

FAQ on the 2022 OSTP Memorandum on Access to Research

On August 25, 2022, the White House Office of Science & Technology Policy (OSTP) issued a memorandum on [Ensuring Free, Immediate, and Equitable Access to Federally Funded Research](#) outlining guidance to federal agencies that will make taxpayer-funded research immediately available for the public to freely access and fully use. Below is a set of Frequently Asked Questions (FAQ's); we will keep them updated as new questions arise.

What does the OSTP Memo instruct federal agencies to do?

The guidance instructs all federal agencies with research and development expenditures to update or create plans to make peer reviewed scholarly publications resulting from federal funding freely available and publicly accessible by default in agency-designated repositories - without any embargo or delay after publication. It asks agencies to ensure that articles are made available in machine-readable formats to enable their full use, and that the underlying data needed to validate the conclusions of articles is made available at the time of publication as well. Further, the Memo also instructs agencies to develop new scientific integrity plans to make appropriate metadata available at the time of publication.

What kind of publications are required to be made publicly available under the OSTP Memo?

Peer reviewed research articles or author's final accepted manuscripts are required to be made immediately available. In addition, the guidance indicates that agencies *may* include peer-reviewed book chapters, editorials, and peer-reviewed conference proceedings, leaving it up to each agency to determine if they want their public access plan to apply to long-form or other content. There is no specific guidance in the Memo related to dissertations.

How is machine-readable defined in the Memo?

The guidance defines "machine readability" as "a format that can be easily processed by a computer without human intervention while ensuring no semantic meaning is lost," and cites the [NISO Z39.96-2015 JATS XML standard](#) currently used by PubMed Central as an example. This definition is found in footnote 5 on page 4 of the guidance.

Does the OSTP Memo address software resulting from federally funded research?

While the Memo requires that the data needed to verify the conclusions of federally funded articles be made immediately available, it is silent on software, code, or algorithms.

How are "agency-designated repositories" defined in the Memo? Are the repositories for articles the same as repositories for data, and is there a list available?

The guidance does not specifically define "agency-designated repositories." It does, however, task the Subcommittee on Open Science with developing "guidance on desirable characteristics of, and best practices for sharing in, online digital publication repositories." We expect this to result in similar guidelines to those outlined in the Subcommittee's May 2022 report, [Desirable Characteristics of Data Repositories for Federally Funded Research](#). Currently, there is no definitive list of agency-approved repositories for publications or data.

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Can publication costs be included as allowable expenses in grant budgets?

Yes. The guidance notes that agencies should allow researchers to include “reasonable publication costs and costs associated with submission, curation, management of data, and special handling instructions as an allowable expense in all research budgets.” Right now, it looks like agencies will be left to define what “reasonable” means in their public access plans.

What federal agencies are covered by the OSTP Memo? Is there a list?

The Memo covers **all** U.S. federal agencies with research and development expenditures - a significant expansion beyond the 20 agencies covered under current policy. OSTP has not yet produced a definitive list.

When will the new guidance from the OSTP Memo go into effect?

Agencies that were subject to the 2013 Holdren Memo and already have public access plans have a shorter timeline and must submit their plans to OSTP and OMB for review within the next six months, with the remaining agencies having a full year. All agencies must publish their final policy implementation plans by December 31st, 2024, with an effective date no later than one year after the publication of the agency plan. This means that the plans from some agencies could go into effect sooner than December 31st, 2024.

How will agency progress and compliance be tracked?

The guidance assigns the task of tracking progress and compliance to the Subcommittee on Open Science. Specifically, the Subcommittee will:

- Recommend standard consistent benchmarks and metrics to monitor and assess implementation and iterative improvement of public access policies over time; and
- Improve monitoring and encourage compliance with public access policies and plans.

We also note that agencies will submit their updated or new plans to both OSTP and the Office of Management & Budget (OMB) for review and approval before they go into effect.

Where can I find resources related to the guidance?

- Full Text of Memorandum: [Ensuring Free, Immediate, and Equitable Access to Federally Funded Research](#)
- OSTP Press release: [OSTP Issues Guidance to Make Federally Funded Research Freely Available Without Delay](#)
- OSTP Blog: [Breakthroughs for All: Delivering Equitable Access to America’s Research](#)
- OSTP Report to Congress: [Economic Landscape of Federal Public Access Policy](#)
- SPARC’s Policy Page: [2022 Updated OSTP Policy Guidance](#)
- SPARC’s Policy Analysis: [Memorandum to SPARC Members](#)

If you have additional questions that were not covered, you may send them to:

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