



## ASSOCIATION OF RESEARCH LIBRARIES

ARL Comments on NIH Revised Public Access Policy  
May 2008

These comments on the revised NIH Public Access Policy are submitted on behalf of the Association of Research Libraries (ARL). Public support for science is enhanced when the public sees the benefits from our Nation's investment in scientific research. There is no doubt that scientific research is advanced by greater access to and dissemination of knowledge and the building upon the work of others.

ARL commends NIH for soliciting additional comments on the revised Policy while at the same time, implementing the congressionally approved change in policy. Because the NIH Policy is integrally tied to the mission of higher education, research libraries are collaborating with others across the academic enterprise to ensure effective compliance with the revised Policy. This entails assisting individual researchers, working with campus research offices, developing or extending existing policies to ensure effective compliance, creating informational websites and more. Copyright management and access have been the focus of ARL libraries for quite some time. This involves helping authors make informed decisions so that they exercise their rights and interests in the ownership and use of copyrighted works in a manner that promotes the greatest possible scholarship and public use of their work. As a result, implementation of the NIH Policy builds on existing policies and initiatives and is seen as one more opportunity to support the interests of the academy.

Question 1: ARL encourages NIH to reconsider the current embargo period of 12 months. An embargo period of 6 months or less is more appropriate as a 12 month embargo is too long a delay for individuals to access needed research information. Research libraries will not cancel needed STM journal subscriptions if a 6 month embargo is implemented. Finally, given that scientific research is global, a 6 month embargo is more consistent with international public access policies.

Question 2: It would be helpful if NIH posted and routinely updated a list of publishers whose author agreements permit authors/institutions to comply with the NIH Public Access Policy. It would also be helpful if NIH could automatically notify the appropriate campus entity ( e.g. Office of Sponsored Research, the Library, etc.) when a manuscript or article has been deposited in PubMed Central (PMC). Finally, it would be helpful if NIH would work with academic institutions on coordinated manuscript deposit between PMC and institutional repositories.

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