

The Library of Congress  
*Office of the Inspector General*

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*Library Services*

*The Library's Collections Acquisitions Strategy:  
Effective, but Some Improvements Are Needed*

**Audit Report No. 2006-PA-104/December 2006**

**PUBLIC RELEASE**





UNITED STATES GOVERNMENT

LIBRARY OF CONGRESS

**Memorandum**

*Office of the Inspector General*

**TO:** Deanna Marcum  
Associate Librarian for Library Services

December 15, 2006

**FROM:** Karl W. Schornagel  
Inspector General

A handwritten signature in black ink, appearing to read "Karl W. Schornagel".

**SUBJECT:** The Library's Collections Acquisitions Strategy:  
Effective, but Some Improvements Are Needed  
Audit Report No. 2006-PA-104

This transmits our final audit report on the Library's acquisitions strategy. The Executive Summary begins on page *i*, and complete findings and recommendations appear on pages 7 to 19.

Library Services response to our draft report is briefly summarized in the Executive Summary and in more detail after individual recommendations appearing on pages 10, 14, 16 and 19. The complete response is included as Appendix C.

Library Services generally agreed with our findings. However, it disagreed with our premise that "the significant logistical and financial resources needed to acquire, process, store, preserve, and protect collection items dictate that the Library reevaluate its acquisitions policies." Based on Library Services response to the draft report, we consider all of the recommendations resolved.

We appreciate the cooperation and courtesies extended by Library Services' management and the Acquisitions & Bibliographic Access Directorate.

cc: Deputy Librarian

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## ▶▶ EXECUTIVE SUMMARY

*The Library should fine-tune its acquisitions strategy to make the most of available resources*

The Library maintains the world's largest collection of books and other materials with more than 132 million items. More than seven thousand items are added to the Library's collections every day. Given the significant logistical and financial resources needed to acquire, process, store, and preserve these collection items, we performed an audit of the acquisition process. Our audit objective was to determine whether the Library is efficiently and effectively acquiring materials that meet researchers' needs, and considering the logistical issues of its acquisitions.

Because of increasingly severe space and budget considerations, we believe the Library must fine-tune its acquisitions strategy. The Library acquires a vast quantity of materials, some without any clear connection to researchers' needs. In light of the logistical issues it faces, we believe the Library should be more selective in both the quantity and usefulness of materials it acquires.

**The Library Should Explore Strategies to Reduce the Quantity of Materials it Collects** — The Library is unable to keep up with the inflow of materials, resulting in a six- to twelve-month delay between acquisition and availability, books overflowing in the stacks, preservation backlogs, and a new \$20 million storage module needed every four years. To ensure it more cost effectively serves its constituency, we recommend the Library explore: (1) not collecting minimal level materials widely held by other libraries, (2) making arrangements for other institutions to act as "trusted repositories" and take on total collection responsibilities for analog materials in selected subject areas, and (3) adding only one, rather than multiple, copies of an item to the collections (see page 11).

**The Library Should Focus its Collection Strategy** — Library Services has conducted reviews to evaluate the relevance of the materials it collects, but only on a decentralized and inconsistent basis. By not taking into account the changing environment and needs of its patrons, the Library risks expending resources to acquire materials that may or may not meet researchers' most critical needs. To its credit, Library Services recognizes the need for more outcome measures and is addressing this in its

strategic planning. Notwithstanding Library Services' recent efforts, we recommend (1) establishing a methodology to determine which materials are more useful to researchers, (2) more effectively using loan records and vendors' access records to electronic databases or subscriptions, and (3) reviewing the collections policy statements at least once every five years (see page 13).

**The Library Should More Effectively Address the Human Element in Acquisitions** — We found inconsistent performance evaluations and criteria, and uncertainty among recommending officers about their duties. We recommend that the Associate Librarian for Library Services and the Collections Policy Committee: (1) develop and communicate to recommending officers criteria for recommending activities that is relevant, complete, measurable, and clearly stated, (2) ensure that recommending officers receive timely performance evaluations that include their recommending duties, and (3) consider expanding recommending officers' authority to deselect materials no longer relevant to the collections (see page 16).

**The Library Has Begun Establishing the Framework for a Transformation to the Digital Age** — We found that the Library has taken, as a whole, the necessary steps for successful transition to the digital environment. We also found that while it has steadily increased spending on electronic resources, it still lags behind many other large research libraries. Furthermore, we found that as a matter of policy, the Library is acquiring as much analog material as it did before the growth of digital media. We recommend that the Library: (1) examine the amount it is spending on electronic resources in relation to other research libraries and reevaluate whether it is successfully serving its patrons, (2) consider creating a full-time digital subscription manager, and (3) reevaluate its policy of maintaining both analog and digital copies of the same material (see page 18).

Although Library Services generally agreed with our findings, it disagreed with our premise that "the significant logistical and financial resources needed to acquire, process, store, preserve, and protect collection items dictate that the Library reevaluate its acquisitions policies." Library Services' complete response is included as Appendix C.

## ▶▶ INTRODUCTION

*Jefferson established the principle of universal acquisitions for the Library of Congress: "there is in fact no subject to which a member of Congress may not have occasion to refer."*

The Library of Congress holds the world's largest library collection, with more than 132 million items, including research materials in over 470 languages and various media. The Library's collections are built on Thomas Jefferson's premise that Congress' interests are universal in scope. The collections cover virtually every discipline and field of study.<sup>1</sup> In general, the Library acquires:

- all books and other library materials necessary to the Congress and the various officers of the Federal Government to perform their duties,
- all books and other materials that record the life and achievement of the American people, and
- records of other societies, past and present, especially of those societies and peoples whose experience is of the most immediate concern to the people of the United States.

The Library does not acquire all published materials, but chooses selectively from copyright deposits and other sources based on policies designed to ensure the Library acquires important and scholarly works. Copyright receipts, exchange receipts, and approval plan<sup>2</sup> receipts together account for the majority of new materials added to the Library's collections. In total, the Library chooses from among about twenty-two thousand submissions to add between seven and thirteen thousand items to its collections every working day.

Library of Congress Regulation (LCR) 319, *Responsibilities for Recommending and Approving Recommendations for Materials to be Acquired for the Collections of the Library*, states that "Library Services has primary responsibility for

<sup>1</sup> The Library does not collect technical materials concerning agriculture or clinical medicine. Those materials are collected by the National Agricultural Library (NAL) and the National Library of Medicine (NLM), respectively.

<sup>2</sup> An approval plan is an arrangement in which a publisher or wholesaler assumes the responsibility for selecting on behalf of the Library publications which fit a predetermined profile.

recommending materials to be acquired for the permanent general and special collections, and the Law Library has primary responsibility for recommending legal materials for the permanent collections in accordance with the Library's Collections Policy Statements [discussed below], collection development guidelines, and acquisition policies.<sup>3</sup> Chiefs in Area Studies Collections, Public Service Collections, and the Law Library, in consultation with the Collections Policy Committee, appoint recommending officers to recommend materials for the collections.

LCR 320, *Selection of Materials for the Library's Collections*, assigns the Associate Librarian for Library Services responsibility to make policy for the selection of materials. Those policies are developed in consultation with the Law Library and Congressional Research Service. The Associate Librarian has delegated selection responsibility to the various topical areas.

LCR 320, Section 2.B., assigns the Anglo/American Acquisitions Division Chief responsibility for selecting materials received through Copyright, Cataloging In Publication (CIP), and official publications of the U.S. Government and its States and Territories. The Anglo/American Acquisitions Division has designated three "Selection Librarians" to review Copyright and CIP materials.

The Library created the Collection Policy Committee (CPC) to provide guidance, coordination, and planning for the development and refinement of the Library's collections.<sup>4</sup> Its duties include:

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<sup>3</sup> Includes Acquisition Policy Statements and the Library Online Acquisitions Manual (LOLA M), a comprehensive guide for the Acquisitions Directorate.

<sup>4</sup> The committee is composed of the Director for Acquisitions & Bibliographic Access; Director for Collections & Services; Director for Preservation; Director, Law Library Services; Assistant Director, Knowledge Services Group; Congressional Research Service (CRS); and others as appointed.

- overseeing the development of the Library's "Collections Policy Statements" and other documents relating to the collections,
- reviewing and monitoring the Library's annual book budget request, including the allocation of funds, and recommending changes in the distribution, as necessary, to implement collections policies, and
- determining which areas of the collection should be given special emphasis through projects such as the "Special Projects" fund.

The Collections Policy Statements set forth the scope, collecting concentration, and goals sought by the Library for a variety of subjects and geographic areas. A major

Library goal is to formulate an acquisitions strategy sufficient to ensure broad coverage, yet specific enough to serve the research needs of the Library's clientele.

*Finding space to store seven to thirteen thousand new items every working day is a daunting challenge*

Finding space to house the seven to thirteen thousand items the Library adds every working day is a challenge. In 1993, the President approved legislation transferring 100 acres at Fort Meade, Maryland from the U.S. Army

to the Architect of the Capitol (AOC) for use by the Library to meet its storage needs. The Library now has access to 100 acres on which it can build up to fourteen "high density"<sup>5</sup> storage modules. Each module will house approximately two million items.

The Library is challenged with continuing to collect analog – books and other print – materials, while at the same time implementing fundamental changes to accommodate the 21<sup>st</sup> century digital revolution. The Librarian has labeled this challenge "Challenge of Change; Maintenance of Tradition." To this end, the Congress asked the Library to lead a nationwide initiative to develop a program, the

<sup>5</sup> "High Density" modules store books and other materials by size, thus maximizing space usage.



National Digital Information Infrastructure and Preservation Program (NDIIPP), for the collection and preservation of digital content. Funded by an appropriation of \$99.8 million, this program intends to develop a digital preservation infrastructure. A broad range of stakeholders from the federal government, the public, and the private sectors are developing plans to capture and preserve digital information. Partners are exploring preservation architecture that will be trustworthy and responsive to rapidly changing technology.

Researchers, scholars, librarians, and teachers generally praise the breadth, depth, and quality/authority of the Library's collections. The completeness of our collections is due to the dedicated and professional efforts of the Library's acquisition specialists and recommending officers. However, the Library is struggling to keep pace with the burden of cataloging, preserving, and storing the astounding influx of new items each day.

We recognize that the Librarian of Congress has mandated that the Library will continue acquiring and sustaining a comprehensive record of American history and creativity, and a universal collection of human knowledge. As part of this strategy, he has set broad parameters on what is collected and restrictions on what may be weeded. In this time of tight budgets, the significant logistical and financial resources needed to acquire, process, store, preserve, and protect collection items dictate that the Library reevaluate its acquisitions policies. This audit explores some solutions to these issues.

## ►► OBJECTIVES, SCOPE, AND METHODOLOGY

We conducted an audit focusing on the Library's acquisition policies and procedures. Our audit objectives were to determine whether the Library is:

- utilizing an efficient approach in acquiring materials,
- considering the impact of its acquisition policies on logistical issues, such as funding, staffing, and collection storage facilities, and
- addressing the impact of the digital transformation of knowledge.

The scope of this audit focused primarily on FY 2006 activities, but also used data from the past five years to develop historical trends. We examined processes for recommending, selecting, and processing materials received from purchase, Copyright receipts, Cataloging in Publication (CIP) deposits, exchange and gift receipts, and approval plans with foreign book dealers.

We focused our audit primarily on Copyright and CIP receipts for two reasons. First, these receipts account for a significant portion (33%) of new books added to the Library's collections. Second, our survey indicated that the Library is more selective with materials it purchases or acquires by exchange than with books acquired via Copyright. We also examined the Library's initiatives to collect electronic resources.

Our methodology included interviewing key personnel, benchmarking against other institutions, researching the Internet, querying the Integrated Library System (ILS), and sampling Copyright deposits. We interviewed Library staff in the Acquisitions and Bibliographic Access Directorate, the Office of Strategic Initiatives, and the Congressional Research Service. For purposes of benchmarking, we interviewed the National Agriculture Library staff and conducted Internet searches on various association websites, including the American Library Association, the Association of Research Libraries, and the

Council on Library and Information Research. ILS staff ran queries for us on the ILS regarding present collection holdings. We also sent a survey questionnaire to 240 recommending officers.

To evaluate the Library's selection process, we randomly tested a population of 21,987 copyright deposits, (received January 1 to February 28, 2005).<sup>6</sup> We reviewed the number of copies the Library selected, number of items selected in electronic format, the number of other libraries holding the identical item, and the type of cataloging performed on the items (copy or original<sup>7</sup>).

We conducted our audit in accordance with Generally Accepted Government Auditing Standards issued by the Comptroller General of the United States (the "Yellow Book"), LCR 1519.1, *Audits And Reviews By The Office Of The Inspector General*, and audit standards established by the American Institute of Certified Public Accountants.

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<sup>6</sup> Our sample size of 91 yielded a 90 percent confidence level and a 5 percent error rate.

<sup>7</sup> Original cataloging is performed on those items for which no catalog records are available. Copy cataloging involves finding a machine-readable record made by someone else that exactly (or almost exactly) matches the item in hand and using that record instead of creating a new one.

## ▶▶ FINDINGS AND RECOMMENDATIONS

Because of increasingly severe collections storage and budget considerations, we believe the Library must fine-tune its acquisitions strategy. In this report, we explore three strategies for easing the acquisitions “crunch:” first, reducing the number of items acquired by using other libraries and making some adjustments in the way items are acquired, second, focusing the collections so as to concentrate on more useful items, and finally, improving the human element of acquisitions. Given the digital revolution that is redefining access to information, we also discuss digital initiatives at the Library and how those tie in with analog acquisitions strategies.

*Library generally does not consider cataloging, preservation, or space issues in its acquisition decisions*

Our overall assessment of acquisitions at the Library is that there needs to be more focus and overall principles guiding the process. The Library acquires a vast quantity of materials, some without any clear reason. In light of the logistical issues facing it, we believe the Library should be more selective in both the quantity and usefulness of materials it acquires.

Our specific findings and recommendations are:

### **I. The Library Should Explore Strategies to Reduce the Quantity of Materials it Collects**

With the exception of large gifts, the Library does not generally consider cataloging, preservation, or storage issues in its acquisition decisions. As a result, the Library is unable to keep up with the inflow of materials, resulting in a six- to twelve-month delay between acquisition and availability, books overflowing in the stacks, and a new \$20 million storage module needed every four years. The proper stewardship of federal resources is an essential responsibility of agency managers and staff. They must ensure that programs operate and resources are used efficiently and effectively, consistent with agency missions, and with minimal potential for waste. We believe the

Library needs to assess the needs of its customer base and reevaluate its selection criteria to ensure it more cost effectively serves its constituency. Given that resources are limited, the Library cannot continue to acquire at the current rate and effectively serve its customers.

From June 2005 to June 2006, the time to complete the cataloging process for monographs (a one-time publication that is complete in itself, i.e. a non-serial publication) increased from 208 days to 254 days (weighted mean for all cataloging priorities). However, this increase involved only materials assigned a cataloging priority two or three. For materials given cataloging priority one<sup>8</sup>, the average processing time is slightly less than 9 days; a decline by one-half day from a year ago. In addition to cataloging delays, we observed general collection books tightly shelved, double stacked, or stacked on the floor in several of the decks in the Jefferson Building. Likewise, overcrowding exists in the CIP work area. At the time of our fieldwork, CIP was working overtime to reduce its backlog.



Figure 1: Book trucks in the CIP Division holding area

We believe that improving the acquisition policies would have a minor effect on researchers and reduce the Library's need for storage modules by at least two over the next 20 years.

Given the accelerated growth of the collections and the limitations on staffing and storage resources, we believe the Library should focus most of its resources on higher priority items (See Appendix B for definitions of collecting priorities). We suggest the Library explore the following three options:

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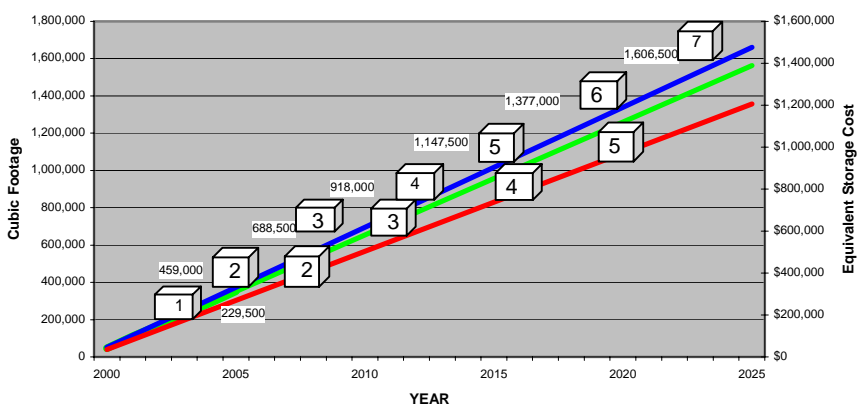
<sup>8</sup> Priority one is assigned to pre- and post-publication CIP titles (constituting 90 to 95 percent of the priority one items), plus titles that may be requested by the Congress, Executive Branch agency heads or higher officers, Supreme Court Justices, or division chiefs or higher officers of the Library. For June 2006, this represented about 30 percent of the monographs cataloged.


- *Not collecting minimal level materials widely held by other libraries.*

Our sample of Copyright deposits revealed that 7.5 percent of the Copyright titles collected are in areas that the Library does not collect extensively (collection levels 1, 2, and 3 materials) and are materials held by 100 or more other libraries. We project savings of \$1.2 to \$1.5 million over the next 20 years if the Library relies on other libraries

to collect this lower level Copyright material. The Library should make an effort to compare its holding to those of other libraries, as it did in the 1980s and 1990s, when it participated in the Research Libraries Group's (RLG) Conspectus.<sup>9</sup>

**Figure 2: Projected Storage Space and Cost Requirements**



Projected storage required for new materials added (print materials and manuscripts only).  
Estimated cost of storage based on present area lease rates.  
Projected storage requirements keeping one copy and holding fewer items widely held by other libraries.  
Each  indicates an additional storage module required.

- *Developing collaborative partnerships with other institutions to act as "trusted repositories."*

The Library should also explore making arrangements for other institutions to act as "trusted repositories" and take on total collection responsibilities for analog materials in selected subject areas, similar to the current arrangements

<sup>9</sup> An inventory of research libraries' existing collection strengths and current collecting intensity, created through a survey using worksheets based on the Library of Congress's classification scheme. The Library used the Conspectus to assess its collections and collecting practices. The RLG Conspectus became a widely recognized collection assessment tool and was adopted by the Association of Research Libraries (ARL) for its North American Collections Inventory Project. However, at the end of August 1997, the RLG suspended the Conspectus.

with the National Library of Medicine and the National Agriculture Library. Agreements should include arrangements allowing the Library to take possession of materials in the event a “trusted repository” fails.

- *Adding only one, rather than multiple, copies of an item to the collection.*

In FY 2005, the Library added multiple copies for 42,178 of the 311,130 (13.6 percent) new monograph titles added to the collection (according to statistics provided by the ILS Office). The criteria for selecting multiple copies, as detailed in the Library of Congress Acquisitions Manual, does not consider other Library holdings that may be very similar, or whether the title is widely held by other libraries. We recognize that the U.S. materials are heavily used and two copies are sometimes used simultaneously. However, it costs the Library \$8,984 to shelve these extra copies (one time cost) and \$5,061 annually to store. The storage costs will compound each year. We project the Library could save between \$1.3 and \$3.4 million (depending on collection growth rates) over 20 years by not adding multiple copies. Alternatively, the Library could consider culling multiple copies once their circulation decreases.

*Depending on other libraries to provide researchers with certain materials presents an opportunity for the Library to better focus its collection efforts*

### **Recommendations:**

We recommend that the Associate Librarian for Library Services and the Collection Policy Committee:

1. focus Library resources more on materials not widely held by other libraries. We recommend a three step process (during cataloging):
  - a. determine the collection level for the title,
  - b. determine how many other libraries hold the title, and

- c. make a revised selection decision based on criteria established by management,<sup>10</sup>
  2. explore developing collaborative partnerships with other institutions to act as “trusted repositories,” and
  3. reevaluate the Library’s collection policies bearing in mind the high costs associated with each acquisition.

### Library Services Response and OIG Comments

Library Services agreed to study our recommendations. It has asked OCLC to match the LC’s online catalog against the WorldCat union catalog to identify LC’s unique holdings in published literature. Library Services noted that factors such as uncertain funding for possible partners and restrictions on interlibrary loans could prevent successful collaborative partnerships.

Library Services also responded that our statistics on processing time did not agree with its figures. We determined that there was an error in data provided by the Social Sciences Cataloging Team. The correct data significantly changed the overall processing time for priority one, but did not change our findings on the overall processing time for all categories. Concerning processing time, Library Services responded that it had approved the use of overtime to clear out the backlogs shown in Figure 1. While we credit Library Services for dealing with the backlog, we believe overtime is a short-term solution to a long-term problem.



Figure 3: Overcrowded conditions on deck 15, Jefferson Building

<sup>10</sup> Library management should establish the threshold criteria, such as not collecting materials held by 100 or more other libraries.



## II. The Library Should Focus its Collection Strategy

The Library does a good job measuring outputs, such as number of titles recommended, or gaps in the collection. These measures, however, do not reflect the true mission of the Library – to be useful to its customers. Only 23 percent of the recommending officers we surveyed indicated they were getting feedback from management regarding the usefulness of the collections to researchers. In order to make better selection decisions, management must have better information about the relevance of the materials it collects. Government Auditing Standards state that managers are responsible for “establishing and maintaining effective internal control to help ensure that appropriate goals and objectives are met; and resources are used efficiently, economically, and effectively...” Effective internal control includes ongoing monitoring of activities.

Library Services has conducted reviews to evaluate holdings, but only on a decentralized and inconsistent basis. For example, the Acquisitions Directorate’s web page provides collection overviews detailing the strengths and weaknesses of individual collections – but the data are over a decade old.

Library Services is addressing this problem in two ways. First, the Associate Librarian for Library Services announced in February 2006 that Library Services would adopt the framework of the Government Performance and Results Act (GPRA) for planning and managing its programs. Second, Library Services FY 2008 to 2013 Strategic Plan (in draft as of September 13, 2006) included outcome objectives and performance goals such as assessing how the Library’s collection development policies meet the current information needs of its patrons. We believe these efforts will allow Library Services to better evaluate whether it is using its resources cost-effectively to accomplish its collection development goals.

At the time of our fieldwork, Library Services was conducting focus groups and customer surveys to better assess whether it was meeting the needs of its patrons. We believe focus groups and customer surveys are excellent

tools to assess whether the collections are meeting researchers needs. However, the current survey does not measure whether the Library's collections include materials of marginal research value or readily available at other libraries.

The Library should use statistical information to determine which of the electronic resources it offers are being used by researchers. The loan module in Voyager <sup>11</sup>, however, is not comprehensive enough to provide management with useful decision-making data. Further, Library Services believes that vendor statistics for subscriptions to electronic resources may be overstated.

Nonetheless, in the absence of other usage statistics, we believe the Library should use these data to develop trends. Those trends should enable management to better assess the usefulness of electronic subscriptions.

Finally, the Library must establish a systematic review process for collections policies. The organization in charge of these policies, the Collections Policy Committee (CPC) is decentralized and its members have other major duties. As a result, the review effort is lagging: at least forty percent of the 68 Collection Policy Statements have not been formally reviewed and updated for over 10

years and at least 78 percent had not been reviewed within the last 5 years. Although the statements are intentionally broad in their scope and may not need revision, we believe a systematic review process is necessary to ensure the Library is keeping its policies in sync with current user needs and expectations. We also believe a staff dedicated to this function would perform more effectively than the current decentralized, "collateral duty" model.

*78 percent of the Collection Policy Statements had not been reviewed within the last 5 years*

*Of those, 51 percent had not been reviewed for over 10 years*

<sup>11</sup> Voyager is the software package the Library uses for its acquisitions, cataloging, and loan processing.

## Recommendations:

We recommend that the Associate Librarian for Library Services and the Collection Policy Committee:

1. establish a methodology to determine which materials are more useful to researchers,
2. more effectively use loan records and vendors' usage records of electronic databases and subscriptions, and
3. review the collections policy statements at least once every five years.

## Library Services Response and OIG Comments

Library Services agreed with our recommendations. It noted that it "cannot limit a user study to researchers." We agree; we consider the term "researchers" to loosely encompass all Library users.

### III. The Library Should More Effectively Address the Human Element in Acquisitions

Symbolic of the apparent lack of focus on consistent collections policies is the casual approach to the human side of acquisitions management.

Recommending officers, generally librarians in individual subject areas, choose the materials the Library purchases for the collections. Recommending officer functions are considered collateral duties.

In our survey of recommending officers, we found inconsistent performance evaluations and criteria. Furthermore, we found uncertainty among recommending officers about their duties. We attribute the conditions to three possible factors: (1) less time for supervisors to manage due to recent staff reductions, (2) recommending functions are collateral duties, and (3) oversight by committee rather than a dedicated office. One recommending officer's statement summarizes the situation: "I believe that the current system of LC recommending officers is quite a patchwork, and that most of us do this as volunteers from pure interest in the

*We found inconsistent performance evaluations and criteria, and uncertainty among recommending officers about their duties*

materials and collections. The demarcation lines between recommending and selecting are very fuzzy and cause confusion, conflict, and uneven recommending practices.”

Many supervisors are not evaluating the performance of the recommending officers on a regular basis as required by the Collective Bargaining Agreements with AFSCME Locals 2477 and 2910.<sup>12</sup> Eighty-two percent of the recommending officers in our survey stated that their position description included their recommending duties. However, supervisors evaluated performance as a recommending officer in only 60 percent of the responses. The other 40 percent responded that either their supervisor did not evaluate their recommending performance or they were not aware if they had been evaluated. According to one recommending officer, “although I have been in this Division for almost 4 years, I have never received a performance evaluation. My impression though is that recommending is not given a high priority.”

Our survey of recommending officers also revealed that supervisors use inconsistent criteria to evaluate performance. Performance criteria often included measures that were not connected to building a quality collection, such as time spent recommending, and number of items recommended. Moreover, some recommending officers were not aware of the criteria used to evaluate their recommending duties. To effectively measure the success of the recommending function, the Library needs a uniform set of criteria that is measurable, clearly stated, and understood by both the supervisor and the recommending officer.

During the past year, the Collections Policy Committee formed a subgroup – the “Collections Development Roundtable” – to improve communication between recommending officers, selection librarians, and

<sup>12</sup> The Collective Bargaining Agreement with AFSCME Local 2910, ARTICLE 15. PERFORMANCE EVALUATION, Section 7. *Time of Annual Performance Ratings*, and the Collective Bargaining Agreement with AFSCME Local 2477, ARTICLE 18. PERFORMANCE EVALUATION, Section 7, *Time of Annual Performance Ratings*, state in relevant part: “... performance ratings shall be made annually[.]”

acquisition specialists. We believe that by sharing ideas and developing more uniform measures, managers can better assess the effectiveness of the collection development efforts.

The Collections Development Roundtable also needs to ensure that all recommending officers are aware of their duties.

In the case of Copyright and CIP materials, three full-time "selection librarians" choose from among submissions to add to the collections. Recommending officers, often reference librarians, have the ability to correct selection errors by deselecting materials of minimal research value or duplicative of other holdings. Some recommending officers responding to our questionnaire were unaware of their ability to determine not to add newly received items to the collections.

Finally, as the topical specialist, the recommending officer should be the final decision maker for what is added to the collection and for decisions on what materials over time are no longer of research value and should be removed from the collection. We believe the Library could significantly reduce storage requirements by encouraging recommending officers to deselect materials that may no longer be of research value or have been supplanted by more recent acquisitions.

### **Recommendations:**

We recommend that the Associate Librarian for Library Services and the Collection Policy Committee:

1. develop and communicate to recommending officers criteria for recommending activities that is relevant, complete, measurable, and clearly stated,
2. ensure that recommending officers receive timely performance evaluations that include their recommending duties, and
3. consider expanding recommending officers' authority to deselect materials no longer relevant to the collections.

### **Library Services Response and OIG Comments**

Library Services responded that it has already taken action or plans to take action on recommendations 1 and 2. For recommendation 3, it stated that “[t]he Librarian of Congress has expressly forbidden staff to deselect materials without his written approval.” We agree that Library Services cannot implement this recommendation without the Librarian’s consent.

### **IV. Library Has Begun Establishing the Framework for a Transformation to the Digital Age**

As part of our review of acquisitions, we met with staff involved with the Library’s digital initiatives to evaluate the Library’s transition to the digital environment. Using the Government Accountability Office’s framework for evaluating a successful transformation, we found the Library has taken the necessary steps but needs to establish target dates for completion of its projects. The Library has developed a planning framework, is assembling advisory groups, and forming partnerships to guide its planning for a national digital information strategy.

In September 2004, the Library announced its first formal NDIIPP digital preservation grants, totaling nearly \$14 million and made to eight lead institutions. The institutions are to identify, collect, and preserve born-digital materials, and build a national digital-preservation infrastructure. We plan to review the progress of four of the eight lead institutions in an upcoming audit. Our objectives will be to determine if: (1) the partners are complying with the cooperative agreement terms and conditions, and (2) they are generally fulfilling the goals of their agreements.

As part of our review of the transformation to digital, we examined the funds the Library is expending on electronic resources. We found the Library has steadily increased its spending but still lags behind many other large research libraries; both in terms of gross dollars spent and total titles purchased. Using the most recent data available from the ARL, we found that the average ARL library spent \$2.75 million on electronic publications/databases in FY 2004, or nearly double the \$1.4 million the Library spent. However, the Library significantly increased its 2006 allocation for electronic resources to \$2 million in FY 2006; a 43 percent increase from FY 2004. Presently, the Library subscribes to about 244 electronic subscriptions/databases. The New York Public Library subscribes to over 300 commercially produced research databases and the Johns Hopkins University Library subscribes to 344. Due to the complexity and high cost of digital subscriptions, strong and sustained oversight is needed if the Library is to successfully serve its patrons. Library Services has assigned several staff to oversee the digital subscriptions as collateral duties. We believe one way to ensure more effective and sustained leadership would be to create a full-time Digital Subscription manager position.

*The Library has steadily increased its spending on electronic resources but still lags behind many other large research libraries*

Digital technology provides the Library the opportunity to more effectively present its collections and engage audiences. Other institutions have begun to offer off-site access to its electronic subscriptions. We note that with a New York Public Library card, you can access their online databases from home. The Acting Head of the ILS Office told us that presently the Library does not offer access for home users or via the Library's web page. We believe the Library needs to explore offering off-site access as a means to better service its patrons. Increased service needs to be weighed against the security risks associated with allowing outside access to the Library's computer systems.

Our review of the Library's transformation to digital revealed that, as a matter of policy, the Library is acquiring as much analog material as it did before the growth of digital media. According to the Preservation Director, this policy is in contrast to the RLG and ARL declaration that a digital copy can be used as a preservation copy. The Library's position is that it is uncertain how long the digital format will last and it is questionable whether we will have the machines to read the medium in 100 years. Machine dependent items are problematic for preservation. Consequently, the Library often adds analog materials to its collections even if the title is available digitally.

As discussed in the first section of this report, the Library is reaching a critical stage in providing storage for its vast collections. In view of these storage issues, we believe the Library may want to reconsider its policy of retaining an analog copy for materials that are available digitally.

### **Recommendations:**

We recommend that the Associate Librarian for Library Services and the Collection Policy Committee:

1. examine the amount the Library is spending on electronic resources in relation to other research libraries and reevaluate whether the Library is successfully serving its patrons,
2. consider creating a full-time Digital Subscription manager, and
3. reevaluate its policy of maintaining both analog and digital copies of the same item.

### **Library Services Response and OIG Comments**

Library Services did not understand the relevance of comparing our expenditure to other libraries' spending on electronic resources. We believe this comparison is one of several measures that Library Services should use to evaluate the level of service it provides to Library patrons. Concerning recommendation 2, Library Services stated that it would consider staff needed for new tasks as part of its strategic planning. Library Services agreed in principle with recommendation 3.



## ►► CONCLUSIONS

Largely because of the dedicated and professional efforts of the Library's acquisitions staff, researchers, scholars, librarians, and educators praise the breadth, depth, and quality and authority of the Library's collections. However, given the intense pace of acquisitions at a time of increasingly tight budgets, the Library is struggling to keep pace with the costs and logistical demands of cataloging, preserving, and storing its vast collections.

To its credit, the Library recognizes that collaborative partnerships are a viable way of keeping up with the explosion of digital material. The NDIIPP adopted a partnering strategy: "[be]cause no single institution – not even the Library of Congress – can maintain all the digital information that will be essential to future researchers and lifelong learners, each institution has agreed to collect and preserve a specific type of material..." We believe this same model is needed for analog materials.

We commend Library Services for recognizing the importance of outcome measures and emphasizing them in its strategic plan. Outcome measures provide better data to prioritize needs, and justify budget and selection decisions so that the Library can maximize the use of its resources.

To successfully address its acquisition goals, the Library needs to make certain that it has sufficient resources to meet demands. Given the severity of the fiscal challenges our nation faces and the wide range of competing federal programs, hard choices are being made across the government and the Library is no exception. The recommendations in our report, realistically, do not foresee any increase in resources for the Library. If the Library wishes to continue its current pace of acquisitions, it will have to request additional resources from Congress.

*The Library is struggling to keep pace with the costs and logistical demands of cataloging, preserving, and storing its vast collections*

### Major Contributors to This Report:

Nicholas G. Christopher, Assistant Inspector General  
Patrick J. Cunningham, Senior Auditor  
Cornelia E. Jones, Auditor

## ▶▶ APPENDIX A: ACRONYMS USED IN THIS REPORT

<b>AOC</b>	Architect of the Capitol
<b>ARL</b>	Association of Research Libraries
<b>CIP</b>	Cataloging in Publication
<b>CPC</b>	Collection Policy Committee
<b>CRS</b>	Congressional Research Service
<b>FY</b>	Fiscal Year
<b>GPRA</b>	Government Performance and Results Act
<b>ICAC</b>	Internal Controls Audit Committee
<b>IG</b>	Inspector General
<b>LCR</b>	Library of Congress Regulations
<b>LOLA M</b>	Library Online Acquisitions Manual
<b>NAL</b>	National Agriculture Library
<b>NLM</b>	National Library of Medicine
<b>OIG</b>	Office of the Inspector General

## ▶▶ APPENDIX B: COLLECTING LEVELS

The Research Libraries Group<sup>13</sup> developed a system of collecting levels, known as the RLG Conspectus, intended primarily for the uniform evaluation of collections in research libraries. The use of these collecting levels evolved from a tool for evaluation into a meaningful set of descriptors employed in library collection policy statements. These levels are used in the Library of Congress policy statements to define the extent of the Library's collections. The general definitions of these collecting levels are:

**0 - Out-of-Scope:** The Library does not collect in this area.

**1 - Minimal Level:** A subject area in which few selections are made beyond very basic works.

**2 - Basic Information Level:** A collection of up-to-date general materials that serve to introduce and define a subject and to indicate the varieties of information available elsewhere. It may include dictionaries, encyclopedias, selected editions of important works, historical surveys, bibliographies, handbooks, and a few major periodicals, in the minimum number that will serve the purpose. A basic information collection is not sufficiently intensive to support any courses of independent study in the subject area involved.

**3 - Instructional Support Level:** A collection that in a university is adequate to support undergraduate and most graduate instruction, or sustained independent study; that is, adequate to maintain knowledge of a subject required for limited or generalized purposes, of less than research intensity. It includes a wide range of basic monographs, complete collections of works of more important writers, selections from the works of secondary writers, a selection of representative journals, and reference tools and fundamental bibliographical apparatus pertaining to the subject.

**4 - Research Level:** A collection that includes the major published source materials required for dissertations and independent research, including materials containing research reporting, new findings, scientific experimental results, and other information useful to researchers. It is intended to include all important

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<sup>13</sup> <http://www.rlg.org/>

reference works and a wide selection of specialized monographs, as well as a very extensive collection of journals and major indexing and abstracting services in the field. Older material is retained for historical research.

**5 - Comprehensive Level:** A collection which, so far as is reasonably possible, includes all significant works of recorded knowledge (publications, manuscripts, and other forms), in all applicable languages, for a necessarily defined and limited field. This level of collecting intensity is one that maintains a "special collection." The aim, if not achievement, is exhaustiveness. Older material is retained for historical research.

## ▶▶ APPENDIX C: LIBRARY SERVICES RESPONSE

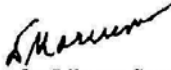
UNITED STATES GOVERNMENT

### *Memorandum*

LIBRARY OF CONGRESS

DATE: November 9, 2006

TO : Karl Schornagel  
Inspector General

FROM : Deanna Marcum   
Associate Librarian for Library Services

SUBJECT : Response to "The Library's Collections Acquisitions Strategy: Effective, but some Improvements are Needed," Audit Report No. 2006-PA-104, September 18, 2006

We appreciate the opportunity to respond to the audit report on "The Library's Collections Acquisitions Strategy," prepared by Mr. Patrick Cunningham. While we find some of the recommendations useful, and we plan to implement them right away, we also have some fundamental concerns.

We in Library Services look to the mission of the Library to guide our acquisitions work. The mission of the Library is "to makes its resources available and useful to the Congress and the American people and to sustain and preserve a universal collection of knowledge and creativity for future generations." That mission is broad and incredibly optimistic, but the Library of Congress serves a nearly unique role in the world as it attempts to collect comprehensively from all parts of the world. The Librarian of Congress stresses every time he testifies before Congress that building and sustaining these collections, not for today's users alone, but for the generations to come is the highest priority of the institution.

In the audit report, you indicate that there are two reasons for the Library applying greater selectivity in building the collections: (1) severe budget constraints, and (2) storage requirements. While budgets and storage space are always a concern, I note that in recent years, the Congress has added funds to our acquisitions budget on a regular basis. In addition, the Congress has approved a plan for meeting long-term storage needs through a systematic building program of high-density storage modules at Ft. Meade. While the building program is behind schedule, modules one and two are completed and in use, modules three and four have been funded and construction is scheduled.

Great libraries have great collections. The real strength of the collections at the Library of Congress is their depth and breadth. A great majority of the collection is unique material, held by no other library in the world. Unlike nearly every other library, we expect to

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preserve as much of the collection as we possibly can. Even though most libraries agree that artifactual collections continue to be critically important, they are investing their dollars in access to electronic databases to meet the daily needs of students and researchers. They rely on the Library of Congress to have the artifactual materials in its custody for use by all.

We agree that our collections development librarians and curators need to be more strategic in acquiring collections, think carefully about possible cooperative solutions to building collections, and to be as frugal as possible in spending acquisitions dollars. But we strongly believe that developing the collections and serving as stewards of those collections is the sine qua non of our responsibilities. Since materials are often unavailable soon after publication, our first charge is to acquire material, even if we do not have resources to process it immediately. We do this on behalf of future generations.

With that context, I now respond to the text itself.

Page 3: In the first full paragraph, I suggest that you add "both for now and for generations to come" to the last sentence. This role of thinking about what future generations should be able to learn about the state of knowledge in the early 21st century should guide our collecting as much as any concern about our contemporaries' information needs.

Page 8: I believe Beacher Wiggins has already commented on the assertion on page 8 that processing time has increased. Our statistics do not bear out that assertion. The time to process **priority one** materials, the bulk of which come through the Cataloging in Publication (CIP) workflow, did not increase from nine days in fy 2005 to 152 days in fy2006. Our statistics show:

**June 2006**-average days for completion of processing = 7.6 days; percentage of materials processed within 14 days +86%

**July 2006**-average days for completion =11.2 days; percentage of materials processed within 14 days = 78%.

When we noted this increase in processing time, we approved the use of overtime in the Acquisitions and Bibliographic Access directorate to clear out the backlogs that were beginning to accumulate. The books held on booktrucks (shown in figure 1) have now been cleared.

Footnote 8 needs to be corrected to include the CIP publications, as CIP items constitute 90-95% of the **priority one** items. The categories cited in the footnote represent a small portion of **priority one** items.

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In terms of the specific recommendations, I have the following comments:

**Section 1: The Library Should Explore Strategies to [Reduce] Quantity of Materials it Collects**

**Recommendations**

**1. Focus Library resources more on materials not widely held by other libraries. We recommend a three-step process:**

- a. Determine the collection for the title,**
- b. Determine how many other libraries hold the title, and**
- c. Make a revised selection decision based on criteria established by management.**

**You add in the footnote that management should establish the threshold criteria, such as not collecting materials held by 100 or more libraries.**

We have asked OCLC to analyze LC's unique holdings in the published literature by matching LC's online catalog against the WorldCat union catalog. Nearly all of the special collections materials are unique, and they constitute the great bulk of the Library's collections.

**2. Explore developing collaborative partnerships with other institutions to act as "trusted repositories." and**

We are willing to study this recommendation more closely, but there are a few important facts to mention in connection with this recommendation. Research libraries in the United States, unlike research libraries in Great Britain, do not have a common funding source. Most of the research libraries that are in any way comparable to the Library of Congress are funded from endowments, grants from foundations, and gifts from individuals. Even state-supported institutions such as the University of Michigan or University of California, report that the bulk of their acquisitions funds come from private sources or endowments for restricted purposes. The financial model for sharing resources would be complicated to determine and even harder to implement. A second consideration is the American Library Association's interlibrary loan code for sharing materials among institutions. Interlibrary lending is restricted to materials that are no longer in print.

If books and journals are available for purchase, the library supporting a student or researcher is expected to buy, not borrow, that material. Finally, there are copyright restrictions on digitizing or photocopying significant portions of works that are protected by copyright. While it makes sense to share resources, the policies that govern access make that especially difficult for all but public domain materials.

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**3. Reevaluate the Library's collections policies bearing in mind the high costs associated with each acquisition.**

We agree that the Library should conduct a careful assessment of collections that are under consideration for acquisition to determine the processing, preservation, and storage requirements presented by that particular collection. The subject specialist should make a case that the inherent value of the collection is great enough to offset the cost of the acquiring and maintaining the collection.

**Section 2: The Library Should Focus its Collections Strategy**

**Recommendations**

**1. Establish a methodology to determine which materials are more useful to researchers.**

We are willing to develop such a methodology for current users. This would be an outgrowth of the nation-wide survey now being conducted by Outsell, Inc. to determine the resources most used by different constituencies.

We cannot limit a user study to researchers. LC's collections are used by Congress, journalists, artistic creators, lawyers, scholars, college students, and the general public. What most of them tell us in surveys is that it is the deep richness of the collection that is so valuable.

The important group that we cannot survey is the user population of future generations.

**2. More effectively use loan records and vendors' usage records of electronic databases and subscription, and**

We agree with this recommendation.

**3. Review the collections policy statements at least once every five years.**

We agree with this recommendation. We have recently gone through all of the policy statements and added information about the electronic resources that should be considered. We should continue to refine and update these policies to take into account new types of materials and new methods of access.



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**Section III. The Library Should More Effectively Address the Human Element in Acquisitions.**

**Recommendations**

**1. Develop and communicate to recommending officers criteria for recommending activities that [are] relevant, complete, measurable, and clearly stated.**

Library Services, as part of its work on a strategic plan, is concentrating on acquisitions. Part of the plan is to develop quantifiable performance measures in this area. The development of criteria is already underway.

**2. Ensure that recommending officers receive timely performance evaluations that include their recommending duties, and**

When I learned that Library Services had a poor record of completing performance appraisals, we made updating them a high priority. During the summer of 2006, all managers were required to complete performance appraisals of their staff. We are now almost completely up to date. We agree that there should be specific language about the effectiveness of the acquisitions roles of the recommending officers.

**3. Consider expanding recommending officers' authority to deselect materials no longer relevant to the collections.**

The Librarian of Congress has expressly forbidden staff to deselect materials without his written approval. We could not implement this recommendation with violating the directive from the Librarian.

**Section IV. Library Has Begun Establishing the Framework for a Transformation to the Digital Age.**

**Recommendations**

**1. Examine the amount the Library is spending on electronic resources in relation to other research libraries and reevaluate whether the Library is successfully serving its patrons.**

We do not understand the relevance of comparing our expenditures to other libraries' spending for electronic resources. We agree that we should closely monitor the extent to which we are providing access to the electronic resources our users need.

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**2. Consider creating a full-time Digital Subscription manager, and**

While it may be a good idea to assign responsibility to manage electronic subscriptions to a staff position designated for this purpose, we do not consider it prudent to follow this recommendation before completing our strategic plan, which includes a consideration of staff needed for new tasks.

**3. Reevaluate its policy of maintaining both analog and digital copies of the same item.**

We agree with this recommendation in principle. In reality, there is a practical problem. The Library does not yet have in place a digital repository in which we can store and preserve electronic materials. Until ITS is able to offer this service, we are compelled to designate paper as the "best edition" for copyright deposit purposes. Yet, our users are clear in their preference for electronic access. We recognize the problem, and we eagerly anticipate the day we have the infrastructure capacity to allow us to make a choice of one format.

Thank you for the opportunity to offer a response. As you can surmise from my comments, I see the acquisitions for the Library as absolutely critical to our mission. I shall be happy to meet with you and your staff to discuss any of these points in more detail.



THE LIBRARIAN OF CONGRESS

February 14, 2007

Dear Karl:

I write in response to Audit Report No. 2006-PA-104, issued in December 2006, entitled "The Library's Collections Acquisitions Strategy: Effective, but Some Improvements Are Needed."

Dr. Marcum reviewed the report, and she has already indicated in her response that Library Services will act on several of the recommendations immediately. It is important that we do more to understand our users' needs and expectations for collections. Circulation statistics and vendor usage data from electronic data bases will be used more systematically in helping us understand today's utilization of our collections. These recommendations in your report are already being incorporated into Library Services' strategic plan.

That the Library should not even attempt to build comprehensive collections is not a new proposition. I have looked carefully at the past history and consulted extensively with the Associate Librarian for Library Services, Deanna Marcum, who has more than thirty-five years of experience in collections building and library leadership. Our clear conclusion is that the substantive recommendations in this report are not practical for analog (non-digital) collections.

I am compelled to offer a more nuanced case for the role and responsibilities of the Library of Congress, an institution that is unique in the world. The report assumes that the Library of Congress is just one of many libraries collecting materials that can be used by everyone. This is simply not the case. The Library of Congress is the authoritative, responsible knowledge institution for the Congress and the United States government.

University libraries, by and large, collect materials to support their institutions' curricula; consequently, there are great similarities among their collections. The Library of Congress's comprehensive collections policies allow us to provide very-difficult-to-obtain, obscure materials that provide information to our lawmakers that is available nowhere else. Quite often, it is precisely the marginal material of today that proves to be most useful at a later date.

In the wake of the September 11, 2001 attack on our country, it was the smudged, mimeographed copy of Osama bin Laden's autobiography found in our African & Middle Eastern Division's collections that gave the Congress the only firsthand account of the individual whose name was foremost in the minds of all Americans. When the first Persian Gulf War began, the military decision makers learned the way in which military tanks might operate in the sands of that part of the world only by consulting rare topographic maps that could be found exclusively in the collections of the Geography and Map Division.

What distinguishes the Library of Congress from all other libraries is that our objective is to find, acquire, and preserve those materials that may be of use to the Congress or the American people. If any topic is likely to be of concern to the United States, we need to have the authoritative word on that topic in our collections. This cannot be done if we take the approach described in your report.

The Library is not a static organization. To be of use, it must continually be brought up to date. We need to acquire more materials every year because the publishing output (despite the digital revolution) increases every year. In all parts of the world, as democracy takes hold, the first noticeable result is an increase in publishing. It is precisely from these developing areas that we most need to collect the books and journals and pamphlets that are distributed to people. And in these areas, the publishing houses are fledgling organizations that do not have the means to maintain inventories and provide materials at a later date. If we do not collect at the time of publication, we have lost our chance.

Access to digital materials—Web sites, opinion pieces, blogs, listservs—is an important part of the Library’s service to Congress and the broader public. We know that the ease of use and immediacy of the Internet make search engines enormously popular among our users. We are actively engaged in digitizing large portions of our collections so that the content will be more immediately available, but this does not mean that books are no longer important. Web sites are highly variable and transient. They contain suppositions, rumors, and self-indulgent revelations as well as valid scholarly content.

Since it is the responsibility of the Library of Congress to provide authoritative answers to Members of Congress and their staffs, it is essential that the Library have the most comprehensive collection possible of peer-reviewed, validated information that is found in books and scholarly journals. Equally important are the librarians and curators who know this material intimately. There is no satisfactory substitute for knowledgeable staff members who have built collections over long years. Recognizing that our users appreciate the convenience of the Web, the Library has undertaken an initiative, the Knowledge Navigators Program, that will incorporate curators’ deep knowledge into Web-based resources, but that program is only now being developed. The enormous legacy print collections that will never be digitized must remain available for answering questions and providing support for in-depth research.

The Library is in agreement with some of the processes recommended in the report:

Collections policy statements will be reviewed at least once every five years.

Library Services is proceeding with the recommendation to make more effective use of loan records and vendors’ records on usage of databases.

Library Services will establish criteria and incorporate performance measures for recommending officers into their annual performance reviews.

Recommendations to develop collaborative arrangements for acquisition with other institutions are simply not practical. Our responsibility is to provide answers to Congress and staff quickly and authoritatively. Our unique responsibilities to the Congress and, by extension, to the federal government preclude a collections policy ultimately controlled by priorities of private

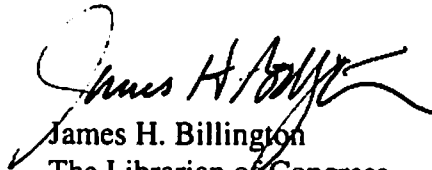
boards of trustees and/or local governmental bodies. Even in those cases when other libraries hold the material we need, the interlibrary loan process used among libraries across the country is labor intensive and time consuming. We cannot wait two to three weeks while requests are issued and materials are sent to us.

A second concern we have about over reliance on partnerships is that the establishment, maintenance, and monitoring of such arrangements are enormously expensive. The cost would offset any marginal savings we would achieve in acquisitions reductions.

The role of the Library of Congress, I regret to say, is frequently misunderstood. It is not simply a warehouse of books and journals that librarians find interesting. It is a dynamic collection of the world's knowledge, carefully considered, judiciously acquired, and preserved. The Library's responsibility is not only to those who need information today. It is the organization that documents the nation's historical record, as well as the primary documents of its culture, and its creativity.

Acquisitions is an inescapable top priority if we are to continue fulfilling our basic mission of serving Congress efficiently and "preserving a universal collection for future generations." Determining what is to be acquired must be governed basically by experienced curators weighing quality judgments not by regulations about quantities—let alone by a study that suggests a presumption of overall reductions at a time when knowledge is more important than ever for our economy and security. The Congress's Joint Committee for the Library of Congress decisively rejected even doing a study on the feasibility of disbursing to other institutions collection responsibilities for analog acquisitions (suggested by a Booze Allen study some years back). We cannot state emphatically or often enough that no other organization has the range of responsibility that the Library of Congress has. Significant damage to the Library's core mission could result from studies that seem to advocate cutting back on the national collection.

Sincerely,



James H. Billington  
The Librarian of Congress

Mr. Karl W. Schornagel  
Inspector General  
The Library of Congress  
Washington, DC 20540  
LIBN/OIG (1060)