



THE RIGHT TO RESEARCH COALITION

Introduction

The Right to Research Coalition is an organization of local, national, and international student associations that advocate for governments, universities, and researchers to adopt more open scholarly publishing practices. In just over six months since its launch, our coalition has expanded to represent over six million students and continues to grow rapidly – a revealing testament to the profound impact that access to research, and often the lack thereof, has on the entire student community, undergraduates and graduates alike across all disciplines. Specifically, our members include the following organizations:

- American Medical Student Association
- California Institute of Technology Graduate Student Council
- Canadian Federation of Students
- Dartmouth College Graduate Student Council
- International Association for Political Science Students
- Library and Information Science Student Association, Simmons College
- Massachusetts Institute of Technology Graduate Student Council
- National Association of Graduate-Professional Students
- National Graduate Caucus of the Canadian Federation of Students
- Oberlin College Student Senate
- St. Olaf College Student Government Association
- The Student Public Interest Research Groups
- Students for Free Culture
- Trinity University Association of Student Representatives
- United States Student Association
- Universities Allied for Essential Medicines
- University of Minnesota Graduate and Professional Student Assembly
- University of Nebraska - Lincoln Graduate Student Association
- University of Tennessee - Knoxville Student Government Association

We would like to thank the Office of Science and Technology Policy for convening this public comment period on such an important issue. The Right to Research Coalition supports the adoption of a mandatory public access policy for all relevant federal agencies using the NIH public access policy as a model.

How do students interact with the current system of scholarly publishing?

Quite simply, students rely on access to academic research for a complete education. Whether researching for a paper or delving more deeply into a given subject, scholarly journal articles provide students with a crucial level of detail. While textbooks and classroom instruction play an unquestionably critical role, it is often the very specific scholarly literature that clarifies crucial points and brings true focus to a student's understanding of a particular concept. Given this essential role, protecting and expanding students' access to this information is of utmost importance.

However, students' access to scholarly articles often falls short of their needs. Since no library can afford access to the entire scholarly record, nearly any student in higher education today can point to at least one instance (and more likely, a number of instances) in which they were not able to read an article that seemed to be exactly what they were looking for, forcing them to settle for an article that was available but not as relevant or up to date. With journal prices continuing to climb and library budgets feeling the full force of the current economic climate, students' access to scholarly research results is under more pressure than ever.

While it is important to ensure students have ready access to academic journal articles across all fields, journals in the areas of science, technology, engineering, and medicine (STEM) have the highest access barriers due to their often expensive subscription prices, especially relative to other fields of study. In these areas, it is not uncommon for journals to cost thousands of dollars per title annually, and sometimes reach well over \$20,000 per subscription per year. Given these costs, some students are already losing access to core titles with more students threatened everyday as subscription prices rise and budgets are cut. One such example is the University of Washington at Pullman's 2009 library budget cuts:

“Once again we have completed the difficult but necessary task of trimming our journal subscriptions in anticipation of a steep increase in costs. The

task grows more difficult each year since we are now losing access to core periodicals in some disciplines. Making the job even more difficult is the number of licenses we have that are part of multi-library contracts. In the near future, many of these deals, which have preserved our access to materials that we could not afford on our own, will be on the table for cuts. If we have to step back from these deals, there will be a dramatic decrease in our access to primary journals.”¹

The range of scholarly articles that students get access to rests squarely on the number of journals their library can afford to purchase. The more money a school has to pay for subscriptions, the more access its students enjoy. The current system, with its significant price barriers, forces students at smaller and less financially robust schools to settle for the limited subset of journals their libraries can afford, hindering their education and putting them at a disadvantage relative to their peers at wealthier institutions. While most articles are available on a pay-per-article basis, the \$20 to \$30 per article fee effectively puts them out of reach for students who already struggle with high textbook prices and would not be able to tell if an article was even truly useful before purchasing it.

One set of students which suffers disproportionately under the current system is the nearly half of American undergraduates who attend community colleges.² While we lean on community colleges to provide the backbone of America’s technical labor force, we often fail to provide them with the most up-to-date technical literature. Community colleges generally provide a lower level of access to scholarly journals than their four-year counterparts due to their more limited budgets.

¹ WSU Pullman Libraries Journal Cancellation Project Title Summary Calendar 2009, <http://www.wsulibs.wsu.edu/collections/CancelCover.html#topic4>

² AACC STATS: <http://www2.aacc.nche.edu/research/index.htm>

How would an NIH-style public access policy change this interaction?

A mandatory public access policy across all federal science agencies would guarantee students access to a solid base of academic research, greatly expanding what is available today. While the adoption of a public access policy would not alleviate all of students' barriers to academic research, it would provide free access to a very significant portion of academic literature while sending a strong message to the rest of the scholarly communication community that openness is the new norm and likely eliminating more barriers in the process.

Today's students have grown up in a world of "on-demand" access to information, both at home and in the classroom. Yet when they reach the undergraduate and graduate levels, when such access is most important for their education and training for a future career, they face the steepest barriers to access. Expanding the NIH public access policy would be a very significant step in providing students with the on-demand access they need for a complete education.

Furthermore, a public access policy would help the students who need it most -- those at institutions that do not have the library budgets to afford the multimillion-dollar annual investment required to secure access to a significant portion of the scholarly record. For these students especially, public access will be crucial in securing the information required for their education and training. More broadly, articles made available by a public access policy will not supplant current journal collections, but rather will greatly enhance and build upon those resources that a student's institution is already able to provide.

What are the necessary features for a public access policy?

A public access policy must be mandatory. Given the experience of the NIH and numerous other funding agencies with optional deposit policies, a mandatory policy is crucial to move from low compliance to the more than 60% deposit rate the NIH currently enjoys under its mandatory policy.³

Immediate access is preferable; access within six months is reasonable. When research is publicly funded, students deserve immediate access to the author's final manuscript. However, if an embargo period is deemed necessary, it should be kept as short as possible and should not exceed six months. Research is both most relevant and most useful when it is initially published, and given the short timeframe of a typical class – approximately four months – any delay in access will negatively impact students' ability to learn with the most relevant material.

Following the example of the Federal Research Public Access Act of 2009, we suggest that all federal agencies with an extramural research budget of \$100 million or more be included in any public access policy. Including all of these major federal agencies will ensure that students in every field of study get access to the relevant federally funded research.

The final published article is the preferred version, but the author's final peer-reviewed manuscript is an acceptable substitute. While making the author's final manuscript available may put two versions of a paper online, the manuscript can be linked to the publisher's version to prevent confusion, and the widespread practice of posting preprints of forthcoming articles demonstrates that making the author's manuscript available will not create confusion.

The policy should require articles to be posted in a fully accessible format, such as XML, that allows reuse and remixing as well as computational data-mining

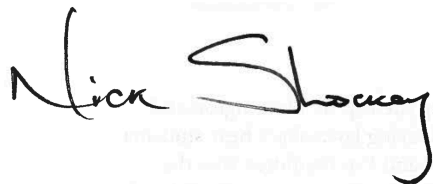
³ NIHMS Monthly Aggregate Submission Statistics:
<http://www.nihms.nih.gov/stats/index.shtml>

techniques. We stand to gain immensely from the hidden interrelationships between fields, which can often only be seen by computers sifting through thousands of articles for non-obvious connections and patterns.

Conclusion

A mandatory public access policy with the characteristics described above would truly revolutionize students' access to the results of scholarly research. With such a policy, we could finally fully leverage the \$60 billion we spend annually on academic research grants and put into students' hands the information that they need to research, learn, and innovate, regardless of institutional size, type, or financial condition. On behalf of the six million students represented by the Right to Research Coalition, I thank the Office of Science and Technology Policy for convening and moderating this important discussion and urge the Obama Administration to implement the strong public access policy that our students deserve.

Sincerely,

A handwritten signature in black ink that reads "Nick Shockey". The signature is written in a cursive style with a large, stylized "S" for the last name.

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