Introduction

The PLSR Study Committee has asked LD&L to review the PLSR Report (dated November 27, 2018) to help identify language that could be unclear to legislators or otherwise present red flags from a legislative point of view. We are grateful for the opportunity to provide feedback. All comments contained in this document are offered with the best intentions and the understanding that you may choose to act on them or disregard them. Some comments are high level while others are very specific. We recognize that some comments are repeated and some may be contradictory. We wish we had more time to offer a more fully developed report. However, the deadline limits our ability to fully review, refine and consolidate.

It may be helpful to you to understand the process we used to gather the information contained in this report. At the LD&L Committee meeting on Friday, November 30, Co-chairs Pletcher and Meyer asked committee members to review the PLSR Report (version 7) and provide their comments to the Co-chairs by December 4. The Co-Chairs decided to compile the comments for the PLSR Steering Committee with a goal of delivering the comments by December 7. While the PLSR Study Committee specifically asked for feedback relative to legislative issues, LD&L committee members also included comments relative to clarity and organizational structure. Those comments have been included as well to assist with improving the readability of the PLSR Report.

The following feedback is organized into three categories:

a) Legislative references and potential “red flags” (highlighted in red below)

b) General comments

c) Comments relative to specific statements

Legislative references and potential “red flags”

Remove references that suggest using the Administrative Code rather than the statutes to effect change, because this is a public document and those will be a red flag to legislators. In recent years there has been considerable controversy as to whether the legislature and DOA has control over administrative rules and regulations at DPI. Most recently, the package of “lame duck” bills seeks to make it more difficult for the governor to enact administrative rules that implement state laws. According to WisPolitics.com on December 4: one of the changes JFC made to the package following the lengthy hearing beginning on Dec. 3, was – “removing a provision that would have exempted the Department of Public Instruction from administrative rules requirements that are part of the package. The state Supreme Court has ruled that DPI isn’t subject to changes Republicans made to the administrative rules process in 2011, though a
A conservative group is now pushing the justices to reconsider that decision. Some conservatives had raised objections to the provision exempting DPI because it would have codified that earlier Supreme Court ruling. In discussions with legislators about their opinions they have said “legislative intent is often ignored, and too much power taken from legislators, through Code changes.” Removing the references to use the Administrative Code does not in any way prevent the DPI from doing so, but does eliminate the red flag. Below are references to administrative code or similar language in the report that could raise red flags.

Recommendation 1 – Develop System Standards, Best Practices and Accountability
- Starting at the bottom of page 11 “Statutes are difficult to adjust. For these reasons it is suggested that the Administrative Code be explored as much as possible as a primary means of establishing any updated regulatory structures. Utilizing the Administrative Code will provide flexibility in the present, while allowing future flexibility as well.”
- Last bullet point under Goals on page 12 “Accomplish a successful update of the Administrative Code in a manner that achieves the recommendation while minimizing risk,”
- page 13 third bullet under Suggested Implementation “Undertake a process of engagement with DPI and other legislative knowledge leaders in order to create a firm understanding of the extent to which the Administrative Code may be used to achieve the goals of this recommendation.”
- page 13 fifth bullet under Suggested Implementation “Present recommended standards concurrently to DPI and LD&L for possible legislative or administrative action.” [syntax: should be “to DPI and LD&L for possible administrative or legislative action” since LD&L doesn’t lobby for administrative changes.]

Recommendation 2 – Enhance Collaboration by Creating Incentives and Removing Barriers
- Top of page 15: “When prudent, seek discrete changes in state statutes or administrative code that would help systems achieve and sustain momentum in this area.”
- Third bullet on page 16: “Publish a process document to assist library systems in effectively planning for any future consolidation. At minimum the document must include a checklist of steps, a detailed example timeline, and must be current in regard to state statutes, the administrative code and DPI interpretations.”

Recommendation 4 (Analyze Funding Formula)
- Summary – page 21: “This appropriation is further apportioned to the library systems by the Department of Public Instruction. In general, this process is conducted according to a combination of statutory imperatives and administrative procedures."
- Goals – page 21: “Identify discrete changes to statutes or administrative procedures that would, at minimal risk, enhance or improve the funding model underpinning library system services.” And “Coordinate the efforts of stakeholder groups in order to create and implement an action plan for any necessary administrative or legislative action.”
- Suggested implementation – page 22: “Identify from the analysis any specific improvements that could be made, and construct a series of administrative or
legislative objectives for action.” AND “Implement governmental/administrative procedures or effective legislative outreach to achieve desired changes.”

Appendix B bottom of page 37 regarding an increase in state aids to systems as a source of future funding: “Annual state funding is allocated according to state statutes and the administrative code....”

By contrast to above references to using administrative code/procedures to circumvent the necessity for statutory change (which should be consistently used throughout rather than “legislative change” as it’s about changing the statutes not the legislature....) there are two references on page 16-17 that appear to go the other direction...

Page 16: “Identify and recommend specific legislative changes to DPI and/or WLA that would streamline the process of voluntary system mergers.”

Page 17: “Either advise DPI in drafting specific legislative changes that may be sought, or draft recommendations for legislative changes and refer to the Library Development and Legislation committee of the Wisconsin Library Association.”

Rephrase or remove statements that may be considered as being out of touch with fiscal realities, and so are red flags. These include:

Page 3: The second sentence of the executive summary says we’re trying to provide “world-class service.” That’s overblown and also not something most legislators are going to support. Equally as important, providing “world-class service” was not the charge given the committee.

Page 9 The final paragraph exorts: “action must be taken quickly and purposefully,” though no support for this urgency is given.

Page 22 The second bullet point on the page ends with “...funding should adequately support the system services that libraries need.” That’s a blithe statement that may paint the committee as out of touch with the realities of funding.

Page 23 The final sentence on this page says that the delivery model would not change the quality of service but would “increase the frequency of service for any libraries who desire it.” This is unsupported by any statements of why greater frequency would be desired, how it would affect library users, and what the cost of doing this for “any libraries who desire it” may be. (The grammar of “any libraries who” is awkward.)

Page 24 The fourth bullet point says “Decrease wait time for patrons...” There is no rationale given for doing this. While decreasing wait times might seem intrinsically beneficial, there is no evidence presented or collected that patrons are displeased or poorly served now. Given that
there is a necessity to use resources efficiently, all calls for “more” of something should ideally be backed by evidence of need and of efficiency.

**Page 27** The second bullet point on the page says, “Provide a best-in-class search interface...” This brings to mind “gold plated.” Dropping the adjectives might be wise because it will focus attention on the desired result, not the bragging rights.

**Appendix C** The first sentence declares, “Any procurement process should emphasize results over cost.” This is a good sentiment but seems naively expressed. Both results and cost must be considered, and results cannot completely override cost. Rephrasing this could help the committee look more in touch with fiscal realities. For example, “any procurement process should emphasize results and cost benefit.”

**Recommendations section and other areas has many references to hiring a project manager. Be careful!** Many may be wary of outside project managers into the future and be asking why DPI can’t handle the work. It needs to be very clear that the relationship of the project manager in this process is completely unrelated to any work after the process. Hiring or appointing a project manager is referenced throughout this document. The wording is different in each section and perhaps it should be consistent. **Suggestion:** “Appoint a project manager and/or Implementation team...”. The wording for Recommendation 7 is palatable because appointing a team is the first bullet, consider hiring a project manager is the second bullet.

**Remove the Appendix C Additional Considerations reference to working with regional systems to achieve crowdfunding.** It’s potentially damaging to libraries and systems to suggest crowd funding (private donations) as a means of funding initiatives. It may also give legislators the idea that crowd funding is a viable alternative to state/local funding. Yikes!

**Page 39**
- Project Management, bullet point 3: Working with the regional systems to achieve necessary levels of collaboration and crowdfunding. **Comments:** Why would regional systems be crowdfunding anything? We are tax payer entities! RED FLAG.

**References to historical reports, JFC language and consolidation in other states is not particularly helpful in a document that should be focused on the future.** While librarians like to provide historical background, in this case the historical references suggest that librarians are responding to government pressure rather than leading change. We suggest removal or rewording. Below are some examples that are red flags.

**Reference to forced consolidation of systems in other states**
**Page 5, para 1** – Background section, referencing 2012 SRLAAW report “This action was largely in response to shrinking governmental budgets and consolidation of public library systems in other states throughout the nation.”
Comment: Is this sentence really necessary? Suggests the “do unto ourselves before state government does unto us” mentality that has since been mitigated by improved relationship building with legislators.

Reference to Governor’s veto language for the JFC study mandate of 2014-15
Page 5, para 2 – Background section, referencing the 2014-15 budget mandate for DOA to study library systems based on LEAN practices. “The Governor deemed this recommendation unnecessary, vetoed it, and acknowledged DPI as the appropriate agency to conduct such a study without the need for legislative directive.” Actual Governor’s veto message language: “I am vetoing this section because it is unnecessary. The Department of Public Instruction is the appropriate agency to conduct such a study and has the ability to do so, without a legislative directive, if it believes a study is warranted.” Comment: First reaction to seeing this sentence was that the phrase “without the need for legislative directive” would more likely be attributed as an opinion of the report writer, rather than to the governor. It either needs to be footnoted to the actual veto link or reworded or both. Suggested rewording: “The Governor deemed this recommendation unnecessary, and vetoed it from the budget bill. He acknowledged DPI as the appropriate agency to conduct such a study and stated DPI had the ability to do so without a the need for legislative directive if it believed a study was warranted.”

References to LD&L
LD&L is mentioned on pages 13 (4 times), 22 (as a “key constituent entity” separate from the WLA Board) and 34 (historical reference). LD&L is a WLA committee that reports to the WLA Board. LD&L recommends to the WLA Board and then implements their decisions. When referencing LD&L it would be best to reference WLA, or the WLA Board as the overarching organization at least initially. The report assumes the reader understands the role of LD&L and its relationship to WLA. It should be described as soon as it is referenced.

Library Development and Legislation Committee is mentioned on pages 12 (as a library community stakeholder group…with the common goal of forging a legislative and/or procedural path toward achieving the recommendation” – with “procedural” possibly a euphemism for administrative code), and 17 as mentioned above.

Page 13 Recognition of LD&L as an important partner in the legislative process to be consulted when statutory changes are necessary is a good thing. However, the last bullet on that page under “Measuring Success” appears to assume that whatever package is delivered to LD&L will be successfully implemented “as is.” “Standards are drafted and endorsed by stakeholder groups (SRLAAW, COLAND, member libraries etc.) to be delivered to LD&L as a package to implement change.” It is more accurate to say: LD&L considers any request from WLA members and partners, vets the request and makes a recommendation to the WLA Board. LD&L is acting on behalf the WLA membership as directed by the WLA Board.
“WLA” is perhaps used interchangeably for LD&L at the bottom of page 15 as one of the “key allies” for merging public library systems per Recommendation 2. Also on p. 16 as mentioned above.

**Recommendation 4** regarding the funding formula could be a gigantic red flag in a year when we’re trying to retain the $1.5M and raise system aids funding by $4M by 2020.

### General Comments

**Link the Superintendent of Public Instruction’s (SOPI) charge to the Steering Committee where it’s referenced in the document.** The appointment letter is on the website. It is important to show the official document that indicates the charge of the committee.

**Passive voice is less impactful.** The report uses the passive voice so frequently—it’s much less effective and a duller document for that. Use active voice and action verbs as much as possible.

**This report suffers from not knowing its intended audience.** Is the intended audience the State Superintendent? COLAND? The library community? Or the legislature and/or general public with little to no knowledge of library geography and mechanisms? How the report is written – the language used, minimization of jargon, assumptions about shared understanding and information – is informed by the designated audience. It may be inevitable that there are multiple audiences for this document. If so, it should be analyzed from each perspective to be certain it achieves its purpose for each. (We appreciate your request to have us look at it from the legislative perspective!)

**While this was undoubtedly a necessary reality, this report suffers from being written by a committee.** Despite using the same headings (summary, goals of the recommendation, value proposition, suggested implementation process, measuring success) different writing styles create a certain amount of cognitive dissonance for the reader. There are different voices as well as syntax – the way words are arranged in a sentence so as to be understandable to the reader. Think: multiple verses of the same song being sung by different people, each with their own inflection, voice range, sense of pitch and phrasing.... As an example of uneven construction, enter “value proposition” into the pdf search box and click through. According to the definition below, this is supposed to be the “selling point” of each recommendation. The value proposition is much more focused and clear for Recommendations 6 and 7 than for the previous recommendations.

**Phrase “value proposition” is jargon.** The definition (in marketing) is an innovation, service, or feature intended to make a company or product attractive to customers. The term refers to a business or marketing statement that a company uses to summarize **why a consumer should**
**buy a product or use a service.** This statement convinces a potential consumer that one particular product or service will add more value or better solve a problem than other similar offerings will. Recommend using “value to library users” or “impact on communities” These phrases resonate with our legislators.

**Rewrite measures of success for each recommendation to measure whether benefits were achieved, not whether tasks were completed.** Use uniform style for the measures (i.e., if there are multiple measures, begin each with a noun or verb uniformly). **For example:** under Measuring Success for Recommendation #3, the draft says “Achievement of at least one effective system consolidation would be an essential indicator.” A measurement that would relate back to the benefits would be more effective. What are the determined benefits of system consolidation? How can they be measured?

**Address Funding Needs Within Each Recommendation Rather Than in an Appendix.** Putting this topic in an appendix assigns it a status of “less important,” while in reality it is crucial.

**Rephrase or remove material that could reflect poorly on the library community.**

Examples include: Pages 4, 9, 10

“Directives Gleaned from the Library Community through the Recommendation Development Process.” This section discusses at great length the extensive, time-consuming, and expensive process that led to these directives. Yet the directives are mostly common-sense statements that should have taken no more than a few moments to compile. It reflects poorly on the intelligence of the library community to declare that it took several years and over a million dollars to come up with these.

*Service improvements must benefit library patrons.*

*Service improvements must be soundly implemented.*

*Take action now on recommendations with (the) most robust support.*

*Potential unintended consequences should be anticipated and studied* (whatever “studying means in this context.)

This includes the sentence “It was made extremely clear by the library community that any efforts to implement recommendations should be preceded by assessments to identify risk factors.” It shouldn’t have had to be made clear by the community that due diligence must be applied, so stating this is embarrassing.

Don’t see a value to outlining the directives in the report, unless they were included to let the library community know they were heard. Instead, that reassurance can be provided by making certain that the recommendations and discussions of their implementation illustrate these
common-sense directives. Just as in good fiction writing, “show, don’t tell” is preferred. This approach necessitates that each recommendation includes a clear statement of how it is beneficial to library patrons, that each implementation plan be soundly constructed, that the recommendations with the strongest support be identified as such.

**Strengthen recommendations by simplifying and restructuring them to flow this way:**

- Recommendation
  - **Benefits expected** replaces Goals
  - Background replaces Summary
  - Suggested implementation actions includes action items now listed under “Goals”
  - Measuring success  

In their current draft form, the report recommendations are overwhelmed with words, and action items confusingly appear under the heading of “goals.” A goal of a recommendation can equate to a benefit, so changing the wording to “benefit” may help clarify what goes in each section. Each benefit should ideally relate back to the charge from the SOPI, in order to strengthen the recommendation.

As an example, look at Recommendation #1. The recommendation is followed by a summary, whereas following it with “Benefits” would give it greater strength. The reader could then be given some background, followed by implementation steps, and a way to measure success.

The items currently listed under “Goals” appear to actually be activities that could be folded into the “Implementation” section.

The items listed under “Value Proposition” could be folded into the “Benefits Expected” area. This would be helpful because “Value Proposition” is a term relating to sales and comparisons of products, and it isn’t being used correctly in this report. It sounds like jargon here, and removing the term would enhance the report.

**Replace, where possible, vague process-oriented statements with activity-based statements.** By following years of process by highlighting more process, the report is in danger of causing readers to wonder what has been done to date. Focusing instead on action verbs gives the report more energy. Just a couple of examples of this language and how it could be changed:

- Under “Goals of the Recommendation” the bullet points each begin with calls for more process.
  - “Construct and implement a process to analyze…” Instead say “Analyze system services…”
  - “Create effective mechanisms to identify…” Instead say “Identify best practices…”

**NOTE:** The above statements are more implementation steps than goals. As such, not recommending that the changed language remain in the “Goals” section; suggest the language be included in implementation steps.
Downplay, rather than highlight, the time, effort, and money that went into this project and report. The reader does not need to know that and does not care, so it sounds whiny or self-congratulatory. More importantly, the results do not justify that large of an investment, so focusing on those large investments weakens, rather than strengthens, the report.

Edit the document for:

- consistency of capitalization and definition of system, library system, regional system
- correct full title of Superintendent of Public Instruction workgroups is one word or two, don’t capitalize it, and be consistent.
- incorrect capitalization of non-proper nouns (e.g. Directors)
- redundancy within and between sentences
- parallel structure of lists (i.e: do they all start with a verb, a noun, or are they — incorrectly—mixed?)
- sentences or paragraphs that don’t add important information and leave the reader wondering why the information is being presented (e.g. page 39 South Central Library System paragraph, or “Nationwide, there are very few examples of statewide library organizations that compare to Wisconsin.”)
- unnecessary modifiers or phrases (e.g. “Appoint a small team of well-qualified individuals.” “Some of the hypothetical duties of a project management entity might include...,” “accomplish a successful update of the Administrative Code...,” “...recommended by the Steering Committee...” – the entire report is recommended by the committee)
- Incomplete thoughts (e.g. page 36 first bullet point contains a sentence that ends with so as to allow. Appendix B Funding Strategies has a second paragraph consisting of a sentence fragment: Local library contributions — libraries paying into services
- Noun-verb agreement (i.e. if noun is plural, verb should be plural)
- Jargon, overused terms, or those used incorrectly (e.g. robust, build capacity, value proposition, paradigm, utilize — employ “use” unless you are giving a new use to something, as in “the pen was utilized as a weapon”
- Claims made without supplying supporting evidence (e.g. “Physical resource sharing generates tremendous value for libraries...”)
- Decide between “patron” and “user.” I prefer “user” because the more common definition of “patron” is a person who gives financial support to an organization. I also find “user” to paint a more active image of libraries being used, not just supported. Legislators are used to people who use services, not patronize them. Whichever term is used, consistency is key.
- Reduce or eliminate the use of the passive voice.
Comments relative to specific sections/statements

Recommendation 1—Raising systems to a new standard level will almost certainly cost them more money. I think a system may say that yes, the new standard is a good idea, but not at the expense of the current service being funded (I say this as a former system director). Or, in other words, new standards necessarily lessen local control. Is the administrative code sufficient to make those changes happen? I’m not sure the recommendation recognizes the probable push back there would be to stronger standards.

Edit Recommendation #1 to stipulate that system standards should be quite minimal, to assure that system services are tailored to local library needs and desires, and to increase the role of system accountability measures. Sameness is not equivalent to equity. One of the great benefits of systems (particularly if not overly large) is that they can adjust to the needs of their member libraries. Trying to achieve sameness will take valued services from member libraries. What may be valuable to measure instead is the totality of services being provided and the cost percentage being paid by each system. That percentage could be something that should be approximately the same throughout the state. This type of measure would assure that system funding is not replacing the need for local communities to adequately fund their libraries.

Recommendation 2 and 3—the title of the recommendation doesn’t accurately reflect the content in recommendation 2. The content of the recommendation is almost entirely about system mergers, but the title is weak and talks about enhanced collaboration. Recommendation 3 is almost/entirely an outgrowth and continuation of #2—can these be effectively combined into one?

Rewrite Recommendation #2 to focus on enhancing collaboration. Currently, it begins that way but the second sentence turns to system mergers, which is the topic of Recommendation #3. If the committee wants to apply Recommendation #2 to system mergers, that is better done within Recommendation #3.

Recommendation 2. Wasn’t this recommendation meant to talk about incentivizing, encouraging, and removing barriers from collaborative efforts that might grow naturally, along the lines of WPLC? This is a valuable recommendation and deserves to be fleshed out and separated from #3.

There is quite a bit of redundancy between Recommendation 2 (removing barriers) and Recommendation 3 (merging systems) which could indicate the concepts could have been merged somehow. And a lot of meaningless verbiage in Recommendation 3, particularly on p. 20.

Very pleased that they have revised Recommendation 2 to be about collaboration. However much of the section is still about merging systems. Section 2 would be stronger if it focused
only on collaboration and all of the wording about mergers could be incorporated into Recommendation 3.

Rephrase Recommendation #3 to say “Remove barriers to, and provide incentives for, organic system mergers/consolidations* that benefit library users. Reducing the number of regional library systems is not supported by facts or data given in any of the information provided within the recommendation. All of that is speculative. Statements such as “Improve equity of access to high-quality services” as a goal/benefit of the recommendation are without proof or even a definition of “equity of access.” Define the differences between mergers and consolidations or choose one of these terms to use exclusively.

Recommendation #3 Pages 19-20 This whole section needs to be removed. In Recommendation 2, mergers are encouraged between systems, so why is this recommendation here? The entire section contradicts SEVERAL other parts of the document. Also, there is no evidence listed to why this recommendation is given. This section is inherently negative. Why would we want to go to the legislature and say hey we need fewer of us?! It is also reported here that this recommendation “the concept of a strategic reduction in the number of library systems was a key recommendation sent to the PLSR Steering Committee with support from the participants in the PLSR Model Development Summit” THIS IS DEBATABLE. The participants were clear that reduction of systems were recommended if other workgroup models and funding didn’t alleviate inequities, and reductions of systems should not be mandated or strategized. Also, who is doing the strategizing? The counties currently choose to belong to a library system. If you cut out the counties and the support and funding they provide, by overstepping their authority on the matter (we have county library planning committees for a reason), you could jeopardize the entire state and the stability of existing systems. RED FLAG. To go deeper – The 1st value proposition mentions “strong potential.” This process is supposed to be made on sound data and not hypotheticals. There has been no data gathered that leads anyone to that hypothesis. The 1st Suggested Implementation Process mentions “Consider establishing additional requirements systems must meet before a director vacancy may be filled.” This would take power over the local system board, which by law, they have the power to hire the director. HUGE RED FLAG.

Recommendation 3 which is about Reducing systems. Suggest moving or eliminating the following:

- Page 15 under Summary: paragraphs 2 and 3
- Page 16 under goals bullets 1, 3 and 4
- Page 17 under Suggested implementation practices bullet 3
- Page 17 under Measuring Success, under bullet 1, the first sub-bullet that stars “A process document...”
- Page 18 last bullet
- If this section is revised then bullet 3 under Goals in Recommendation 3 on page 19 will need to be removed as it references Recommendation 2. Also perhaps bullet 2 under Suggested Implementation Process on page 20. I’m not sure what aspect of Recommendation 2 that bullet is referencing.
Under the Goals section on page 18, add a goal to identify several collaborative pilot projects that help further objectives from PLSR work group reports, or new ideas. These could be projects already under way or brand new projects.

Under the Suggested Implementation Process on page 17 would like to see a paragraph that addresses reaching out to existing collaborative groups such as SOMBWA, CE Coordinators, and system technology staff and providing them with tools (financial and non-financial) to support and strengthen their efforts, including support for pilot projects.

Under Measuring success, add Successful completion of collaborative pilot projects.

**Recommendation 4**—Think this recommendation will be extremely difficult to implement. Sounds disingenuous to say no system would be negatively affected. One of the goals is to “Achieve meaningful changes that improve equity of access to high-quality library services across Wisconsin, while ensuring that no system experiences a decrease in base funding.” That feels like a relatively poorly defined proposition followed by a near-impossible promise.

**Change Recommendation #4** to “Replace System State Aid Distribution Formula with One that Increases Systems’ Ability to Aid Local Libraries in Meeting User Needs.” Currently, this recommendation is too passively stated as “analyze the current funding formula.” Not only is this hard to get excited about, it raises the excellent question of why in the past 3.5 years of PLSR work, this was not done. There’s not much to “analyze:” it’s a crystal clear formula. Let’s not just analyze it, let’s replace it after careful study and development of a better formula.

**Remove listing (in Summary) of discrete factors to be explored (poverty, unemployment, infant mortality rate) because those were inserted by the writer, and were not directives of the Summit participants.**

**Recommendation 5**—Delivery. An improved delivery system feels necessary only if there is an expected increase in inter-system delivery. That is, it could not be effective to have Milwaukee delivery all come to Waukesha (as some maps show) if there isn’t a corresponding sharing of ILS and resources. Delivery sharing on its own, without system changes, isn’t logical. Also, on page 26 the three bullet points are very compelling and easy to understand. I’d want to think about how that information should be shared. How would a legislator read that information—that 70% of our costs cover 97% of delivery, and 30% covers only 3%? There are implications to that fact that could go beyond delivery. This is a very important point. **We can’t justify spending a great deal of money chasing solutions for a small percentage of transactions.**

**Replace Recommendation #5 with “Engage Logistics Experts and Library Users to Determine the Most Cost Effective Delivery Systems to Pilot for Sharing Library Resources.”** The most cost effective delivery system needs to look at what library user expectations are and how well we can afford to try to meet those expectations. The sky is not the limit. The pilots should be designed by logistics experts, not librarians, who have great experience in this realm and can
give fairly accurate cost estimates that take into account the myriad factors never considered by the workgroups.

Remove from Recommendation #5 the insistence that “something resembling” the workgroup’s proposed model is the measure of success. (page 25 Measures of Success)

Recommendation 6—shared discovery layer. This feels like half of a recommendation. The recommendation talks about discovery, and letting citizens see and discover resources from around the state, but it does not talk about what happens next. Is sharing implied in this? If sharing isn’t implied, why is discovery important or useful? If sharing is understood, there is a lot that isn’t included in the recommendation, which ends at selection and configuration of software.

Discuss in Recommendation #6 how a statewide discovery layer would financially impact libraries which are net lenders, and what the plan is to eliminate that inequity. This is not a detail to wait for later. It’s necessary to address this in the recommendations to reassure potential net lenders and to manage the expectations of small and rural libraries that their users will have easy and timely access to the collections of other libraries.

Stipulate in Recommendation #6 that demand management software must be employed to assure that residents of the community which funded the purchase of materials always top the list of reserves for those materials. Because of the lack of information in this recommendation, the survey that is currently available will likely show great support for this particular recommendation from small and rural libraries whose directors think Christmas just arrived. Have heard too many say that we’ll essentially have a statewide collection that their users will have equal access to. That ignores the reality that funding of the collection is a local responsibility.

Page 27 Recommendation 6, Goals, 3rd bullet. It is implied that the Discovery Layer will replace the regional discover layers. Don’t remember seeing this before. Believe this would be a very hard sell. The current trend is toward local customization of the discovery layer. Will local customization be accommodated and will this really reduce budget, etc.? Benefits of a discovery layer software need to be clearly articulated and compelling.

Recommendation 7—CE portal. The weakness of this recommendation is that it doesn’t talk about how any system would need ongoing support, written into someone’s job description.

Appendix A—System history. Wonder why this section included. Perhaps a better explanation of the need to look back in order to properly plan for the future?

Appendix B—there’s a sentence fragment that isn’t clear: “Local library contributions — libraries paying into services.” Is that fleshed out anywhere? On page 37, under Increase in state aids,
the first bullet point does talk about the need for ILS tools to aid in delivery—however, in recommendation 5 and 6 these are not combined at all.

Appendix C—why is it important to note the role of South Central? That doesn’t feel like it’s necessary. In earlier drafts it had been in the delivery recommendation section. However, if it’s included, there needs to be a better explanation of how it ties into the recommendations.

Page 3  Introduction: “The intention of this project is to enhance the ability of public libraries to access the services they need in order to provide world-class service to the citizens of Wisconsin.”  **Comments:** “world-class service” is unrealistic and should be removed. Do not believe that intention was ever given by Tony Evers.

Page 4  -- Additional directive number 3 (also on page 9). Parallel structure missing. Should be “Recommendations with robust support should be acted on now.”

Page 5  Unclear connection between paragraph and bullet pointed list below it.  3rd paragraph: This work group identified areas of service provided by library systems that could be made more efficient.  **Comments:** “could be made more efficient” portrays negativity and uncertainty. Should be re-written as “future efficiencies” and add “potential” in front of areas.  Also “Resource libraries must redefine their value proposition for the 21st century” uses jargon (value proposition)

Page 8  worst example (entire page) of passive voice.

Page 9  What’s the purpose of the first paragraph? Recommend eliminating it to make directives stronger. Bottom of page 9:  “For example, state-scale implementation of a service such as technology would require changes to governance structures, funding, administration” Change would to may. The second “would” in that sentence is good.

Page 11  The recommendation: Develop System Standards, Best Practices, and Accountability  **Comments:** By only stating ‘develop system standards’ it gives the illusion that we have no standards at all which is untrue and could have negative consequences if legislators thought that.

Page 11  1st Summary paragraph  **Comments:** The whole paragraph is convoluted and makes little sense. It is also largely negative. Suggest eliminating “Therefore, services provided to member libraries vary greatly from system to system in availability, funding, and scope. Member libraries are sometimes unaware of the services required by statute and often systems use their best judgement in delivering services that may or may not be viewed as standard system services in other parts of the state.”  Makes library system directors seem incompetent.

Page 11.  Second to last paragraph. The sentence “Technology, often a key driver of system
services...” seems random and does not add anything. Why blame technology?

Page 11 the sentence “These should not be addressed...” perhaps could say “These may not need to be addressed through formal standards or regulation but perhaps could be...”. This opens the possibility of creating standards for current best practices. Should is a strong word.

Page 12 The first full sentence on this page, referring to best practices for systems, is “This is a clear example of an untapped resource which has been revealed by this project.” Although the intent of this statement is likely to show positives that came from the PLSR process, it also makes the DPI and systems appear out of touch with one another. That may be the case, but perhaps there’s another way to phrase this?

Page 12 1st paragraph: “untapped resource” Comments: “untapped resource” is jargon and I am unsure of where this comes from.

Page 13 1st Measuring Success: Establishment of a process by which best-practices can be captured, refined promulgated will be an immediate improvement beyond what is currently available to systems. Comments: “captured, refined promulgated”—Suggest removing jargon and fixing missing punctuation.

Page 17 4th Suggested Implementation Process: Construct a “gold standard”. Comments: “gold standard” is jargon and the whole sentence should be removed. This qualifier is not needed. We would of course strive for the best possible service without a directive as such and a gold standard may not be possible if the funding formula is not fixed equitably.

Page 24 Goals of the recommendation: Utilize the Delivery Workgroup Report as a flexible foundation. Comments: I would eliminate ‘flexible’. What does that mean in context?

Remove the Appendix B Funding Strategies second paragraph sentence fragment “Local library contributions – libraries paying into services” or expand that statement and make certain that whatever the expanded statement says will not be a surprise to the library community since they will not have had a chance to respond to it.

Page 39 Remove “crowdfunding” as it’s a red flag word.