

UNIVERSITY OF MINNESOTA

Twin Cities Campus

Office of the University Librarian
University Libraries

Wilson Library
309-19th Avenue South
Minneapolis, MN 55455

September 28, 2011

Mr. William Boarman
Ms. Mary Alice Baish
Government Printing Office
732 N. Capitol St. NW
Washington, DC 20402-0001

Dear Mr. Boarman and Ms. Baish,

This letter is in response to your letter of September 15, 2011, in which you state that the Government Printing Office (GPO) cannot support the multi-state regional depository proposed by the State Library of Michigan and the University of Minnesota Libraries. While the letter was addressed to Nancy Robertson, state librarian of Michigan, Ms. Robertson has shared your letter with me, since the University of Minnesota Libraries has an obvious stake in the exchange and in ensuring the accuracy of the assertions made.

In your letter you provide several reasons for denying support of the multi-state regional model, a rationale that includes critical inaccuracies in the factual support for your argument. It is unfortunate that you were not able to respond to my previous contacts made with your office and that you have not communicated directly with the University of Minnesota Libraries to verify your information. Consequently, I believe it is necessary to correct the record, and more importantly to ensure that the best interests of the public are upheld. I make this distinction between protecting the status quo of the Federal Depository Library Program (FDLP) and fulfilling the information needs of members of the public, since your argumentation suggests the former is the goal rather than ensuring that the mission of the program can be fulfilled.

Let me address your assertions (*bold/italics*) in sequence:

The precedent for multi-state regional depository models is no longer valid. You note: “the last of the current multi-state agreements was approved by GPO almost 20 years ago. GPO has no intention of disrupting any of these [seven] preexisting multi-state regional arrangements. From this point forward, however, in view of the fact that the language of 44 USC 1912 does not explicitly authorize multi-state regionals, we believe such arrangements should be approved by the Joint Committee on Printing.”

Given all of the technological developments in the last twenty years, this argument is without merit. Twenty years ago, libraries did not have mechanisms to provide ready access to experts through electronic mechanisms such as email or real-time online reference. Training could only be accomplished by travel and attendance at workshops. Inter-library lending was dependent on typed paper forms and postal services rather than global databases for discovery and local services to scan and deliver documents for ready access. Contemporary libraries easily bridge constraints of time and space with webinars, online tutorials, 7 x 24 online reference services, and digital transmission of needed materials. The capacities of libraries have changed substantially in the past two decades. If multi-state regional models were deemed viable without these enhancements, what is the basis for the change in opinion at GPO?

“The Public Printer and I... agree that this particular proposal is not necessary for the economical or practical implementation of the FDLP...”

The Library of Michigan is dropping regional depository status due to the economic situation within the state of Michigan. In the multiple discussions regarding Michigan and regional options for the future, no other library (or combination of libraries) in Michigan has come forward to take on the regional responsibilities, in many cases due to the economic and practical implementation of taking on these additional and costly responsibilities. As you know, there have been other recent departures from the FDLP, often due to the difficulties in dealing with the unfunded mandate for institutional support of the depository library program. Indeed, GPO's 2008 report to the Joint Committee on Printing, *Regional Depository Libraries in the 21st Century*, cited survey data indicating almost 20% of regional depository libraries agree or strongly agree that they are considering relinquishing regional designation. More than 25% indicated they would consider serving as a regional for selective depositories in a neighboring state. The planned withdrawal of the Library of Michigan and the recent withdrawal of the University of Nevada confirm that libraries are dropping regional responsibilities. GPO has a responsibility to address this trajectory.

As of October 1st, the 43 selectives in Michigan will not have the practical support of a regional library to help in their collection development, reference and research services, and implementation of the policies of the Federal Depository Library Program. It would be very helpful to understand your reasoning that there is no economic or practical need for Michigan to find a new regional depository library.

“To more than double the number of libraries for the Minnesota regional depository coordinator to oversee is not practical....with no apparent increase in staffing, [it] is not an approach that appears to be sustainable in the future.”

The aforementioned 2008 GPO study notes that California has one regional depository library that serves 90 selective depositories (now 82) and an estimated 2006 population of 36 million (now 37 million). The proposed Minnesota multi-state regional would serve 75 selective depositories and a population of only 15 million.

In outlining the regional support that the University of Minnesota Libraries will provide to Michigan, we have stated that we will be able to provide the necessary support, actually a level of support that is much greater than several other regional libraries currently provide. Minnesota already provides support to South Dakota and is well aware of the requirements. Recently, the University of Minnesota Libraries has, in fact, increased staff support in anticipation of serving Michigan and has invested significantly to make government documents more accessible: documents previously housed in storage have been moved to open stacks for ready access, and a major cataloging effort has been undertaken to ensure global access to information about our collections. These investments in staff, shelving, moving, and cataloging have been significant.

It is interesting to note that previous inspections of the University of Minnesota Libraries by the Government Printing Office have been positive. In the last inspection, GPO noted Minnesota's compliance in all areas, and the report states: “This is a very active regional depository, providing a number of services to the selective depositories in Minnesota and South Dakota. The responsiveness and attention given to the selectives is greatly appreciated.” An earlier evaluation in the 1991 concluded: “In the view of the Library Inspectors, the University of Minnesota is in the vanguard of Regional Federal Depositories when it comes to interdepository cooperation.”

“The geographic distance between Michigan and Minnesota is a practical limitation that cannot be overcome by researchers needing to utilize official tangible publications currently held in the depository collection at the State Library of Michigan.”

First, I might note that the distance from Escanaba, Michigan to East Lansing Michigan is 374 miles, while the distance from Escanaba to Minneapolis is 352 miles. The distance from Rapid City, South Dakota to Minneapolis is 610 miles. Distance has not been a factor in our current services to South Dakota and would not be in supporting Michigan depository libraries. The University of Minnesota regional depository works on a

regular basis with researchers from across the United States and internationally. We do not require that these researchers come to the University of Minnesota to use our documents; we rely on interlibrary loan, special loaning arrangements with depository libraries (including ones outside our region) and on the resources available to provide scan-on-demand copies of documents via email and file sharing sites.

The University of Minnesota Libraries has a stellar record in providing interlibrary loan services – both in delivering tangible documents and in scan-on-demand and network delivery. The Library has consistently been ranked in the very top tier within the Association of Research Libraries (ARL) in the volume of lending handled on an annual basis. A 2004 study conducted by ARL cites the University of Minnesota as one of the three high-performing lending operations in their study. Our services have developed significant economies of scale and can easily accommodate the likely increase related to Michigan. The Library of Michigan has shared 2010 statistics on circulation, loans, and copied government documents. Fifty-one documents were loaned, 28 were copied. An additional 325 circulations were recorded through the state-wide, user-initiated borrowing system. All told, approximately 400 circulations or loans of government documents were made from the Library of Michigan regional depository. The University of Minnesota’s annual inter-library lending volume for 2010 was 185,000 loans and copies. Even if lending activity were to significantly increase in light of improved access to our cataloged collection, the impact would be de minimis.

“...In these times of tight budgets and limited funding, there does not appear to be, nor do you indicate that there will be, an increase in the budget for regional services at the University of Minnesota. Importantly also, it is unknown if there will be adequate future funding from the people of Minnesota to provide these services for depository libraries located in Michigan and South Dakota.”

The University of Minnesota is funded from diverse sources with only ~18% support from the state of Minnesota. This research institution and its Libraries have a global reach and view our responsibilities to serve scholarship and inquiry in this broad context. Further, the Libraries are committed to multi-institutional cooperation to share our resources and expertise. While no depository library can forecast its future funding context with precision, we have stated our commitment to provide this support, and University leadership has affirmed this position. I would suggest that the Government Printing Office cannot guarantee its own ability to support the Federal Depository Library Program, as reflected in the recent appropriations bills that cut millions from the program.

You advance assertions that discarded documents will be sent from the State Library of Michigan and other institutions as part of the Michigan weeding process and that “there are costs associated with the transport of materials from the selective depository libraries in Michigan to a scanning location to be used in the Committee on Institutional Cooperation (CIC) scanning project.”

The CIC is an academic consortium of the Big 10 universities plus the University of Chicago. The CIC digitization project has drawn on no longer needed, discarded government documents from selective depositories within its consortium to contribute to a growing corpus of digital government publications made available through the HathiTrust (a non-profit consortium of 52 institutions providing ongoing infrastructure for preservation and access to digital collections). The government documents corpus is estimated to reach approximately 500,000 items this year, covering nearly half of the estimated legacy print documents. The vendor providing the digitization service has supported all costs of transport and digitization.

Our description of regional depository services and the signed Memorandum of Agreement with the Library of Michigan indicated that duplicate titles approved by the regional depository library for disposal may be included in initiatives to digitize government documents; there has been no assertion that costs must be borne by the disposing library. To be clear, the University of Minnesota confirms that it will retain at least one copy of all government publications either in printed or microfacsimile form as part of the UMN Regional Federal Depository Library collection. Any titles targeted for disposal from selective depositories that are not held in the regional depository will be added to the regional collection to ensure a comprehensive collection.

While you note that the CIC scanning project is not part of any GPO agreement, the resulting corpus of network-accessible documents has fulfilled a vital service as evidenced by feedback from libraries and users alike. As you know, regional depository libraries – including the four regional depositories within the CIC – are committed to retaining copies of all government publications in a tangible form (including print and microformat); consequently there is significant redundancy of print copies in the United States, with 49 regional depositories. A corpus of tangible copies of government documents is not in jeopardy; rather these digital surrogates are providing access to the public from any location, at any time – also reducing wear and tear on print collections. While the digital copies may not fulfill all research needs, and handling the print copy may be necessary in some cases, regional print collections fulfill those instances when an “authentic” copy is warranted.

As to the issue of a GPO agreement related to this project, the CIC had initiated and maintained ongoing contact with the previous Superintendent regarding the transfer of digital files to be incorporated in FDSys. While GPO may or may not decide to effect such a transfer, or may wish to keep their options open for a future decision, it is the case that the CIC recognizes the desirability of GPO managing a digital file of retrospective federal documents. CIC has, both contractually and technically, acted to protect the feasibility of such an eventual transfer. In the meanwhile, CIC has been contacted directly by several federal agencies—most recently the Department of Labor— about the prospects for transferring certain files directly to their information systems.

“Finally, the core issue associated with this proposed service arrangement is the lack of equal and equitable access for government publications for the people of Michigan. The proposal lacks any information as to what will happen to the historical collection of materials held in Michigan depository libraries. The current collections have been developed with great care and attention to building a comprehensive collection of tangible Federal publications within the state. The weeding process under the Minnesota regional is much more laissez-faire than the process in Michigan.”

The characterization of the University of Minnesota regional depository library as incapable of providing the key requirements of the depository library program is a gross inaccuracy in the face of the work we have done to ensure all libraries within our region and the general public have access not only to our print collections but to the additional resources we have purchased to support government information research. We provide excellent reference and research help, provide in-person services as well as handle countless inquiries by phone, real-time online reference, and through cooperative services such as interlibrary loan. Such ad hominem commentary is contradicted by the Government Printing Office’s own investigations and documented evaluations of our services.

In the past few years the University of Minnesota has allocated substantial funding to catalog our entire regional collection (over 1 million documents) so that accurate representation of our physical holdings is available to all. It is worth noting that only one-third of the Library of Michigan regional depository collection is cataloged; consequently information about regional holdings in Michigan is not readily available. Our depository staff meets with selective depository libraries’ staff to ensure that these libraries are working towards the same goals of equal and equitable access for government publications to all. Our record of online meetings, training, and educational opportunities ensures that all depository library staff within our region has an opportunity to participate in discussions regarding access to government information and to develop their skills in exploiting these resources. Our quarterly regional meetings are offered in-person and online with an average participation of 80-85% from the selective depositories in our region. These strategies have been critical at a time when constrained library travel budgets prohibit traveling for meeting attendance (whether 50 miles or 500 miles).

Our disposal policy and practices ensure that we have tangible documents available to those that need them. You characterize our operations as “laissez-faire,” yet the basic tenets of our discard policy have been in place since at least the 1990’s, certainly during the inspections your office has conducted. This policy has always been freely accessible through our website, has been cited by GPO staff at Federal Depository Library Conferences during discussions of discard policies, and been used by other regionals as a model for their policy.

The Library of Michigan has determined that the University of Minnesota Libraries regional services will more than adequately meet the needs of Michigan.

I can appreciate that in these tough economic times, the Government Printing Office has the right and the community motivation to raise concerns regarding the future of the depository library program. However, GPO also has a responsibility to ensure that access to government information is sustained for all members of the public. As of October, the citizens of Michigan will not have access to a regional depository, and selective depository libraries within the state will have neither support nor training to fulfill their roles within the FDLP. Further, no library will be able to dispose of unwanted documents, compromising efficient management of collections and space.

In closing, I would reiterate that the University of Minnesota Libraries has an exceptional record of meeting (and exceeding) statutory obligations as a regional depository for Minnesota and for South Dakota. We did not take on the prospect of serving the state of Michigan lightly and recognize the commitment such a multi-state regional depository entails. The characterization of the University of Minnesota Libraries as not meeting the requirements of the program has no factual basis to support these allegations, particularly in light of GPO's official evaluations. The discrediting of a regional library that has invested significantly over 100+ years to ensure free and equal access to government information does not speak well for the Government Printing Office's support of depository libraries.

Participants in the FDLP expect and need dependable, consistent, and accurate counsel about the program and its requirements. Your letter outlines a departure from past precedent in support of multi-state regional depositories and the authority of senators to designate regional depository libraries. As the 2008 GPO study to JCP notes: "within the statutory framework, different arrangements for sharing resources and responsibilities between and among depository libraries have been implemented successfully, with GPO approval." The first multi-state regional depository was approved in 1966 and six other instances have been approved (or initiated by GPO) since then. Further, your recent interpretations of the process for relinquishing regional status and designation of regional depositories again depart from past Superintendents. While we have received consistent and notable support from GPO during the first year of our work together regarding the Michigan-Minnesota proposal, the recent shifts in interpretation of policy and practice since the change in GPO administration this year suggest that GPO cannot provide reliable and consistent support for depository libraries. The University of Minnesota Libraries has consistently supported and invested in the FDLP for over a century and intends to continue to support and advance this critical public service.

Sincerely,



Wendy Pradt Lougee
University Librarian
McKnight Presidential Professor

Copy to: The Honorable Carl Levin
 The Honorable Debbie Stabenow
 The Honorable Amy Klobuchar
 The Honorable Al Franken
 The Honorable Dan Lungren
 The Honorable Charles E. Schumer
 Nancy Robertson, state librarian (Michigan)
 Nancy Walton, state librarian (Minnesota)