

ALA/ACRL NIH Policy Response

These comments are provided on behalf of the Association of College and Research Libraries (ACRL), a division of the American Library Association, which serves nearly 8,500 academic and research librarians and interested individuals working in institutions of higher education, in response to a Request for Information (RFI) issued by the National Institutes of Health (NIH). ACRL is in favor of public access to peer-reviewed scholarly publications, data, and code resulting from federally funded research. Public access to the results of federally funded research benefits all Americans, far beyond students and researchers.

ACRL is fundamentally committed to the open exchange of information to empower individuals and facilitate scientific discovery, as reflected in our previous support for governmental policies and legislation that facilitate open access and open education—including the NIH Open Access Policy, the 2013 Office of Science and Technology Policy Memorandum, and the Fair Access to Science & Technology Research Act and Federal Research Public Access Act bills. Public access to taxpayer-funded research is a responsible measure to control library costs. The status quo of placing federally funded research behind a paywall is untenable and keeps libraries from providing equitable access. Our response outlines the role of academic and research libraries, suggesting points for consideration as NIH develops its policy.

Academic and research libraries are a fundamental component of the scholarly ecosystem. In ACRL's 2019 publication *Open and Equitable Scholarly Communications: Creating a More Inclusive Future*, the authors explore the ways in which the academic and research library workforce has worked to accelerate the transition to more open and equitable systems of scholarship and the barriers that remain, many of which persist today.¹ Libraries preserve and disseminate myriad types of scholarship through extensive scholarly collections and repositories; increasingly, libraries also play a key leadership role as institutions navigate educating their campus community about best practices for scholarly publishing, data management, and compliance with public access funder mandates. Some library programs providing this scholarly communication support and expertise have also stepped in to cover the cost of publisher article processing charges (APCs), supporting a faculty need and a push toward broader systemic open access to materials. However, using library budgets to fund APCs further drains budgets that are often already overextended due to the longstanding issue of the “serials crisis”: the

¹ Maron, Nancy and Rebecca Kennison with Paul Bracke, Nathan Hall, Isaac Gilman, Kara Malenfant, Charlotte Roh, and Yasmeen Shorish. *Open and Equitable Scholarly Communications: Creating a More Inclusive Future*. Association of College and Research Libraries, 2019. <http://bit.ly/ACRLOpenRA>.

escalating costs of inflationary increases that are passed on to libraries by publishers each year in order to continue to provide access back to the scholarly community that authored the scholarship in question.²

Given this role and positionality, we offer the following recommendations:

We advocate that unsustainable publishing models are the core issue that must be addressed and recommend that the NIH broaden its policy approach.

ACRL applauds NIH's goal of maximizing research funds for research activities. However, we are concerned that the proposed actions included in the RFI are not comprehensive enough to do so. ACRL agrees with the RFI response submitted by SPARC, a nonprofit advocacy organization with around 250 libraries and academic organization members that supports open systems for research and education, and other open advocates that simply eliminating, or establishing limits on, publishing costs will not resolve the primary issue of unsustainable publishing cost models like APCs that divert funding from scientific research to publisher profits. Until this issue is addressed, institutions and the academic and research libraries that serve them will remain in a cycle of absorbing the cost of covering rising per-article fees.

We recommend that the NIH policy acknowledge the diversity of approaches to OA publication, while recognizing the very real financial impacts APCs incur.

ACRL commends the NIH for mandating public access to federally funded research. ACRL supports all forms of open access (OA) as a key component of open science, while remaining mindful of both equity in scholarly publishing and OA's impact on library budgets. Open access, a set of principles that result in research outputs that are free from cost and copyright barriers, can be attained through a wide array of revenue models and/or community-developed infrastructure. Author or institution-side fees through APCs is one pathway to OA but it is not the only pathway. Institutional and disciplinary repositories, for example, have ensured that open access manuscripts and publications are made available to anyone with an internet connection. Similarly, sharing preprints, code, and other research outputs provide alternative ways of accessing research knowledge besides the final manuscript. A sole focus on achieving open access through APCs risks the creation of an exclusive publishing ecosystem that limits the ability of researchers to publish their works broadly. Overall, we recommend a shift in focus away from specific revenue models and toward OA as a set of principles, empowering the community to develop a diversity of pathways to attaining that goal.

We recommend that NIH should promote best practices in equity and ethics for peer review, including standards for quality and timeliness.

² Jurchen, S. (2020). "Open Access and the Serials Crisis: The Role of Academic Libraries." *Technical Services Quarterly*, 37(2), 160–170. <https://doi.org/10.1080/07317131.2020.1728136>.

Specifically, we recommend aligning with the “Ethical Guidelines for Peer Reviewers” compiled by the Committee on Publication Ethics (COPE).³ Compensation for peer review was a specific topic in the NIH RFI, so we want to address it as such. There has been considerable debate about the unpaid labor involved in the peer review system, and NIH could influence this discussion. While there are no examples of a sustainable system for compensating peer reviewers, limited studies have found that acceptance of invitations and timeliness of reviews may be affected by offering compensation.⁴ In these examples, the quality of the reviews where the peer reviewers were compensated was comparable to reviews where the peer reviewers were not compensated. However, compensating peer reviews may lead to higher APCs as publishers attempt to recoup their costs. In addition, we caution that linking higher APC caps to peer reviewer compensation may inadvertently favor large commercial publishers and disadvantage smaller or nonprofit journals. If peer reviewer compensation is incorporated into this policy, we recommend that NIH provide guidance about setting compensation levels, including adjusting for standard of living, and explore non-monetary compensation models.

Overall, we appreciate NIH’s leadership in advancing broader public access and the opportunity to share our response. We hope that NIH will seize the opportunity to continue to lead policy development that will prioritize research advancement and movement away from an unsustainable, publisher-driven model.

³ Committee on Publication Ethics (COPE). “COPE Ethical Guidelines for Peer Reviewers.” Version 2 September 2017. <https://doi.org/10.24318/cope.2019.1.9>.

⁴ Else, H. “Publishers trial paying peer reviewers — what did they find?” *Nature*, March 28, 2025. <https://doi.org/10.1038/d41586-025-00968-6>.