



July 25, 2025

To: Joint Associations Group Indirect Costs Subject Matter Experts Team

Cc: Dr. Kelvin Droegemeier, Chair

Re: Research Information Services

On behalf of the members of the Association of Research Libraries (ARL), thank you for the opportunity to provide additional feedback on the FAIR Model developed by the Joint Associations Group (JAG). ARL is a nonprofit membership organization representing research libraries and archives across the United States and Canada, which are committed to supporting the research enterprise and advancing progress in science and innovation. We support JAG's efforts to adequately resource and provide increased transparency around the costs associated with sponsored research, and we appreciate the recognition of Research Information Services as one element of Essential Research Performance Support under the FAIR Model.

However, we are concerned that the description of Research Information Services in the Executive Summary of the FAIR Model released on July 10 represents *an incomplete account of the support research libraries currently provide to federally funded researchers*. While "journal subscriptions, database access, [and] institutional repositories" are important service offerings that allow researchers to access and disseminate cutting-edge research outputs, they comprise just one small part of the functions of the twenty-first-century research library. And while the reference to "related resources" acknowledges that other service offerings not mentioned by name may also qualify as includable costs under Research Information Services, we believe that this lack of specificity will lead to confusion and inconsistency as the FAIR Model is codified and implemented.

Therefore, ARL has prepared **the following, more comprehensive list of activities** that should be considered includable costs under Research Information Services, which we encourage you to put forward as you discuss the FAIR Model with stakeholders across the federal government. The activities listed here are primarily related to supporting organized research rather than instruction, clinical care, or other functions of research institutions. These activities are relevant to most if not all funded research projects, as opposed to specialized services that might most appropriately be budgeted as Research Performance Costs. The costs associated with these activities *must include personnel costs*, just as the other elements of Essential Research Performance Support do.

Collections and Content Licensing

Materials purchasing, processing, and management

Open access publishing agreements

Subscriptions to electronic resources

Subscriptions to research information systems

Consultative Research Services

Code and software training

Consultation on copyright and licensing

Consultation on public access requirements

Consultation on publishing options

Content digitization and transformation

Data curation and metadata services

Evidence synthesis and systematic reviews

Preserving and archiving research data

Research visibility and impact services

Review of data management plans

Research Information Infrastructure

Code and software hosting

Institutional repositories

Library publishing services

Memberships to persistent identifier services

Research data repositories and storage

Subscriptions to research workflow tools

Please feel free to contact me or my colleague Marcel LaFlamme, Director, Research Policy and Scholarship, marcel@arl.org, to discuss this list of activities. Thank you for your work to ensure that the full range of library contributions to the research enterprise is recognized.

Sincerely,



Andrew K. Pace, Executive Director
Association of Research Libraries