to publication. ACRL employs this practice with its own scholarly journal, *College and Research Libraries*. We also support deposit of authors' final manuscripts in their home institutional repositories in addition to the managed repository environment that would be established by the funding agencies. So long as each version is properly documented, we believe that any potential confusion caused by having multiple versions available is offset by the expansion of access this would create.
 5. **Format.** The authorized repository should provide support for converting the file to a standard mark-up language, such as the currently preferred XML, if the file is not submitted in that format. PDF, a document format in ubiquitous use, does not support robust searching, linking, text-mining, or reformatting over the long-term, nor does it provide full accessibility for the blind and reading impaired. Standardization of format across the board is a key element to long-term public access. The options for submission format should follow the conventions of the disciplines from which the papers come, and not create an undue burden for the authors or publishers.
 6. **Cost control.** To keep implementation costs reasonable, it will be important for agencies to avoid establishing independent proprietary repositories. Federal agencies should look for possible economies of scale by partnering with each other or with academic institutions.ⁱ The latter's research libraries already have experience with repository management, archiving, and access by coordinating investments for maximum advantage to scholarship as a whole. NIH has instructive implementation data.ⁱⁱ Additionally, the primary policy requirements should be coordinated across agencies to reduce the burden on grantees to learn requirements for multiple policies, to facilitate compliance across the board, and to maximize the discoverability of all relevant papers regardless of funding agency.
 7. **Comment/feedback features.** Scholars are increasingly communicating peer-to-peer while research is in progress and, "what the publisher produces—the final journal article—is more or less a footnote to the R&D process."ⁱⁱⁱ In some disciplines, there is a movement to "democratize knowledge," which can be interpreted as both reaching out to the public to share academic discoveries and

inviting contributions.^{iv} In light of this, any measures or policies being adopted now must be carefully crafted to allow, and not inadvertently thwart, changes in scholarly practices that are emerging or that have yet to emerge.

Academic and research libraries across the country invested significant time helping their campuses prepare for and implement the new NIH policy – through outreach, copyright education, technical support, and other means. Should additional federal agencies adopt public access policies, ACRL is well-suited to assist our libraries and campuses again by sharing best practices, promulgating model publication agreements, and providing education about the rapidly changing scholarly publishing environment in which these policies fit. Meanwhile, the ALA will continue its mission to assist our patrons in accessing such critical federally funded information that would be made available.

ⁱ Harnessing Openness to Improve Research, Teaching and Learning in Higher Education. Committee for Economic Development. 2009. See second recommendation for colleges and universities. p 44.

http://www.ced.org/images/library/reports/digital_economy/dcc_opennessedu09.pdf

ⁱⁱ Analysis of Comments and Implementation of the NIH Public Access Policy. September 30, 2008. p 2

http://publicaccess.nih.gov/analysis_of_comments_nih_public_access_policy.pdf

ⁱⁱⁱ Reality Bites: Periodicals Price Survey 2009. By Lee C. Van Orsdel & Kathleen Born -- *Library Journal*, 4/15/2009 <http://www.libraryjournal.com/article/CA6651248.html?q=periodicals+price+survey+2009>

^{iv} For more on this see <http://www.hastac.org/forums/hastac-scholars-discussions/democratizing-knowledge-digital-humanities>