

July 30, 2015

Alicia Wise
Director of Access and Policy
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Oxford
United Kingdom
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Dear Alicia:

We are writing on behalf of the Medical Library Association (MLA) and Association of Academic Health Sciences Libraries (AAHSL) concerning Elsevier's "updated sharing and hosting policies."

MLA and AAHSL support open access policies that accelerate the exchange of information among the research community, enable researchers to realize new discoveries more quickly, and enhance the affordability and distribution of scientific and scholarly research. MLA and AAHSL are concerned that the revised policy will impede the progress made by the biomedical and scientific communities to share and use the results of research knowledge. The policy would also create barriers for Elsevier-published authors in complying with funders' open access policies.

We believe that robust open access policies provide increased access to research, thereby strengthening biomedical research and improving patient care. Public access to NIH-funded research has proven extremely beneficial to the medical library community and to its users, including the public. As organizations whose members constitute a large percentage of the subscribers to medical journals, we can attest that the availability of NIH-funded research articles in PubMed Central has not led libraries to cancel journal subscriptions.

We have specific concerns related to

- The lack of clarity in the sharing policy that creates confusion among authors and increases the administrative burden to disseminate their work;
- The length of the embargo period—a delay in the open availability of research articles would hinder scientific progress and reduce the accessibility of research to the healthcare providers and the public; and
- The ability for authors to share their results broadly.

We recommend that

- The policy be updated to clarify the scope of the articles to which the policy pertains and only apply to articles published on or after 4/30/15, the date policy changes were announced;
- The use of the Creative Commons CC-BY copyright license that is the least restrictive copyright license that will facilitate the broadest applicability of research results for published works to enable further scientific discovery and clinical advances; and
- Use of the shortest possible embargo period for all articles which would allow for expeditious research results sharing, similar to the National Institutes of Health Public Access Policy which allows for a maximum of 12 months. A 12 month embargo is part of the standard plans for most, if not all, of the other US federal agencies public access plans. While Gold OA allows for shorter embargoes, this is not automatic as it must be written into grants. This should be made more transparent (or maybe clarified up front) so that investigators know this as they are writing their grants.

We are pleased to have this opportunity to provide feedback on the new policy, and are ready and willing to engage in further discussions on the issue.

Sincerely,



Michelle Kraft, AHIP
MLA President



Paul Schoening, MS, MBA
AAHSL President