



## ASSOCIATION OF RESEARCH LIBRARIES

### Comments on behalf of the Association of Research Libraries

March 20, 2008

These comments are made on the behalf of the Association of Research Libraries on the revised NIH Public Access Policy. ARL strongly supports the Policy and commends NIH for soliciting comments while moving ahead in a timely manner with this critically important congressionally approved policy. Most ARL libraries support researchers who receive NIH funding thus are collaborating with others to ensure effective compliance with the Policy. As is abundantly clear by the numerous comments filed by ARL members, there is strong support for the revised NIH Policy because it is integrally tied to the mission of higher education.

As Dr. Zerhouni noted this morning, since the Policy was first introduced in 2004, there has been extensive public comment, legislative consideration by the House and Senate, review by an NIH appointed Working Group that included publishers, and many meetings with affected parties and NIH. Now is the time to work collaboratively to ensure that implementation is successful as public access to federally funded research furthers scientific discovery, enhances U.S. competitiveness, and ultimately, improves the health of Americans.

ARL and its members are actively engaging in a number of activities to assist institutions and their researchers in complying with the NIH Policy. Steps taken to date demonstrate that institutions believe that compliance is achievable. This is due in part because research libraries focused on copyright management and access issues well before the NIH policy surfaced. This involves helping authors make informed decisions to exercise their interests in the ownership and use of copyrighted works – and to do so -- in a manner that promotes the greatest possible scholarship and public use of their work. This includes promoting tools that allow authors to deposit their works in disciplinary repositories like PubMed Central and also their own institutional repositories.

Briefly, ARL developed a suite of resources to assist campuses with implementation of the policy. These range from exploring the implications of the NIH Policy with a group of library directors, chief research officers, staff from NIH, and representatives from higher education associations to publishing a resource guide on the policy for research institutions. In addition, with NASULGC, ARL co-sponsored a webcast focused on retaining deposit rights for compliance and helping institutions and investigators be successful in responding to the NIH Public Access Policy. Finally, ARL released a joint white paper with SPARC and Science Commons that explored new institutional policies that address copyright management issues. All of these resources and communication strategies are designed to accelerate the readiness of institutions and their researchers to successfully comply with the NIH policy.

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With regards to possible changes to the Policy, we encourage NIH to reconsider the embargo period of 12 months and once again, solicit comments on a 6 month embargo as originally proposed. As is widely understood, even with a 6 month embargo period, research libraries will not cancel journal subscriptions as that is too long a time without needed research information. Publishers therefore are not at risk from the revised Public Access Policy or from a shortened embargo period.