December 7, 2022

Dear Chairs of the NSTC Subcommittee on Open Science,

Thank you to the many subcommittee members who were able and willing to join the Association of Research Libraries and the Association of College and Research Libraries recent listening session on the 2022 Office of Science and Technology Policy (OSTP) public access guidance, "Ensuring Free, Immediate, and Equitable Access to Federally Funded Research." Nearly 350 people registered for the session, with approximately 255 in live attendance. The recording is available on the ARL website.

Our associations strongly support the 2022 OSTP public access guidance, particularly the removal of the 12-month embargo, the additional focus on research data, and the administration's goals to expand equitable participation in federally funded scientific research. As the panelists conveyed, the academic and research library community is deeply committed to partnership within our institutions, across higher education, and with the federal government to support successful implementation of agency plans. While panelists raised concerns about the cost of implementation and compliance, they provided considerations for multiple pathways to achieving the goal of free, immediate, public access.

Highlights from the listening session included:

- The US repository ecosystem is distributed and evolving. Open, standards-based infrastructure, and robust metadata—including digital persistent identifiers for authors, funding sources, organizations, and digital assets (data and publication); and exposure to common indexing systems through common metadata schema—will drive discovery.
- Organizations, including the Data Curation Network and the US Repository Network, are committed to engaging with the Subcommittee on Open Science as it works with agencies on harmonization and common elements of plans, particularly on issues related to curation and deposit.
- Disciplines like humanities and fine arts need varying levels of support for non-article research artifacts, which should be reflected in agency plans.
- There is deep expertise within the academic and research library community on scholarly infrastructure policies and practices, such as repositories, curation, digital preservation, copyright, metadata standards, and data management and sharing best practices.
- While the OSTP guidance does not endorse one business model over another for scholarly publications, there is concern in the library community that publishers may narrow or limit

author options to "gold" open access, or an author-pays model, even as the agencies provide a "green" option through their designated repositories. There is opportunity for research libraries to partner with agencies to inform and educate investigators and institutions about these potential consequences of the new guidance.
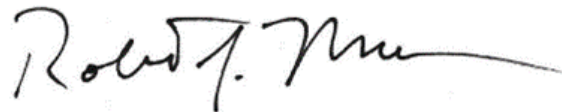
Cost, particularly of data sharing and its administrative burden, remains a concern for research-intensive institutions and their libraries. ARL and the Data Curation Network are currently conducting an NSF-funded modeling study of the costs of making data publicly accessible across six institutions and five disciplines. As federal agencies are considering what expenses to allow for data management and sharing, ARL, in discussion with the Council on Governmental Relations, recently published a draft set of activities that researchers and institutions may undertake that have expense considerations. Findings from this study will help inform needed investments in repositories, people, and training.

ARL looks forward to ongoing engagement with the OSTP, the SOS, and individual agencies as plans are developed and harmonized.

Respectfully submitted,

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