

## **Consultation on the Federation for the Humanities and Social Sciences “Open Access and the ASPP: Draft Policy Position” [May 2014]**

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The University of Toronto Libraries are pleased to acknowledge the Federation’s support of open access monographs. The policy should benefit both the academic and the broader community by expanding the visibility of Canadian social sciences and humanities researchers. We have several recommendations that we believe will strengthen the proposed approach.

### Scholarly Acceptance and Preservation

The current proposal allows for considerable freedom in how, where, and in what medium scholars and publishers distribute open-access books. While the values of academic and editorial freedom must be pre-eminent, we suggest measures to address the prevailing absence of scholarly confidence in open access as a stable and credible alternative to traditional publication. Books posted on personal or publisher websites routinely disappear. Moreover, texts can be poorly formatted with flawed metadata. As a result, there is an assumption that open access monographs are inferior. To promote acceptance, we recommend incorporating assurances of minimum standards for preservation and intellectual quality.

A number of low cost preservation and access measures are available:

1. Use of persistent identifiers or URLs, such as Handle or ARK.
2. Deposit in one or more repositories, including at least one trusted digital repository.
3. Posting in an openly described format such as PDF, HTML or Open Office.
4. Avoidance of digital rights management restrictions. Such measures impede preservation, accessibility, and use, and other established mechanisms address inappropriate use.

We also would encourage the Federation to mandate a set of commonly used quality indicators long associated with scholarly publishing:

1. Posting of the final peer-reviewed copy-edited version.
2. Provision of complete and accurate metadata to support discovery not only through traditional finding tools such as library catalogs, but also through web scale discovery tools such as Amazon and Google.
3. Use of standard licenses such as Creative Commons to define acceptable uses. The myriad of licenses currently in use, unlike the standardized and accepted copyright law, impede use and the development of a academic norms around acceptable uses

Economics:

We agree with the Federation's assertion that economic models for sustaining open access publishing are still developing. We also concur with our colleagues in scholarly publishing that currently we lack the evidence to assess the effect of open access on print sales. We would like to emphasize, however, that while projections of minimal or positive effects on sales are premature, so too are negative projections.

What evidence we do have suggests that successful open access monograph approaches include broad collaboration. Such approaches not only pool differing expertise but also spread risk. Some examples include the Open Library of Humanities and the Ontario Council of University Libraries' Scholars Portal. The title-by-title approach proposed has potential benefits, but may not promote a sustainable Canadian model of open access scholarly monograph publishing. We therefore ask the Federation to consider funding a publicly available infrastructure to support the cost of publishing monographs online. A central infrastructure could also facilitate minimum metadata and preservation standards, and promote visibility.

Building a Canadian Evidence Base:

Given the number of questions surrounding open access monographs, we also recommend that the Federation collect some information about the items it funds, including the economic model used, and whether the title will also be published in print.

Similarly some basic usage measures may be very helpful in building acceptance of this new medium, and developing appropriate quality measures. While we are by no means suggesting that usage or tweets should be used as proxies for excellence, such data may yield insights that assist future development.

We have reviewed the comments provided by the Ontario Council of University Libraries and we support these comments.

Thank you for the opportunity to comment on an important scholarly development. We would like to acknowledge the leadership of the Federation in this area. Please feel free to contact us if you require additional clarification or assistance.