July 2014 Draft GODORT Response to "Discussion Document SODPPS Regional Discard" (http://fdlp.gov/file-repository/about-the-fdlp/superintendent-of-documents-policy-statements/2501-discussion-document-sodpps-regional-discard)

On behalf of the Government Documents Round Table (GODORT) of the American Library Association (ALA), we applaud the willingness of the U.S. Government Printing Office (GPO) to actively and thoughtfully consider changes to the Federal Depository Library Program (FDLP) in order to continue to strengthen the Program and improve its long-term viability. In light of this, we also appreciate your solicitation of feedback regarding proposed changes to the administrative rules governing the Program, and we look forward to our ongoing dialogue.

The proposal put forth to modify the retention guidelines for regional depository libraries in the policy discussion document announced in the FDLP Connection (vol. 4, iss. 3), distributed July 16, 2014, would provide authorization for a regional library to discard tangible depository materials from their collections if the publications (1) have been retained by the regional in tangible form for a period of seven years and (2) are available as authenticated and digitally signed files in GPO's Federal Digital System (FDsys).

Although not listed as explicit conditions for authorization, the statement indicates that regional libraries must inform GPO of their intent to discard materials under this authorization, and must receive approval from the Superintendent of Documents prior to discard. This instruction is included in order to ensure that an appropriate but as-yet-undefined number of tangible publications remain in the Program. The proposed policy requires that withdrawn materials be offered to selective depository libraries within the area served by the regional, and other depository libraries nationwide. It also clarifies that this policy does not require regional depository libraries to dispose of tangible publications meeting the criteria.

We agree that this policy may enable regional depository libraries facing insurmountable challenges in space allocated for collections to continue to maintain their designations as regional depositories. In order to provide this support while ensuring the provision of permanent no-fee public access to federal government information resources, we agree that this policy can be implemented for existing authenticated FDsys collections with the following conditions:

- first, GPO creates and shares a list of eligible collections currently available in FDsys that are fully authenticated and known to be complete;
- secondly, GPO and the FDLP community collaborates to develop interim specification or guidelines regarding the desired number and geographic distribution of tangible copies remaining in regional depositories; and
- third, the policy clarifies the role of the Superintendent of Documents in authorizing the disposal of these materials.

Prior to the expansion of this policy to include additional fully authenticated and complete collections of digitized historical publications beyond those currently present in FDsys, we highly recommend that substantial progress be made in assuring permanent access to both the digital surrogates and the tangible materials. This progress includes:

- first, GPO and the FDLP community collaborating in the development of a national inventory of historical federal publications held in depository libraries;
- second, GPO and the FDLP community encouraging and consulting research to establish the number of tangible copies of a publication necessary to ensure ongoing access and preservation;
- third, GPO adopting a rigorous quality assurance (QA) process to guarantee the quality of digitized publications made available for substitution; and
- fourth, FDsys undergoing a trustworthiness audit.

Collections and Access Assurance

One of the strengths of the FDLP has long been the relationship between redundancy, and reliable access and preservation. The policies and requirements of the Program must continue to assure this key tenet. Although the content in FDsys is duplicated in the LOCKSS-USDOCS network, we continue to be concerned about the long-term implications of relying on a single digital product as the sole available version of core information resources, particularly in the current uncertain environment of Congressional appropriations. The need for FDsys to be independently audited by a trusted organization for long-term reliability under internationally-recognized standards such as the Trusted Digital Repository Checklist (TDR) becomes more pressing as reliance on its contents increases.

The government documents community recognizes the need for quantitative and qualitative research into the long-term persistence of government documents in paper and microformat collections for access, preservation, and possible re-digitization. The geographic distribution of these materials is also an important topic of study; existing administrative boundaries such as EPA- or Census regions may suggest avenues of research, although the needs and challenges in locating and providing access to historical government publications are different from the content managed in these organizations.

Until this research can be conducted and reviewed, we recommend that a conservative approach be taken as the system begins to move below the threshold of one known tangible copy per area served by a regional. We are encouraged that GPO continues to conduct planning to ensure the long-term availability of federal publications published in paper format, regardless of the status of their digital surrogates. In light of this priority, we encourage GPO to develop measures to both proactively ensure and subsequently confirm that an adequate number of tangible copies are held in a geographically dispersed manner.

Interim requirements for both the desirable and minimum threshold for confirmed copies within the Program as well as their geographic distribution should be developed in broad consultation with the government documents community, the library preservation community, and other stakeholders. We also suggest that GPO encourage regional depositories to consult and cooperate with selectives and neighboring regionals in order to maintain geographic dispersal of the tangible copies remaining in the system.

Absent a confirmed list of FDsys collections that are fully authenticated and would be eligible for substitution, it is difficult to predict the full impact of this policy. However, there is a general expectation that FDsys will continue to add authenticated digitized historical documents and create complete, high-quality collections. Under this policy, we can expect to see a substantial increase in historical collections becoming eligible for discard from regionals. Therefore, we recommend the cooperative development of

a national inventory to identify holdings and document retention commitments for tangible historical publications.

While the draft document does not specify whether this authorization goes into effect at the collection level or the item level, implementation at the item level seems impractical. We highly recommend that GPO audit collections in FDsys eligible for substitution in order to document and correct gaps in coverage prior to permitting wholesale substitution. As digitized historical documents become an increasing component in FDsys collections, we also recommend the adoption of a rigorous quality assurance (QA) process prior to certifying any digitized document as an authentic publication suitable for electronic substitution (see for example "The Digital-Surrogate Seal of Approval: a Consumer-oriented Standard." James A. Jacobs and James R. Jacobs. D-Lib Magazine, March/April 2013, Volume 19, Number 3/4 http://dx.doi.org/10.1045/march2013-jacobs).

The Substitution and Discard Process

The process outlined in the discussion draft describes the role of the Superintendent of Documents as confirming that the regional depository is authorized to discard materials, following the disclosure of intent to discard. It is implied but not stated that in confirming authorization, the Superintendent of Documents is taking into consideration factors that include the desirable number and distribution of tangible copies of the publication, and knowledge of other regional depositories discarding the same collection.

The Superintendent of Documents is responsible for ensuring the long-term integrity of the depository collection cannot be overstated in what is fundamentally a voluntary system. Therefore, we recommend that approval for substitution be a formal condition for discarding publications. Under circumstances in which access to a publication in tangible format for a substantial geographic area would be in question, the Superintendent of Documents must explicitly retain the authority to work with the library in order to develop an alternate solution.

Authorization to discard collections will permit regional libraries to relieve some of the pressures of space their current collections demand; therefore, we encourage GPO to put measures in place to ensure that distribution of the relief is as fair as is practical in light of the need to maintain the overall integrity of the national collection. The development of clearly stated guidelines for the evaluation of proposals will aid regional depositories in determining which collections to consider substituting under this policy, if any. Additional planning will undoubtedly be required to triage the initial requests that will be made under any policy of this nature, and we encourage GPO to review feedback regarding the policy and process before the number of collections eligible for substitution increases.

Policy Review

Finally, we recommend that the final policy and any accompanying guidelines be publicly reviewed every three years. As membership in the FDLP changes, and as additional substantive changes to the Program are explored and implemented, decisions made at this time may be cast in a different light in the future.

We are grateful for the opportunity to provide our initial response to this proposal, and look forward to future dialogue regarding these and other crucial changes to the FDLP. Our shared vision of ensuring no-fee permanent public access to government information resources through a strengthened FDLP must be achieved through ongoing cooperation, and we are pleased to be partners in this process.