

# DATA CURATION NETWORK

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**Ethical. Reusable. Better.**

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To Whom it May Concern:

The Data Curation Network (DCN; <https://datacurationnetwork.org/>) appreciates the opportunity to provide feedback on the USDA's [Implementation Plan to Increase Public Access to USDA-Funded Research Results](#) (Notice 2024-01673). The DCN is a membership organization of seventeen institutional and two non-profit data repositories whose vision is to advance open research by making data more ethical, reusable, and understandable. We are pleased to see USDA's efforts in this area, and offer the following comments for consideration.

- How can USDA best implement its plans to improve public access to USDA-funded research results?

In our work with researchers, there can be confusion about what constitutes 'research results'. It would be useful for USDA to define this phrase beyond publications and data. We encourage USDA to include as 'results' the necessary software and code to read/see/re-use research data, as do the NIH and NSF (see <https://grants.nih.gov/grants/guide/notice-files/NOT-OD-24-005.html>).

We appreciate the USDA's focus on long-term data preservation by including as allowable expenses those related to publications and the management and curation of research data. Professional data curation and preservation are not inexpensive. The DCN suggests the agency emphasizes that publication of data, supplementary files, and/or code on publishers' sites or GitHub is not equivalent to repository publication and curation and will not fulfill the USDA's requirements. We recommend that USDA remind researchers that there may be existing institutional assistance and solutions for their open-access publishing and data sharing and preservation needs, such as institutional repositories and data curation services.

- How can USDA update or refine its policies to improve public access to USDA-funded research results?

We support USDA's recognition that all shareable data, even if not associated with a publication, should be publicly available after an award ends. We suggest that the agency emphasize the sharing of well-curated data; 'data dumps' of uncurated/poorly curated data are worthless.

Regarding data associated with a publication, the requirement for data to be made

“freely available and publicly accessible by default at the time of publication” (p.3) is clear but may be difficult for researchers dealing with large datasets associated with multiple publications. In an ideal world, researchers would actively curate data during the research so that datasets are ready to publish and share; the reality, in our experiences, is the opposite. Preparing data for publication is often an extensive process and may require additional processing time in order to align with FAIR principles. In addition, piecemeal releases of data upon publication, perhaps to multiple repositories and without a process or identifier (e.g., the USDA award number) to eventually re-connect the subsets and provide context, may diminish the value of publishing a larger dataset. We note that there is the possibility of “extensions in public access requirements” (p.5). It would be useful to researchers if USDA would evaluate several anticipated scenarios of data release and sharing in its documentation, with clear guidance regarding the timeline for each.

- How can USDA ensure equity in publication opportunities?

The DCN commends the agency for its support of open-access publication of USDA-funded research, including budgeting for author page charges (APCs). The USDA might consider capping APC allowances to discourage inflationary increases by publishers; we suggest that this policy be reviewed and reconsidered regularly. We recommend that USDA remind researchers that open-access need not cost and that APCs are not equitable. There are alternatives such as sharing pre- and/or post-prints via institutional and other repositories that allow equity for both the author (no requirement for purchasing licensing permissions) and the reader of the publication.

As part of equity considerations, we encourage USDA to support researchers in making data accessible to all, such as through the use of screen readers and other assistive technologies. While this effort requires a significant investment of time and resources in the preparation of research data, it is essential.

- How can USDA use partnerships to improve public access and accessibility to results of USDA-funded research?

The DCN proposes that USDA work with other federal agencies to further develop the required characteristics of a ‘good’ repository and to develop funding mechanisms to support improved accessibility to research datasets (as mentioned above). We suggest that USDA researchers and data curators utilize relevant DCN primers (<https://datacurationnetwork.org/outputs/data-curation-primers/>) to create more FAIR datasets. The National Transportation Library tested and adopted the DCN CURATED workflow for its curation practices; has the National Agricultural Library also evaluated it?

- How can USDA monitor impacts on communities impacted by its public access policies?

One approach might be tracking the budgetary requests and payments made in meeting the requirements for open-access publications and research data management, curation,

sharing, and preservation. The DCN suggests that APCs, in particular, be tracked, in order to monitor for inflationary increases from publishers. Would the USDA consider amending the discussion of budgetary support to include the idea of encouraging and expecting cost reductions over time, acting as a good steward of funding dollars? Does the agency have plans or a process to track the positive impacts on the field of agriculture from the implementation of these requirements?

Thank you again for the opportunity to provide feedback on the plan thus far. We are happy to offer additional information through an email or meeting should it be useful. You can contact me directly at [mnarlock@umn.edu](mailto:mnarlock@umn.edu).

A handwritten signature in black ink that reads "Mikala Narlock". The signature is written in a cursive, flowing style.

Mikala Narlock

Director, Data Curation Network

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