



The Prints and Photographs Division Effectively Tracks Its Materials,
But Needs to Assess the Risks Associated With
Its Growing Quantity of Materials Not Fully Processed



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OFFICE OF THE INSPECTOR GENERAL

LIBRARY OF CONGRESS

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WASHINGTON, D.C. 20540

August 12, 2016

MEMORANDUM FOR: David Mao
Acting Librarian

FROM: Kurt W. Hyde
Inspector General

SUBJECT: *The Prints and Photographs Division Effectively Tracks Its Materials, But Needs to Assess the Risks Associated With Its Growing Quantity of Materials Not Fully Processed,*
Report No. 2014-PA-106

This transmits our final report summarizing the results of the Office of the Inspector General's review of the Prints and Photographs (P&P) Division's acquisition process. The audit findings and recommendations appear on pages 1 to 21. Management's response to our recommendations appears in Appendix C.

Based on management's written response to the draft report, we consider all of the recommendations resolved. Your response provided an action plan addressing implementation of the recommendations, including an implementation date, in accordance with LCR 2023-9, *Rights and Responsibilities of Library Employees to the Inspector General*, §6.A.

We appreciate the cooperation and courtesies extended by the P&P Division, Library Services, and other units within the Library during this audit.

cc: Associate Librarian, Library Services
Chief, Prints and Photographs Division
Special Assistant to the Librarian, LIBN/O

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Summary

To further its monitoring of collections-related issues, the Office of the Inspector General (OIG) conducted a performance audit of the Prints and Photographs (P&P) Division's administrative and accounting controls over its collection. Our objectives were to examine (1) the criteria guiding the P&P Division's acquisition process, (2) the P&P Division's mechanisms for tracking and accounting for the items acquired, and (3) how the performance of the P&P Division's acquisition efforts are assessed. The OIG has reported on collections-related issues previously.¹

The Prints and Photographs Division Accounted for All the Prints and Photographs Tested by OIG

All of the prints and photographs selected as part of the tests were accounted for by the P&P Division, but OIG concluded that the division should strengthen its call slip practices.² Additionally, OIG identified that the Library can gain efficiencies by restructuring the P&P Division's processes and technology used for ingesting material. The Library should consider the P&P Division's information-related requirements when evaluating possible replacements to ILS.

The Prints and Photographs Division Has Not Been Able to Timely Process Acquired Materials

Based on an analysis of the P&P Division's acquisition data over fiscal years 2005-2014, the P&P Division has not kept pace with processing new acquisitions. This poses a risk for theft, damage, and

loss because unprocessed materials lack adequate bibliographic, inventory, and security controls. At the time of our fieldwork, OIG determined that the P&P Division would need approximately 40–60 years to eliminate its backlog of materials that are not fully processed, which has grown over time.

Arrearage may very well be a part of any agency like the Library, such as a museum or archival library. The Library's arrearage poses significant long-term business and budget implications and has systemic ramifications; the Library uses resources to house and process its arrearage and to make arrearage materials accessible (e.g., physical infrastructure, personnel, and information technology resources).

The OIG does not take a position on how much unprocessed material the Library can or should maintain. However, OIG recommends that the Library should examine its strategic plan (e.g., the plan's objectives and performance measures), policies, procedures, and other parts of its internal control system to determine whether the Library-wide controls respond to the risks posed by arrearage, including establishing a sustainable level of arrearage.

Management's Response

In response to our draft report (see Appendix C), the Library's senior leadership agreed with all of our recommendations and provided time frames for the implementation of corrective actions.

¹ For example, see *Library Services: The Library Collects Extensively but Faces Increasing Challenges in Processing, Controlling, Storing, and Making Accessible All It Collects*, Report No. 2013-SP-102, September 2013.

² The OIG selected for examination: (1) a statistically representative sample of 167 collection materials using the P&P Division's bibliographic records in the Library's Integrated Library System (ILS); (2) 30 judgmentally selected gifts acquired over calendar years 2001–2014 using Memorandum of Recommendation forms in the Gift Office; and (3) ten judgmentally selected paper call slips taken from the P&P Division's shelves.

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Background

The Prints and Photographs Division

The Library is a broad collector, covering virtually every discipline and field of study, including the entire range of different forms of publication and media for recording and storing knowledge.³ The P&P Division holds approximately 10% of this broad collection. Based on fiscal year (FY) 2014 data, of the Library's estimated 160.7 million items, the P&P Division's collection includes approximately 15.6 million items and many different types of materials: prints produced by a mechanical or manual process, photographic prints, photographic negatives, drawings, paintings, posters, and books illustrated with original prints, among others. The collection covers areas ranging from the American landscape and cityscape; architecture, design, and engineering; politics and propaganda; the life and peoples of the United States; and the world at large. The collection is particularly strong in materials documenting the history of the United States and the lives, interests, and achievements of the American people.

The history of the P&P Division collections fall into three broad eras as the custody of the Library's visual materials evolved over time:

- 1802–1896: Acquired commercial graphic art prints, posters, and photographs chiefly through copyright deposit. Managed as part of the general collections.
- 1897–1944: Acquired fine art prints and art reproductions. Managed through the Department of Graphic Arts (1897–1898), the Division of Prints (1899–1929), and the Division of Fine Arts (1929–1944).
- 1943/1944–present: Acquiring a broader range of materials, including large collections of documentary photography. Managed through the Prints and Photographs Division.⁴

In FY 2014, the P&P Division had 35 staff members, including managers, curators, reference specialists, cataloging specialists, digital library specialists, and technicians. The division's staff received support from 24 interns, fellows, and volunteers.

The P&P Division provides access to its collection onsite through its reading room located in the Library's James Madison Memorial Building and online through the Prints and Photographs Online Catalog (PPOC).

³ The Library of Congress does not acquire technical agriculture and clinical medicine materials for its collections; it yields to the National Agricultural Library and the National Library of Medicine, respectively.

⁴ John Y. Cole and Jane Aikin, *Encyclopedia of the Library of Congress* (Bernan Press, 2005), page 419.

The Prints and Photographs Division's Selection, Purchasing, and Processing Activities

In reviewing the criteria guiding the P&P Division's acquisition process, OIG mapped the acquisition process workflow, which generally involves selection, purchasing, and processing activities.⁵ Each fiscal year, the P&P Division develops an acquisition strategy that helps the division's curators, who are responsible for enhancing the division's collection, focus their selection activities and make recommendations. The strategy identifies the P&P Division's top items, collections, and thematic areas of interest. The Chief, as well as other Library officials, reviews and approves the acquisition strategy. According to the division, having an acquisition strategy does not preclude the P&P Division from taking advantage of opportunities that may become available unexpectedly, as long as they are identified under the Library's Collections Policy Statements.⁶

At the time of OIG's fieldwork, the P&P Division was completing a purchase that illustrates the division's selection activities. A P&P Division curator attended a show organized by photography dealers and identified a daguerreotype of interest taken at the time of the Mexican-American War (1846–1848).⁷

As shown, the daguerreotype is of a drummer for the U.S. Army ("Mexican War drummer"). The drummer sits facing forward with a plumed Shako hat placed on top of a large bass drum at his side. Cloth strips on his shoulders form the drum straps and a drumbeater with a leather covered ball for striking the drum rests across his legs.



Image 1: Mexican War drummer
Source: Library of Congress, P&P Division

The curator recommended that the P&P Division purchase the Mexican War drummer for

⁵ In addition to purchases, the P&P Division acquires material through donations, transfers, and other means.

⁶ The Collections Policy Statements govern the Library's collections development and acquisition efforts. They provide the policy framework to support the Library's responsibilities to serve the Congress as well as the U.S. Government as a whole, the scholarly community, and the public. The policies provide a plan for developing the collections and maintaining their strengths. Additionally, they set forth the scope, level of collecting intensity, and goals sought by the Library to fulfill its service mission.

⁷ Daguerreotype refers to the chemical process developed by Frenchman Louis Jacques Mandé Daguerre that is generally considered to be the first fully successful and practicable photographic process. The term also refers to the resultant photograph.

various reasons. For one, the image appeared historically accurate based on an examination of the infantryman's uniform. The P&P Division has approximately 780 daguerreotypes overall.

As part of the division's selection activities, the curator consulted collectively with the P&P Division's other curators and the Chief about purchasing the Mexican War drummer. According to the P&P Division, this is a standard practice—the division's curators typically discuss potential acquisitions as a group. The P&P Division stated that there was general support for the purchase, and that the daguerreotype's price was considered. The curator assessed the value of the daguerreotype and confirmed that it was priced appropriately.

To purchase the Mexican War drummer, the curator prepared a hardcopy Memorandum of Recommendation (MoR).⁸ The MoR is a critical control point at the start of the acquisition process because it provides detailed information about the item, why it is being purchased, and how it is being purchased. The MoR also has a section to indicate that the P&P Division's Chief approved the acquisition.⁹ The P&P Division uses approved MoRs to create an initial bibliographic record containing preliminary information about the item in the Library's Integrated Library System (ILS).¹⁰ ILS is the Library's electronic database for bibliographic and other kinds of data about the Library's collection materials.

The P&P Division then submits approved, hardcopy MoRs to the Library's Acquisitions & Bibliographic Access Directorate (ABA). The ABA uses MoRs and the initial ILS bibliographic records to execute purchase orders, which are necessary to initiate purchases in ILS.¹¹ The ABA and the P&P Division retain copies of the MoRs. The OIG observed that the hardcopy MoRs are not automated, serialized, and electronically linked to the purchase order system in ILS, thereby limiting assurance that all approved MoRs become purchase orders.¹² This puts the P&P Division's approved acquisitions at risk of not being completed and of funds not being used for their intended purpose.¹³

⁸ As noted by Library of Congress Regulation 318-1, *Acquisition of Collection Materials by Purchase*, the MoR is used for acquisitions valued at \$1,000.00 or more. A separate form, the Request for Acquisition, is used for smaller purchases of \$999.99 and below.

⁹ Higher dollar value purchases also require approvals of higher ranking Library officials.

¹⁰ At this point in the acquisition process, the initial bibliographic record is suppressed in ILS and not made available to the public.

¹¹ MoRs are also used by ABA's special collections coordinator for all non-routine gifts being given to the Library.

¹² The *Principles of Auditing* notes that sequential numbering helps to account for all transactions. Walter B. Meigs [et al.], *Principles of Auditing 9th edition* (Boston: Irwin, 1989), pg. 161. Additionally, the Government Accountability Office's *Standards for Internal Control in the Federal Government* identifies sequential numbering as a control for accounting for transactions. See *Standards for Internal Control in the Federal Government*, September 2014, GAO-14-704G, page 47.

¹³ In reviewing a draft of this report, the P&P Division Chief acknowledged that an automated tracking system would be an improvement, but stated that the division mitigates the identified risk by tracking the division's 47 purchase orders on average per year "by hand" in a spreadsheet. The division compares that data with ILS acquisition data to identify orders that have not been placed and materials not received. The P&P Division is not the only division that uses MoRs.

The ABA is the recipient of most purchased acquisitions for the P&P Division and takes custody of them on behalf of the Library. For example, the U.S. Anglo Division/U.S. Monographs Section (USAN/USMON), within the ABA, tracks the custody of delivered rare and special materials using a hardcopy acquisitions log book.¹⁴ When an acquisition arrives, a P&P Division curator goes to ABA to examine the acquisition and sign off on accepting the material. Arrangements are also made to transport the acquisition to the P&P Division.¹⁵ In the acquisitions log book, USAN/USMON records information about the acquisition, including descriptive information about the material being acquired, its arrival date, and its transport out of ABA to the service unit responsible for the acquisition. The signature of the curator who accepted the acquisition and the purchase order number are recorded in the log book. After an acquisition leaves ABA, an ABA librarian updates the status of the purchase order in ILS.¹⁶

Once acquired materials arrive, the P&P Division starts to “process” them under the guidance of the Technical Services Section head. Processing for the P&P Division generally involves division technicians placing acquired materials into archivally safe storage boxes, “accessioning” the material,¹⁷ and creating an initial bibliographic record for them in ILS if needed.¹⁸ Accessioning represents when the division assumes custody for acquired materials. As part of accessioning, the division records certain information, such as the acquisition’s source, the acquisition type (i.e., purchase, gift, etc.), the quantity of material, and the type(s) of material(s) acquired. The act of accessioning was at one time documented by hand in hardcopy accession log books. Today, the P&P Division uses a stand-alone Microsoft Access electronic database to document its accessioning activities, including the date of ownership for all materials received. The OIG observed that the P&P Division relies on several electronic and hardcopy systems to manage data about its collection materials, including ILS, the accession log, and others, as outlined at a high level in Appendix B. Accessioned materials are given a sequential control number which serves as a temporary call number in ILS. To mitigate the risk of approved acquisitions not being completed, the P&P Division has a practice of reconciling approved MoRs against accession log records.

¹⁴ The OIG did not use the USAN/USMON acquisitions log book to test whether the P&P Division’s assets could be accounted for because there are many divisions within ABA that execute the P&P Division’s purchases and they are not codified in one log book that could be used to select a representative sample of all the division’s purchases. This issue is further addressed in Appendix A, the Objective, Scope, and Methodology section of this audit report.

¹⁵ The P&P Division curators are responsible for inspecting acquisitions for damage and comparing the shipment against the MoR to ensure that the correct material was provided. The P&P Division does not take custody of material that is damaged and coordinates with the sending party to obtain remediation.

¹⁶ Some acquisitions, such as gifts, are delivered directly to the P&P Division.

¹⁷ The verb “accession” is defined by the Society of American Archivists as taking legal and physical custody of records or other material and to formally document their receipt.

¹⁸ Non-purchased materials (e.g., gifts) may not have an initial bibliographic record created early in the acquisition process.

The P&P Division provided an example to illustrate the different roles played by ILS and the accession log. The Marian S. Carson Collection consists of about 10,000 items acquired through nine different transactions between 1992 and 2001. The accession log provides information about each of the nine different transactions, such as when and how the material was acquired. As the collection was processed, items and groups of items were cataloged in ILS using almost 1,000 separate catalog records. The ILS catalog records provide bibliographic descriptions that help researchers find and request the collection materials and enable P&P Division staff to locate them.¹⁹

The initial bibliographic records created in ILS are preliminary descriptions and are not considered complete until more detailed physical descriptions and subject information are added. For example, when a new acquisition has 500 or more items, a specialized P&P Division technician – known as an accessioner – typically estimates the number of items using industry standards.²⁰ This was the case when the P&P Division received a donation of approximately 250,000 rights-free, Congressional Quarterly and Roll Call (CQ/Roll Call) photographs; the photographs show Congress at work in news conferences and committee hearings from the 1980s to the 1990s, among other things. Nevertheless, the initial bibliographic record plays an important role in making acquired materials accessible to Library users. Once accessioning is completed, the accessioner makes the initial bibliographic record visible in ILS so that the information can be found by Library users through PPOC.²¹ PPOC is the P&P Division’s internet-accessible catalog that can display digitized images as well as provide searchable information on the division’s collection materials. By entering keyword searches, users can identify materials in the division’s collection. For example, at the time of our audit, the Mexican War drummer could be found using PPOC.^{22,23} Once identified, users can request to view the materials in the P&P Division’s reading room.

In mapping the P&P Division’s acquisition process, the P&P Division explained its use of an electronic bibliographic database that is separate from ILS. Because ILS originally lacked the capacity to effectively handle the descriptive information needed by the P&P Division for its collections, the division created a “Minaret” electronic database in the early 1990s. The Minaret database, although now considered a legacy system, currently holds the majority of the P&P Division’s bibliographic records. At the time of our fieldwork, the P&P Division

¹⁹ The OIG did not use the accession log to test whether the P&P Division’s assets could be accounted for given that an accession log entry could be associated with hundreds of ILS catalog records, as illustrated by the example of the Marian S. Carson Collection, and with collection materials stored in many different locations. More methodology information is available in Appendix A.

²⁰ According to the P&P Division, the counting standard used by the P&P Division was developed by the Smithsonian Institution.

²¹ <http://www.loc.gov/pictures/>

²² <http://www.loc.gov/pictures/item/2014655087/>

²³ The Mexican War drummer also appears in the Library’s online catalog, a module of ILS, which helps users locate descriptions of Library materials in all formats but does not display digital images.

Chief estimated that it would take about 8–10 years to fully migrate the division’s Minaret records to ILS, which has been upgraded over time and can better meet the division’s needs.²⁴

The P&P Division also uses hardcopy card catalogs. The P&P Division explained that bibliographic data on approximately 85,000 fine print cards, 50,000 artist poster cards, and 5,000 movie poster cards have yet to be transferred to ILS, hence limiting the amount of information available about these collections to Library users through PPOC. Accordingly, users would have to consult with a division librarian to obtain specific information about many fine prints and posters that still exist in the card catalogs.

²⁴ Our inquiries into this issue resulted in an ILS staff member being assigned to focus on the transfer of the P&P Division’s Minaret records to ILS.

I. The Prints and Photographs Division Accounted for All the Prints and Photographs Tested by OIG, but OIG Identified Some Areas That Need to be Addressed

To ensure that prints and photographs received by the Library are properly accounted for, OIG selected for examination: (1) a statistically representative sample of 167 collection materials using the P&P Division’s bibliographic records in ILS; (2) 30 judgmentally selected gifts acquired over calendar years 2001–2014 using MoRs in the Gift Office; and (3) ten judgmentally selected paper call slips taken from the P&P Division’s shelves. Outlined below are the results of these tests and OIG’s analysis of the P&P Division’s acquisition process. All test materials were located and verified, but OIG identified selected areas that need to be addressed.

Prints and Photographs Listed in ILS Were Accounted for by the Division

The OIG selected a statistically representative sample of 167 records that included both analog and digital materials from all of the bibliographic records maintained for the P&P Division in ILS.²⁵ ILS is the Library’s comprehensive bibliographic description and inventory control system. The Library uses ILS to support the acquisition, cataloging, circulation, and inventory of Library material. The P&P Division located and presented all of the test materials to the OIG for examination. Based on the test results, OIG concluded that the P&P Division can account for its collection materials as identified in ILS.

One of the test materials was a collection of 745 photomechanical prints identified in PPOC as being entitled “Views of

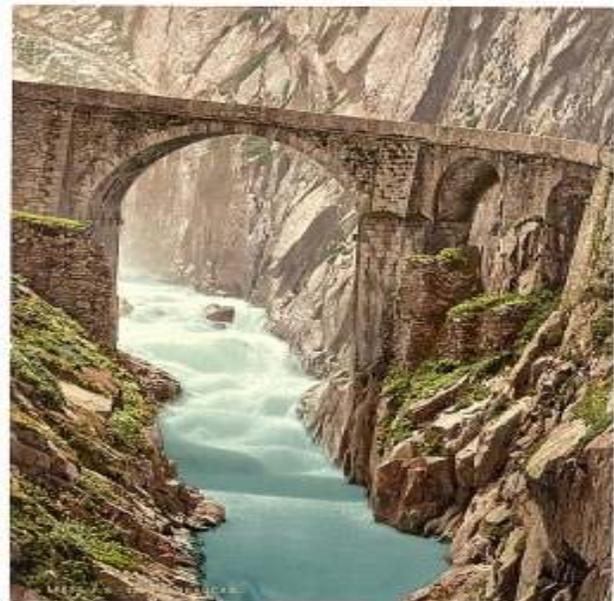


Image 2: Devil's Bridge, Andermatt, Switzerland
Source: Library of Congress, P&P Division

²⁵ The OIG received the assistance of the Library to obtain the ILS data needed to perform this test.

Switzerland.”²⁶ According to PPOC, one of the prints in the collection, as shown, is entitled “Devil’s Bridge, Andermatt, Switzerland.”²⁷ It was created between about 1890 and 1900. The division’s photochrom print collection has almost 6,000 views of Europe and the Middle East and 500 views of North America. These prints were created by the Photoglob Company in Zürich, Switzerland, and the Detroit Publishing Company in Michigan. The images are usually 6.5 x 9 inches.

Prints and Photographs Acquired as Gifts Were Accounted for by the Division

In the second test, OIG judgmentally selected 30 gifts acquired by the P&P Division over calendar years 2001–2014 using the paper files maintained by the Library’s Gift Office, which is administratively part of the USAN Division.²⁸ The OIG examined gift acquisitions because they were a significant segment of the materials acquired by the P&P Division. For example, based on the P&P Division’s internal records, approximately 73 percent of its total acquisitions in FY 2014 were gifts.²⁹ As defined by the Library, a gift is “a voluntary transfer of collection materials made without consideration, and evidenced by offer, acceptance, and delivery.”³⁰



Image 3: United States Capitol from N.E., most beautiful building in America, Washington
Source: Library of Congress, P&P Division

²⁶ The collection “Views of Switzerland” is located in “LOT” 13410; a LOT is a group of images related to one another by provenance, creator, subject, or format. The PPOC entry for LOT 13410 is -- <http://www.loc.gov/pictures/item/2001700653/>. A container list of the images comprised in the LOT is available in the P&P Division’s reading room.

²⁷ <http://www.loc.gov/pictures/item/2001701096/>. The OIG examined the “Views of Switzerland” collection, but not the “Devil’s Bridge, Andermatt, Switzerland” print. At times, test materials were not a specific item, but a collection of multiple items. This was the case for the “Views of Switzerland” collection, which had 745 items. When this occurred, we verified custody and judgmentally selected an item within the collection to determine whether it was representative of the collection’s description. The OIG did not examine every item in part because the collections often did not have a full accounting of all items in ILS. This is further addressed in Appendix A.

²⁸ For the purpose of this report, the term “Gift Office” refers to a special collections coordinator in the USAN Division who manages donor files and other gift-related activities.

²⁹ After completing the audit’s fieldwork, OIG obtained the P&P Division’s annual report for FY 2015, which indicated that approximately 58 percent of the division’s total acquisitions were gifts in FY 2015.

³⁰ Library of Congress Regulation 317-1, *Acquisition of Collection Materials by Gift*, Section 1.

The P&P Division located and presented all of the test materials to the OIG for examination.

The photographic print shown on page 8 was included in the test; it was listed in PPOC as a stereograph card. The print, created in approximately 1904, is entitled “United States Capitol from N.E., most beautiful building in America, Washington.”³¹ Stereographs consist of two nearly identical photographs, paired to produce the illusion of a single three-dimensional image, usually when viewed through a stereoscope.

Prints and Photographs Removed via Call Slips Were Accounted for by the Division, but the Division Needs to Strengthen Its Call Slip Practices

The P&P Division uses both automated and hardcopy call slip systems, such as an automated ILS circulation system used to charge out items that go on display for exhibits at the Library. For the purposes of the third test, OIG focused on the P&P Division’s hardcopy call slip system. We judgmentally selected ten paper call slips to examine the division’s tracking and accounting of the materials associated with the slips. The P&P Division located and presented all ten of the test materials to OIG for examination. However, OIG concluded that the P&P Division should strengthen its call slip practices in order to improve its collections control and inventory management.

Visitors of the P&P Division’s reading room can request access to an item in the division’s storage area by manually completing a paper call slip. The division’s call slip form has fields for the requester’s printed name, signature, and seat number in the reading room, as well as the date of the request. The call slip also has fields for the item’s call number (i.e., a numeric or alphanumeric identifier), location in the storage area, and title; it also has a field for descriptive information (e.g., artist, photographer, author, publisher, etc.). After being handed the call slip, a member of the P&P Division’s staff reviews the call slip, locates the requested item, and pulls it off the shelf. When doing so, the staff member places the call slip on the shelf where the item was being stored to indicate the item’s status and whereabouts. Call slips are also used in a similar manner when collection materials are used for Library exhibits.

When conducting the test, OIG identified several areas that should be strengthened in the P&P Division’s use of call slips. For example, OIG observed one instance in which the official call slip form was not used. In three other instances, call slips had, respectively, inaccurate information (i.e., about the location of the removed item), indecipherable information, and incomplete information (e.g., information was not provided in the location field). In another instance, the call slip identified the removed item as having been served to a

³¹ <http://www.loc.gov/pictures/item/2003671064/>

Library employee in the division's reading room nearly one year earlier. The OIG determined that the item was located in a different part of the Library for an exhibit. Additionally, a call slip had been on a shelf for approximately 30 years. The P&P Division investigated and reported to OIG that the item had been removed for rehousing and relocated, but the call slip had not been taken from the shelf when it was relocated.

The OIG attributed these issues in part to the P&P Division having unclear requirements related to call slip-related activities. The Library of Congress Regulation (LCR) 610-2, *Security of the Collections: Use*, calls for procedures for providing and maintaining collections security. It defines "collection security" as "the administration of continuing effective security controls of Library materials while in process, in storage, in use, or on exhibit. These controls are designed to safeguard against theft, loss, misplacement, or damage resulting from inadequate bibliographic and inventory control..."³² The OIG identified different call slip-related requirements documented at different times that did not provide consistent guidance and that were in draft form.³³ The condition of the division's call slip requirements made them unclear and difficult to enforce. To improve these security-related controls, the OIG recommends that the P&P Division develop and implement in final form a division-wide policy and associated procedures to ensure consistent call slip-related activities and to facilitate management's ability to hold division personnel accountable for meeting these requirements.³⁴

The OIG also found that the P&P Division needs to strengthen its physical control of collection materials removed via call slips. The P&P Division told OIG that it had not analyzed its call slip records in years due to limited staff resources. The OIG determined that one obstacle to analyzing call slip data is the P&P Division's lack of a central electronic database tracking all of the materials removed via call slips, and that call slips are not numerically and sequentially controlled. This prevents the division from having readily accessible, comprehensive information about the materials removed via call slips, such as information on their current locations and how long they have been removed from their storage shelves.

To strengthen its collections control and inventory management, the OIG recommends that the P&P Division start conducting regularly scheduled inventories that involve comparing the division's call slip records to the physical

³² LCR 610-2, *Security of the Collections: Use*, Section 2, Part A.

³³ The OIG identified call slip requirements for processing and cataloging personnel and separate requirements for reference librarians. The processing and cataloging requirements were dated 2002. The reference librarian requirements were dated 2014. Additionally, the guidance was not consistent. For example, the processing and cataloging guidance states "check shelves, boxes, drawers for call slips older than 1 year," but this was not in the reference librarian guidance. This practice, if effectively implemented, could have potentially alerted division management to the 30-year-old call slip.

³⁴ The Government Accountability Office's *Standards for Internal Control in the Federal Government* state, "Management periodically reviews policies, procedures, and related control activities for continued relevance and effectiveness in achieving the entity's objectives or addressing related risks." See *Standards for Internal Control in the Federal Government*, September 2014, GAO-14-704G, page 56.

assets that were removed, with special attention to confirming the removed materials' locations. Through periodic inventories, division management could confirm that call slips are completed in compliance with policies and procedures and strengthen its physical control over collection materials removed via call slips. The P&P Division's oversight activities should be outlined in the P&P Division's new division-wide call slip policy and associated procedures. The OIG also recommends that the P&P Division serially control its call slips and the Library should consider options for developing a central electronic database of materials removed via call slips to improve tracking capability.

The Library Should Streamline Its Processes Via System Updates

The Library can gain efficiencies by restructuring the processes and technology used for ingesting material. When mapping the workflow of the P&P Division's acquisition process, the OIG identified limitations that make the division's acquisition process less efficient and effective.

- The OIG found that MoR forms are not automated, serialized, and electronically linked to the purchase order system in ILS, as discussed on page 3. MoRs are not initiated through ILS, electronically approved at the appropriate levels, automatically used to initiate a purchase order, nor serially controlled.³⁵
- Because the P&P Division's accession log is a stand-alone electronic database, the division's accessioner has to record acquisition data in the accession log and again in ILS, making the accessioner's work duplicative to some extent.
- The P&P Division explained that when many different items in a large collection share descriptive information, it needed the Minaret software to generate records in bulk and load them into ILS. Otherwise, without Minaret, the P&P Division's technicians would have to enter the same descriptive information for each item into separate ILS records one at a time.

The OIG learned during the audit that the Library is in the preliminary stages of evaluating whether to purchase a new system to replace the current ILS.³⁶ According to the Library's Information Resource Management (IRM) Plan,³⁷ the P&P Division's information requirements should be taken into consideration. The IRM Plan states, "As each service unit develops plans on how to meet its mission objectives, those plans are analyzed to understand the requirements for

³⁵ The Library has been working to automate its "request for acquisition" process for a number of years. The Library may want to conduct monthly reconciliations of MoRs and purchase orders until the project is funded and completed.

³⁶ Funding for the next generation of ILS is under review for the inclusion in the Library's FY 2018 budget request.

³⁷ Library of Congress Information Resource Management Plan, Version 1.0, February 19, 2010, page 4. The Library's IRM plan addresses information requirements in the context of planning and enterprise architecture activities. It states that it was "designed to be implemented across the Library and it applies to all Library organizations, systems and information technology investments. Accordingly, the organizational scope of the IRM plan includes all service and support units of the Library of Congress."

future business processes, information, systems and information technology infrastructure. That “to-be” picture of the Library is described in the target state of the Enterprise Architecture, along with guidelines and standards designed to assist the Library in achieving that target state.”^{38,39,40} In light of the Library’s IRM Plan, OIG recommends that the Library ensure that the P&P Division’s information-related requirements have been identified and taken into consideration when evaluating possible replacements to the current ILS. Efforts to identify the division’s requirements were underway at the time of this audit.

³⁸ Ibid, page 4.

³⁹ The Library’s policy and responsibilities related to IRM are outlined in LCR 1600, *Information Resource Management Policy and Responsibilities*.

⁴⁰ Also, the Government Accountability Office’s *Standards for Internal Control in the Federal Government* notes the importance of management designing information systems that “obtain and process information to meet each operational process’s information requirements...” See *Standards for Internal Control in the Federal Government*, September 2014, GAO-14-704G, page 51.

II. The Prints and Photographs Division Has Not Been Able to Timely Process Acquired Materials

Data from FY 2005 to FY 2014 show that the P&P Division had a growing “working backlog” of acquired materials, referred to as an “arrearage” for the purposes of this report. The Library has defined arrearage as material that has been in an in-process state for longer than a reasonable amount of time. This poses a risk for theft, damage, and loss because unprocessed materials lack adequate bibliographic, inventory, and security controls.⁴¹ At the time of our fieldwork, OIG determined that the P&P Division would need approximately 40–60 years to eliminate its current arrearage, as discussed below.

Arrearages are common in museums and archival libraries. Anecdotally, there are instances where unprocessed items decades-old were rediscovered and found to provide valuable information to researchers.⁴² The OIG does not take a position on the correct arrearage level that the Library can or should maintain, but the OIG does recommend that the Library establish a sustainable level of arrearage. To start, as discussed below, the Library and the P&P Division should conduct an assessment of the risks posed by the P&P Division’s growing arrearage and respond accordingly with a mitigation plan. The Library should further examine its strategic plan, policies, procedures, and other parts of its internal control system as needed to determine whether Library-wide internal controls adequately respond to the risks posed by arrearage, including establishing a sustainable level of arrearage. Arrearage poses significant long-term business and budget implications and has systemic ramifications; the Library uses resources to house and process its arrearage and to make arrearage materials accessible (e.g., physical infrastructure, personnel, and information technology resources).

The Prints and Photographs Division’s Collection Has Grown Over Time and Is a Sizable Portion of the Library’s Collection Overall

As shown in Figure 1, from FY 2010 to FY 2014, the collection has grown about 10 percent to a total estimated size of 15,632,376 items, according to the division’s data. This figure includes both processed and unprocessed collections. An item may be a single physical piece or digital file; it could also be an album of photographs or a sketchbook of drawings. According to the Library’s FY 2014 *Annual Report of the Librarian of Congress* (Annual Report), the Library’s collection had 160,775,469 items overall, making the P&P Division’s collection

⁴¹ The OIG has reported previously on the risks posed by the Library’s arrearage. See *Library Services: The Library Collects Extensively but Faces Increasing Challenges in Processing, Controlling, Storing, and Making Accessible All It Collects*, Report No. 2013-SP-102, September 2013.

⁴² For example, a rare letter written by the poet Walt Whitman for a wounded Civil War soldier was found in the National Archives by a volunteer who was preparing 150-year-old files to be digitized and placed online. This letter is one of only three known to exist. See <http://www.archives.gov/research/military/civil-war/walt-whitman.html>.

approximately 10 percent of the Library’s collection. The Library has reported on the quantity of its prints and photographs in the Annual Report at least as far back as 1897. The Library reported at that time that it had 54,236 engravings, etchings, photographs, lithographs, prints, etc.

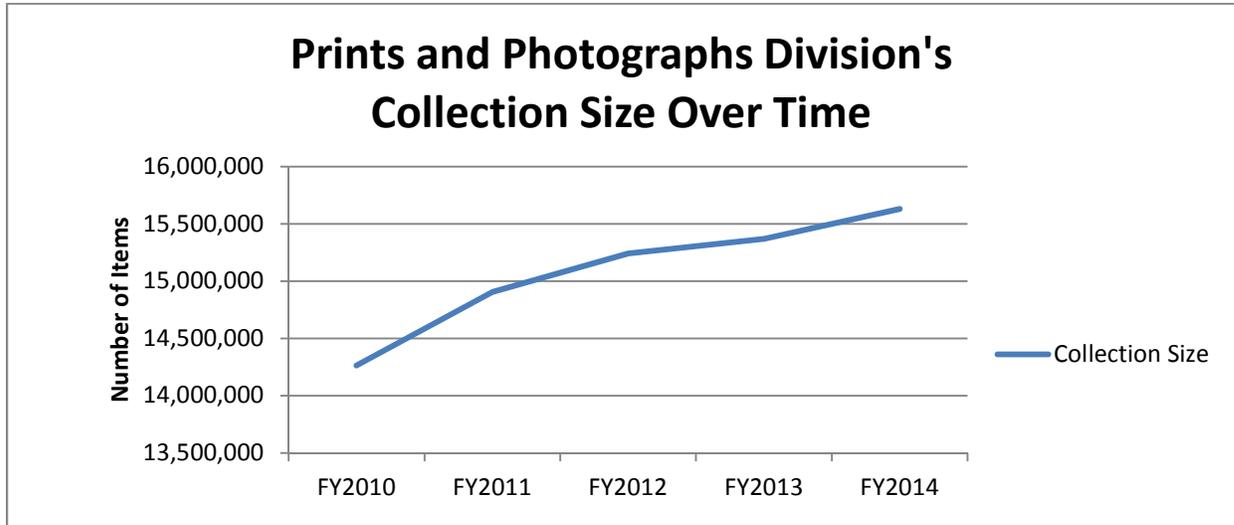


Figure 1: Prints and Photographs Division’s Collection Size Over Time
Source: P&P Division’s FY 2014 Annual Report

In conducting the audit, the OIG determined that the P&P Division does not know precisely the size of its collection; the 15,632,376 figure represents an estimate. The OIG noted that the Library did not qualify this amount or the 160,775,469 amount representing the overall size of the Library’s collection as an estimate in its FY 2014 Annual Report.

The Prints and Photographs Division’s Arrearage Has Grown Significantly Over Time and Will Take Decades to Eliminate

From FY 2005–FY 2014, the P&P Division did not keep pace with processing new acquisitions and its arrearage grew significantly as a result. Figure 2 shows that the P&P Division’s inflow of acquired materials has outpaced its processing-related activities. Specifically, the figure compares the amount of total acquisitions to the total number of clearances each fiscal year from FY 2005 to FY 2014. “Total acquisitions” includes materials acquired through purchases, gifts, etc. “Total clearances” refers to materials that have been processed and that are no longer considered by the division to be part of its arrearage. The figure shows that total acquisitions exceeded total clearances nearly every year. In sum, based on the data underlying Figure 2, the P&P Division acquired about 1,790,680 items and cleared about 649,349 items; this represents about 2.76 times more acquisitions than clearances.

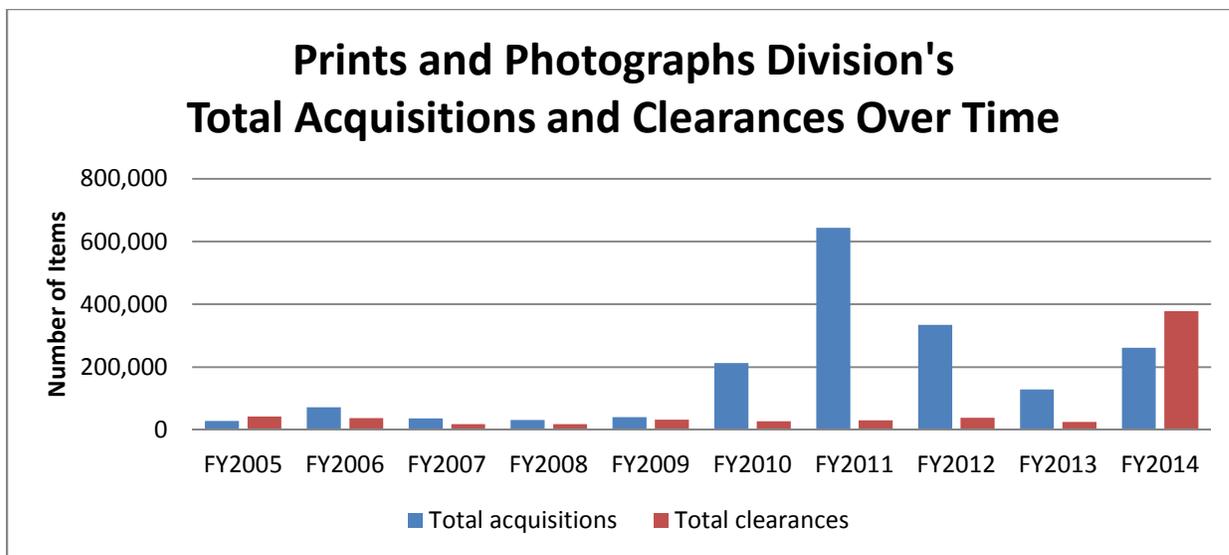


Figure 2: Prints and Photographs Division’s Total Acquisitions and Clearances Over Time
Source: P&P Division’s Key Indicator data FY 2005-FY 2014

There were spikes in total acquisitions and total clearances as shown in Figure 2. The spike in acquisitions in FY 2011 for example was attributable in part to the P&P Division purchasing 500,000 rights-free architectural photographs taken by Balthazar Korab, who according to the division has become one of the most respected architectural photographers in the United States.⁴³ The spike in FY 2012 was attributable in part to the P&P Division receiving the CQ/Roll Call donation of 250,000 rights-free photographs. The spike in total clearances in FY 2014 was attributable, in part, to the division temporarily being assigned extra personnel who assisted with processing the CQ/Roll Call donation.

The P&P Division identified its unprocessed materials as “arrearage” in its earlier annual reports and in interviews with OIG, but the Library assessed the division’s unprocessed materials as a “working backlog” in 2005 and then stopped referring to it as an arrearage in its Annual Reports to Congress. The Library submitted a report to Congress in 1989 entitled *Unprocessed Arrearages of the Library of Congress*⁴⁴ that documented the P&P Division as having a significant portion of the Library’s total arrearage; pictorial materials were estimated to be 34 percent of the Library’s total arrearage. The report provided a definition of arrearage:

3. Arrearages are library materials that have been in an in-process state for longer than a reasonable amount of time, or which are not expected to be processed within the foreseeable future. (The in-process state begins upon the Library’s receipt of the item and ends when complete processing has

⁴³ The P&P Division had not fully processed the Balthazar Korab collection at the time of our fieldwork based on OIG’s review of PPOC entries for the collection.

⁴⁴ See the Library of Congress report submitted to the House and Senate Committees on Appropriations, *Unprocessed Arrearages of the Library of Congress*, December 1, 1989.

been accomplished and the object has been placed in the location from which it will be served.) The “reasonable” time will vary according to the type of material, the extent of the processing, or other factors.⁴⁵

However, by April 2005, the Library determined that more than ten million pictorial items had been cleared from the P&P Division’s arrearage, a reduction reportedly of about 77 percent, and consequently the division’s remaining unprocessed material was renamed a “working backlog.”

Figure 3 shows that the division’s arrearage has grown significantly. According to OIG’s analysis of the division’s data, the arrearage grew from approximately 2,951,824 items at the close of FY 2005 to about 4,107,236 items at the close of FY 2014. This was an increase of over 1.1 million items and represented an increase of about 39 percent.

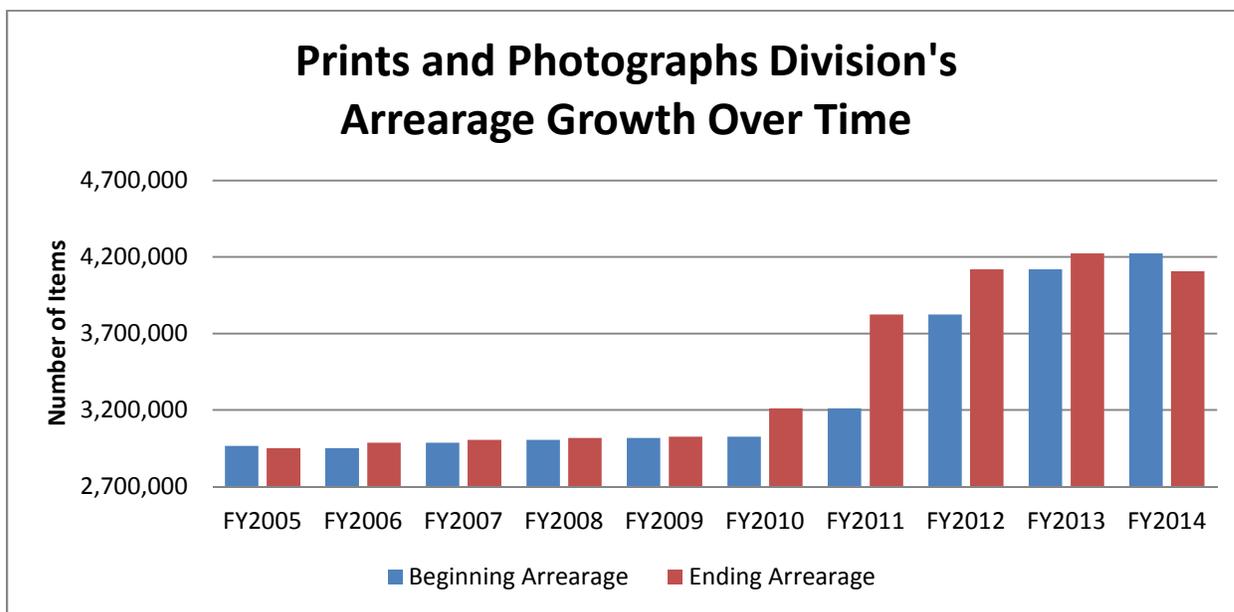


Figure 3: Prints and Photographs Division’s Arrearage Growth Over Time
Source: P&P Division’s Key Indicator data FY 2005-FY 2014

The OIG determined that it will take the P&P Division decades to eliminate its FY 2014 arrearage. The P&P Division estimated in 2005 that the division aimed to eliminate approximately 100,000 items per year from its arrearage.⁴⁶ By this estimate, it would take about 41 years for the division to eliminate its FY 2014 arrearage of 4,107,236 items. The P&P Division may want to revisit the 100,000 items per year estimate because OIG found that the division had “total clearances” of approximately 65,000 items per year from FY 2005 to FY 2014. At this lower rate, it would take about 63 years for the division to eliminate its FY 2014

⁴⁵ Ibid, page 4.

⁴⁶ The P&P Division did not have a more recent estimate of how many items it was aiming to eliminate per year from its arrearage. The division noted that it would like to sustain this pace or do better, but that this would require additional staff.

arrearage. The P&P Division was aware of its arrearage problem and stated that it has tried to reduce the rate of its acquisitions to help address the arrearage; it has also asked for approval to fill technician vacancies.^{47, 48}

The OIG Was Not Able to Identify the Primary Driver of the Prints and Photographs Division’s Growing Arrearage

The OIG identified factors that contributed to the growth of the P&P Division’s arrearage, but was not able to identify a primary driver for the growth. One factor is the number of items collected year-to-year and another, as highlighted, was the division’s reduction in staff. Figure 4 below illustrates the growth in arrearage in comparison to reduction in staff from FY 2005 to FY 2014. Over this period of time, the size of the division’s staff declined about 29 percent or from 49 to 35 staff members, according to the division’s internal records.⁴⁹ In particular, the P&P Division told OIG that a lack of processing technicians and catalogers led to the significant increase in the division’s arrearage. Over the same time period, the Library’s total number of personnel, as measured by full-time equivalents (FTEs), declined about 21 percent from 4,115 to 3,248 FTEs.

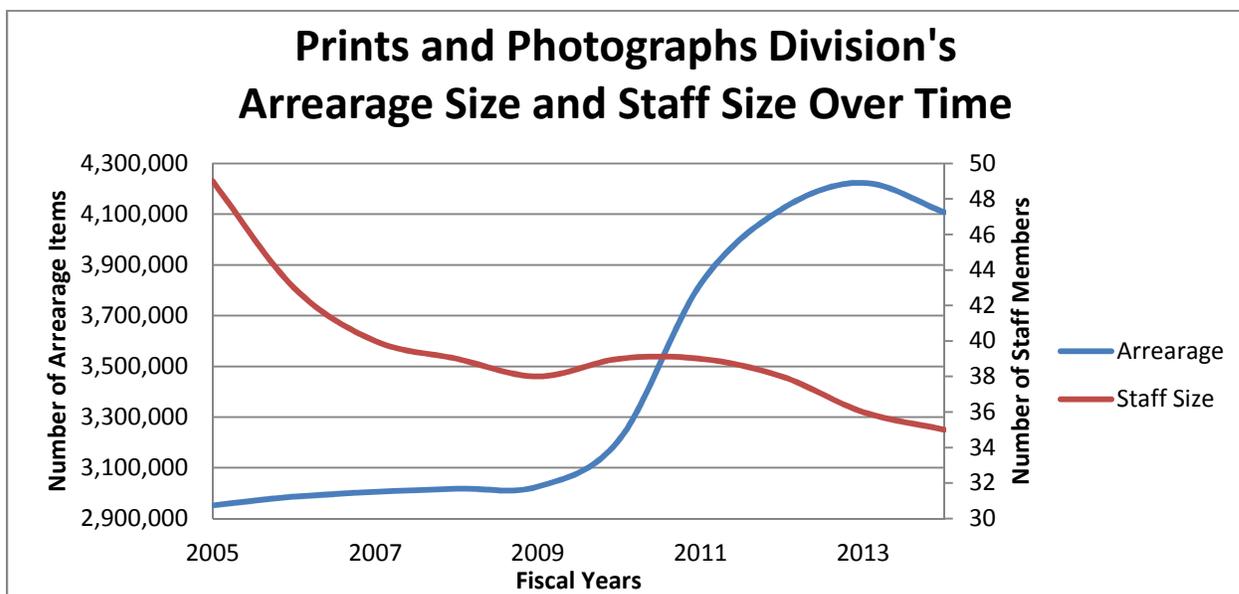


Figure 4: Prints and Photographs Division’s Arrearage Size and Staff Size Over Time
Source: P&P Division’s Key Indicator data FY 2005-FY 2014

The P&P Division also told OIG that it has had to balance processing needs with the demands of other priorities, such as digitizing the division’s collection for

⁴⁷ The P&P Division’s FY 2015 annual report, which was available after OIG completed its fieldwork, showed that the division’s arrearage continued to grow. For FY 2015, the P&P Division acquired a total of 76,577 items (down from 261,893 the previous year) and cleared a total of 11,457 (down from 378,486 the previous year), which resulted in the division’s arrearage growing by 65,120 items.

⁴⁸ In response to this report, the Library approved filling four vacated technician positions in the P&P Division.

⁴⁹ The Library does not have full-time equivalent data by organizational unit, such as the P&P Division.

preservation purposes and to make it more easily accessible. Additionally, preparing collection materials for a move from the Library's facilities in Landover, Maryland to Ft. Meade, Maryland has drawn resources away from addressing the division's arrearage.

The Library and the Prints and Photographs Division Should Identify, Analyze, and Respond to the Risks Posed by Arrearage

In 2005, the Library assessed the risks associated with the division's arrearage as having declined to the point where it would be characterized going forward as a working backlog. However, as stated above, it has grown since that time by about 39 percent and by over 1.1 million items, thereby justifying another assessment of the risks posed by the P&P Division's arrearage. The P&P Division told OIG that some activities have already been taken in response to risks, such as developing lists to track arrearage collections at a finer level of granularity and serving unprocessed materials by appointment only. This allows staff to preview the material beforehand and sit with Library users during the appointment to reduce the risk of misfiling and loss. The OIG recommends that the Library and the P&P Division assess again the risks posed by the P&P Division's arrearage and respond accordingly with a mitigation plan.

The OIG previously reported in September 2013 that the Library generally has not kept pace with processing new acquisitions and that arrearage materials pose an internal control risk to the Library.⁵⁰ This is in part because items that are unprocessed generally lack bibliographic, inventory, and security controls. Bibliographic and inventory controls allow the Library to track and account for materials as well as connect users with the Library's resources. Security controls, such as marks and labels, are applied to newly acquired materials to help protect them. Arrearage materials are not fully marked to identify them as Library property, putting them at greater risk of being stolen, lost, or forgotten.

The OIG also recommends that the Library examine its strategic plan (e.g., the plan's objectives and performance measures), policies, procedures, and other parts of its internal control system to determine whether Library-wide controls adequately respond to the risks posed by arrearage, including establishing a sustainable level of arrearage. The Government Accountability Office's (GAO) *Standards for Internal Control in the Federal Government (Standards)* state that an entity determines its mission, sets a strategic plan, establishes entity objectives, and formulates plans to achieve its objectives.⁵¹ Internal control provides reasonable assurance that the objectives will be achieved; it comprises the plans, methods, policies, etc. used to fulfill the mission, strategic plan, and objectives.

⁵⁰ *Library Services: The Library Collects Extensively but Faces Increasing Challenges in Processing, Controlling, Storing, and Making Accessible All It Collects*, Report No. 2013-SP-102, September 2013.

⁵¹ *Standards for Internal Control in the Federal Government*, September 2014, GAO-14-704G, page 7.

The OIG reviewed the Library's strategic plan for FY 2016 to FY 2020 and concluded that the plan's "Strategy 2" was applicable to ensuring the security of collection materials. Strategy 2 is to "acquire, preserve, secure, and provide access to a universal collection of knowledge and the record of America's creativity."⁵² However, as currently documented, some of the specific terms of Strategy 2 were unclear, such as who is to achieve the strategy and the time frames for achievement. Strategy 2 was also not defined in measurable terms so that performance could be assessed. Subsequent to our fieldwork, but prior to the issuance of the OIG's draft audit report, the OIG followed-up with regard to performance measures and learned that two measures had recently been approved. One targeted the elimination of a small type of arrearage and the other proposed the development of a plan to reduce the Library's manuscript arrearage because the manuscript arrearage was the Library's largest area of arrearage. Additionally, the OIG was unable to identify any Library-wide policies, procedures, or other guidance that outlined management's directives related to arrearage.⁵³

Arrearage may very well be a part of any agency like the Library, such as a museum or archival library. However, the Library's arrearage poses significant long-term business and budget implications and has systemic ramifications; the Library uses resources to house and process its arrearage and to make arrearage materials accessible (e.g., physical infrastructure, personnel, and information technology resources).

The OIG's September 2013 report identified options for consideration with regard to the Library generally acquiring materials faster than it can process them.⁵⁴ These were not recommendations. For the long-term, OIG suggested two options for Congress, but the Library may want to pursue these options:

Require the Library to create a system-wide strategy that marries future collections efforts to its ability to timely process, properly store, and make accessible the material it acquires. This strategy may require Congress to establish changes in how the Library collects, such as only digitally for newly copyrighted materials, and the amount it collects in any given year; it may require the Library to aggressively pursue additional private monies to provide for housing and processing its collections, rather than totally relying on congressional funding; and it may require other tactics such as expanding the Library's internship programs with colleges and universities in preservation and cataloging.

⁵² *The Library of Congress Strategic Plan, FY2016 through FY2020, Serving the Congress and the Nation, Strategy 2*, page 15.

⁵³ The Library has "processing of materials" regulations, which relate indirectly to arrearage. For example, LCR 411-1, *Priorities in Cataloging Within Cataloging Levels*, establishes priorities governing the cataloging and re-cataloging of materials. However, OIG found no guidance related directly to managing an arrearage.

⁵⁴ *Library Services: The Library Collects Extensively but Faces Increasing Challenges in Processing, Controlling, Storing, and Making Accessible All It Collects*, Report No. 2013-SP-102, September 2013.

Create a board similar to that required in the National Recording Preservation Act of 2000 that can develop, among other things, a coordinated national acquisitions and collections policy and “trusted partnerships” with organizations in the public and private sectors, similar to arrangements that other national libraries have made.⁵⁵

More specifically, OIG recommends that the Library include arrearage data for prints and photographs material in its Annual Reports to Congress.⁵⁶ Arrearage has historically been an area of concern for Congress, as evidenced by the Library being directed by Congress to submit the 1989 report *Unprocessed Arrearages of the Library of Congress*.⁵⁷ According to OIG’s analysis of the data, the Library would have reported a 19 percent larger total arrearage to Congress in FY 2014 if the Library had incorporated the P&P Division’s arrearage. Instead of reporting an arrearage of 21,632,919 items, it would have reported an arrearage of 25,740,155 items.

⁵⁵ Ibid, pages vii-viii.

⁵⁶ As stated in the Library’s FY 2014 Annual Report in the footnote for “Table 6. Unprocessed Arrearages” on page 85, “Print material, maps, pictorial materials and rare books are no longer considered arrearage. Remaining work on hand will be processed by regular staff, not as part of arrearage reduction. The moving image arrearage includes approximately 300,000 still images from the silent-film era purchased late in the previous fiscal year for custody in the Motion Picture, Broadcasting, and Recorded Sound Division.”

⁵⁷ See the Library of Congress report submitted to the House and Senate Committees on Appropriations, *Unprocessed Arrearages of the Library of Congress*, December 1, 1989.

Recommendations

We recommend:

- 1) The P&P Division should develop and implement in final form a division-wide policy and associated procedures to ensure consistent call slip-related activities and to facilitate management's efforts to hold division personnel accountable for meeting these requirements.
- 2) The P&P Division should start conducting regularly scheduled inventories that involve comparing the division's call slip records to the physical assets that were removed, with special attention to confirming the removed materials' locations. These oversight activities should be outlined in the new division-wide call slip policy and associated procedures.
- 3) The P&P Division should serially control its call slips and the Library should consider options for developing a central electronic database of materials removed via call slips to improve tracking capability.
- 4) The Library should ensure that the P&P Division's information-related requirements have been identified and taken into consideration when evaluating possible replacements to the current ILS.
- 5) The Library and the P&P Division should conduct an assessment of the risks posed by the P&P Division's growing arrearage and respond accordingly with a mitigation plan.
- 6) The Library should examine its strategic plan (e.g., the plan's objectives and performance measures), policies, procedures, and other parts of its internal control system to determine whether Library-wide controls adequately respond to the risks posed by arrearage, including establishing a sustainable level of arrearage.
- 7) The Library should provide the P&P Division's arrearage data along with the Library's other arrearage data in its Annual Reports to Congress.

Appendix A: Objectives, Scope, and Methodology

The audit's scope involved the Prints and Photographs (P&P) Division and its administrative and accounting controls over its collections. Our specific objectives were to examine (1) the criteria guiding the P&P Division's acquisition process, (2) the P&P Division's mechanisms for tracking and accounting for the items acquired, and (3) how the performance of the P&P Division's acquisition efforts are assessed. The Office of the Inspector General (OIG) has reported on collections-related issues previously.⁵⁸ We initiated this audit in February 2014 and our fieldwork activities were completed in July 2015.

Audit methodologies included in-person interviews, document analysis, inspections, data analysis, and tests, as outlined in this report, of the P&P Division's controls for tracking and accounting for its acquisitions. Over the course of our audit, OIG interacted mainly with members of the P&P Division management and staff. We conducted extensive interviews to understand the division's acquisition process. We also conducted interviews with staff located in other Library Services' offices as needed, including the Acquisitions and Bibliographic Access Directorate (ABA) and the Technology Policy Office. We performed some interviews outside of Library Services, such as with the then Office of Strategic Initiatives, for clarification purposes.⁵⁹ Additionally, OIG reviewed laws and regulations, policies, strategic plans, annual reports, and other records related to our audit objectives. We also examined the P&P Division's reading room in the Library's James Madison (Madison) Building and the division's storage locations in the Madison Building and the John Adams Building in Washington, District of Columbia and offsite storage facilities in Ft. Meade and Landover, Maryland. The OIG also analyzed data. This included examining bibliographic data for accuracy and reliability.

During the initial phase of the audit, OIG documented the workflow of the P&P Division's acquisition process to identify the associated internal control structure.⁶⁰ As part of this effort, OIG reviewed the processes used by the U.S. Anglo Division/U.S. Monographs Section (USAN/USMON) to make purchases and the Library's Gift Office to facilitate the acquisition of gifts. Both offices are located within ABA. The OIG reviewed purchases made by USAN/USMON because it manages the majority of the division's purchases. We reviewed gifts

⁵⁸ *Library Services: The Library Collects Extensively but Faces Increasing Challenges in Processing, Controlling, Storing, and Making Accessible All It Collects*, Report No. 2013-SP-102, September 2013; *Library Services-Asian Division: Opportunities Exist to Improve the Security and Management of the Asian Division Collections*, Report No. 2011-PA-108, September 2012; *ILS Workflow*, Project No. 2009-SP-101, October 2011; and *Library Services: The Library's Collections Acquisition Strategy: Effective, but Some Improvements Are Needed*, Report No. 2006-PA-104, December 2006.

⁵⁹ The Office of Strategic Initiatives was dissolved as part of a reorganization in fiscal year 2016.

⁶⁰ The acquisition workflow was documented in a narrative table and reviewed by the Library to confirm its accuracy.

acquired through the Gift Office because of its responsibility for coordinating major gifts for the Library.

The OIG designed four exploratory tests to examine the P&P Division's mechanisms for tracking and accounting for its acquisitions. We examined an acquisitions log provided by USAN/USMON; Memorandum of Recommendation (MoR) forms located in the donor files in the Library's Gift Office, which is administratively part of the USAN Division; Integrated Library System (ILS) bibliographic records associated with P&P Division's collection materials; and the P&P Division's materials located in its physical inventory. The OIG used the lessons we learned during the exploratory testing to develop the tests performed during the fieldwork phase of the audit.

For each exploratory test, OIG judgmentally selected analog and digital materials acquired by the P&P Division as purchases and gifts. The OIG included both purchases and gifts because they comprised the bulk of the P&P Division's annual acquisitions. The OIG intended to narrow the scope to acquisitions made in fiscal years (FY) 2010–2014, although that was not always possible, such as when OIG selected materials during the physical inventory test.

The OIG examined whether selected materials were accounted for across different points in the acquisitions workflow by examining different kinds of acquisition-related documentation. For each selected material, OIG reviewed and documented the MoR, ILS bibliographic record, and purchase order (PO), if applicable.^{61,62} The accession record, located in the P&P Division's Microsoft Access database, was also reviewed and documented. The OIG also documented the processing status, specifically whether the material was processed or unprocessed. Additionally, OIG checked the Prints and Photograph's Online Catalog (PPOC) to determine whether the test materials were searchable online.

The OIG also determined whether the materials could be located in the P&P Division's inventory. When the division provided the selected materials to OIG for examination, they were photographed. Some of the materials selected during the exploratory tests, as well as the materials selected later during the fieldwork tests, were not a single item, but a collection of multiple items. For example, OIG selected material during fieldwork testing that was a collection of approximately 50,000 items. In such cases, OIG did not examine every item in the collection. This was in part because when a collection had not been fully processed the P&P Division would not have a full, item-level accounting of all the collection's materials in ILS.

⁶¹ The PO information and bibliographic records were accessed in ILS by the OIG.

⁶² The OIG reviewed MoRs and accession records located in the P&P Division's records. The OIG also reviewed MoRs located in the Gift Office's records.

In the first test, OIG judgmentally selected ten entries from the USAN/USMON acquisitions log that represented rare and special materials purchased on behalf of the P&P Division.⁶³ We selected materials with an estimated value of over \$1,000 because they were higher value and planned to pick materials that were purchased in FYs 2010–2014, two per year, during the July–September timeframe. We wanted to focus on the July–September timeframe because it represented the end of the fiscal year when OIG believed the majority of purchases would be most likely to occur. As part of the test, OIG examined the MoRs and accession log records, which were provided by the P&P Division. The P&P Division presented materials for nine of the entries to OIG for examination. In the case of the tenth entry, the material had been loaned to another part of the Library for an exhibit; the OIG examined the paper call slip that had been left where the material was removed.⁶⁴

Through the exploratory test, OIG determined that there were several limitations to using the USAN acquisitions log for testing the P&P Division’s tracking and accounting of acquisitions. As a result, OIG decided not to perform such a test during the fieldwork phase of the audit. The OIG learned that the acquisitions log did not capture the purchase date of the materials, just the arrival date, which prevented OIG from being able to select acquisitions based on when they were purchased. The log’s data fields were the arrival date for the purchased material, the PO number, vendor information, a material description, the estimated value of the purchase, and the names of the purchasing department and recommending officer responsible for the acquisition.⁶⁵ Additionally, OIG learned that the P&P Division’s purchases are executed by several divisions within ABA, not just USAN/USMON, and that the purchases collectively are not codified in one acquisitions log that could be used to select a representative sample of all the P&P Division’s purchases. The USAN/USMON acquisitions log was also in hardcopy form and included purchases made for numerous divisions in the Library, which were not sorted by purchases made per division. This made filtering the P&P Division’s purchases challenging.

The OIG conducted two exploratory tests that pertained to the P&P Division’s tracking and accounting of gift acquisitions because gifts were a major source of the division’s acquisitions. In one test, we planned to judgmentally select and review two ILS bibliographic records of gifts. However, we learned that this could not be done easily because of the complexities of ILS and how purchases and gifts were often acquired. The Library attempted to fulfill OIG’s request by identifying ILS bibliographic records that did not have any associated PO information.⁶⁶ The thinking was that these records would represent gift

⁶³ The USAN/USMON executed a major portion of the P&P Division’s POs.

⁶⁴ As discussed in the report, P&P Division staff place a paper call slip where material had been removed from storage. The call slips were used for inventory management and tracking purposes, among other purposes.

⁶⁵ The P&P Division’s curators are recommending officers.

⁶⁶ As the Library’s system of record, ILS has a cataloging module that includes bibliographic information as well as an acquisition module that has purchase-related information. The ILS also has modules for circulation and online public access.

acquisitions because gifts generally do not need a PO. However, after an initial attempt, the Library communicated to OIG that the effort would be labor-intensive and potentially result in a listing of records that may not reliably represent just gift acquisitions.⁶⁷ The OIG learned that certain ILS records represent a mix of both gifts and purchases, making it difficult to separate out just gift acquisitions without an extensive effort and that the effort may not produce results that were fully accurate. Given these issues, OIG did not complete this exploratory test. The test did however inform OIG that ILS records could be used during fieldwork testing to examine the P&P Division's tracking and accounting of acquisitions generally.

The OIG's other exploratory test related to gift acquisitions involved judgmentally selecting two MoRs approved between FYs 2010–2014 from the donor files of the Library's Gift Office. Because the methodology used in this exploratory test enabled OIG to examine the P&P Division's tracking and accounting of gift acquisitions, the OIG used it again in conducting a broader test during our fieldwork testing. Both MoRs represented gifts consisting of multiple items. Records associated to the gift MoRs were reviewed and documented. These records included the P&P Division's accession log records and ILS bibliographic records. We also confirmed that the materials were searchable and available in PPOC. The P&P Division provided both collections to OIG for examination. The OIG verified custody of the collections and examined items within the collections, but OIG did not examine every item in each collection. For example, one test selection was a gift MoR representing a multi-year agreement of approximately 115,000 architectural photographs. As part of the test, the OIG observed that the hardcopy MoRs are not automated, serialized, and electronically linked to the purchase order system in ILS.

In another exploratory test, a P&P Division staff member guided an OIG auditor through the division's inventory of materials in storage areas or "vaults" in the Madison building. During the walk-through, OIG judgmentally selected ten materials for the purpose of examining their internal control-related records pertinent to tracking and accounting for the acquisitions. These records included MoRs, the P&P Division's accession log records, ILS bibliographic records, and POs, if applicable. We also confirmed that the materials were searchable and available in PPOC. In making the selections, OIG deliberately chose a variety of materials that were in different locations in the P&P Division's storage vaults. The test items were housed in shelving units and drawer storage in the P&P Division's vaults. Because of the nature of the walk-through, OIG was not able to control for the date or method by which the material had been acquired as we did in the other exploratory tests. Two of the test items chosen by OIG were represented by paper call slips located where the materials had been removed. In one case, the material had been removed for an exhibit; it was located in a holding

⁶⁷ The OIG was unable to access ILS data independently. We performed a review of the computer-processed information provided by the Library to assess its sufficiency and appropriateness.

area within the P&P Division. The other was being digitally scanned. As part of the test, the OIG observed that different call slip forms had been used. This, and other observations about the division's use of call slips, suggested that OIG should conduct a test involving call slips during the fieldwork phase of the audit.

The lessons learned during the exploratory testing led to the development of the three tests performed during the fieldwork phase; the tests are presented and discussed in the audit report. For example, through the exploratory testing, OIG determined that ABA does not have the P&P Division's purchases codified in one acquisitions log that could be used to select a representative sample of the P&P Division's purchases; that, although ILS data could not be filtered to identify the division's gift acquisitions, the data could be used to select a representative sample of the division's acquisitions generally; that, despite being in hardcopy form, the Gift Office's records offered a source of data on the division's gift acquisitions; and that the division's call slip practices needed more in-depth examination. The OIG also learned that it would be difficult to locate and examine the P&P Division's acquisitions using the division's accession log because a single log entry could be associated with collection materials stored in many different locations.

To review the P&P Division's mechanisms for tracking and accounting for acquisitions during the fieldwork phase of the audit, OIG examined a statistically representative sample of 167 collection materials using the P&P Division's bibliographic records in ILS; 30 judgmentally selected gifts acquired over calendar years 2001–2014 using MoRs in the Gift Office; and ten judgmentally selected paper call slips taken from the P&P Division's shelves.

To create a statistically representative sample, OIG chose to use ILS and not the P&P Division's Minaret database, which is described in the background section of the report and in Appendix B. At the time of OIG's fieldwork, Minaret held the majority of the division's bibliographic records, according to the Library. As explained in the report, the P&P Division once relied on Minaret to store descriptive information about collection materials because ILS originally lacked the capacity to effectively handle the descriptive information. However, OIG did not test Minaret data because the Library considered the P&P Division's Minaret databases a legacy system and was phasing it out. The Library was in the process of transferring Minaret data to ILS because ILS was the Library's comprehensive inventory control system.

The OIG conducted a statistical sample for attributes of the P&P Division's bibliographic records in ILS.⁶⁸ The purpose for the test was to evaluate the accuracy of location information of the bibliographic records and to verify the existence of the collections material. The sample was chosen randomly from the

⁶⁸ The test design included sampling parameters of a 3% expected error rate, +/- 5% precision, and 90% sample reliability. We employed statistical software to generate a random number sample to assist in the selection of bibliographic records for testing. Based on the sampling framework, we randomly selected 167 records for testing.

P&P Division's entire population of bibliographic records in ILS, which were provided to OIG by the Library. The sample included both analog and digital materials and represented acquisitions generally, including acquisitions obtained through gift, purchase, etc. The OIG did not attempt to stratify the sample by acquisition type because there was no efficient way to differentiate the records by acquisition type. We reviewed information about the materials in our sample in ILS and PPOC. The P&P Division located and provided the test materials to OIG for examination.

The test revealed that three of the selected materials were not at their designated locations as listed in ILS; OIG considered these exceptions to be errors.⁶⁹ Nevertheless, P&P Division staff quickly determined the locations of the materials. In one case, a call slip had not been left behind to indicate where the material was located. In a separate case, the size of the housing being used to store the material was listed incorrectly in ILS. In the third case, bibliographic data in ILS did not accurately reflect that the test material was unprocessed.

To examine how the P&P Division tracked and accounted for gift acquisitions, OIG judgmentally selected 30 gifts acquired by the P&P Division over calendar years 2001-2014 using the donor files maintained by the Library's Gift Office.⁷⁰ The OIG examined the Gift Office's information about the 30 gifts on their associated MoRs. The OIG also reviewed information about the selected gifts in ILS and PPOC. The OIG noted that a majority of the selected gifts had not yet been fully processed by the P&P Division. This may mean that the data available for OIG's review may not have been complete. The OIG also learned that the Gift Office did not have a comprehensive listing of gifts received by the P&P Division. The P&P Division located and presented all of the test materials to OIG for examination.

To examine how the P&P Division tracked and accounted for acquisitions using call slips, we judgmentally selected ten paper call slips from the division's physical inventory and asked the division to locate and present the associated materials to OIG for examination.⁷¹ Each paper call slip was documented, including its location. Information about the selected material was also reviewed in ILS and PPOC. The P&P Division located and presented all of the test materials to OIG for examination, although our testing identified several shortcomings in the P&P Division's use of call slips as outlined in the report.

The OIG conducted this performance audit in accordance with generally accepted government auditing standards as prescribed by the Comptroller General of the

⁶⁹ These results compute to a 2% error rate, which may be projected to the entire universe. The results are within the established tolerable limit and we conclude the division has adequate custodial control over its collections.

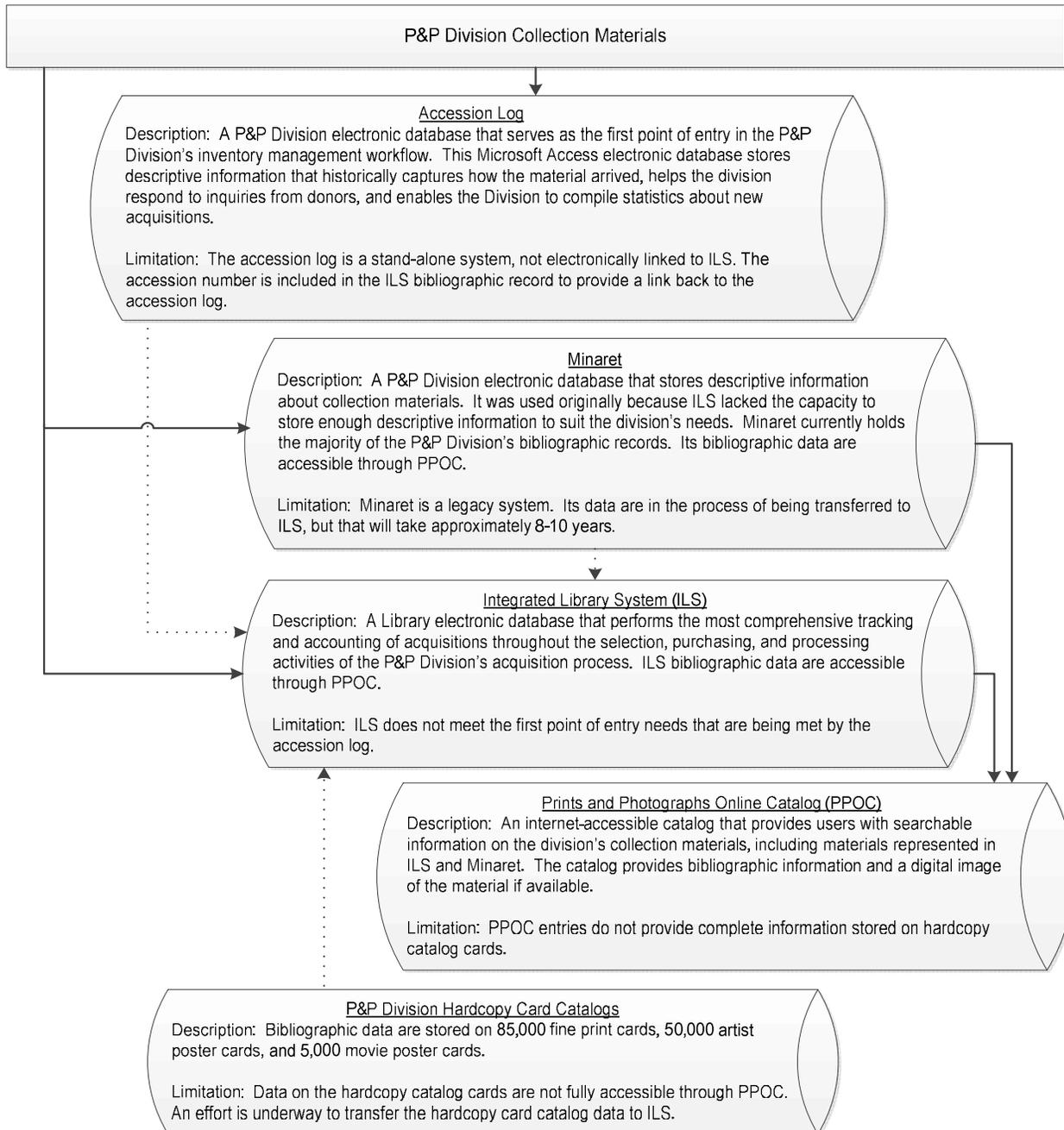
⁷⁰ We judgmentally selected 13 gift acquisitions among those that did not require formal gift agreements and 17 among those that did.

⁷¹ We selected seven paper call slips from the Madison Building and three from the storage facility in Landover, Maryland.

United States and LCR 211-6, *Functions, Authority, and Responsibility of the Inspector General*. These standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our conclusions based on our audit objectives.

Appendix B: Electronic and Hardcopy Data Systems Used to Manage the Prints and Photographs Division's Collection Materials

The OIG observed that the P&P Division relies on several electronic and hardcopy systems to manage its collection materials, including the systems identified below. The limitations of each system may hinder the division's ability to efficiently and effectively account for its materials.



Appendix C: Management's Response

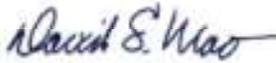
 LIBRARY OF CONGRESS

OFFICE OF THE LIBRARIAN

MEMORANDUM

DATE August 4, 2016

TO Kurt W. Hyde, Inspector General

FROM David S. Mao, Acting Librarian of Congress 

SUBJECT Comments on Draft OIG Audit Report No. 2014-PA-106, *The Prints and Photographs Division Effectively Tracks Its Materials, But Needs to Assess the Risks Associated With Its Growing Quantity of Materials Not Fully Processed*

Thank you for the opportunity to comment on the draft subject report. We appreciate the OIG's review of the Prints and Photographs Division (P&P) and its recognition of the high level of effort the division invests in maintaining custodial control over its collections.

The Library agrees with the OIG's findings and recommendations and provides the following comments on the same.

Recommendations

1. The P&P Division should develop and implement in final form a division-wide policy and associated procedures to ensure consistent call slip-related activities and to facilitate management's efforts to hold division personnel accountable for meeting these requirements.

Agreed. P&P will revise its existing call slip policy and procedures, as recommended, for division-wide implementation by December 2016.

2. The P&P Division should start conducting regularly scheduled inventories that involve comparing the division's call slip records to the physical assets that were removed, with special attention to confirming the removed materials' locations. These oversight activities should be outlined in the new division-wide call slip policy and associated procedures.

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Agreed. Starting in FY 2017, P&P will conduct regularly scheduled inventories to confirm removal locations and will outline the procedure in the new call slip policy.

3. The P&P Division should serially control its call slips and the Library should consider options for developing a central electronic database of materials removed via call slips to improve tracking capability.

Agreed. The Library is ordering call slips with pre-printed serial numbers in FY 2016; P&P will use the new forms once they arrive. The Library will consider a central, automated tracking system for materials removed via call slip as part of the next generation integrated library system (ILS).

4. The Library should ensure that the P&P Division's information-related requirements have been identified and taken into consideration when evaluating possible replacements to the current ILS.

Agreed. Library Services has submitted an FY 2018 New and Expanded Program Request (NEPR) for the funding of the next generation ILS. This request lists all Library service units as stakeholders, and each unit—including P&P—will have an opportunity to submit its information-related requirements for consideration.

5. The Library and the P&P Division should conduct an assessment of the risks posed by the P&P Division's growing arrearage and respond accordingly with a mitigation plan.

Agreed. Library Services and P&P will conduct an assessment and respond with a mitigation plan by December 2017. This plan will be informed by the policies and procedures established in response to recommendation six, and will be completed after that report.

6. The Library should examine its strategic plan (e.g., the plan's objectives and performance measures), policies, procedures, and other parts of its internal control system to determine whether Library-wide controls adequately respond to the risks posed by arrearage, including establishing a sustainable level of arrearage.

Agreed. Library Services will conduct an assessment to determine whether current controls adequately address the risks posed by arrearage and respond with a report by September 2017. The Library's existing collections security framework is a useful guide to the physical, preservation, and inventory control measures that are in place ensure accountability.

7. The Library should provide the P&P Division's arrearage data along with the Library's other arrearage data in its Annual Reports to Congress.

Agreed. The Library will include Library-wide arrearage data, as recommended, in the *Annual Report of the Librarian of Congress* for the fiscal year ending September 30, 2017. This date will allow Library Services to conduct the assessments and prepare the mitigation plan as described in recommendations five and six.

Please let me know if you have questions or would like to discuss these comments.

cc: J. Mark Sweeney, Associate Librarian for Library Services
Helena Zinkham, Director, Collections and Services
Nicole L. Marcou, Special Assistant to the Librarian; OIG Audit Liaison

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