



December 23, 2025

To: Office of Science and Technology Policy (OSTP)

Re: Accelerating the American Scientific Enterprise

On behalf of the Association of Research Libraries (ARL) and its 125 member institutions, thank you for the opportunity to provide comments on strategies to support the expansion of scientific knowledge as well as mechanisms to transition these discoveries into the marketplace, as outlined in OSTP- TECH-2025-0100. ARL is a nonprofit membership organization that champions research libraries and archives, influences policy, and develops the next generation of library leadership. Within research institutions, libraries provide essential services, collections, and infrastructure that support knowledge creation and application across the science and technology ecosystem.

Our comments address two of the specific questions posed by OSTP:

**What policy mechanisms would ensure that the benefits of federally funded research—including access to resulting technologies, economic opportunities, and improved quality of life—reach all Americans?**

One of the most important policy mechanisms for advancing this goal is OSTP’s 2022 memo on “Ensuring Free, Immediate, and Equitable Access to Federally Funded Research,” which requires public access to federally funded scientific publications and research data. Evidence shows that public access to these outputs unlocks economic growth, enhances innovation, and leads to efficiency gains, by enabling knowledge users to explore validated findings at no cost and by avoiding the conduct of duplicative research.<sup>1</sup> *ARL commends the progress of federal agencies to date on implementation of public access policies, and pledges to continue working with the research community to make these policies successful.* Consistent with OSTP’s prior guidance, ARL acknowledges that limitations on public access to research data may at times be appropriate to protect confidentiality, privacy, and national security, or in light of other legal or ethical considerations. In these cases, ARL advocates for transparent disclosure of the conditions under which access can be granted, in order to preserve as many of the benefits of public access referenced above as responsibly possible.

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<sup>1</sup> Tsipouri L, Liarti S, Vignetti S, Martins Grapengiesser I. The economic impact of open science: a scoping review. Royal Society Open Science. 2025; 12(9): 250754. <https://doi.org/10.1098/rsos.250754>

**How can the federal government leverage and prepare for advances in AI systems that may transform scientific research? What infrastructure investments, organizational models, and workforce development strategies are needed to realize these capabilities while maintaining scientific rigor and research integrity?**

Research libraries are critical to workforce development during periods of technological innovation such as the current AI boom, contributing to student success and career readiness by teaching AI and other forms of digital literacy at our institutions. Libraries are also working with federal agencies, publishers, and other infrastructure providers to ensure that the scholarly record is interoperable with AI systems deployed across the research life cycle. Consistent with OSTP's prior guidance, ARL promotes the use of digital persistent identifiers for researchers, institutions, and funding awards in publications and other research outputs, in order to establish the provenance of sources used by AI models and to properly attribute scientific claims. *ARL also recommends that funding agencies move toward the adoption of machine-actionable data management plans as a standard component of research proposals*, which would enhance the interoperability of these plans with AI systems aimed at improving institutional resource allocation or assessing compliance with agency requirements.<sup>2</sup>

Please feel free to contact me or my colleague Marcel LaFlamme, Director, Research Policy and Scholarship, [marcel@arl.org](mailto:marcel@arl.org), to discuss these comments. In 2026, ARL anticipates conducting a landscape study of programs and services at research libraries across the United States that support the public impact of research; we would welcome the opportunity to brief OSTP on the results of that study and to discuss ways of scaling best practices across our nation's research institutions.

Sincerely,



Andrew K. Pace, Executive Director  
Association of Research Libraries

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<sup>2</sup> Dean C, Grady B, Hudson Vitale C, LaFlamme M, Praetzellis M, Ruttenberg J. Machine-actionable data management plans (maDMPs) pilot report. Washington (DC) and Oakland (CA): Association of Research Libraries and California Digital Library; 2025. <https://doi.org/10.29242/report.mappilot2025>