

## FEEDBACK:

### Disposition of Materials for FDLs Relinquishing Depository Designation



August 18 2021

#### CLOSED REQUESTS FOR COMMENTS RECORD:

TOPIC: Superintendent of Documents Depository Guidance Document: Federal Depository Libraries Relinquishing Their Designation, a Strategic Disposition of Depository Materials in Support of the *National Collection of U.S. Government Public Information* (proposed revision)

PROPOSAL: [Federal Depository Libraries Relinquishing Their Designation](#) (Draft SOD-DGD-1-202X)

COMMENTS: Comment Period Closed

DEADLINE: June 25, 2021

FOR MORE INFORMATION: [Leaving the FDLP Guidance](#) on [FDLP.gov](#)

NOTICE: [Request for Comments: Federal Depository Libraries Relinquishing Their Designation](#) (May 11, 2021)

NOTICE: [Request for Comments by June 25: FDLs Relinquishing Their Designation](#) (June 15, 2021)

COMMENTS RECEIVED: [Feedback: Disposition of Materials for FDLs Relinquishing Depository Designation](#) (August 18, 2021)

#### FEEDBACK

There were 20 responses to the request for comments, including a letter submitted by the Association of Southeastern Research Libraries (ASERL). Four respondents did not provide free text comments; they replied with N/A. And nine respondents opted to have their name and institution be redacted from the publicly accessible comments.

**I am ... (check all that apply)**

Commenters self-identified, I am ... (select all that apply)			
General public user of Federal Government Information			0
A depository library coordinator			8
A regional depository library coordinator			9
A government information librarian			5
A librarian other than a government information librarian			3
An administrator at a library with a designated depository library			3
From a library association/organization			2
From a library consortium			0
From a Federal agency			0
From a non-profit organization			0
From the public sector			0
Other, please specify:			0
From this type of library:	Academic: 8	Public: 1	State: 1

I \_\_**(fill in the blank)**\_\_ the concept conveyed in the draft depository guidance document, "**Federal Depository Libraries Relinquishing Their Designation**". *The number in parentheses indicates the number of responses.*

Like (9)

Do not like (3)

Am neutral about (4)

Am unsure about (4)

**Please provide any comments you have about the draft depository guidance document, or respond with N/A.** *Comments are presented as received.*

Name	Institution / Organization	Redact Name & Institution	Please provide any comments you have about the draft depository guidance document, or respond with N/A.
Donald R. Smith	Morehouse Parish Library (formerly director of the library at the Univ. of LA at Monroe)		It still leaves a library not wishing to continue as a selective depository with an extremely large expense to disperse the materials, particularly in times of financial stress. While at the university library I was requested to investigate leaving the depository system but in examining the personnel and other expenses involved, it was less expensive to maintain depository status.
Hayley Johnson	Louisiana State University		N/A
Lori Thornton	New Mexico State Library		I support this policy 100%. As a regional librarian I have supervised libraries relinquishing their status and disposing of collections, some with a cooperative administration and the others not. Library staff (including regional library coordinators) are not able to override the authority of library directors who do not wish to follow the disposition process. As a result, rare or valuable materials are often lost to a state (not to mention the country) when they are disposed of en masse for expediency. This policy is a very necessary step to build and preserve a comprehensive national collection.
REDACTED	REDACTED	Yes	One possible change would be to allow LSCM to select the materials they need before the library's request to keep them. My concern is that once they are out of the program they will no longer be required to offer those materials. If they can be used for digitization that would be preferable. I've gone through the process of a library either leaving the FDLP or doing a massive and sudden discard. The more clarity we have with the process the better we will be able to guide a library that is leaving. I applaud the effort to make the process less onerous- one aspect to consider is that the time it takes to properly offer materials can be used to justify staying in the program. There have been times when a library, upon realizing the work involved, has decided to stay.
REDACTED	REDACTED	Yes	N/A
REDACTED	REDACTED	Yes	N/A

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Alicia Kubas	University of Minnesota		<p>I think bringing GPO/LSCM into the disposition process when a library leaves the program will be a beneficial change. Working together, the regional and GPO staff can better inform and educate the library about their options and what it means to withdraw. I'm happy to see that this draft policy allows flexibility for different regional processes and procedures which is key since not each regional handles withdrawals the same way. I like the language of "whenever possible" • to allow that wiggle room. For example, some regionals don't require libraries to offer everything nationally, but I think we can find a middle ground where GPO and the regional library work with the withdrawing/weeding library to make sure salient material is being offered out.</p> <p>Related to this new procedure of doing more to get this material to other libraries who want it: if libraries are required to offer materials nationally or to preservation stewards, we need eXchange functioning at its best to make this an easier process (i.e. we need all those upgrades we were promised a number of years ago). In relation to this, it would be helpful for libraries to easily see a spreadsheet of the preservation steward titles and corresponding stewarding libraries along with contact information. Unless all preservation stewards have their needs in eXchange, the process of looking up all the steward info is quite manual and having the information readily available would help with the process. The current page on the website for preservation stewards is not easily scannable or grouped by title and nor does it have contact information for each preservation steward.</p>
REDACTED	REDACTED	Yes	The proposed draft revision is necessary and clarifies language that was left vague or left out of previous documents. The disposition of materials and the date by which a library ceases to be an FDLP member needed to be made clear.
REDACTED	REDACTED	Yes	I find it acceptable and logical.
Kathy Piselli	Fulton County Library System		<p>The concept of building and preserving a comprehensive National Collection of U.S. Government Public Information is a worthy one, so in that sense I support this process. The devil will be in the details (but I especially like "No materials shall be discarded prior to receiving this authorization"). In my own recent experience, a library director with very little understanding of the FDLP wished to remove us from the program simply in order to free up shelf space. In our case, our Regional was able to explain more about how removing us from the program was not going to achieve this in the desired timeframe. That director has now left, and the designation was saved. I know of several other depositories that have struggled with vanishing directors unschooled in the value and requirements of the FDLP. Therefore, I would improve this document by strengthening the role of the Regional. The initial contact of the depository should be to the Regional, and after that the GPO. The Regional can be helpful in finding alternatives that impact patrons less drastically. Additionally, I believe the Congressional entity for the population a depository was intended to serve should be notified at an early stage. If the designation is then relinquished, as the owner of the materials, GPO should then oversee the process of disposition, requiring the depository to assign additional staff as needed to carry out the details of the process.</p>

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REDACTED	REDACTED	Yes	<p>I understand that the intent behind this updated guidance is to provide flexibility for libraries leaving the FDLP and also to ensure that GPO has a way to build its "National Collection" - and I support the intent. My concerns/questions focus mostly on the implementation of this updated guidance and its impact on libraries in a given region.</p> <ol style="list-style-type: none"> <li>1. Does LSCM plan to consistently implement this guidance across the FDLP? Or are there criteria in place that determine priority for more direct GPO involvement? (i.e., will GPO be cherry-picking the libraries and collections that they work with, leaving the Regionals to pick up the pieces with the rest?)</li> <li>2. The guidance indicates that LSCM will work with Regionals "and their process, for as long as practicable" - what does this mean for libraries in regions that use the ASERL Disposition Database (i.e., offering beyond their state, just not nationally)?</li> <li>3. There is no inventory for a "National Collection" and many depositories (still) have not cataloged their complete collections. How will LSCM personnel review collections for "at-risk" or rare/unreported publications? Does GPO have plans to widen the scope of its needs list for digitization so that libraries can more easily identify materials to send to LSCM? Does LSCM have the staffing to adequately support this work?</li> </ol> <p>While I understand that the intent is to bring flexibility, I am concerned that by further inserting itself into the disposition process GPO will add to libraries' burdens, not reduce them, and impact currently-effective relationships among FDLP libraries in a given region.</p> <p>Thank you for the opportunity to comment - it is much appreciated!</p>
Neal R. Axton, JD, MLIS	University of Kansas		<p>The University of Kansas (KU) is the regional repository for the District of Kansas and a major research university. KU is a proud member of the Federal Depository Library Program (FDLP) and FDLP's generosity with technical assistance and funding opportunities has been wonderful in recent years. While the FDLP is entitled to structure the program however it feels is best, we are frankly puzzled by the desire to micromanage the collections of libraries withdrawing from the FDLP.</p> <p>One of the great strengths of the Federal Depository Library Program (FDLP) is that the program embodies federalism through its merger of centralized federal production and decentralized control of collections.</p> <p>Dedicated professionals across the country make difficult decisions every day in terms of how to provide optimal access to government information for their patrons. KU believes that a simple federalism analysis indicates that local control is generally superior to micromanagement from Washington, DC.</p> <p>While it is true that FDLP documents are government property, this analysis neglects the utility of these documents. While the fair market value of these documents does not capture their historical and cultural value, it is one measure of these resources.</p>

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			<p>An analysis of the fair market value of government documents is difficult due to the breadth of these documents. But many of the historical documents in our collections are literally crumbling and fading with age due to the acidic paper upon which they were printed.</p> <p>To preserve the information content of these documents, many government documents have been digitized and indexed by GPO and by private vendors. The offering of vendors includes an array of sophisticated research platforms and value-added tools.</p> <p>Librarians spend a great deal of time and energy deciding how to spend scarce library resources. Library budgets, floor space, and staff time are all limited. But libraries struggle to meet an array of community needs within these constraints. Library directors regularly must make a cost-benefit analysis and determine if their patrons would be better served with a license to an integrated search repository or maintaining a collection of FDLP originals. KU does not believe that it is in the interests of the FDLP or member libraries to have these decisions "second guessed" by individuals with limited access to the facts of each individual library and the community it serves.</p> <p>Increasingly, information resources have moved online, yet many library collections contain outdated government information on the shelves. Leaving these documents on the shelves can create a trap for the unwary. As a research institution, KU possesses the resources to support patrons in their research needs into government research, but that is not necessarily true of smaller libraries such as public libraries and community college libraries, which are among our selective libraries.</p> <p>Luckily with online reference support and interlibrary loan, regionals are able to provide high quality research support to individuals across the nation despite the distances that may separate us. The technological advances in communication technology have allowed regional libraries to support the research interests of US citizens with speed and alacrity. To the degree that this rule change would interfere with the ability of local library partners to manage their collections based upon the realities of the situation, we oppose it. We urge the FDLP to trust the member institutions and their dedicated staff who make heart-rending decisions every year based upon budgetary realities but always with the best interests of their patrons and communities at heart.</p> <p>From a resilience perspective, requiring the FDLP to approve of all dispositions seems unwise. Our experience with the COVID pandemic also demonstrates the difficulty of communicating with Washington, DC during a lockdown and with staff who may be quarantined or sick with a life-threatening disease. These experiences should encourage us to be humble in our goals and not create additional burdens that assume government will work with its usual efficiency in all circumstances. There is no reason to believe that COVID will be the only pandemic of the 21st century.</p> <p>Similarly, it is foreseeable the threats posed by climate change will challenge us as a nation and are likely to degrade our telecommunications infrastructure. While these challenges can be overcome with ingenuity and resolve, they will likely</p>

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			<p>require more flexibility on the part of FDLP and member institutions.</p> <p>Therefore, we believe that the proposed rule would be improved by creating a rebuttable presumption that the decisions of regional libraries for handling the collections of selective libraries departing the FDLP program should be accepted unless FDLP staff are able to provide additional support or suggestions within a reasonable period of time.</p> <p>However, the withdrawal of regionals and shared regionals obviously would create more significant concerns that would need to be resolved through intense consultation with FDLP.</p> <p>For these reasons, KU urges the FDLP to reconsider this proposed rule in its current form.</p>
REDACTED	REDACTED	Yes	<p>I like the idea that regional libraries and selective libraries within the same state, as the potential outgoing FDLP library, have the opportunity to visit the outgoing library first, to see if there are items they would like to claim, before LSCM has the chance to come in and claim items. I also like the idea that LSCM will help to digitize "at risk" items and offer remaining materials to other FDLP libraries across the country.</p>
Celina McDonald	University of Maryland		<p>Before I get too far into my comments, I want to say that overall even though I am neutral about the concept conveyed in the draft depository guidance document, I am not opposed to the changes. For that reason, the comments I am submitting are questions.</p> <ul style="list-style-type: none"> <li>- For example in the first paragraph, it says that GPO "will work with regional depository coordinators and their process, for as long as practicable." I am not sure what "for as long as practicable" means. Does that mean until GPO runs out of resources to participate? Until GPO would take over the process if they cannot work with the regional depository coordinator and their processes?</li> <li>- Later in the document, it says that GPO will transmit the "Collection Disposition Plan." What such a plan look like? Would it be written in consultation with the regional? Would the regional be informed of the plan? Would it be a legally binding document? What would happen the library relinquishing its status or regional library are unable follow the plan?</li> <li>- At another point in the document, it says "authority for the final disposition decisions will rest with the Superintendent of Documents." In practice, does that mean the regional library would direct the library leaving the program to send disposition inquiries to GPO? Does that mean the regional's role in the process would be more akin to the role of a selective depository library in its service region (where they can accept an offer, but otherwise have little involvement)?</li> <li>- My final question has more to do with the long-term implications of the changes to this process. When I read this policy, I immediately started to wonder how this guidance would affect other document disposition processes - would GPO take a more active role in disposition of materials from participating libraries? Overall would that mean to the role of regional libraries.</li> </ul> <p>All of these comments/questions are solely the opinion of the writer and not her institution.</p>

REDACTED	REDACTED	Yes	<p>June 21, 2021  Ms. Laurie Byer Hall  Superintendent of Documents  United States Government Printing Office  732 North Capitol Street, NW  Washington, DC 20401</p> <p>Ms. Hall,  I respectfully submit my comments regarding Superintendent of Documents Depository Guidance Document 1-2021, "Federal Depository Libraries Relinquishing Their Designation Strategic Disposition of Depository Materials in Support of the National Collection".</p> <p>SOD Draft Guidance 1-2021 Federal Depository Libraries Relinquishing Their Designations.  Overview Bypasses Title 44, Section 1912 by creating a secondary class of disposition materials, those materials being disposed of libraries leaving the Federal Depository Library Program (FDLP), under the guise that these dispositions would be come under the sole purview of the GPO as a means "in support of the National Collection". This document bypasses existing guidance in Title 44, Section 1912 to support the theoretical concept of a "national collection". A collection which could only be built with the continued cooperation of regional and selective Federal Depository Libraries and the existence of Section 1912.</p> <p>Unintended consequence of the draft guidance drives a wedge between the regional federal depository libraries and selective federal depository libraries. In addition, bypassing local regional depository expertise will ignite a rush to dispose collections in such a number that those libraries participating in programs such and ASERL's Centers of Excellence or even GPO's Preservation Stewards Program that these cooperative entities my not be able to sift through the mass of materials. The new policy by-passes the need for selective federal depository libraries considering leaving the FDLP to notify regional federal depository libraries. This violates a long-standing operational principle that the regional federal depository library has the appropriate knowledge and context to understand the pressures behind the selective depository library's request. The new policy leaves little ground for the selective depository library to explore options other than leaving the program, as stated in the policy, the process begins "When the Federal Depository Support Services (FDSS) receives notification from a library indicating they no longer wish to be part of the FDLP". •</p> <p>A more comprehensive policy would indicate what interim steps and tools could be available prior to the "final decision" to leave the program.</p> <p>The process (bulleted on pages one and two of the proposed guidelines) creates an implied GPO management of the process absent the traditional partnership between GPO-FDSS exiting in Title 44, Section 1912. Examples of this unequal partnership is communicated by language as in statement #5,  "LSCM may visit the library to assess the situation and the collection. Regional depository coordinators are encouraged to do the same". If GPO intends the National Collection to become an operational or theoretical reality it should work to strengthen its communication and relationships with the regionals beyond "encouraging".</p> <p>Additionally, the guidelines create the impression that the "National Collection" is a singular program within GPO without mentioning key partnerships including the Preservation Stewards and regional collection activities like the ASERL's Collaborative Federal Depository Program (CFDP) Centers of Excellence and the even longer-standing partnership with regional depository libraries.</p> <p>Realizing the goal of a "National Collection" will take the full cooperative efforts between GPO, current and future Preservation Steward collections, regional collection programs like ASERL's Centers of Excellence and strong communication with and support of regional depository operations.</p>
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In short, the process outlined needs to reflect the importance of and cooperative partnership of GPO/FDSS and all regionals. For many years it has been left to the regional federal depository library to manage the "disposition of unwanted documents" (section 1912). To bend this interpretation to not include selective depository libraries leaving the program creates a logic that there are two classes of unwanted publications: (1) those no longer wanted because of age or condition, and (2) those no longer wanted because the selective no longer wants to be a depository. Until now, GPO considered both positions falling under section 1912.

GPO's description on pages three (3) and four (4) of the guidance document conflates the difficulties regionals faced in dealing with discards from their selectives. Unfortunately, the period under discussion also stops with 1995 or twenty-six years ago. In the interim regionals have tried multiple times to work with GPO LPSS (now FDSS) to identify and overcome the "burdensome process". This time limited view does not include the many attempts requesting GPO to assist with guidelines, communicate with library administrations the necessity of having enough staffing to comply with guidelines, including section 1912. Finally, the discussion does not acknowledge the development of consortia (ASERL Disposition database) and national (GPO Exchange) disposition tools. This brief history of the disposition process also ignores any lack of progress on GPO's part to inform library administrations on the importance of living up to GPO guidelines by both selective and regional depository libraries to the point that the concept of the "National Collection" now dominates GPO's relationship with its depository libraries.

It would be a more efficient system if GPO FDSS pledge to work with Regional Depository Libraries to provide collection assessment services and training that would assist selectives in managing their resources and regionals as their role to provide comprehensive collections and services within the geography they serve. The assistance could also be extended to those regionals that have developed consortia working agreements around collections and services.

To this end GPO FDSS should have the following goals:

- (1) Support the service and collection goals of all regional and selective depository libraries, including recommendations on minimum staffing and other resource-based guidelines to ensure collections and services are available to the public for which the program is addressed to serve.
- (2) Advocate for improved training and education in the operation of Federal Depository Libraries.
- (3) Continue to coordinate with selective and regional federal depository libraries on defining and building the "National Collection" as well as ensuring that resources are available at the regional/consortia level for comprehensive collections and services.

I applaud GPO's desire to put further resources into the development of a "National Collection". The question is whether the foundations of the Federal Depository Library Program are worth the expense. Is one "national collection" managed and maintained by GPO, an entity that jettisoned its own in-house collection in the 1970's more valuable than maintaining a network of local (congressionally based collections supported by nearly complete or comprehensive regional collections) services and expertise. Or has GPO given up on supporting the Federal Depository Libraries to create their "National Collection"?

Sincerely,

Name	Institution / Organization	Redact Name & Institution	Please provide any comments you have about the draft depository guidance document, or respond with N/A.
Cheryle Cole Bennett on behalf of John Burger, Director	Association of Southeastern Research Libraries (ASERL)		<p>[Inserted below is text of a letter submitted to Laurie Hall. Footnoted text may not transfer due to formatting differences.]</p> <p>June 24, 2021</p> <p>Laurie B. Hall, Superintendent of Documents  U.S. Government Publishing Office  732 North Capitol Street, NW  Washington, DC 20401</p> <p>RE: Request for Comments: Federal Depository Libraries Relinquishing Their Designation</p> <p>Dear Superintendent of Documents Hall:</p> <p>Thank you for the opportunity to provide comments on "Federal Depository Libraries Relinquishing Their Designation: Strategic Disposition of Depository Materials in Support of the National Collection," SOD-DGD-2021-1.</p> <p>The Association of Southeastern Research Libraries (ASERL) heartily supports the efforts of the U.S. Government Publishing Office to build and preserve a comprehensive collection of public government information. This concept has been at the heart of our Collaborative Federal Depository Program (CFDP) since its inception in 2006. While much work has been done over this time, a clearly defined National Collection remains elusive. The lack of a national union catalog of FDLP materials continues to make the process of identifying and acquiring a comprehensive collection difficult at best.</p> <p>We agree that depository libraries have long seen the disposition of materials process as burdensome, but we question the need and purposes of this current document under review.</p> <ul style="list-style-type: none"> <li>• Since 1995, Regional depositories - either by themselves or in cooperation with consortia - have created successful systems that significantly improve the discard system.</li> <li>• Further, ASERL acknowledges the yeoman's work being done by the Regional and Selective Depositories in the Southeast over the past 15 years. Together, these libraries have established the CFDP and embraced the ASERL Documents Disposition Database to simplify and streamline the disposition process and further strengthen FDLP collections in the Southeast region.</li> <li>• Since 2012, 100,500 discarded documents have found homes among the 232 depository libraries registered to use the ASERL Documents Disposition database. Of these, almost 50,000 Federal documents have been claimed for Center of Excellence (COE) collections.</li> <li>• When FDLP eXchange was launched in 2018, we implemented database enhancements to ensure offers which had expired in the ASERL Documents Disposition Database could be easily exported for use into FDLP eXchange, making those items available to all federal depository libraries across the country. Our CFDP program guidelines specifically encourage posting materials that would be rare or likely to be of significant interest beyond the region.</li> <li>• The similarities between the objectives of ASERL's CFDP and GPO's Preservation Steward program are clear. As a result,</li> </ul>

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			<p>CFDP-participating libraries have been well-positioned to support the Preservation Steward program, several agreeing to preserve collections for which they were already a Center of Excellence. We encourage GPO to acknowledge that there are other partnerships, such as the ASERL Centers of Excellence, that may not be official Preservation Stewards, but nevertheless should be given priority in the disposition process because of the important contributions they make to gathering and preserving parts of the FDLP collection.</p> <ul style="list-style-type: none"> <li>• The ASERL Documents Disposition Database further supports this initiative in allowing libraries needing items for their COE collections to have priority access to items posted for discard.</li> </ul> <p>Title 44 Section 1912 -- as echoed in other GPO guidance -- has long been interpreted that "by law, regional depository libraries are responsible for the disposal process in their state/region." Regional depository libraries take these roles very seriously. It is a deeply-rooted operational principle that the Regional has the appropriate knowledge or context to understand the pressures behind the Selective depository's decision to leave the FDLP and the competence to work closely with LSCM to steward the process. Any changes -- such as those proposed here -- should be designed transparently in conjunction with the community, seeking to bolster the existing system rather than prescriptive changes seemingly made without community input. The lack of a clearly defined communication channel and coordination of actions that explicitly includes the Regional has the potential to disrupt and erode existing processes and relationships. These relationships are recognized as being "an essential part of maintaining the strength and utility of the FDLP".</p> <p>Additionally, the interpretation of Sections 1909-1912 makes a distinction between the disposition of materials from a Selective depository library leaving the program and the more routine disposition of weeded materials which creates two classes of unwanted publications — (1) those no longer wanted because of age or condition, and (2) those no longer wanted because the Selective no longer wants to be a depository - with differing disposition processes and authority. We understand the desire of the Superintendent of Documents to have a more active role in the disposition of materials from libraries relinquishing their depository designation. However, we echo recent concerns expressed by the Depository Library Council in response to proposed legislative changes to Title 44 U.S. Code Chapter 19, section 1912 that additional requirements related to disposition will create unnecessary burdens for selective depositories. Alternatively, strengthened communication between regional depositories and GPO would facilitate the transfer of materials to Preservation Stewards and other libraries actively working on preservation efforts.</p> <p>As stated above, the current draft risks damaging the roles and relationships of the Regional Depository and the successful discard systems currently in place. Rather, we would encourage GPO to work more closely with Regional Depository Libraries to provide additional resources for stewarding the disposition of materials from libraries relinquishing their depository designation. This can be done in conjunction with the Superintendent of Documents to ensure collections and services continue to be available.</p> <ul style="list-style-type: none"> <li>• GPO should consider simultaneous visits of GPO staff and the Regional Depository Library staff to consult with the library leaving the program, funding the travel of the Regional when that is necessary.</li> <li>• In particular, we think this statement should be modified: "Authority for the final disposition decisions will rest with the Superintendent of Documents" to indicate that the final disposition of any items remaining after all the other enumerated</li> </ul>

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			<p>steps in the disposition process have been taken will be made in consultation with the Regional Depository Library.</p> <ul style="list-style-type: none"> <li>• We would further encourage GPO to continue to coordinate with Selective and Regional federal depository libraries in creating a clearly defined National Collection of U.S Government Public Information, one which nurtures flexibility for collaboration and innovation while ensuring tools are available at the regional/consortial level for identifying and building comprehensive collections and services.</li> <li>• We also believe additional new resources are needed to improve training and education to ensure FDLP libraries are better equipped to sustainably manage their collections.</li> <li>• Last but not least, we encourage GPO to enhance the functionality of FDLP eXchange to assign Preservation Stewards, and other libraries/programs engaged in preservation efforts, priority access to items which meet their preservation collection needs. This would strengthen confidence that government information preservation efforts are well supported on a national level via FDLP eXchange.</li> </ul> <p>Depository libraries in the Southeast have a long history in supporting public access to government information and in establishing collaborative efforts to manage and preserve these important resources. For 15 years, these libraries have shaped a disposition process that supports the intentional building of comprehensive tangible collections. Our process is attentive to the needs of preservation efforts that helps assure the future availability of these materials. We appreciate the chance to provide feedback on the draft guidance document and thank you for your consideration of our comments.</p> <p>Kind regards,</p> <p>John Burger, Executive Director</p>
REDACTED	REDACTED	Yes	N/A

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Arlene Weible	On behalf of Regional Government Information Library Group (REGIL)		<p>June 25, 2021</p> <p>Thank you for the opportunity to provide comments on the proposed draft revision of Depository Guidance Document (DGD), "Federal Depository Libraries Relinquishing Their Designation". Regional Government Information Librarians group (REGIL) offers the following comments based on feedback from individual regional coordinators which should not be viewed as a reflection of shared opinion among all coordinators.</p> <p>One commenter said that the document lays out a clear process for libraries that wish to relinquish depository status and dispose of materials. Historically, libraries pursuing this process have had to communicate their intention to other depository libraries and their congressional representatives. The current draft does not provide language documenting this step and we would like clarification that this is no longer required. Even if it is no longer required, language to encourage wide communication about intentions to relinquish depository status should be included in the policy.</p> <p>Another commenter observed that this policy addresses the real and growing knowledge gap about FDLP print collections. Staff attrition at both regional and selective libraries means that the collective experience with big weeding projects may be limited at the local level. If some of the processes are overseen by GPO LSCM, this expertise can be centralized. This does require LSCM staff to have a good understanding of FDLP print collections. Staff will also need ongoing training and preparation to work with the variety of tools used to manage collections at the local level (ILS, shelflists, etc.) as well as build project management and collaborative skills to effectively advise local libraries. It is hoped that GPO acknowledges the need to build and grow this expertise among staff and provide sufficient opportunities for them to pursue these skills.</p> <p>Another commenter remarked that some selective depositories consider their regionals' labor-intensive discard policies as the main argument for remaining in the FDLP. Their concern is that any easing of the disposition process by GPO could spark a rush to exit. Yet even if more libraries were to leave the FDLP, this may not result in additional items for GPO to digitize. As another commenter pointed out, depositories are already free to remove collections and become "e-only" without relinquishing depository status. GPO staff involvement in one scenario (relinquishment) but not the other (large weeding project) creates a choice. Libraries will likely choose the lower cost path, without weighing lost benefits to the wider community. It is hoped that GPO staff understand that their involvement in only one scenario of disposition processes may cause unneeded confusion and result in decisions that do not reflect local, state, and regional needs.</p> <p>Another commenter expressed a concern that active participation by GPO in the process could slow down decision-making about final disposition of materials in situations where there is local pressure to expedite movement of materials. While GPO does have legal authority over the material, this active interest has not been exercised historically. Some libraries may not react positively to an assertion of this authority if it negatively impacts local needs and timelines. Regional libraries need to maintain positive relationships with libraries within their region if they are to successfully coordinate and manage FDLP resources at the local level. GPO assertion of authority could result in situations that damage these important working relationships. While we understand that GPO staff intend to work collaboratively with Regional coordinators, the language of the guidance document does not always reflect that spirit of cooperation.</p> <p>For example, the document states:</p>

Name	Institution / Organization	Redact Name & Institution	Please provide any comments you have about the draft depository guidance document, or respond with N/A.
			<p>"LSCM may visit the library to assess the situation and the collection. Regional depository coordinators are encouraged to do the same."</p> <p>We would like to see language that encourages LSCM staff and Regional coordinators to plan visits and communication strategies together so they can share information and expertise with the local library in an open and transparent dialogue among all interested parties. Regional coordinators can supply valuable insight into local library needs that can assist LSCM staff as they manage the "public relations" • aspects of disposition of materials.</p> <p>Finally, a last commenter suggested the proposed process does not make it simpler. "A library that leaves still needs to follow the requirements for offering. One aspect I think should be altered is that the FDLP digitization efforts should come before what the library wants to keep (looking at the chart the library request to keep materials comes before the LSCM obtaining materials). Digitizing will increase access, and once the library is out they won't be required to offer materials if they decide to weed those items later."</p> <p>Submitted by Arlene Weible,  On behalf of REGIL members  REGIL Leadership for 2020-2021  Arlene Weible, Arlene.WEIBLE@slo.oregon.gov  Ashley S Dees, aesorey@olemiss.edu  Hayley Johnson, hjohnson1@lsu.edu  Janelle Breedveld, jbreedveld@azlibrary.gov  Jen Kirk, jen.kirk@usu.edu  Lori Thornton, Lori.Thornton@state.nm.us</p>
Ester McShepard	Fisk University		I DO NOT LIKETHE IDEA OF DOING THIS.
Michael Rodriguez	University of Connecticut		I strongly support these draft recommendations for making the process of relinquishing a library's federal depository status more clearly delineated and better supported through revised guidelines and FDLP engagement.