



## **Expanding the NIH Public Access Policy will advance science, innovation, competition, and the good of the American public**

Comments submitted to the Office of Science and Technology Public Access Policy Forum  
January 21, 2010

On behalf of the more than 90 organizations that comprise the Alliance for Taxpayer Access (ATA), I would like to thank the Office of Science and Technology Policy for initiating this open public comment period to consider the very important issue of facilitating taxpayer access to the results of taxpayer-funded research.

### **About the Alliance**

The Alliance for Taxpayer Access (ATA) is a coalition of advocacy, academic, research, and publishing organizations that supports open public access to the results of federally funded research. The Alliance was formed in 2004 to urge that peer-reviewed articles stemming from taxpayer-funded research become fully accessible and available online at no additional cost to the American public.

The diverse members of the coalition are committed to the general principle that American taxpayers are entitled to open access on the Internet to the articles that result from research funded by the U.S. government, and that facilitating broad access to these articles is an essential, inseparable component of our nation's investment in science. ATA members firmly believe that this (and other scientific information) should be shared in cost-effective ways that take advantage of the Internet, stimulate further discovery and innovation, and advance the translation of this knowledge into public benefits. Enhanced access and expanded sharing of information will lead to increased use of this information, and will deliver an accelerated return on the taxpayers' investment.

As 41 Nobel Prize-winning scientists recently wrote in an open letter to the U.S. Congress:

“For America to obtain an optimal return on our investment in science, publicly funded research must be shared as broadly as possible... As the pursuit of science is increasingly conducted in a digital world, we need policies that ensure that the opportunities the Internet presents for new research tools and techniques to be employed can be fully exploited. The removal of access barriers and the enabling of expanded use of research findings has the potential to dramatically transform how we approach issues of vital importance to the public, such as biomedicine, climate change, and energy research.”

[http://www.taxpayeraccess.org/supporters/scientists/nobelists\\_2009.shtml](http://www.taxpayeraccess.org/supporters/scientists/nobelists_2009.shtml)

The Alliance supports the implementation of government-wide public access policies to facilitate the sharing of scientific results, and make this level of access a reality.

### **The Alliance supports expanding the NIH policy to all other federal science agencies**

As a practical way forward, the Alliance for Taxpayer Access supports building upon the proven success of the public access policy implemented by the National Institutes of Health (NIH), which requires recipients of NIH funding to deposit articles resulting from their funded research into the agency's online repository, so that they may be made openly accessible to the public no later than 12 months after publication in a peer-reviewed journal.

Since its implementation in 2008, the NIH policy has resulted in over 4,500 new articles being made publicly available each month. Demand for this information is extremely high, with more than 450,000 unique users accessing material from this repository each day. As of today, the NIH database contains more than 81,000 articles on hypertension research, 103,000 on diabetes research, and more than 85,000 on heart disease research. As citizens whose tax dollars underwrite this research, we have a right to expect that crucial details of the most recent advancements in these areas are made available not only to us, but also to doctors and caregivers whose responsibilities are the health and long life of all Americans. Access to up-to-date, health-related information plays a crucial role in ensuring that patients are as educated as possible about their individual situations, including the latest therapies. Under an expanded policy, research results related to issues of equally critical importance – from climate change to renewable energy – will be just as readily accessible to the public.

Citizens routinely turn to the Internet – and resources such as the NIH's PubMed Central database – as a source of information. They expect that they will have access to the very latest results generated by public agencies, and many are shocked to find out that this is simply not the case.

Absent a policy that ensures public access across agencies, the only way to see the results of this crucial research is to pay to access it through journals whose subscription fees range from a few hundred to over \$20,000 per year. Given the high price of these journals, U.S. taxpayers do not have comprehensive access to the results of our collective \$60 billion annual investment in scientific research.

Expansion of the NIH Public Access Policy would ensure that these research results are made readily accessible to anyone who wants them. Expanded sharing of this material will stimulate further discovery and innovation in all scientific disciplines, and accelerate the translation of this knowledge into public benefits – which is the core reason the public supports funding research.

### **Recommended components of an expanded public access policy**

The Alliance supports building on the successful framework of the NIH Public Access Policy, and recommends that an expanded policy include the following components:

- ***Public access to the published results of federally funded research should be a mandatory requirement across all agencies.*** As the experience of the NIH has shown, a voluntary policy is not enough. The NIH saw that 5% of eligible authors deposit their manuscripts under a voluntary policy. However, after the policy was made mandatory in April 2008, the percentage manuscripts deposited quickly rose to over 60%.
- ***Articles that result from federal funding should be made freely accessible no later than six months after publication.*** While the Alliance feels strongly that the results of taxpayer-funded research should be made available to the public immediately upon publication, we recognize that this is not always practical, and support an embargo period of up to six months as an acceptable compromise.
- ***Articles should be housed in permanent, interoperable digital archives.*** The results of federally funded research should be archived permanently, in interoperable repositories (maintained or approved by the agency) that allow this critical layer of information to be freely linked to the wealth of other publicly accessible databases.
- ***Access may be either to the author's final manuscript or to the final published version.*** The requirement for deposit of the author's raw final manuscript, rather than the final published article, allows publishers the opportunity to continue to market a product that contains value-added

enhancements beyond what is available in the public repositories. Where the publisher allows, access to the final published version is also desirable.

- ***Articles should be presented to the public in a standard digital format that allows them to be fully read and used.*** The Alliance supports XML as the preferred standard. While we support the additional inclusion of PDF files, PDF alone is not an acceptable format, as it does not support robust enough linking and searching.
- ***The archives must ensure permanent public search, retrieval, and full use rights.*** Policies must ensure that the maximum use of this research is fully realized – enabling previously unobtainable connections and discoveries to be made.
- ***Implementation should be closely coordinated across all agencies to ensure seamless compliance.*** The Alliance strongly believes that public access policies must be as closely coordinated across agencies as possible, and that multiple policies with multiple implementation requirements would result in unnecessary overhead and costs.

## Conclusion

The Alliance for Taxpayer Access, with its diverse membership of consumer groups, patient groups, universities, students, and library organizations – strongly supports the establishment of policies that ensure fast, free, public access to the results of research funded by our tax dollars. We believe that the NIH played an important leadership role in establishing a clear, successful blueprint for public accessibility to the results of its publicly funded research. We note that many other research funders around the world – both public and private – have established policies that share many of the characteristics of the NIH Public Access Policy, and encourage the U.S. federal government to expand the NIH policy to all other federal science agencies in an expeditious manner.

On behalf of the Alliance, we look forward to working with you to help ensure that the public's investment in research is maximized to the fullest extent. If you have any questions or comments, please don't hesitate to contact us.

Sincerely,



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Attachment (1)



## Members

AIDS Action Baltimore - MD  
AIDS Vaccine Advocacy Coalition - NY  
American Association of Law Libraries - DC  
American Library Association - DC  
American Medical Student Association - VA  
Amherst College Library - MA  
Arthritis Foundation - DC  
Asian & Pacific Islander American Health Forum - DC  
Association of Academic Health Sciences Libraries - WA  
Association of Cancer Online Resources - NY  
Association of College & Research Libraries - IL  
Association of Maternal and Child Health Programs - DC  
Association of Research Libraries - DC  
Association of Southeastern Research Libraries - GA  
Autism Speaks (formerly National Alliance for Autism Research) - DC  
Autosomal Recessive Polycystic Kidney Disease and Congenital Hepatic Fibrosis Alliance (ARPKD/CHF Alliance) - PA  
Barth Syndrome Foundation - FL  
Boston College Libraries - MA  
Boston Library Consortium - MA  
Bowdoin College Library - ME  
Bowling Green State University Libraries - OH  
Carnegie Mellon University Libraries - PA  
Chemists Without Borders - Canada  
Chordoma Foundation - NC  
Christopher Reeve Foundation - DC  
Colorectal Cancer Coalition - DC  
Committee for Economic Development - DC  
Consumer Project on Technology (CPTech) - DC  
CUNY – City College Libraries - NY  
Cutaneous Lymphoma Foundation (formerly Mycosis Fungoides Foundation) - MI  
Coalition for Heritable Disorders of Connective Tissue - DC  
Colorado State University - CO  
Conquer Fragile X Syndrome - FL  
The Creutzfeldt-Jakob Disease (CJD) Foundation - OH  
Cystinosis Research Network - IL  
Denison University – William H. Doane Library - OH  
Down Syndrome Treatment and Research Foundation - CA  
Eastern Kentucky University Libraries - KY  
Emory University Libraries - GA  
Essential Action - DC  
Facing Our Risk of Cancer Empowered (FORCE) - FL  
Francis Countway Library of Medicine (Harvard Medical School) - MA  
FreePatentsOnline  
Genetic Alliance - DC  
Global Neuroscience Initiative Foundation - WA  
GNU EPrints - UK  
Greater Western Library Alliance - MO  
International Mosaic Down Syndrome Association (IMDSA) - TX  
International Journal of Medical Sciences - MD  
IP Justice - CA  
IsoDicentric 15 Exchange, Advocacy and Support (IDEAS) - OR  
Kent State University Libraries - OH  
Linda Hall Library of Science, Engineering & Technology - MO  
Loyola University Chicago Libraries - IL  
Medical Education Online - MI  
National Coalition for PKU & Allied Disorders - MA  
National Fragile X Foundation - MI  
National Tay-Sachs & Allied Diseases Association - MA  
New England Biolabs - MA  
New York State Higher Education Initiative (NYSHEI) - NY  
Oberlin College - OH  
Ohio Library and Information Network - OH  
Parent Project Muscular Dystrophy - OH  
Planetree - CT  
Prader-Willi Syndrome Association - FL  
Public Knowledge - DC  
Public Library of Science - CA  
Pseudoxanthoma Elasticum (PXE) International - DC  
Scholarly Publishing and Academic Resources Coalition (SPARC) - DC  
South Dakota State University, Hilton M. Briggs Library - SD  
Special Libraries Association - VA  
Spina Bifida Association of America - DC  
Students for Free Culture - FL  
Swarthmore College - PA  
Tourette Syndrome Association - DC  
Trinity University Coates Library - TX  
Tufts University Libraries - MA  
Universities Allied for Essential Medicines - NJ  
University of Colorado at Boulder Libraries - CO  
University of Connecticut Libraries - CT  
University of Kansas - KS  
University of New Hampshire - NH  
University of Wisconsin – Madison Libraries - WI  
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Utah Academic Library Consortium - UT  
Wayne State University College of Nursing - MI  
Williams College Libraries - MA  
Y-ME National Breast Cancer Organization