

ALA American Library Association

May 26, 2008

Cynthia Etkin
U.S. Government Printing Office
732 North Capitol Street NW
Washington, DC 20401

Re: American Library Association's response to request for comments

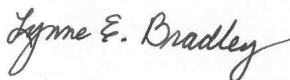
Dear Ms Etkin:

On behalf of the American Library Association (ALA), I am writing in response to the Government Printing Office's (GPO's) request for comments as part of the study on the conditions of regional depository libraries. We appreciate the opportunity to comment and welcome the study as the first in a series of efforts to ensure the Federal Depository Library Program (FDLP) continues to provide no-fee public access to critical government information in the digital age.

We recognize that many complex issues face FDLP library participants including: (1) space, budget, and staffing constraints; (2) provision of expert services; (3) deteriorating and uncatalogued print collections; (4) permanent public access to electronic government information; (5) technological change; and (6) collaboration on access to collections and services. To that end, we have included more detailed letters from two key units of ALA that deal with government documents – the Association of College and Research Libraries (ACRL), and the Government Documents Roundtable (GODORT). These letters reflect a diversity of concerns, challenges, and ideas with respect to the current and future role of the FDLP.

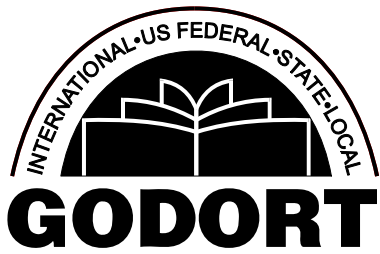
Thank you for the opportunity to submit comments as you work to gather information on the state of regional libraries in the FDLP. Given the complexity of this program and the thousands of libraries and millions of users affected, we ask that you provide us more opportunity to elicit concrete suggestions. Through dialog and collaboration, we can work together to identify successful strategies for meeting the challenges of providing no-fee permanent public access to government information in the digital age. ALA looks forward to continuing this very important conversation as GPO completes the study and considers more effective means to ensure the public's right to know.

Sincerely,



Lynne Bradley
Director
American Library Association Washington Office

Attachments



Government Documents Round Table • American Library Association

Michele McKnelly,
Chair
ALA Government Information Subcommittee

May 8, 2008

TRANSMITTED VIA E-MAIL

Dear Michele,

GODORT is pleased to see the Committee on Legislation (COL) and the Government Information Subcommittee (GIS) taking the lead in coordinating an ALA-wide response to the study requested by the Joint Committee on Printing (JCP) on the “State of Regional Depositories in the Federal Depository Library Program” (FDLP). GODORT leadership has worked with our Legislation Committee, The Federal Documents Task Force and our membership to gather information in response to your questions. As you might imagine when querying a group of depository librarians and government information professionals there are as many views on the future of the Regional Depository Libraries as there are librarians.

1. Turning first to the ‘crisis in structure of the FDLP’ and the issue of selectives leaving the program: it is difficult to extrapolate, from the many disparate issues facing Regionals, specific crises that cut across the entire program. Many of the dynamic challenges affecting libraries in general are faced also by the FDLP. Space, staffing, aging collections, increased operating costs and dwindling budgets, to mention just a few, challenge the government information librarian as surely as they do library administrators. GODORT recognizes that faced with these challenges there is the potential that some Regional libraries may elect to relinquish their status in the FDLP if opportunities for new structures are not supported. We believe that GPO should make every effort to ensure that Regionals have the support they need to stay in the program.

In discussing selectives leaving the depository program the Subcommittee on Attrition and Retention (SOAR) organized by the Depository Library Council (DLC) in 2002 expressly dealt with the issue.ⁱ Although it is several years old, the range of issues and responses identified in that document remain relevant to this discussion. GODORT believes it is important to not approach the issue as a crisis, but as a challenge to be met by a new vision that embraces 21st century collaborative solutions. While it is certainly true that selectives have left the program it is also true that new libraries have joined the program while other entire communities of users, such as tribal colleges, are clamoring to be admitted.ⁱⁱ

Additionally, large selectives – those at 75% and higher - face many of the same challenges as do the Regionals but often with less support for their mission. If we are to maintain the excellent level of service that the public has come to value from depository libraries, GODORT believes it

would be more appropriate for the Government Printing Office, in responding to the JCP's request, to look at the situation in both the Regional libraries and in the larger selective depository libraries.ⁱⁱⁱ

Overall, GODORT is less interested in the 'cause and effect' of the changing environment but rather in ensuring a healthy environment for growth and cooperation in the FDLP so that the Regionals and selectives can continue their partnership in providing no-fee access to government information.

2. Provision of expert services remains a challenge as institutions streamline and downgrade government information collections and departments. Simultaneous with this change is the growing demand for knowledge leaders who can provide support for the users of e-government services.^{iv} The FDLP is one such community of leaders that can provide this level of expertise and assistance. As ALA formulates a response to the study requested by the JCP GODORT believes it is imperative that the depth of knowledge possessed by librarians in the FDLP is acknowledged and that is communicated to the JCP and GPO that unless there are changes to the system the public may lose access to these experts.
3. Aging print collections are a looming *slow fire* in the depository community. GODORT recommends that all FDLP participants determine collaboratively how best to maintain our tangible collections. This may mean looking at different methods for managing them than we have in the past, including shared housing or off-site storage for little used materials. There is as of yet no data to support a suggestion that shared housing or off-site storage in any way hinders access by users or the care of depository material when it is cataloged and appropriately preserved. However we respond we must recognize that while the future of the program is electronic, the tangible documents in our collections represent the public history of our nation and that library administrators owe that material responsible stewardship. ALA should encourage GPO to continue its clear communication with depository library administrators to this end.
4. While geography is an important consideration when looking at how Regionals and selectives interact, for example states like Alaska, California and the Dakotas have all been 'stretched' to be served by the Regional system, the relationship between the Regional and selective depositories has always been as much about individual personalities as it has been the structure of the FDLP. This does not obviate the responsibilities of Regional libraries to provide support to their selectives. However, the dynamic challenges mentioned in point one above have made demands on many libraries so that it is difficult, if not impossible, for Regional depository librarians to provide the level of leadership that participation in the program requires. Exploring new administrative structures is an appropriate response in such an environment. The vision document prepared by the Depository Library Council in 2006 is a good jumping off point for such an effort.^v
5. Has access by the public to no fee-government information been diminished by pressures on the Federal Depository Library Program? Certainly there have been many suggestions that this has been the case but these are primarily anecdotal in nature. There has been no quantitative study that conclusively demonstrates that diminished access to public information (excluding classified

and otherwise secure information) is directly attributable to changes in the FDLP. GODORT urges the Government Printing Office to provide documentation of changes in access so as to better demonstrate how or if service in FDLP institutions has indeed diminished.

As ALA prepares a response to the GPO study on the state of the regional libraries in the FDLP the Government Documents Round Table urges that ALA's approach be cautious and supportive. The Government Printing Office and ALA have long been partners in the provision of government information and we believe that it is important to not approach our Associations' response with preconceived notions of "crisis" or "lost access" before the final report is actually produced.

Again, on behalf of GODORT I thank you for the opportunity to provide guidance to ALA. We look forward to continued participation in developing ALA's response to the Government Printing Office study.



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ⁱ SOAR – Suggested Responses to Frequently Cited Reasons for Leaving the Depository Library System. 2002. http://www.access.gpo.gov/su_docs/fdlp/council/soar-suggestions.pdf

ⁱⁱ ALA CD#20.2 (2008), Resolution on Tribal College Library Membership in the Federal Depository Library Programs (FDLP), which reads: "That the American Library Association (ALA) supports the membership of tribal colleges in the Federal Depository Library Program; and that the ALA works with the Government Printing Office (GPO) to assist all tribal colleges interested in joining the FDLP." <http://www.ala.org/ala/ourassociation/governanceoffice/council/councilactions/2008mwca.cfm>

ⁱⁱⁱ Selectives are also excluded from the expectation to retain all publications and to serve other FDLP libraries, although most still do this. Nevertheless, the burden of participation in the FDLP on the larger selectives should not be overlooked. A complete discussion of the requirements for Selectives may be found at <http://www.fdlp.gov/handbook/index.html>

^{iv} Bertot, John Carlo, Et al. *Drafted: I want you to deliver E-Government*. 2006. [Library Journal](http://www.libraryjournal.com/article/CA6359866.html). <http://www.libraryjournal.com/article/CA6359866.html>

^v Depository Library Council. *Knowledge will forever govern*. 2006. http://www.gpo.gov/su_docs/fdlp/council/dlcvision092906.pdf

NOTE: Comments to be submitted via online form on GPO site, not on ACRL letter head.

Dear Mr. Davis and Ms. Etkin,

I am writing for the Association of College and Research Libraries (ACRL), a division of the American Library Association, to offer comments as you prepare your report for the Joint Committee on Printing. Of the 53 regional Federal Depository Libraries, almost two thirds are affiliated with academic institutions. As such, ACRL has a great interest in this issue. ACRL and ALA have supported shared regional depository libraries in the past. ACRL, on behalf of our 13,500 members, continues to do so in principle.

We think the salient question at this point is, “What is the appropriate model for providing access to government information to 21st century audiences?” This is not only an issue as it relates to depository libraries and federal documents but to our collections in total. Providing access to information of all kinds is part of a larger shift in libraries in the 21st century. The broader library community increasingly engages in activities like consortial buying and digital delivery of collections as part of this shift. While we recognize that there are significant organizational, financial, space, and other challenges in operating a regional depository library, we think that employing cooperative models and practices could improve public access to Federal depository resources.

We see the question around access to government information as a critical issue and are concerned about the timeline for the survey of regional depository libraries and the short comment period. This is a complex issue involving hundreds of organizational and institutional stakeholders. We would much rather have a thorough sense of the state of regional depositories, including partial depositories in order to offer more substantial comment, but the timeline has precluded this.

We do recognize the nature of pressures experienced by regional depository libraries, in line with the stated purpose of the current study you are undertaking. They include:

1. increasing pressure on physical space for collections
2. increasing interest in providing services based on digital collections
3. increasing need to balance processing and access to digital collections with processing, access to, and management of legacy paper collections
4. the need for collaborative approaches to managing legacy paper collections across both regional and partial collections, including expedited "needs & offers" procedures that might underlie such efforts
5. the overall situation about multi-state repository collections
6. fiscal pressures on staff, facilities, and the transition to digital services

ACRL believes that collaborative work supports libraries’ ongoing strategies for balancing digital and tangible resources from the government and from all other sources as well. We understand at the same time that many people in the library community are concerned about the long term quality of government information services, and ACRL is convinced that the quality of services associated with collaborative efforts may be even stronger.

In ACRL's June 26, 2007, letter reacting to the guidelines for shared regional depository libraries, we noted: "Flexibility and simplicity are critical to the success of rethinking models for housing and delivering government information to our various constituents." In the case of the University of Kansas and the University of Nebraska, they are constrained by the interpretation of the current statute. We support the solution they proposed, believing regional Federal Depository Libraries can develop effective models for cooperation and future collaboration that serve their users well.

ACRL is a proponent of reconsidering Title 44 so that it ensures excellent access to government information while allowing for innovations as libraries work to provide this service. Regional depository libraries are self-funded and voluntary participants in the Federal Depository Library Program. They play a critical role in providing public access to government information, and we support allowing them flexibility to collaborate, innovate, and experiment in order to thrive.

Thank you for giving us the opportunity to provide comment as you conduct your study on the condition of and factors influencing the success of regional Federal Depository Libraries. We urge you to consider any information obtained through this current study period as only a first step and to continue exploring the issues in more depth over the next several months.

Sincerely,

Julie Todaro
ACRL President, 2007-2008