

## **Summary of Comments Received on Notice of Proposed Rule Changes and Division Response**

December 6, 2011

The following comments were received regarding the proposed changes in the grant rules. The comments were primarily aimed at the Library Cooperative Grant rules, with one concerning State Aid.

### **Library Cooperative Grant**

#### **1. Comment:**

In reviewing the proposed rule changes I am concerned about the change in the funding formula for the MLCs. I understand the premise that with the dissolution of the Central Florida MLC additional libraries were absorbed by TBLC and NEFLIN. However past funding formulas were not based on the number of libraries or population served. Also I think the legislature recognized that there was one less MLC and lowered funding accordingly with the expectation that the funds would be divided equally among the remaining MLCs. Up to now we have always considered MLCs to be equal even though their populations of libraries and users was vastly different. I think it is a bad precedent to create unequal MLCs.

#### **Division Response:**

It is the intent of the Division to ensure that all libraries in all regions of the state receive the services provided by the library cooperative grant funding. In order to ensure the continuation of these services, the funding formula was modified to provide funds to support the two cooperatives that are providing services to the libraries in the central Florida region.

For the 2011-2012 year, the 1/6 amount that would have gone to Central Florida was divided between the two cooperatives so that service could be continued in this year.

In future years, the revised formula does not simply take the amount of funds that previously went to Central Florida and divide it evenly among the two cooperatives. It increases the base grant amount to each of the five cooperatives and provides additional funding to the two who are providing the services. This is being done to ensure that all areas of the state are served by this funding, while also working within the legal restrictions on the maximum amount of funding a cooperative can receive.

## **2. Comment:**

If local or state funding continues to decline we will probably see other MLC's folding and/or libraries dropping their memberships due to lack of funds. The purpose of the MLC's has been evolving over the past few years and it seems that their principal purpose is to provide access to training. With most training now being offered online the need for so many MLC's needs to be re-examined. The question also needs to be posed as to how much training the State Library can provide access to and whether the State Library will re-exert leadership in the training area which also potentially impacts the need for MLC's.

### **Division Response:**

At this point in time, the futures of both state and local budgets are unknown. The recent past, along with current budget projections, seem to indicate that state and local funding will be limited. The Division will need to work with the MLCs to determine how to further refine the complementary roles that each plays in training.

## **3. Comment:**

The directors from the five MLC regions .... reached an agreement to ask for the following:

A funding formula that would be scalable no matter what the allocation from the legislature. We would of course aim for \$1.2M - \$1.5M, but want a formula that can be scalable for any allocation. We looked at several formula variations and the dollars are similar so we agreed to try this simple formula. We will also discuss it with the Division to let them know our preference.

The formula:

- We would use 84% of the entire allocation to divide five ways as a base grant.
- We would use the remaining 16% to divide evenly between NEFLIN and TBLC to compensate for the additional service area.

For example, \$1million would give \$168,000 as a base grant plus \$80,000 each for NEFLIN and TBLC.

For example, \$1.2 million would give \$201,000 as a base grant plus \$96,000 each for NEFLIN and TBLC.

For example, \$1.5 million would give \$252,000 as a base grant plus \$120,000 each for NEFLIN and TBLC.

**Division Response:**

The proposed funding formula from the MLC directors will be accepted. The formula will be modified from what was proposed to be as follows:

1. 84% of the entire allocation will be divided five ways as a base grant.
2. The remaining 16% will be divided between NEFLIN at 6% and TBLC at 10% to compensate for the additional service area.

**4. Comment:**

Support for the funding formula developed by the five MLC directors for distributing funds to the MLC regions.

**Division Response:**

See proposed formula in previous response.

**5. Comment:**

Request for clarification and context for the noncompliance status paragraph.

**Division Response:**

The Division will continue to use the language developed by Department of State legal staff regarding noncompliance in its grant agreements and grant guidelines. The language is standardized across all grant programs.

**6. Comment:**

Request not to delete service population as a demographic feature of the general description of the MLC regions.

**Division Response:**

The intent of the change is not to delete the service population as a demographic feature of the MLC. The intent of the change is for the Division to provide the information in lieu of the individual MLCs. The service area population would be reported on the annual compilation of the MLC statistics.

## **State Aid to Libraries**

### **7. Comment:**

Include changes recommended by the Department of Financial Services (DFS) review to the State Aid to Libraries Grant Program.

### **Division Response:**

As a result of the DFS review, the following changes will be added to the State Aid program:

- The grant agreement will be revised to explicitly allow for the carryover of the balance of any State Aid grant funds until expended.
- Reporting forms will be revised to require that grant recipients report on subsequent year's expenditure of grant funds in compliance with the purposes for which they were awarded.