



ASSOCIATION OF RESEARCH LIBRARIES

These comments are submitted on behalf of the Association of Research Libraries (ARL). ARL is a nonprofit organization of 123 research libraries in North America. ARL strongly supports the "NIH Revised Policy on Enhancing Public Access to Archived Publications Resulting From NIH Funded Research" (hereafter the NIH Public Access Policy). ARL members include many university libraries that support researchers on campuses who receive NIH funding. As a consequence, many ARL libraries are collaborating with others within their institution to ensure effective compliance with the revised Public Access Policy.

The U.S. Government funds research with the expectation that new ideas and discoveries from the research will further scientific discovery, stimulate the economy, and improve the lives and welfare of Americans. These strategies, such as the revised NIH Public Access Policy, advance science, enhance U.S. competitiveness, improve access to the fruits of our collective investment, and provide better accountability of our Nation's research investments. For these reasons, ARL is a strong supporter of the NIH Public Access Policy.

ARL and its member libraries are actively engaging in a number of activities to assist institutions and their researchers in complying with the NIH Public Access Policy thus maximizing its benefits for researchers and research institutions as well as the public. ARL has developed tools and resources for the research and education community and for institutions to assist in developing and/or modifying existing policies and practices in order to comply with the NIH Public Access Policy. It is important to note that although the change in the NIH Public Access Policy is relatively recent, ARL and its members have been focused on copyright management and access issues for some time. For example, helping authors of works make informed decisions about these issues has been a priority for research libraries for many years. As a recent survey of ARL member libraries demonstrates, libraries are providing and promoting tools that allow authors to deposit their works in disciplinary repositories like PubMed Central and also their own institutional repositories. Please see:

<http://www.arl.org/sc/copyright/author-rights-resources.shtml> and
<http://www.arl.org/bm~doc/spec299book.pdf.zip>.

The resources that ARL developed since the announcement of the revised Public Access Policy include the following. First, ARL hosted a small group of library directors and chief research officers with staff from NIH, a copyright expert and representatives from higher education associations to explore the implications of the mandatory NIH Public Access Policy. The group identified strategies that research universities and their national associations could pursue to support campus investigators in complying with the new deposit requirement. These strategies were shared with the ARL community. Following up on that session, ARL published the "*NIH Public Access Policy: Guide for Research Universities*." (<http://www.arl.org/sc/implement/nih/guide/index.shtml>) This *Guide*

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complements the NIH resources devoted to the Public Access Policy and includes links to many examples of resources created by research institutions. Third, ARL released a joint white paper with SPARC and Science Commons that explored new institutional policies that address copyright management issues that may be needed to comply with the NIH Public Access Policy. The paper analyses a set of options that institutions can use to ensure that the rights needed for articles to be made available in PubMed Central are reserved.

(<http://www.arl.org/pp/access/accessfunded/nihaccess.shtml>)

More recently, on March 7, 2008, ARL co-sponsored with the National Association of State Universities and Land Grant Colleges (NASULGC), a webcast entitled, "*Institutional Compliance with the NIH Public Access Policy: Ensuring Deposit Rights.*" (<http://www.arl.org/sc/implement/nih/webcast/>) This webcast reached over 1,000 participants and focused on retaining deposit rights for compliance and helping institutions and investigators be successful in responding to the NIH Public Access Policy. 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.