

OECA Position Paper on the 2007 EPA Library Plan

The Office of Enforcement and Compliance Assurance (OECA) is committed to maintaining information resources to support our enforcement programs and projects. We want to continue to support our enforcement partners and stakeholders by providing information services and materials, but are concerned how this will be accomplished as library support is cut across the Agency.

The plan for library reductions addresses many complex and complicated issues. We have attempted to take the details from the plan and categorize them into over-arching themes or issues and provide examples which illustrate how that issue may impact OECA in “real terms”. We have also stated OECA’s position on specific topics. Additionally, there was a library network conference call on August 8, 2006 where some of the specifics questions posed by the draft plan were addressed. This paper makes reference to details addressed during that call that are of importance to the OECA position.

The over-arching issues that OECA is concerned with are:

1. Costs and Funding
2. Accessibility of information – Access to Information
3. Timeliness of services

ISSUE 1 - COSTS AND FUNDING

Many of the points put forth in the plan have associated costs which have not been adequately addressed in the plan. These costs are both actual costs, such as paying a vendor for a product or service and costs or increased use/demands on a library, resulting in increased labor costs, both contract and EPA employee hours. Some specific examples of concerns with undefined costs are put forth in the following examples:

A. Cost of digitizing of documents - as put forth on page 5 of the plan, “Agency documents not currently in the EPA National Environmental Publications Information System (NEPIS) database will be sent to Cincinnati for digitization into NEPIS”. While OECA supports the concept of digitizing documents, we have many questions that are not answered in the plan. OECA’s questions regarding this issue are:

- o Digitizing is a very expensive process, how is this process going to be funded?
- o Will these costs be passed on to OECA?
- o How will these costs be paid by OECA?

OECA’s position on digitizing documents - We support the concept of digitizing many of the Agencies documents, however, we firmly believe that a systematic approach be “mapped-out’ and procedures defined, including cost management, prior to implementation of the process.

B. Interlibrary Loan Services (ILL) - An interlibrary loan is a reciprocal system of sharing between libraries, usually at low or no cost to the libraries involved. The draft plan addressed substantial changes in these services, many of which imposed fees or had added costs. Currently, the NEIC library participates in ILL services with other libraries at low or no cost to the NEIC library. Initially, the draft plan was very vague on how the ILL fee process would be implemented and OECA had concerns about the impacts and costs of the proposed re-structuring. As of the August 8, 2006 library network conference call, NEIC was verbally assured that the reciprocal ILL arrangement that is currently employed will continue to be available to the NEIC library at no cost from the other Agency libraries that remain open. However, for other OECA employees outside of the NEIC library area, there may be costs associated with getting needed materials where the regional library has closed and therefore is not participating in a reciprocal ILL arrangement. For example, when an OECA employee located within a regional office requests material through an interlibrary loan at the regional library, since that library is closing and can't reciprocate by lending out material, that library or individual will incur a fee for getting the requested information through the ILL system. OECA's questions concerning ILL are:

- o How will OECA/OECA employees not at NEIC pay for the additional fees for ILL materials?
- o How will this system be managed? And by whom?
- o How much will these additional fees be?

OECA's Position on ILL - This plan does not address the specifics of how this "fee system/liaison system" will be managed or how it will be applied to non-reciprocating libraries. OECA has concerns on how the fee system will be structured and implemented. While OECA can appreciate that a true interlibrary loan system is based on reciprocity and understands that if a library is not in the position to lend, then a payment of sorts would be justified. However, we have concerns on the implementation.

C. Desk-top Subscription funding reduction - Although the plan says that staff "will continue to have access to the full EPA Desktop Library", the Agency's license for ScienceDirect for the Desktop Library involves both paper subscriptions and electronic access. Of the hundreds of journals included in the ScienceDirect service, EPA only has full-text electronic access to those journals for which we have also have a paper subscription. As physical libraries close or stop their subscriptions, the impact on electronic licenses (full-text) *may* be devastating. Without the substantiating scientific information available in current literature, OECA's mission, including supporting civil and criminal litigations and the development of regulations, will be compromised. OECA's questions regarding the Desktop library are:

- o What will the "full EPA Desk-top Library" contain?
- o What is the FY07 Working Capital Fund rate for this service?

- o Who will fund this service for offices within OECA?
- o How will OECA be assured of continued access to the vital resources needed by OECA employees?

OECA's Position on the Desktop Library - OECA needs assurance of continued access to many of these subscriptions even if the subscription via the Desktop library is gone. We need clarification on the WCF rates.

- D. **The Online Library System (OLS)** is the backbone of the Agency's Library system. OLS is the system which tracks the status of all the libraries' holdings and is the electronic form of a card catalog. This is a crucial service and we need the functionality of OLS to be continued in order to locate materials needed for enforcement. The plan states "Future funding mechanisms....are being explored" At the library network call on August 8, 2006, NEIC was assured that this system will be funded in 2007 by OEI.

OECA's Position on OLS - While OECA is in support of OEI funding OLS in 2007, funding source(s) beyond 2007 need to be identified as soon as possible.

- E. **OECA's (NEIC) library capacity** The NEIC Library is the only specialized environmental forensic library in the Agency. The NEIC library supports enforcement in the regions when there is a need for NEIC's expertise or unique materials, such as standards and industrial process information. Loss of support for enforcement within the regions may cause an overwhelming demand on the small NEIC library by requiring the NEIC library to provide not only unique materials, but also items that the regional libraries currently provide.

OECA's Position on NEIC's Library Capacity - There is no budget available to expand NEIC's library capacity should this increased demand for NEIC library services occur. NEIC is already seeing a slight increase in requests from other regional libraries whose staff/hours are being cut.

ISSUE 2 - ACCESSIBILITY OF INFORMATION / ACCESS TO INFORMATION

Many of the points in the library plan address various aspects of what will happen to collections and documents as regional libraries close. While the plan addresses a phased approach to closing physical libraries, OECA is concerned about the potential loss of valuable information. Additionally, OECA is concerned that the loss of institutional memory as well as the loss of expertise from professional librarians in the regions will hamper OECA's enforcement program. The following examples outline OECA's concerns:

A. Dispersal of Collections – The plan outlines a hierarchy of locations where collections will be sent but does not adequately address the planning process used to determine how a dispersal location will be determined. OECA is also very concerned about the accessibility of third-party data or documentation which OECA may have used or relied upon to form guidance or determinations. For example, Region 5 has already begun dispersal of their collections without these protocols in place. Information from the collections regarding the Great Lakes Initiative or data surrounding human health studies may have been dispersed and OECA and the Agency may not be able to locate this essential information. We must have continued access to supporting information to be able to substantiate and support our findings, determinations, and guidance.

OECA's Position on Dispersal of Collections - OECA needs the information, collections, and data from closing regional libraries that is necessary for enforcement work; particularly industrial process documents, analytical methods, and background documents used to develop OECA guidance and rules to be kept within an Agency collection or library. OECA is seriously concerned that these documents may be distributed without adequate documentation and cataloging and may become virtually lost within the system. OECA needs assurances that this type of information will be maintained within an Agency collection and that these collections will remain cataloged, inventoried, and accessible. Having this data or information offered out to other federal, state, or local libraries, or universities is not an acceptable option for OECA. Prior to a regional collection being dispersed, OECA believes that dispersal protocols must include review by regional enforcement personnel.

B. Accessibility of Digitized Information - The plan currently calls for the digitization of many of the documents from the collections within the libraries that are closing. While OECA supports the concept of digitization, we also have concerns about continued accessibility to original documents after they are digitized and on-line access after a document is digitized. OECA supports the earlier library network position that two copies of the documents being digitized be retained, in separate locations, for disaster recovery purposes.

OECA's Position on Access to Digitized Information - OECA believes that the cataloging of the digitized image needs to be subject to rigorous review and QC to ensure that the image is cataloged and correctly referenced. One small mistake could result in a valuable document being lost for all time.

Issue 3 - TIMELINESS OF SERVICES

The plan stresses that it is committed to providing EPA “employees the library services they need to do their jobs”, but does not adequately explain how this will be accomplished if libraries are closed and others have reductions in available services. The plan calls for the cutting of services and reduction of available resources and the overall availability of information to many employees. The following are examples used to highlight the nature of the timeliness issue:

- A. **Timeliness of Service** - If OECA is involved in a civil or criminal litigation and the judge asks for documentation, we can currently rely upon a library to locate the information and have it produced to a court house in a timely manner. Under the cuts called for in the plan, timeliness for such services is not addressed.
 - o How will situations such as this be handled if a regional library is closed?
- B. **Timeliness and ILL within Closed Libraries** - The ILL process for regional and HQ offices with closed libraries as put forward in the current plan presents a real problem in terms of timeliness, especially for enforcement. Many times OECA employees are faced with tight deadlines. If they must use an ill-defined and costly process to obtain the information they need to make their case within tight timeframes, the Agency may be faced with serious ramifications.

OECA’s Position on Timeliness - OECA would like the issue of timeliness for accessing information to be addressed and a plan developed for contingency measures to provide emergency access in time-sensitive, critical situations.

Summary

In summary, OECA is concerned that the plan does not adequately address the issues of cost, accessibility, and timeliness. In order to continue to support OECA’s mission, our employees need information which is current, timely, correct, and accessible. While we are fully aware of the budget cuts impacting the Agency, OECA needs to ensure that its employees continue to have access to the information that is critical for them to do their jobs and fulfill the Agency mission and protect the American public.