



Government Documents Round Table • American Library Association



May 17, 2007

Richard G. Davis
Acting Superintendent of Documents
Director, Library Services & Content Management
Government Printing Office
Washington, DC 20401

VIA EMAIL [rdavis@gpo.gov]

Dear Mr. Davis:

Thank you very much for allowing us the opportunity to provide comments on the May 2007 draft *Guidelines for Establishing Shared Regional Depository Libraries*. We are pleased that the Government Printing Office (GPO) is taking steps to plan how regional depository libraries, one of the fundamental components of the Federal Depository Library Program (FDLP), might continue to effectively contribute to the mission of the FDLP in ensuring no-fee permanent public access to Federal government information.

The American Library Association (ALA), American Association of Law Libraries (AALL) and the Special Libraries Association (SLA) have several comments to offer on the draft *Guidelines*. First and foremost, we believe that the statement concerning Joint Committee on Printing (JCP) approval (p. 1 of the *Guidelines*) must be strengthened to state that the formation of a shared regional “will require approval” of the JCP. Current law is very clear about the roles and responsibilities of regional depository libraries. We also believe that every potential shared regional situation will be unique and should be considered on a case-by-case basis.

We are pleased that the draft *Guidelines* carefully identify many important factors that will determine the success of a shared regional. We ask for this portion of the document to be strengthened by making each of the proposed guidelines a requirement. This change will ensure that adequate deliberation and preparation is carried out when a shared regional is proposed. Our remaining comments will be grouped under the headings in the guidelines portion of the document.

Communication

Open communication is perhaps one of the most important components of the process surrounding the formation of a shared regional. Affected selective depositories must be given ample opportunity to engage in the deliberative process concerning the formation of a shared regional. Included in the requirements should be documentation that all selective depositories have been apprised of intent and that concerns regarding intent are addressed prior to the signing of a Memorandum of Understanding (MOU).

While we do not believe that one or two selective depositories should be allowed to “veto” the formation of a shared regional, their concerns should be addressed in a reasonable manner, particularly if the concerns are shared by several selective depositories. Further, it is important that, in addition to approval from the administrations of the affected libraries, the individuals who manage the depository collections and services should also support any proposed shared regional. The guidelines should reflect this.

Collections

There is some concern here that there could be a lack of clarity as to where materials are housed. It would be advantageous for there to be some guidance to address how selective depositories, the public, and others will identify regional holdings (e.g., a shared catalog, holdings of libraries participating in the MOU reflected in all their catalogs). Obviously, this concern falls equally under the next section, Access & Services.

In addition, when the issue of shared regionals was last discussed publicly, at the Spring 2006 DLC meeting in Seattle, many selective depository librarians expressed the importance of having a regional library in their state to which they could refer users. We are especially concerned about multi-state plans, such as those proposed by ASERL, and their impact on the selective depository libraries in these states and on public access.

Access & Services

Because the primary mission of the FDLP is to provide government information at no cost to the public, the access and services section may be the most crucial portion of the document. In this light, early in the *Guidelines* document we read that proposed shared regionals are to be developed “with the expectation of improved public access to the depository collections.” It seems to be a step backward when we read in the guidelines the statement, “Address how this agreement will improve, *or at least not diminish*, service to the public....” We would argue that going through the effort to create a shared regional to merely maintain the status quo would not be a worthwhile endeavor. We suggest that the italicized phrase be eliminated and that any proposal for a shared regional should be analyzed to make sure that the result is, in fact, improved public access and a stronger FDLP.

Additionally, the Access & Services section seems to imply that collections should be cataloged, which is obviously a goal, but not one that can be easily reached. Some have questioned whether this means shared regionals will be held to a higher standard than single regionals.

MOU

As previously mentioned, the points that are now indicated as guidelines should be reflected in the MOU. We believe that any proposal for a shared regional must include an analysis that public access will be strengthened. The MOU should also address how online collections may or may not affect tangible collections. Additionally, we believe that both library directors and their depository librarians should be signatories to the MOU.

Lastly, a question has been raised about how the proposed MOU differs from a selective housing agreement. Would this only be required if the institutions were officially sharing regional status? If a single institution has the regional designation, but houses significant portions of the regional collection with other institutions, this can be accomplished by selective housing agreements. Would these MOUs actually supplant selective housing agreements?

Ultimately, we believe that proposals to combine regional depositories are a very serious undertaking. Permanent public access to the FDLP collections should be improved with any change in regional structure. These changes need to be carried out only after the most careful analysis of need, planning and collaboration among the libraries involved, including the selective depositories in the affected region(s), and approval from the JCP. This careful consideration is even more crucial when multiple states are involved.

We appreciate the fact that GPO is allowing regionals and selectives the opportunity to be flexible in how service is provided to the public. This is important because every shared regional will contain a unique set of circumstances and the librarians managing those collections and serving the public know best the needs of their users. At the same time, this means that a “one-size-fits-all” approach would be ill-advised.

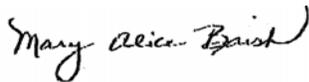
The *Guidelines* document begins to outline many basic requirements to forming a shared regional. We believe that the guidelines and requirements could better serve depositories wishing to explore a shared regional if there were first a study of a shared regional or pilot from which real experience could be drawn. The *Guidelines* document seems to make assumptions based on such statements as "...shared regional models can offer practical and economical means to improve public access while achieving operational efficiencies for the participating libraries." This kind of claim should be grounded in fact. We are also concerned that "operational efficiencies" not be the driving force behind the formation of shared regionals. Rather, we would like to see proven improved access to FDLP materials become the driving force.

In closing, we again commend the GPO for beginning to examine possible new ways of providing Federal government information through the FDLP. At the same time, we urge great caution on any proposals to merge regional libraries. We hope you will modify the draft *Guidelines* to include our proposed comments. Our associations welcome the opportunity to play a role in redefining the regional system and look forward to working with both the GPO and JCP on this initiative. Please do not hesitate to contact us with any questions. Thank you.

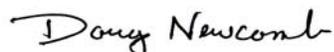
Sincerely,



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GODORT Chair



Mary Alice Baish
American Association of Law Libraries



Doug Newcomb
Special Libraries Association