

Have Your Say: Best Practice Consultation

Pathways to Compliance

Problem statement

For smaller publishers, full COUNTER compliance can be a major technical challenge. This best practice guidance identifies incremental steps that non-compliant publishers could take to make their usage reporting easier to access and more valuable to report consumers.

This guidance applies to Release 5.1 of the COUNTER Code of Practice.

Eligibility

No publisher who is compliant with Release 5.1, or who has been compliant with Release 5, is eligible to apply for pathway status.

Small publishers who are not compliant with R5.1, and who were not compliant with R5, may apply to COUNTER for inclusion in the Registry under the terms of the pathway to compliance.

A small publisher is as defined in [Section 9.3](#) of the Code of Practice: “report providers delivering COUNTER reports for a single platform, where that platform includes up to 150 books OR 15 journals OR one database.”

Publishers who join the pathway to compliance are required to make a commitment to reaching full compliance as and when COUNTER migrates to a future Release 5.2 (not before January 2030).

Requirements

Data

To be on the pathway to compliance, a publisher must process their raw usage data in compliance with the requirements of the Code of Practice.

Reports

A publisher on the pathway to compliance is only required to provide the Platform Report, plus the Database, Title and/or Item Reports as relevant. No standard views are required. All attributes must be included by default (e.g. the Title Report must include the Access_Type, Access_Method, and YOP attributes).

A publisher on the pathway to compliance may provide their reports in either tabular or json format, or both.

Where only one format is available, our preference is for publishers on the pathway to compliance to provide reports in json format via the COUNTER API (formerly sushi).

For those publishers on the pathway to compliance for whom the json format and COUNTER API are not viable, delivering tabular reports by email once a year is the minimum requirement. More regular (quarterly or monthly) reports are preferred, but we acknowledge this may not be viable for the smallest publishers.

Metrics

A publisher on the pathway to compliance must provide Total_Item_Investigations, Unique_Item_Investigations, Total_Item_Requests, and Unique_Item_Requests. Where relevant (i.e. for Books and Reference_Works), the publisher must also provide Unique_Title_Investigations and Unique_Title_Requests.

A publisher on the pathway to compliance should provide denial metrics (No_License or Limit_Exceeded), where these are relevant. For example, OA publishers will not have denial metrics.

A publisher on the pathway to compliance may choose not to provide search metrics (Searches_Platform, Searches_Automated, Searches_Regular, Searches_Federated).

A publisher on the pathway to compliance must not include any non-COUNTER metrics in their COUNTER reports except as outlined in [Section 11 of the Code of Practice](#). That is, the non-COUNTER metric must be identified via a namespace and must only be delivered if explicitly requested by the report consumer.

Transparency and verification

Validation

Reports from a publisher on the pathway to compliance must pass the checks included in the COUNTER Validator. COUNTER will run the validation in-house, on an annual basis, to ensure compliance.

Publishers on the pathway to compliance who have elected to provide reports in json format must pass the COUNTER API checks included in the COUNTER Validator.

Publishers on the pathway to compliance are not subject to formal audits per the Code of Practice, as the cost and resource demands may be prohibitive for small publishers. However, if errors are reported by more than three report consumers in one calendar month, COUNTER will trigger an investigation into their compliance status. This will include reaching out to the report consumer community more generally to seek feedback on report quality, and rechecking reports with the Validator.

Where issues are identified, either during the annual technical and structural checks or through the error reporting mechanism outlined above, the usual fix period outlined in [Section 9.3 of the Code](#) will apply, including extensions.

Where the publisher is found not to be properly on the pathway after the expiration of the fix period, COUNTER will delist the publisher from the COUNTER Registry.

Registry inclusion

COUNTER will list all publishers who are on the pathway to compliance in the COUNTER Registry, provided they meet the validation criteria and are members in good standing.

The Registry listing will identify publisher platforms that are on the pathway to compliance using the following criteria:

- Validation: last COUNTER Validator check date.
- Reports:
 - standard views offered Y/N
 - tsv offered Y/N
 - json offered via COUNTER API (sushi) Y/N
- Metrics:
 - denials offered Y/N
 - searches offered Y/N