



STATE OF MICHIGAN
DEPARTMENT OF EDUCATION
LANSING

RICK SNYDER
GOVERNOR

MICHAEL P. FLANAGAN
SUPERINTENDENT OF
PUBLIC INSTRUCTION

June 30, 2011

Mary Alice Baish
Assistant Public Printer
(Superintendent of Documents)
U.S. Government Printing Office
732 N. Capitol St. NW
Washington, D.C. 20401-0001

Dear Ms. Baish:

Thank you for your June 10, 2011, response to my letter of April 14, 2011, via which I transmitted the information you had requested during our March 3, 2011 phone meeting. You refer in your recent letter to my notation in my letter of May 2, 2011, to you and Anne Wooden of Delta College, that October 1, 2011 will be the date on which regional services from the Library of Michigan (LM) for Michigan selectives will cease. That date is indeed firm. By that date we will have performed the duties and services of a regional federal depository for more than a full fiscal year since our funding and staffing were cut as of October 1, 2010, to reflect a more than 20% reduction in operations coverage and a more than 30% cut in staffing. In early 2010, when we began the process of seeking a change of status from regional to selective, our goal was to have a plan in place by the end of calendar year 2010.

We have continued to provide regional services for over a year since we announced that we would seek a change in designation. We felt a responsibility to seek an alternative means of ensuring regional services for Michigan prior to stopping our regional activities. Now, given our continuing financial and staffing circumstances, we cannot continue to do so as of October 1, 2011. That is why it is imperative that we move the process forward with our Senators and seek your facilitation of the closure of the process once they make the designation.

It is essential that there not be a vacuum in regional service between the time that we cease our regional services and the time that the University of Minnesota Libraries (UMN) begin to provide regional services to Michigan. Our entire process has been thoughtfully and collaboratively undertaken to ensure a seamless transition of regional service for Michigan libraries. My understanding from my on-going conversations with GPO staff since March of 2010 has been that once the designation by the Senators has been submitted to you, the notification of change in status for LM and the transfer of the regional status to UMN can be quick and seamless.

LIBRARY OF MICHIGAN

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Your letter states that there are parts of the process with which we must still comply:

- Submit a letter to the Superintendent of Documents requesting the changes in your designation from regional to selective.

This we had done in a letter from Michigan Department of Education (MDE) Superintendent Michael Flanagan to then Acting Superintendent of Documents Richard Davis on March 10, 2010. This notice was well within the six month notice you reference listed in the document "Guidance for Federal Depository Libraries Relinquishing Regional Designation". Indeed, notice to your office was the first step in the process that has been going on for well over a year.

- Provide GPO with a plan that includes a timeline for the change, the effective date, and any strategies for extensive weeding or change in collection focus.

We have been working with GPO since March of 2010 and had not finalized the actual timeline since we had not arrived until now at the point at which we (MDE/LM and UMN) were fully prepared to approach the Michigan and Minnesota Senators to request the changes in designation necessary. However, now that we are at that point, I am providing a complete timeline of the entire process, including the goal of having the regional status changed by no later than October 1, 2011. My letter of April 14, 2011 includes a statement about the weeding process once LM is no longer a regional. What I said there still holds true:

The Library of Michigan has an urgent need to reduce the quantity of federal documents received going forward and is working on our selective depository profile. Once the Minnesota and Michigan U.S. Senators designate Minnesota as the regional federal depository serving Michigan, the Library of Michigan will submit its selective depository profile [to GPO] for federal materials to be received going forward

The Library of Michigan does not have a pressing need to reduce the number of legacy regional federal depository materials in its collection. We anticipate taking some time [possibly a couple of years or more] to determine what legacy materials are essential to the on-going mission of the Library of Michigan. Once that is determined, we will begin to identify materials that are not essential to the on-going mission of the Library of Michigan and will follow the disposal request process of our regional federal depository library.

- Notify all selective libraries currently serviced by your library of the intent to change designation and inform them of the associated timelines

The Michigan directors and government documents coordinators at all of the selective federal depositories in Michigan have received numerous communications from the LM since May of 2010. They received notice of our

intent to relinquish regional status when MDE's February 12, 2010 memorandum was released. This decision was reiterated when they received a letter dated, May 3, 2010, inviting them to participate in the four focus groups held all around the state in May 2010; when they were asked in a letter dated July 26, 2010, to define their commitment to sustaining a potential in-state shared regional collection and service; when they received an email on October 8, 2010 stating that LM was moving forward in pursuit of having another state's regional serve Michigan; when they were told on January 11, 2011, that we were working with UMN in pursuit of plan to have UMN serve as Michigan's regional; and finally, when they were notified that we continue to pursue the multi-state regional plan with UMN in an email sent to them on March 9, 2011, giving them an extended deadline of April 14, 2011, to submit an alternative in-state regional plan to you (an extended deadline that was done at your request). In working with GPO these past sixteen months, we have repeatedly made it clear that our intent has been to effect the change in our status as soon as possible. We have had consistent support from GPO from the beginning, including articulation of the process, which we have followed explicitly. The timeline for its accomplishment has been impossible to identify precisely in part because of the questions about GPO process that have arisen. It was never anticipated that effecting the actual change of our status from regional to selective would take us to the now impending deadline of the beginning of our next state fiscal year on October 1, 2011.

- Notify the offices of your state's U.S. Senators of the final decision.

We have been keeping the offices of the Senators apprised throughout the process. The first letter of notification of intent to relinquish regional status was sent by Superintendent of Public Instruction Michael Flanagan to Senators Levin and Stabenow on April 7, 2010. A follow up letter keeping them apprised of the process taking place to identify alternative regional service for Michigan libraries was sent to the Senators in a letter from me dated July 28, 2010. Since then, I met with the Senators' aids on May 11, 2011, to brief them on the situation and emphasized our need to relinquish regional status as soon as possible.

While the two actions you mention in your letter do accomplish two purposes, the conjoining of the process into one works in the best interests of the Michigan depository libraries. During our March 3, 2011, phone conversation, I asked if the Senators' letters relinquishing LM's regional status and designating UMN had to come separately or could come to you together, and you responded that it would work either way. The purpose of the entire process that LM and MDE have undergone in working so closely with GPO from beginning has been to ensure that there will not be a time during which Michigan selectives have no regional services. Clearly, the best way for that to be accomplished is for the statements of designation from both the Michigan and Minnesota Senators to be delivered and acted upon simultaneously. Then notice can be given to LM that its

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regional status is rescinded and that UMN has been designated to serve as the regional for Michigan, without a delay resulting by treating the two actions as completely autonomous. Our understanding during the entire process working with GPO has been that this could be accomplished as a conjoined process.

We understand that regional designation notification is to be addressed to you by the Senators and that the Joint Committee on Printing will receive notification from you as well. However, Title 44 clearly states that the authority for designation of regional library services to states and territories rests with the Senator or Resident Commissioner in the areas served by them. Additionally, there is ample precedent for multi-state regional service whereby a dozen states and territories are each served by a single regional in a different state. Therefore, we anticipate that the designation by the Michigan and Minnesota Senators will be sufficient to effect the change in the LM's status from a regional to a selective and to implement UMN status as the regional for Michigan.

We look forward to your timely facilitation of the final stages of this long and complex process once the designation letters from the Senators reach you, so that the best interests of the selective depository libraries in Michigan will be served by ensuring no break in regional library service coverage.

Sincerely,



Nancy B. Robertson
State Librarian of Michigan

Attachment

cc: William Boarman, Public Printer of the United States
Michael P. Flanagan, Superintendent of Public Instruction, MI Dept. of Education
The Honorable Carl Levin, United States Senate
The Honorable Debbie Stabenow, United States Senate
Carol L. Wolenberg, Deputy Superintendent, Michigan Department of Education

Contacts with Government Printing Office (Robertson/LM-MDE) and Time Line for Completion

3/3/10	Phone call with Ann Sanders, Elaine Harrison (both of LM/MDE), Richard Davis (Acting Superintendent of Documents, GPO), Robin Haun-Mohamed (GPO staff), Cynthia Etkin (GPO staff). Alerted GPO to the need for LM/MDE to relinquish regional status
3/4/10	Received email from Davis stating that GPO "stands ready to work with you ... to help ensure regional services continue for the selective libraries and citizens of Michigan."
3/10/10	Letter sent from Michigan Superintendent Mike Flanagan to Davis giving official written notice of LM/MDE intent to relinquish regional status
3/9/10	Email correspondence between Robertson and Davis re: Michigan Department of Education preparing letters from State Supt. Flanagan to Michigan's U.S. Senators Levin and Stabenow
3/19/10	Emailed Haun-Mohamed in response to her inquiry about the need to list GPO as a stakeholder in LM/MDE's planning. Assured her we recognize them as key stakeholder.
3/19/10	Received email from Haun-Mohamed confirming above and asking how they can assist.
4/7/10	Supt. Mike Flanagan sent letters giving official notice of need/intent to relinquish regional status to Senators Levin and Stabenow. Davis was copied.
4/12/10	Received email from Haun-Mohamed checking on how things are going and asking if the letters had been sent to the senators. I responded that they had been sent and provided her with a copy of the letter.
5/4/10	Copied Davis, Etkin, and Haun-Mohamed on LM invitation for Michigan directors and coordinators to attend one of four focus groups
5/17-5/19/10	Four focus groups statewide. Davis and Haun-Mohamed attended in each one by phone. Etkin attended each one in person.
5/24/10	Copied Davis, Etkin and Haun-Mohamed in email follow-up to focus group attendees. Davis responded with thanks for including GPO in the focus groups and reiterated GPO willingness to work with us on next steps. He noted that the "sessions were fantastic."
6/23/10	Copied Davis, Etkin, and Haun-Mohamed when sending notes out from the four focus groups to the Michigan selective depository directors and coordinators
6/25/10	Davis, Etkin and I met for a lunch meeting in D.C. to review progress and talk about next steps in the process for Michigan relinquishing regional status and ensuring regional services for Michigan.
7/17/10	In response to my email of 7/16/10 to him, Davis responded with his suggested additions or clarifications to the letters I drafted to the Michigan selective directors and coordinators soliciting their commitments for regional coverage at their own institutions and to five Great Lakes state regionals asking about their interest in providing regional service to Michigan.
7/22/10	Received email from Davis stating, "These letters are fantastic."
7/28/10	Copied Davis on follow-up letters about the focus groups and outcomes to Senators Levin and Stabenow.
9/16/10	Emailed Davis, copying Lougee, about my initial phone conversation with Wendy Lougee of UMN Libraries.

9/17/10	Davis emailed, responding that he looks forward to working with us to move ahead.
9/29/10	Phone call with Lougee, Davis, Etkin, Haun-Mohamed. Davis outlines process: Senators write letters of designation to GPO; letters shared with Congressional Affairs Officers; JCP notified. Since there is precedent for multi-state arrangement, expects support. Michigan and Minnesota letters can come in together, so both aspects of the plan are covered as one. Confirms that status change can happen as soon as designation is effective. Offers that GPO can contribute to the training UMN will need to provide for Michigan. Once the regional for Michigan, UMN makes decision on disposition of discarded materials from Michigan's collection. Haun-Mohamed stressed Michigan needs to work with the Michigan selectives. Davis acknowledged that Michigan has been working with the selectives.
10/5/10	Emailed Davis and Lougee re: draft message announcing Michigan moving forward with pursuit of having another state's regional serve Michigan
10/5/10	Etkin provided sample letters from senators designating regionals to serve other states
10/8/10	Sent email to Michigan selective depository directors and coordinators re: Michigan moving forward with pursuit of having another state's regional serve Michigan. Copied Davis on the missive.
11/5/10	Emailed Davis and Etkin, copying Lougee, requesting verification of process information about changing regional status
11/5/10	Davis responded agreeing that the process as stated in my email was accurate. He noted that he would verify with their Congressional affairs officer
11/12/10	Email from Etkin to me and Lougee, copying Davis, noting that the JCP would expect GPO to be able to ensure that all preliminaries are in place (implementation plan, letters of agreement or MOU, and shared with GPO.
11/17/10	Emailed Davis a copy of the email sent to the Michigan selective depository directors and coordinators announcing that Minnesota is the state we are working with.
1/11/11	Copied Davis on email to Michigan selectives announcing our work with UMN Libraries to develop a multi-state regional arrangement under which UMN Libraries would serve as Michigan's regional. Also sought interest from the selectives regarding interest in participation in a Michigan working group to discuss services
2/4/11	Meeting of 12-15 of Michigan selectives at Library of Michigan. Davis, Etkin, and Haun-Mohamed participated by phone. Kirsten Clark from UMN Libraries attended in person
3/3/11	Spoke by phone with Mary Alice Baish, Davis, Etkin, and Haun-Mohamed to recount planning and progress to date in the plan to designate LM as selective and UMN Libraries as regional service provider for Michigan. Baish asked for extension of time (until 4/14/11) for Michigan selectives to define an alternative in-state plan, and she asked for MOU between LM/MDE and UMN Libraries, for detailed description of services to be provided by Minnesota to Michigan, and for plans for disposal of federal materials held by Michigan (no date defined for this reporting from LM/MDE and UMN Libraries during the phone call). I asked if the letters from both states' senators should be sent separately, or can they be combined? Baish indicated that it does not matter. She said that after the JCP is notified (they will usually have questions), then the Superintendent of Documents responds through congressional relations and after that she would notify the Library of Michigan (and I'm assuming UMN Libraries). A copy of the approval would be filed with the agreement and would

	be filed with both institutions' plans. Davis verified that my write up of the process from my 11/5/11 email to him and Etkin stated the process correctly.
3/3/11	Etkin sent copy of guidelines for relinquishing regional designation
3/7/11	Sent draft email for Michigan selectives explaining extension to 4/14/11 to Baish for review. Copied Davis
3/7/11	Baish responded approving the draft message without other comment.
3/9/11	Copied Baish on email to the field re: extension until 4/14/11
4/14/11	Sent Baish MOU; UMN Libraries regional services document; letter summarizing Michigan process and UMN Libraries solution and reasoning and explanation of process to be used to dispose of federal documents from LM's collections – all as requested by Baish on 3/3/11. Copied William Boarman, Public Printer
4/20/11	Sent follow up email to Baish asking for confirmation of receipt of documents sent 4/14/11 and requesting response to Lougee's questions about process sent previously to Davis and Etkin on 1/27/11
5/2/11	Responded by email to Anne Wooden's (of Delta College, Michigan) proposal to allow time for development of a 10-15 year transition plan. Copied Baish and Boarman (No response rec'd to date)
5/2/11	Carol Wolenberg of MDE emails Baish and Boarman declaring departmental support of the plans underway by Library of Michigan and UMN Libraries for Minnesota's regional to serve Michigan
6/10/11	Received email from Baish with letter of response to the packet of information we sent to her on 4/14/11. She copied Senators Levin and Stabenow
6/17/11	Received hard copy of Baish letter; emailed Baish informing her that we received her letter and will be responding
July 2011	Make official request to Senators Levin and Stabenow to designate UMN Libraries as regional for Michigan
July 2011	Michigan and Minnesota Senators jointly send letter to Baish/GPO designating UMN Libraries as regional for Michigan
Prior to 10/1/11	Baish informs JCP of the designation by the four Senators and implements change in Library of Michigan's status from regional to selective and recognizes UMN Libraries as the regional serving Michigan
10/1/11	UMN Libraries begins providing regional services to Michigan's selective federal depository libraries, including the Library of Michigan