ASSOCIATION OF RESEARCH LIBRARIES

August 9, 2023

Mr. Steven Mackey
Policy Analyst
Office of Federal Financial Management at the OMB
Washington, DC 20006

Re: 2 CFR Chapter 2, Part 200 — Fair Reimbursement for the 21st Century Library

Dear Mr. Mackey,

As you work to update and revise the 2 CFR Chapter 2, Part 200 (2 CFR 200), referred to as the "Uniform Guidance," we offer analyses and support for the recent letter that the Council on Governmental Relations (COGR)[1] provided you which includes recognizing *Fair Reimbursement for the 21st Century Library*. The Association of Research Libraries (ARL) and its members have a particular interest and expertise on this topic, and this follow-up to the COGR letter emphasizes the importance of ensuring the Uniform Guidance accurately reflects the critical role of libraries within the research ecosystem.

ARL is a membership organization representing 127 research libraries affiliated with research universities, federal libraries, and public libraries. As collaborative partners supporting the full life cycle of scientific inquiry, ARL's mission is to create an equitable, enduring, and barrier-free research information environment to advance research and learning. In 2021 ARL institutions, on average, had $605 million in research expenditures. This funding came from federal sources—the National Institutes of Health (NIH), National Science Foundation (NSF), and Department of Defense (DOD), and others— as well as institutional research investments, nonprofit organizations, and state and local funding.[2] Libraries provide critical infrastructure and services to support the scientific needs of researchers on their campuses.

---

[1] COGR. (2023, July 21). Letter from COGR to Steven Mackey, Office of Federal Financial Management at the OMB re *2 CFR Chapter 2, Part 200 – Data-Driven Evidence Supporting Important Revisions*. https://www.cogr.edu/sites/default/files/COGR_OMB_DataRequest_July_21_2023%20final.pdf.

[2] Higher Education Research and Development (HERD) Survey, "Rankings by Total R&D Expenditures," National Center for Science and Engineering Statistics, US National Science Foundation, accessed June 25, 2023, https://ncsesdata.nsf.gov/profiles/site?method=rankingBySource&ds=herd.

Libraries have transformed significantly since 1958 when OMB Circular A-21 was first published, and even in the last 10 years since the implementation of the Uniform Guidance. Library collections have always been foundational to research libraries and the communities they support, however, in the last decade research libraries have expanded services and infrastructure to include more computational research (such as statistical or GIS services and systematic reviews) and research data infrastructure and services. These services provide the tools to enable researcher and institutional compliance for federal public access and data management and sharing policies. Often the libraries' investment and development of these services are a result of increased research and development (R&D) expenditures and federal policies related to the research taking place in higher education institutions.

In November 2022, ARL polled its members, asking them to identify what strategies they were using to support the research process. Members reported the top three activities **currently underway** were: *providing institutional repository services, consulting on where or how to publish open access, and reviewing data-management plans*.

Asked about services **planned for** in the next two to three years, institutions indicated *machine-learning support and training* as the top service being planned for in order to respond to the growing computational research needs of researchers to conduct cutting-edge science.

Service	Currently doing	Planning to do in the next 2–3 years	No plans to develop services
Reviewing data management plans	**96.23%**	1.89%	1.89%
Conducting literature reviews (including systematic reviews)	72.55%	3.92%	23.53%
Providing statistical analysis services	44.00%	22.00%	34.00%
Offering research data storage	73.08%	11.54%	15.38%
Referring researchers to services across the institution	94.34%	5.66%	0.00%
Data visualization services	61.54%	25.00%	13.46%
Consulting on where to publish or how to publish open access	**98.11%**	1.89%	0.00%
Providing institutional repository services	**98.11%**	1.89%	0.00%

Service	Currently doing	Planning to do in the next 2–3 years	No plans to develop services
Machine learning support and training	16.33%	**36.73%**	46.94%
Data curation and metadata services	69.23%	21.15%	9.62%
Locating data for use in a research project	94.23%	3.85%	1.92%
Finding appropriate data repositories	88.46%	7.69%	3.85%
Preserving and archiving research data	75.47%	22.64%	1.89%

Additional activities members were currently doing were identified in the open-ended survey question:

- Consulting on patent and intellectual property questions and issues
- Providing research impact services ("How to increase the impact of your research")
- Providing geospatial support for mapping and spatial analysis; coding support, such as R and Python
- Delivering training and education on cybersecurity practices
- Developing and delivering grant workshops
- Offering digital humanities services, such as text analysis and website hosting

Research libraries are key partners on campus to support research-data services that are necessary for the sharing of accessible and reusable research data. In ARL's Realities of Academic Data Sharing (RADS) research initiative we found, throughout the research life cycle, research libraries provide services and infrastructure at every stage of the process.[3] Many research libraries offer services supporting upwards of two dozen activities to enable data management and sharing. These services include: *consulting on data-use agreements*, *supporting intellectual property and copyright considerations*, *managing active data*, *providing data curation and preservation services*, and *supporting researchers in persistent identifier assignment and use*.

---

[3] See Figure 4 in the Realities of Academic Data Sharing Research Update #3, released July 21, 2023. https://www.arl.org/blog/realities-of-academic-data-sharing-rads-initiative-research-update-3/.

Results from this 2021–2023 research initiative align with what ARL members reported in the quick poll, showing significant library support of cutting-edge research and science taking place on our campuses. These results were also corroborated in a separate report by COGR,[4] which found that across 34 COGR members, the administrative and financial burden for compliance with the 2023 NIH Data Management and Sharing Policy fell primarily on libraries, campus IT, and the faculty and investigators engaged in performing the research activities.

The library's role in supporting research-data services and computational research, as well as services and infrastructure to comply with the forthcoming federal public access policies, will only continue to grow in the coming years. These services, along with others that support the cutting-edge research happening on our campuses, show the extent to which libraries are integral partners to the research enterprise.

We support COGR's recommendation on how the library component for 2 CFR 200 Appendix III.B.8 should be modified to read:

> 8. Library Expenses
>
> a. The expenses under this heading are those that have been incurred for the operation of the library, including the cost of books and library materials purchased for the library, less any items of library income that qualify as applicable credits under §200.406. The library expense category should also include the fringe benefits applicable to the salaries and wages included therein, an appropriate share of general administration and general expense, operation and maintenance expense, and depreciation. In addition, research data and management sharing, information technology, research compliance, and other costs specific to supporting the research infrastructure of the institution are allowable. Costs incurred in the purchases of rare books (museum-type books) with no value to Federal awards should not be allocated to them.
>
> b. In the absence of the alternatives provided for in Section A.2.d, the expenses included in this category should be allocated to serviced or benefitted academic functions (e.g., Instruction, Research, Other Sponsored Activity) on the basis of modified total salary costs.
>
> c. Alternatively, the expenses included in this category first should be allocated on the primary categories of users and second to the applicable functions associated with each category of users.
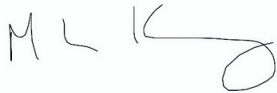
This recommendation for updating the treatment of the library in Appendix III will provide a more fair reimbursement of library costs to research institutions given the significant

[4] "Results from the COGR Survey on the Cost of Complying with the New NIH DMS Policy," COGR, May 11, 2023, https://www.cogr.edu/results-cogr-survey-cost-complying-new-nih-dms-policy-1.

investments they have made in services and infrastructure in support of the cutting-edge science happening on their campuses.

We appreciate the opportunity to submit this evidence, and we look forward to providing responses to any questions you may have. Please contact Cynthia Hudson Vitale, Director of Science Policy and Scholarship, at cvitale@arl.org if you have questions.

Sincerely,

Mary Lee Kennedy
Executive Director
Association of Research Libraries

Cc: Deidre Harrison, Deputy Controller