September 16, 2011

Mary Alice Baish
Superintendent of Documents
U.S. Government Printing Office
732 N. Capitol Street NW
Washington, DC 20401

Re: Future Direction of the Federal Depository Library Program

OMB Watch welcomes the opportunity to comment on the future direction of the Federal
Depository Library Program (FDLP).

As a nonprofit organization dedicated to open government, accountability, and citizen
participation since 1983, OMB Watch has long supported efforts to improve public access to
government information. FDLP plays a valuable role in supporting public access, and if
reinvigorated for the 21st century, it could do so even more effectively.

General Comments on the FDLP Modeling Initiative

Most fundamentally, the purpose of the FDLP is to provide equitable public access to
government information. Broad access to such information remains vital to empowering
Americans and upholding democratic accountability. This must be the starting point for all
discussions of reforming the FDLP.

However, FDLP has failed to keep pace with technological and other changes in how
government information is created, managed, disseminated, used, and preserved. As a result,
FDLP's role in ensuring equitable public access to government information has diminished.

The basic model of FDLP continues to hold promise and we believe can be updated to provide
more of the access and services the public needs. Ensuring equitable access requires government-
wide standards and oversight for the dissemination of government information, a role in
alignment with GPO's mission. The volume and complexity of government information increases
the public's need for services to discover and use the right information, a role in alignment with
the missions of the nation's libraries. FDLP is a natural bridge between those sets of activities
and could efficiently enhance equitable access to government information if forward-looking
reforms are enacted.

We applaud GPO for undertaking the modeling initiative to envision those reforms. In addition, we commend GPO's openness in soliciting stakeholder comments and in publicly posting the documents from the Ithaka study. The modeling initiative should take the needs of GPO and depository libraries into consideration, but it should also be informed by the needs of other stakeholders. GPO should make a distinct effort to reach out to users and potential users of government information, federal agencies, and libraries that could participate in the program and conduct research on their needs.

Supporting the Public's Use of Government Information

The FDLP developed during an era in which libraries were needed to provide access to government information. That role, while still significant, is more marginal today, when Americans have widespread access to FDLP information online, through FDsys and other systems. While there is still a need for access to, and preservation of, digital and tangible collections of government information, the more pressing need is for support in discovering and making use of government information. FDLP should place greater emphasis on such services. Broadening the FDLP model to include user services as well as collections would move the program toward embracing libraries as not just depositories but partners in achieving open government. The Ithaka report offers some initial recommendations for how this might be done, and GPO should carefully consider the report's recommendations while soliciting additional feedback.

OMB Watch recommends that the support services considered not be limited to information currently distributed through FDLP. Instead, FDLP should reevaluate what government information the program will cover and provide support services for. In recent years, the federal government has created an increasing number of websites and e-government tools to improve public access to government information. However, awareness of these tools remains limited, and using the tools can be complicated. FDLP should support and encourage libraries to provide reference services, training, and outreach to strengthen public use of these tools.

Such a role would align with and reinforce the e-government work that libraries already undertake. For instance, 81 percent of public libraries reported assisting patrons with e-government applications, according to research by the American Library Association.[1] This shift toward support services over basic access is also representative of the general trend for all libraries. For example, a 2011 report by the Institute of Museum and Library Services noted that 86 percent of computer users in public libraries reported having Internet access at home. The

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[1] *Libraries Connect Communities: Public Library Funding & Technology Access Study 2010-2011*. http://www.ala.org/ala/research/initiatives/plftas/2010_2011/index.cfm

report posited that those users visited libraries for value-added services, such as access to professional library staff.[2]

Although many libraries already offer some services to support discovery and use of government information, such services remain limited as libraries struggle to include new e-government tools while facing sharp budget cuts. A reformed FDLP would be uniquely positioned to strengthen these library services, leveraging GPO's vantage point and experience as a publisher of government information.

OMB Watch also recommends that as the FDLP is reformed to emphasize support services, efforts should be made to expand the number of libraries participating. Such an expansion could improve the level of equitable access the program is able to achieve. As the Ithaka study notes, by "maximizing participation, the Program has the best hope of serving the greatest number of Americans' government information access and services needs."[3] However, FDLP should set meaningful standards for participation and certify that participating libraries meet those standards. FDLP should use such certification in order to advertize the availability of services to the public.

FDLP should also assume primary responsibility for providing training and supporting materials to participating libraries in order to bolster the effective delivery of services to users. This responsibility should be shared with the library community as well as the federal agencies that produce information.

Conclusion

OMB Watch appreciates the opportunity to comment on the future direction of the FDLP. We hope you take our recommendations into consideration. If you have questions about our comments or want to discuss the issues further, please feel free to contact us.

Sincerely,

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Director, Federal Information Policy   Federal Information Policy Analyst

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[2] *Who's in the Queue? A Demographic Analysis of Public Access Computer Users and Uses in U.S. Public Libraries.* http://www.imls.gov/assets/1/AssetManager/Brief2011_04.pdf
[3] p. 92.