



ASSOCIATION OF SOUTHEASTERN RESEARCH LIBRARIES

ASERL Comments on the *Guidelines for Establishing Shared Regional Depository Libraries*

January 18, 2018

The Association of Southeastern Research Libraries (ASERL) appreciates the opportunity to provide comments on the discussion draft of the ***Guidelines for Establishing Shared Regional Depository Libraries***, dated November 26, 2017. We are very optimistic the criteria for implementing shared regional models presented in the draft document will provide greatly increased flexibility in managing these important information assets across the southeast and nationally.

The ASERL region includes 10 states and 2 territories with 248 depository libraries, 12 of which are Regionals. The importance of flexibility in designing and implementing collaborative projects to manage FDLP materials cannot be overstated. Developing “*both intra- and inter-state shared regional models that offer a practical and economical means to maintain public access, reallocate library space, while achieving operational efficiencies*” is a goal shared with the ASERL Collaborative Federal Depository Program (CFDP), which we initiated in 2006 for this express purpose.

Regional Depository Library Coordinators from the region were invited to participate in a conversation on January 3, 2018 to provide input on the draft document and help inform our response. The draft document received universally favorable response. ASERL recommends the following edits to improve clarity:

Page 1, In General – 2nd bullet:

- Proposals that include sharing collections across state boundaries must have the support and signed consent of at least one Senator from each the participating states, in accordance with 44 United States Code §1912.

Page 2, First paragraph –

~~While GPO is not a signatory of the agreement, the MOU must be shared with and approved by the Superintendent of Documents prior to signing and implementation. This is to ensure there are no conflicts between the provisions of the MOU and Title 44 of the United States Code, and other FDLP guidance.~~

While GPO is not a signatory of the agreement, the MOU must be reviewed by the Superintendent of Documents prior to signing and implementation to ensure there are no conflicts between the provisions of the MOU and Title 44 of the *United States Code*. A copy of the signed MOU shall be transmitted to GPO for inclusion in the libraries’ official files.

Association of Southeastern Research Libraries

% Robert W. Woodruff Library
540 Asbury Circle, Suite 316
Atlanta, GA 30322-1006
404-727-0137 | www.aserl.org

Page 2, First paragraph continued -

~~Once an intra-state agreement is finalized the participating regionals must notify the congressional delegation(s) of their state's new arrangement.~~

Participating regionals must notify the congressional delegation(s) of their state's new arrangement.
This sentence would be more clear if moved to page 3 within the section labeled 'TRANSITION AND IMPLEMENTATION' pertaining to communication.

Page 2, The Proposed Shared Regional Plan – 1st bullet:

- Obtain the support of the administrations from all participating libraries that are assuming portions of the Regional Depository Library's responsibilities.

Page 3, Review by the Superintendent of Documents – 4th bullet:

- Notify the parties of the ~~decision~~ determination that the MOU meets established criteria and is approved for signatures and implementation.

Page 3, Memorandum of Understanding must Include – 4th bullet

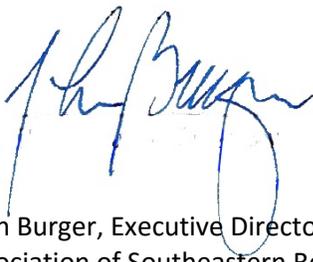
- ~~Clear statement that all regional requirements of the FDLDP continue to be in effect.~~
- Clear statement that all statutory requirements for Regional Depository Libraries continue to be in effect.

Page 3, Footnote#1

- If the plan is for regionals to cross state boundaries, the consent of ~~the Senators~~ at least one Senator from each participating state is to be submitted with the draft MOU.

ASERL believes these guidelines will foster innovative new collection management models, allowing libraries to share roles and responsibilities needed to support the FDLDP well into the future. This is long overdue, and we are anxious to see these guidelines implemented quickly. We look forward to the continued opportunity to work with the Government Publishing Office in support of our mutual goals.

With our thanks for your consideration of our comments,



John Burger, Executive Director
Association of Southeastern Research Libraries (ASERL)
% Robert W. Woodruff Library
540 Asbury Circle, Suite 316
Atlanta, GA 30322-1006
Tel: 404-727-0137