



June 21, 2025

To: Joint Associations Group Indirect Costs Subject Matter Experts Team

Cc: Dr. Kelvin Droegemeier, Chair

Re: FAIR Cost Models

On behalf of the members of the Association of Research Libraries (ARL), thank you for the opportunity to provide feedback on the FAIR Cost Models developed by the Joint Associations Group and shared with the research community last week. ARL is a nonprofit membership organization representing research libraries and archives at universities and institutions across the United States and Canada, which are committed to supporting the research enterprise and advancing progress in science and innovation. We appreciate the Joint Associations Group's leadership in developing a new model for the reimbursement of costs associated with the delivery of essential research support to federally funded researchers, and share its goal of establishing a research funding system that is accountable, transparent, and can continue to deliver benefits for the public good.

ARL's feedback builds on our track record of advocacy for modernizing how research libraries are supported by federal grants. In 2023, we worked with COGR to [recommend revisions to 2 CFR 200](#) aimed at recognizing fair reimbursement for the twenty-first-century library. While the revisions we recommended were not implemented at that time, we regard the JAG model development process as a fresh opportunity to address known challenges. Specifically, **accounts of library contributions to the research enterprise must evolve beyond an emphasis on facilities and collections to address the research services that today's libraries provide.** A 2022 poll of ARL members identified services across the grant life cycle including evidence synthesis, review of data management plans, statistical analysis services, and consultation on open-access publishing. While existing regulations treat services like these as allowable expenses in calculating the library component of an institution's negotiated rate, the emphasis on legacy functions like book purchasing can result in these services being misallocated to nonresearch functions, which limits the appropriate level of cost recovery.

Overall, we believe research libraries can be effective partners under either of the FAIR Cost Models. We acknowledge that FAIR Model 1 is easier to explain to a broad range of stakeholders, and this may translate into more durable support for it. However, we believe that **library contributions to the research enterprise will be more reliably resourced under FAIR**

Model 2. By recognizing Research Information Services as a distinct component of Essential Research Support, FAIR Model 2 enables libraries to allocate all relevant costs to the funded research they support and to recover those costs directly. Moreover, by breaking out Data Management and Sharing as a separate line item, FAIR Model 2 reflects the cross-functional nature of these services (including but not limited to libraries¹), although it arguably mischaracterizes these costs as related to compliance rather than research impact in terms of replicability and reuse. **We encourage the Joint Associations Group to retain these cost categories** in any hybrid model that is developed, and to advocate for adequate time for institutions to implement the tracking and accounting processes that would be needed to report these expenses.

In what follows, we provide more granular feedback on the FAIR Model Guide, with a view to shaping the deliverables produced following the community feedback period that is currently underway:

Model 1

On p. 9, the overview of Fair Model 1 states that “ERS includes costs such as Research Library Materials.” Please consider updating any future iteration of this statement to read “ERS includes costs such as Research Library Materials **and Services.**”

More generally, greater clarity is needed on how library costs are to be calculated as a component of ERS under Model 1. Costs should not be limited to library materials, but **must also include salaries and benefits** as currently allowed under 2 CFR 200. Without the contributions of experienced staff, libraries cannot deliver the consultative research services on which federally funded researchers rely.

Model 2

On p. 20, the Research Information Services component of ERS under Model 2 is defined as “**expenses related to scientific journal subscriptions, database access, and institutional repositories (physical and digital) directly supporting research activities.**” While the recognition of institutional repositories as research infrastructure that directly benefits federal funded researchers is welcome, this account of library support for the research enterprise remains incomplete. Please consider updating any future iteration of this definition to read “expenses related to library collections and content licensing, consultative research services such as

¹ Hofelich Mohr, Alicia, Jake Carslon, Lizhao Ge, Joel Herndon, Wendy Kozlowski, et al. Making Research Data Publicly Accessible: Estimates of Institutional & Researcher Expense. Washington, DC: Association of Research Libraries, 2024. <https://doi.org/10.29242/report.radsexpense2024>

evidence synthesis, and research infrastructure including institutional repositories that directly support research activities.”

On p. 24, the instructions for testing Model 2 advise institutions to include “budgets related to data repositories, libraries, and open-access publishing” in direct costs for Data Management and Sharing. Some but not all of a research library’s budget is relevant to data management and sharing, and costs related to open-access publishing are generally distinct from the costs of data management and sharing. To the extent that future deliverables provide detailed guidance on the calculation of data management and sharing costs, **we recommend *using the evidence-based list of “Data Management and Sharing Activities for Public Access”*** developed by the Realities of Academic Data Sharing project,² which is organized by research phase including planning, design, and start-up; data collection, storage, and management; making data broadly available; data retention, including preservation, archival, and long-term access, and compliance and close-out. The parenthetical description of Data Management and Sharing on p. 19 of the Model Guide as “data storage, archiving, curation, and dissemination” could also be updated to reflect this more comprehensive set of categories.

We look forward to continued engagement with the Indirect Costs Subject Matter Experts Team as a final model is developed. Please feel free to contact me or my colleague Marcel LaFlamme, Director, Research Policy and Scholarship, marcel@arl.org, to discuss the feedback we have provided, as well as any other questions you may have about the contributions and needs of research libraries.

Sincerely,



Andrew K. Pace, Executive Director
Association of Research Libraries

² Kozlowski, Wendy, Joel Herndon, Shawna Taylor, Cynthia Hudson Vitale, Jake Carlson, et al. “Realities of Academic Data Sharing (RADS) Initiative Public Access Data Management and Sharing Activities,” version 3. Washington, DC: Association of Research Libraries, 2023. <https://doi.org/10.29242/radsdmsactivities2023>