

UNITED STATES GOVERNMENT

LIBRARY OF CONGRESS

Memorandum**Office of the Inspector General**

TO: James H. Billington
Librarian of Congress

March 29, 2002

FROM: Karl W. Schornagel
Inspector General

SUBJECT: *Collection Security: Issues Are Being Addressed But Effective
Tracking and Restricting Access Remains A Challenge*
Audit Report No. 2001-PA-103

This transmits our final audit report on collection security. Our objectives were to assess the effectiveness of current inventory, bibliographic, and physical security controls formulated by the custodial divisions, the Copyright Office, and the Office of Security to mitigate the risk of theft.

Due to the size and value of the Library's collections, theft continues to be a considerable risk despite current security measures. In our opinion, the Library has taken strong action to provide an effective internal control structure over safeguarding materials against unauthorized acquisition, use, or disposition. Although the Library has installed the hardware and control mechanisms necessary to mitigate the risks to the collections, staff and contractors hinder security efforts by not following control procedures. Additionally, the Library faces the challenge of balancing its security objectives with conflicting objectives involving patron service, fire protection, cleaning services, and building maintenance. This report identifies opportunities for improvement.

The Associate Librarian for Library Services, Director of Security, and Copyright Security Manager provided written comments on the draft report. Additionally, the Motion Picture, Broadcasting and Recorded Sound Division (MBRS) submitted separate comments regarding the processing of its collection materials. We have included the responses as Appendixes to this report. The service units generally concurred with our recommendations and have already initiated corrective actions. MBRS took exception to our finding involving inputting its materials into the ILS.

Please provide a consolidated action plan within 90 calendar days that addresses each recommendation, including implementation dates, in accordance with LCR 1519-1, Section 4.B.

We appreciate the cooperation and courtesies extended by service unit staff during the review.

cc: Deputy Librarian of Congress
Associate Librarian for Library Services
Director for Acquisitions

The Library of Congress
Audit Report No. 2001-PA-103

Office of the Inspector General

March 2002

Director of Security
Protective Services Officer
Associate Librarian for Copyright Services
Copyright Security Manager

The Library of Congress
Audit Report No. 2001-PA-103

Office of the Inspector General

March 2002

TABLE OF CONTENTS

EXECUTIVE SUMMARY.....	i
BACKGROUND.....	1
OBJECTIVES, SCOPE, AND METHODOLOGY.....	2
FINDINGS AND RECOMMENDATIONS.....	4
I. Tracking System Improvements Are Needed to Help Locate Collection Materials...	4
A. MBRS Should Immediately Input Records Into the ILS.....	4
B. BCCD Should Use ILS to Efficiently Track and Locate Materials	5
C. “Processing Status” Errors Should Be Reduced.....	5
D. The Use of Call Slips in the Main Reading Room Should Be Discontinued.....	5
E. All Copyright Material Should Receive A Copyright Accession Stamp.....	5
II. Stronger Actions Are Needed to Ensure Collection Areas Are Better Secured.....	7
III. Main Reading Room Materials Need More Theft Protection.....	9
IV. Physical Security Significantly Strengthened as a Result of the FY 1999 Omnibus Appropriation.....	10
V. Collection Management Division ILS Updates Needed to Provide More Effective Tracking.....	11
VI. All Special Collection Materials Need Direct Ownership Markings.....	12
VII. ILS Bar Code Needed on All Special Collection Material.....	13
VIII. Reader Registration Staff Should Refer Questionable Identifications to the Supervisor.....	14
IX. Initially Accepted Deposits Should Be Recorded.....	14
APPENDIXES: A Results of Sample Testing.....	16
B Summary of Budget Requests FY1997 to FY 2001.....	17
C Formal Response to the Draft Report –	18
Library Services.....	
D Formal Response to the Draft Report – Copyright Office.....	26

*The Library of Congress
Audit Report No. 2001-PA-103*

Office of the Inspector General

March 2002

E Formal Response to the Draft Report – Office of
Security.....

28

EXECUTIVE SUMMARY

Internal theft may occur regardless of security measures, however, it is crucial that the Library invest in quality security measures to protect its collections. Over the past five fiscal years, the Congress approved funding related to collection security totaling over \$23 million and denied requests totaling \$8.6 million. The Library has installed the hardware and software and generally implemented the controls necessary to ensure reasonable physical security. However, our testing disclosed that staff actions, contractor mistakes, and judgment errors circumvent controls and hinder the Library's ability to meet its security objectives. Furthermore, the Congressional decision not to approve the Library's funding request to convert manual control files to the Integrated Library System (ILS) makes it difficult for the Library to comply with the General Accounting Office internal control standard to periodically count assets and compare the results to control records.

The Library could not locate or account for 8 of the 83 (9.6 percent) titles we judgmentally selected for testing from recent purchases, exchanges, and Copyright deposits (see Appendix A). We gained access to restricted areas via doors that staff and contractors had not fully closed. Additionally, once we gained access to the restricted areas, staff did not challenge us even though we did not display proper identification. The Librarian closed the stacks to better ensure patrons do not remove collection materials without proper checkout. For this to occur, staff must enforce the security controls.

We also determined that the Library is not using the ILS to the extent necessary to effectively track the flow of collection materials. The ILS is not used to track the flow of material undergoing preservation treatment or binding. The Preservation Directorate is currently evaluating the use of the ILS to track workflow as materials are transferred from custodial divisions to preservation divisions. Our interviews with custodial divisions indicated that using a shared database, such as the ILS, would provide great benefits in improving the control over material flow.

The service units concurred with our findings, with one exception, and have already initiated actions to improve security and control. The Motion Picture, Broadcasting and Recorded Sound Division (MBRS) Chief replied that our report was inaccurate in stating "MBRS does not immediately input records into the ILS." We agree that our report was misleading regarding compact discs, but correct regarding videocassettes. The report should have stated that the bibliographic records for compact discs are immediately input into the ILS staff module. However, MBRS suppresses these records from the Library's Online Public Access Catalog until it can replace the record with the Online Computer Library Service bibliographic record. During our testing, we searched only the Library's Online Public Access Catalog.

BACKGROUND

The Library of Congress has the world's largest library collection comprising nearly 121 million items including research materials in over 450 languages and various media. The collections include more than 28 million books and other printed materials, 54 million manuscripts, 12 million photographs, 5 million maps, 4 million pieces of music, 2 million audio recordings, and 844 thousand motion pictures. The collection of incunabula (books printed before 1501) is the largest in the Western Hemisphere, and the collections of maps, atlases, newspapers, music, motion pictures, photographs, and microforms are probably the largest in the world. Each day the Library adds more than 10,000 items to its collections for use by the Congress and the nation.

Due to the size and value of the Library's collections, theft continues to be a considerable risk despite current security measures. The Library constantly faces trade-offs in developing its collection security program. Library management has made concessions to allow Architect of the Capitol (AOC), Library police force, and cleaning staff access to perform their responsibilities. Similarly, the Library must maintain positive patron relations while enforcing reasonable rules and procedures. For efficiency, some collection materials are self-service. Some collections are cataloged at the collection level due to the enormous quantity and these collections are served without the reading room staff performing a piece count. The reading room relies upon physical control to compensate for this lower degree of inventory control.

KPMG's Risk Analysis Study dated September 20, 1999, identified collection security as a high-risk area. To better secure its materials, the Library segregates its collections by degree of tolerance of risk. The Library uses the names of five precious metals and defines each group as follows:

- Platinum:** The Library's most priceless items.
- Gold:** Rare items that have prohibitive replacement cost, high market value, and significant cultural, historical, or artifactual importance.
- Silver:** Items that require special handling and items at particularly high risk of theft, such as computer software, popular titles in print, videos, and compact discs.
- Bronze:** Items served without special restrictions in the Library's reading rooms and materials that may be loaned without stringent restrictions.
- Copper:** Items the Library does not intend to retain but holds while deciding, for example, whether the item may be used for the exchange program.

The Library provides enhanced security for its platinum, gold, and silver materials such as storage in vaults or cages with limited access and entry logs. Once in place, internal security controls provide reasonable, not absolute, assurance of meeting the Library's security objectives. On August 21, 2000, the Library officially accepted the Integrated Library System (ILS). Implementation of the ILS provided the platform for enhancements in collections security. All

*The Library of Congress
Audit Report No. 2001-PA-103*

Office of the Inspector General

March 2002

non-rare monographs are bar-coded and linked to a specific holding record at the first stage of the acquisitions process. Both the bar coding and the creation of a holdings record is an enhancement provided by the ILS. The system allows item-level tracking of collection items and facilitates collection inventory. Additionally, the Library continues to contract for sampling projects to verify information in the ILS and establish baseline data for assessing the extent of missing materials. During FY 2001, KPMG conducted random sampling projects in the Prints and Photographs, Manuscript, and Anglo-American Acquisitions Divisions. The projects also highlight inadequate tracking controls.

In addition to enhanced bibliographic and inventory control measures, the Library recently strengthened its physical controls. For better surveillance, the police force was expanded and contracted security staff were added. The Library also increased its surveillance through an extensive closed circuit camera system. The Library's FY 2000 Stewardship Report indicated that book theft detection targets were installed in 539,283 volumes in the general collections and incoming materials in the Copyright Office. Since 1992, targets have been installed in 7,108,505 collection items, or 60 percent of the general collections.

OBJECTIVES, SCOPE, AND METHODOLOGY

Our objectives were to assess the effectiveness of current inventory, bibliographic, and physical security controls formulated by the custodial divisions and the Copyright Office to mitigate the risk of theft. We also performed follow-ups on the risk assessments performed by KPMG during the period of FY 1997-1999.

Our audit covered FY 2000 and FY 2001 activities. The scope of our review included all activities associated with the security of the Library's collections and focused on the general collections. We conducted our fieldwork from December 2000 to April 2001. Our report was delayed due to special assignments of higher priority. However, on May 4, 2001, we notified the service units of our findings and obtained preliminary responses. We also updated the report to reflect any security enhancements made between April 2001 and September 2001. To obtain information regarding collection security enhancements since April 2001, we met with the Director for Acquisitions in early December. In early January 2002, we met with the Office of Security's Special Assistant to update budget information.

To evaluate workflow, we interviewed management and staff of the Acquisitions Directorate, Copyright Office, Preservation Directorate, Collections Management Division, and the various custodial divisions. We conducted walk-thru tours and examined pertinent records. Key internal controls were identified and assessed, and we conducted tests to ensure that the controls were working as intended.

We tested a sample of 36 titles acquired through purchase or exchange, and 47 titles received by the Copyright Office. We used judgmental sampling rather than statistical sampling because the order documents (dealer catalogs, memos from recommending officers, letters to auction houses, etc.) pertaining to the purchased items were not in an order that facilitated the drawing of a

The Library of Congress
Audit Report No. 2001-PA-103

Office of the Inspector General

March 2002

statistical sample. Furthermore, judgmental sampling permitted the inclusion of materials more susceptible to theft such as rare or high dollar items, and popular items such as music compact disks and videocassettes.

We conducted our audit in accordance with generally accepted government auditing standards. The criteria used to evaluate the audit evidence gathered included the *Standards for Internal Control in the Federal Government* (GAO/AIMD-00-21.3.1, November 1999) and applicable Library of Congress Regulations.

The Library of Congress
Audit Report No. 2001-PA-103

Office of the Inspector General

March 2002

FINDINGS AND RECOMMENDATIONS

I. **Tracking System Improvements Are Needed to Help Locate Collection Materials**

The Library could not locate or account for 8 of the 83 (9.6 percent) titles we judgmentally selected for testing from recent purchases, exchanges, and Copyright Office deposits (see Appendix A). We believe this was due to shortcomings in the Library's tracking systems rather than theft. Nevertheless, the effect is that the Library is less able to serve the needs of the Congress, the U.S. Government, and the public through accessibility to the collection assets.

GAO's *Standards for Internal Control in the Federal Government* states, "Internal control should be designed to provide reasonable assurance regarding prevention of or prompt detection of unauthorized acquisition, use, or disposition of an agency's assets." Furthermore, "An agency must establish physical control to secure and safeguard vulnerable assets." Our test results indicate that the Library needs to strengthen its controls over collection assets.

The lack of inventory control was due to (1) not immediately establishing inventory control in the ILS for all items, (2) not fully tracking in the ILS the flow of materials during processing, (3) an improper status (in process or not charged) on the MARC¹ record, (4) the use of call slips rather than the ILS to request materials in the Main Reading Room, and (5) improper accession stamps.²

A. *MBRS Should Immediately Input Records Into the ILS*

An ILS record did not exist for 17 (10 compact disks and 7 videocassettes) of the 20 Motion Picture, Broadcasting and Recorded Sound Division (MBRS) items included in our sample. MBRS does not immediately input compact disks and videocassettes into the ILS due to a backlog of materials to catalog. Instead, it assigns a tracking number and maintains a tracking system separate from the ILS to locate the item. We note that MBRS located all items except one videocassette.

In our opinion, the ILS should be used to the extent possible to (1) establish accountability at the earliest stage, (2) better track collection materials, and (3) share information with other divisions. One of the strengths of the ILS is the ability to share information among divisions and with researchers. By not immediately inputting the record into the ILS, Library staff and researchers are less likely to find the material when needed.

¹ MARC (Machine-Readable Cataloging) is the national standard for the exchange and distribution of cataloging data. It provides the mechanism by which computers exchange, use, and interpret bibliographic information and its data elements make up the foundation of most library catalogs used today.

² LCR 414, Section 2, states, "It is the Library's policy to mark incoming library materials to indicate Library of Congress ownership, the mode, and date of the acquisition of each piece. Accessioning stamps shall be used for this purpose whenever possible."

*The Library of Congress
Audit Report No. 2001-PA-103*

Office of the Inspector General

March 2002

B. BCCD Should Use ILS to Efficiently Track and Locate Materials

Three of the eight titles we could not locate involved the Binding and Collection Care Division (BCCD). BCCD does not use the ILS to track materials shipped to the bindery. Instead, it maintains bibliographic and inventory control of items sent to the commercial binder through an automated system called LARS (Library Automated Retrieval Control System). To search for titles in our sample, BCCD used the date received noted on the ILS record and then manually searched LARS for titles that were shipped around that timeframe. This method is not a reliable means to efficiently locate a particular title because the LARS system cannot search by title. According to the Director for Preservation, the ILS does not have a binding module in the current release. However, a binding module is expected in the next release, and an interface between LARS and ILS is under development. To reduce the number of items sent to the BCCD, the Cataloging Directorate should forward materials not requiring binding directly to the appropriate custodial division.

C. "Processing Status" Errors Should Be Reduced

We located one title in our sample test in the stacks even though the MARC record indicated "In Process." BCCD management cited additional examples of titles coming from the Cataloging Directorate with the status incorrectly noted as "Not Charged." Similarly, Collections Management Division (CMD) management cited examples of BCCD transferring materials without updating the processing status. An incorrect processing status makes it difficult for the Library to locate a title, especially if urgently needed by a Congressional office.

D. The Use of Call Slips in the Main Reading Room Should Be Discontinued

Items requested in the Main Reading Room are not necessarily charged-out via the ILS. Researchers may request an item with a call slip. CMD management cited this as a reason why we may not find a particular item on the shelf even though the ILS record indicated "Not Charged." The Main Reading Room is in the process of phasing out the use of call slips. Eventually, all requests for collection materials will be processed through the ILS. Until that time, the Library cannot fully rely upon the ILS status to locate a title.

E. All Copyright Material Should Receive A Copyright Accession Stamp

Our testing revealed that the accession stamp might not properly denote the source of the acquisition. The Copyright Office forwards materials to the Cataloging In Publication Division (CIP) for review by the Selection Officers. Occasionally, CIP will receive items from Copyright without the Copyright accession stamp. For these unstamped items, a CIP stamp may be applied. This process is faster than sending the item back to Copyright. While this procedure is efficient and provides an ownership marking, it does not properly denote the acquisition source. This is important if the Library suspects that a particular copy has been stolen.

*The Library of Congress
Audit Report No. 2001-PA-103*

Office of the Inspector General

March 2002

Recommendations

1. MBRS should establish a minimal ILS record for materials as soon as received and abandon the independent tracking system.
2. Cataloging Directorate should send materials not requiring binding directly to the appropriate custodial division, and continue efforts to interface data in the LARS with the ILS.
3. Cataloging Directorate should remind staff of the importance to update the ILS status during processing and to be alert for an incorrect status.
4. Library Services should continue efforts to fully implement the ILS charge-out system in the Main Reading Room.
5. CIP and Cataloging Directorate staff should ensure that materials received without an accession stamp receive the proper stamp.

Service Unit Responses and OIG Comments

Management concurred with findings 2 through 5. Library Services responded that it will continue to press the ILS vendor to “provide the promised (and contracted for) circulation and binding modules that will interface effectively with vendor software (LARS or any alternative) to allow accurate tracking of materials sent for commercial library binding.” Concerning reducing the number of titles sent to the BCCD, Library Services responded that “With some few exceptions, the labeling function will be moved from the BCCD to the cataloging divisions, providing much greater efficiencies.” We believe these actions will effectively address our finding.

Regarding Section A, the Associate Librarian for Library Services responded “While our reaction to the rest of the audit was quite reasonable, both the findings and recommendations regarding MBRS elicited such strong reaction that I believe another look is merited before your audit is finalized.” We believe that the MBRS response provides sufficient detail to explain why we may not have been able to locate the ILS record for the MBRS items sampled.

The MBRS Chief responded that our report erroneously states that videocassettes and audio compact discs are not immediately cataloged with item-level bibliographic records on the ILS. Based on the responses from the MBRS Section Heads, we realize that our statement was not totally accurate regarding the compact discs. The report should have stated that the compact discs are immediately input into the ILS staff module. However, these records are suppressed from the Library’s Online Public Access Catalog until they can be replaced by the OCLC

The Library of Congress
Audit Report No. 2001-PA-103

Office of the Inspector General

March 2002

(Online Computer Library Service, a nonprofit computer service and research organization whose systems help libraries locate, acquire, catalog, and lend library materials). During our testing, we searched only the Library's Online Public Access Catalog.

Our report is correct concerning the videocassettes. The MBRS Moving Image Section's response stated, "The point made in the IG's report that MBRS does not immediately input videocassettes into the ILS due to a backlog of materials is true." MBRS agreed with the recommendation to establish a minimal ILS record for videocassettes as soon as they are received and abandon the independent tracking system. "Multiple efforts are being pursued in the Division to reach that goal."

**II. Stronger Actions Are Needed to Ensure
Collection Areas Are Better Secured**

Our testing revealed that doors leading to restricted stack and processing areas were generally locked. However, we gained access to restricted areas via doors that were not fully closed. Additionally, once we gained access to the restricted areas, staff did not challenge us even though we did not display proper identification. The effect is that it is currently possible for unauthorized persons to enter the stacks and processing areas and remove collection materials without detection. The Librarian closed the stack areas to better ensure that collections materials are not removed without proper checkout. Our test results indicate that stricter enforcement is required. Specific weaknesses included:

- Doors to processing areas include signs noting that the area is restricted to "Authorized Staff." However, we were able enter these areas from public hallways because the doors were not locked or controlled by card reader access.
- Custodial divisions, except for the Manuscript Division, had no formal procedures for overseeing housekeeping staff and AOC staff while working in collection and processing areas.
- The stairs leading up from Alcove 7 in the Jefferson Building has a sign "Staff Only." However, the door is not locked to prevent others from going up the stairs. At the top of the stairs, we found a door leading to the stacks. While the door was equipped with a card reader, the door was not fully closed and we were able to enter the stack area.
- Two doors with magnetic locks on Gallery 3 leading to Deck 11 in the Jefferson Building were unlocked. The doors led into the restricted stack area.
- On the fourth floor of the Adams Building, we observed that the cleaning staff had propped open the door leading into the African and Middle East Division collection area with their cleaning cart. We entered the area without challenge. We did observe that the rare materials were secured behind a locked screened area.

The Library of Congress
Audit Report No. 2001-PA-103

Office of the Inspector General

March 2002

- Using the freight elevator inside the African and Middle East Division collection area (fourth floor, Adams Building) we exited to the loading dock. The LOC Police Officer and the dock personnel stationed at the Adams Building dock did not challenge us. We asked if both of them would try their access card on the elevator to help us get to Deck 6. Both tried, even though they did not know us. Neither card worked.
- At the Madison Building loading dock, we observed packages containing collection materials left unsecured on the loading dock waiting for pick-up by the proper custodial division. We also observed books awaiting shipment for mass deacidification treatment stored on unlocked carts in the unlocked fumigation room that opens into the loading dock.
- In the cellar of the Adams Building, we observed unattended collection materials in unlocked tubs waiting for delivery to the Binding and Collections Care Division for labeling.

The Acquisitions Directorate has submitted requests to the AOC to have card reader access installed in processing areas. The AOC has not taken action due to other priorities. The unrestricted access to processing areas is especially problematic considering that the Acquisitions Directorate does not mark materials as soon as received. Divisions must first make sure that the material is what was ordered. If marked first and later determined that the division has to return the title, the dealer may not accept a marked book. GAO's *Standards for Internal Control in the Federal Government* requires that, "Internal control should be designed to provide reasonable assurance regarding prevention of or prompt detection of unauthorized acquisition, use, or disposition of an agency's assets." "An agency must establish physical control to secure and safeguard vulnerable assets." Current controls have not ensured collection security.

In our opinion, the Library has the control mechanisms to provide reasonable assurance regarding prevention of or prompt detection of unauthorized use or disposition of the Library's collections. Nevertheless, human mistakes and judgment errors have affected the Library's ability to achieve its collection security objectives. Staff and contractors violated the control mechanism by not ensuring that doors are closed. Cleaning staff and Library police violated control systems by being overly concerned with providing assistance rather than security. Even though we did not display proper identification, it was possible to talk our way past established security controls without revealing our identity or purpose.

Recommendations

1. CMD and the Office of Security should emphasize to their staff the importance of ensuring that locked doors are fully closed and secured and question any persons in restricted areas not displaying proper credentials. Further, contract janitorial staff should be reminded that it is inappropriate to prop open doors to secured areas.
2. Library Services and the Office of Security should ensure that the doors in acquisition areas that exit into public hallways are secured from the inside to prevent unauthorized

The Library of Congress
Audit Report No. 2001-PA-103

Office of the Inspector General

March 2002

access. Requests to the AOC for the installation of card readers should be resubmitted.

Service Unit Responses and OIG Comments

According to the Director of Security, "The Office of Security, in collaboration with the Operations subcommittee chaired by the Chief, CMD [Collection Management Division], will launch Site Assistance Visits (SAVs) beginning in April, 2002. The SAV's will focus on security practices of staff, and concerns raised in the OIG audit will be addressed as special interest items." Concerning securing doors, the Director of Security stated that the recommendation will be implemented when the Capitol Police Board selects the mag-lock system that will be used in the Library. We believe that these actions will correct the deficiencies we disclosed.

III. Main Reading Room Materials Need More Theft Protection

General collection materials used by researchers in the Main Reading Room are unnecessarily at risk. The door from the Main Reading Room (LJ-100) to the front of the Jefferson Building is not effectively monitored and secured. The security guard stationed at the main entrance to the Main Reading Room does not inspect researchers upon leaving. As a result, reference collection materials and materials on the 3-day reserve shelf are more prone to undetected theft.

Additionally, patrons may remove materials they charged out using a call slip and it would be difficult to identify the last person using the material. LCR 610-2, Section 3A, *Security of the Collections: Use, General Policy for Use of Library Materials*, dated November 22, 1995, states, "Materials retrieved for readers' use shall be used only in assigned reading rooms or research facilities." Furthermore, the regulation requires that "Any material removed from the security-controlled environment of a reading room or storage area, and meeting established criteria, must be charged as an internal or external loan through the Loan Division in accordance with established loan regulations."

CMD has two staff stationed inside the Main Reading Room just inside the LJ-100 doorway. However, guarding the door is not their primary duty. The staff did not question us when we exited from this door. On another occasion, we observed that both staffers were attending a staff meeting and no one monitored the unlocked doorway. We believe that this exit needs more effective monitoring. The CMD is reluctant to have the LJ-100 entrance locked and alarmed. Fire regulations require that the door remain open from the Main Reading Room and CMD believes that false alarms would cause too much of a disturbance in the Main Reading Room. Additionally, CMD staff often use the door as an exit.

The contract security guard monitoring the main researcher entry is responsible for ensuring that persons entering the Main Reading Room have proper identification. The security guard does not check persons exiting the reading room to determine if they have uncharged materials. According to CMD, the Library police stationed at the various exits to the outside of the buildings are responsible for detecting persons attempting to leave with collection materials. In our opinion, the Library police inspection provides theft deterrence and detection, to a limited

The Library of Congress
Audit Report No. 2001-PA-103

Office of the Inspector General

March 2002

extent. Increased control is possible if the contract security guards also observe and question anyone leaving the Main Reading Room with Library materials.

Recommendations

1. CMD should take action to ensure that the LJ-100 doorway is monitored at all times to prevent the public from unauthorized entry and to ensure that collection materials are not removed from the Main Reading Room.
2. The Office of Security should direct the contract security guard stationed at the main entry to the Main Reading Room to visually inspect all patrons when leaving and question anyone attempting to exit with Library materials.

Service Unit Responses and OIG Comments

Library Services and the Office of Security responded that they will further explore ingress and egress routes in the Main Reading Room and look for the best way to ensure collections security consistent with staffing patterns and safety requirements. The Office of Security replied, "Post orders for the Main Reading Room exit are being modified to include a procedure for exit inspections." We believe these actions address our findings.

IV. Physical Security Significantly Strengthened as a Result of the FY 1999 Omnibus Appropriations Act

Over the past five fiscal years the Congress approved funding related to collection security totaling \$23,294,491. With this funding, the Library has significantly increased its police force, begun planning for the consolidation of its police command centers, and plans to redesign and enlarge the public entries at the Jefferson Building to accommodate x-ray equipment. While the Congress has been generous to the Library, \$16,975,000 or 73 percent of the funding resulted from the FY 1999 Omnibus Appropriations Act. For all other appropriation requests, the Congress approved \$6,319,491 and denied requests totaling \$8,621,515. Not funded were FY 2001 requests for \$2,691,109 to transfer manual bibliographic files to the ILS, \$1,141,275 for a physical shelf compare program, and a FY 1998 request for \$642,410 to staff a cloakroom and reader registration stations. We concluded that the denied funding should not significantly affect security of new acquisitions but will hinder the Library's ability to fully utilize the ILS to support inventory control and tracking of retrospective collections.

GAO's *Standards for Internal Control in the Federal Government* states, "An agency must establish physical control to secure and safeguard vulnerable assets." Based on our testing and observations we conclude that the Congress has provided funding for the Library to effectively secure and safeguard its collections, although, the denied funding requests have hindered the Library's ability to comply with GAO's internal control standard to periodically count assets and compare the results to control records. Appendix B summarizes the budget requests that the Congress funded (bold type) as well as the requests that the Congress did not approve.

*The Library of Congress
Audit Report No. 2001-PA-103*

Office of the Inspector General

March 2002

The FY 1999 and FY 2000 approved funding included no-year funding of \$16,975,000 (\$11,590,960 for FY 1999 and \$5,384,040 for FY 2000) as part of the FY 1999 Omnibus Appropriations Act. These funds related to the Library's Security Enhancement Plan and were part of a larger appropriation to the Capitol Police Board. The Security Enhancement Plan included hiring additional police officers, consolidating the command centers, and purchasing closed circuit television and screening equipment. Congress approved an additional \$2,451,800 and \$79,086 for FY 2001 to continue the added police force initiated by the FY 1999 Omnibus Appropriation.

The Capitol Police Board divided the funding into two phases. Under Phase I, the Board immediately transferred \$3,651,000 to the Library and \$510,000 to the AOC. According to the Board, "A request to transfer the Phase II balance of the approved funds will be submitted when the Phase I design estimates are completed and project plans receive the Committee approval." The Board transferred \$4,300,000 to the Library on November 17, 2000, for Command Center consolidation, an intrusion detection system, and screening equipment. On January 2, 2002, the Board transferred \$1,390,000 to the Library as Phase II funding for closed circuit television. Additionally, on January 2, 2002, the Board transferred \$3,564,000 to the AOC for physical upgrades (redesigning and enlarging the lobbies in the Jefferson Building to better accommodate x-ray equipment and the Madison Building to make the Gift Shop less vulnerable, and to add bulletproof desks for the Library police). The Library's Office of Security has submitted a request for the \$5,434,000 (\$4,950,000 and \$484,000) budgeted for access control including security barriers around the perimeter of the buildings, guardhouse, and granite walls. As of January 2, 2002, the transfer of these funds is pending approval by the Joint Committee on the Library.

Recommendation

None

Service Unit Responses and OIG Comments

The Copyright Security Manager provided additional detail with respect to the \$993,500 we recorded in Appendix B as funding approved in FY 1999. According to the Security Manager, "the requirement for technical research to be performed beforehand made it impossible to use all the funds in FY 1999. As a result, the Copyright Office received Congressional reprogramming approval for one year to use \$780,000 of the \$993,500 for other purposes (i.e. IT technology and overtime)."

V. Collection Management Division ILS Updates Needed to Provide More Effective Tracking

CMD staff do not update the ILS record to reflect receipt of a title and the placement of the title on the shelf. Furthermore, the Library lacks a follow-up reconciliation to determine if CMD has

*The Library of Congress
Audit Report No. 2001-PA-103*

Office of the Inspector General

March 2002

received all materials transferred from BCCD. Consequently, the Library cannot effectively ensure that all materials transferred to CMD are received and placed on the shelf. By not fully tracking the movement of the items, the Library limits its ability to locate the item if urgently needed by the Congress. The lack of a packing list and reconciliation were high-risk areas identified by KPMG in its risk assessments and is one factor hindering the Library from receiving an unqualified opinion on the Independent Auditor's Report on Internal Control. The Library reported to the Congress that it would use the ILS to track materials as it travels among departments for cataloging, binding, preservation treatment, and storage.

Due to the volume of material and limited staff resources, the Library relies upon BCCD staff to update the ILS record from "In Process" to "Not Charged" when a title is transferred to CMD. According to the Director for Preservation, responsibility for updating the ILS record from "In Process" to "Not Charged" is being moved to CMD as soon as equipment is installed. Other custodial units are also being asked to change the status when items are received in their collections. Having the final receiving unit update the ILS record should provide more effective tracking. However, we believe that BCCD should also indicate the date the material is transferred to CMD and the custodial divisions in the ILS.

Recommendations

1. CMD should record in ILS the date received for each item.
2. BCCD should record in ILS the date material is transferred to CMD and the other custodial divisions.
3. ILS management staff should periodically produce a report that indicates the titles sent by BCCD to CMD more than two months ago (for example), but not received by CMD.

Service Unit Responses and OIG Comments

Library Services replied that recommendations 1 and 3 will be incorporated into workflow as part of the CMD/Loan Divisions merger and the full functioning of the new Collections Access, Loan, and Management (CALM) Division. Concerning recommendation 2, the Preservation Directorate suggested that CMD and other custodial units assume responsibility for removing the "In Process" status when materials actually arrive in their custodial divisions rather than the BCCD performing this function. The Preservation Director stated that this change will speed the flow of materials through BCCD, and place responsibility for updating the status of items at its logical place. We agree with the Preservation Director concerning having the CMD and other custodial divisions assume responsibility for removing the "In Process" status. However, for effective total tracking, we believe the BCCD should record the date the material is transferred from the division to the newly formed CALM.

VI. All Special Collection Materials Need Direct Ownership Markings

*The Library of Congress
Audit Report No. 2001-PA-103*

Office of the Inspector General

March 2002

Our test sample included 3 of 83 items without an accession stamp. Additionally, we found 10 compact discs and videocassettes with the accession stamp on the case but not the actual item. Marking materials provides a vital means by which Library ownership can be recognized and proven. Marking also is a deterrent to the theft of Library materials. The three items included in our sample without an accession mark indicates the need for management to closely scrutinize materials during processing to ensure that all are marked. For example, catalogers should take steps to have materials marked whenever they discover an unmarked item.

LCR 414-1, Marking of Library Materials, dated August 5, 1981, requires that accessioning stamps be used to mark all materials acquired by exchange, gift, CIP program, Copyright, and from various government sources. The regulation states that certain rare, fragile, or delicate materials may be accessioned by hand in a manner that will not disfigure the piece. LCR 414-1 Section 3C, lists four types of materials that should not be marked: microfiche, motion pictures, phonograph records, and taped recordings.

We believe the three items were missing an accession stamp due to staff oversight. Considering the volume of materials received daily, it is unreasonable to expect flawless processing of every item. For this reason, constant review during the entire processing stage is necessary to reduce the number of items not stamped. Concerning the 10 compact discs and videocassettes with the accession stamp on the case, the Copyright Office began marking these materials with a laser in FY 2000. This will provide more effective theft determent for this type of material.

Recommendation

The Cataloging Directorate should closely examine materials to ensure the Copyright Office and the Acquisitions Directorate have marked the materials.

Service Unit Responses and OIG Comments

Both Library Services and the Copyright Security Manager concurred with the finding. The Director for Cataloging responded that he did not believe that marking the containers provides any additional security to the item housed within and may in fact give staff a false sense that the material is secure. We agree. However, we believe that marking the container, especially with a bar code, enhances efficient processing and storage.

VII. ILS Bar Code Needed On All Special Collection Material

We found 6 of the 83 titles tested did not have an ILS bar code. Five of the six were special collection materials: three were Rare Book materials, one a Music Division manuscript, and one was a Geography & Map Division atlas. The purpose of the bar code is to make inventory control more efficient. While we agree that it may not be appropriate to put markings on these special types of materials, we believe it is necessary to associate an ILS item number with these materials that can be easily accessed.

LCR 414-1, Marking of Library Materials, dated August 5, 1981, states that certain rare, fragile,

*The Library of Congress
Audit Report No. 2001-PA-103*

Office of the Inspector General

March 2002

or delicate materials may be accessioned by hand in a manner that will not disfigure the piece. The policy of Library Services is that marking should not damage or cause deterioration to the physical, informational, or aesthetic integrity of the special collection materials. Therefore, these offices do not place labels on the actual material.

Recommendation

Special collection divisions should place an ILS bar code on containers manufactured to hold the special material.

The Library of Congress
Audit Report No. 2001-PA-103

Office of the Inspector General

March 2002

Service Unit Responses and OIG Comments

Management did not provide comments for this section.

VIII. Reader Registration Staff Should Refer Questionable Identifications to the Supervisor

Staff at the Reader Registration Center did not effectively verify identification. Office of the Inspector General auditors were able to register using the picture identification of another employee. The effect is that the Library has not created an accurate record to establish accountability for items charged from the collections. Accurate data is necessary to locate a person in case material is missing.

LCR 811, *Required Information about Readers*, dated October 5, 1977, states "Readers are required to provide their names and addresses when requesting materials from the Library's collections." According to the Head, Collections Control Center, the standard procedure requires staff to bring questionable identification to the supervisor for review. If still questionable, Reader Registration staff may ask for a second form of identification. During our testing, the Reader Registration staffer did not follow the office procedure of contacting the supervisor any time there is a question about a form of identification. Registration staff did question whether the identification card picture belonged to the person registering. However, the Registration staffer accepted the explanation that the auditor's identification using incorrect photographs did not match because they were old. No further identification was requested.

Recommendation

Reader Registration staff should request a second form of identification whenever there are any doubts regarding the first form of identification.

Service Unit Response

Management concurred.

IX. Initially Accepted Deposits Should Be Recorded

Our sample included five Copyright deposits that the Library's Selection Office initially selected and the Cataloging Directorate subsequently determined were excess and could be surplused. We could not determine with certainty that the Library had surplused these titles. The Cataloging Directorate does not make a notation in the MARC record to reflect the surplus of titles. However, we verified that the Library held two other copies and the MARC record indicated that additional copies were not required. Based on this, we made the assumption that the Cataloging Directorate surplused these copies.

The effect of not recording the transfer of surplus material to the exchange program is that the

*The Library of Congress
Audit Report No. 2001-PA-103*

Office of the Inspector General

March 2002

Library cannot provide reasonable assurance that these materials are properly surplus rather than misused. Recording that a copy is surplus is valuable for inventory control. More importantly, recording the surplus permits the Library to reconcile the surplus items with the items received by the exchange program. This control ensures that all materials transferred are received.

GAO's *Standards for Internal Control in the Federal Government* states, "Internal control should be designed to provide reasonable assurance regarding prevention of or prompt detection of unauthorized acquisition, use, or disposition of an agency's assets." Four titles surplus were received through the Copyright Office deposit. The Copyright Law contained in Title 17 of the United States Code permits the Library to use excess materials in the Library's exchange program. Title 17 U.S.C. 704 (b) states "In the case of published works, all copies, phonorecords, and identifying material deposited are available to the Library of Congress for its collections, or for exchange or transfer to any other library. In the case of unpublished works, the Library is entitled, under regulations that the Register of Copyrights shall prescribe, to select any deposits for its collections or for transfer to the National Archives of the United States or to a Federal records center, as defined in section 2901 of Title 44."

The Director for Cataloging stated that the ILS record indicates what the Library has in its collections and is not intended to reflect what may have come through the door but was not kept. The Director believes that adding a notation in the catalog record of the existence of a surplus copy does nothing to protect the surplus copy. The Director for Cataloging believes that the accession stamp provides sufficient control against theft since the Library's police officers check materials upon exiting the buildings. Our sample indicated that approximately 13 percent of the Copyright 407 deposit titles initially selected by the Selection Office are later determined by Cataloging staff to be excess due to other holdings received earlier. We note that neither the Copyright Office nor the Selection Office searches the ILS to determine if the Library has sufficient copies.

Recommendation

Cataloging Directorate should note in the MARC 955 field whenever a copy is surplus.

Service Unit Responses and OIG Comments

"Library Services does not have the staff to record receipt and disposal of materials not selected for the permanent collections. We believe that as long as an arrearage exists awaiting bibliographic control, we must focus our resources on this much more critical aspect of collections security." We agree that reducing the arrearage is a high priority, and we recognize Library Services may not have adequate staff to input a record for every item not selected. However, our finding did not involve every item not selected for the permanent collections. Instead, the finding deals with the smaller number of materials initially selected by the Selection Office and later surplus by the Cataloging Directorate because the Library already had the item in the collection. In these instances, the Copyright record erroneously indicates that the

The Library of Congress
Audit Report No. 2001-PA-103

Office of the Inspector General

March 2002

Library selected the item. Until such time as the Copyright system and the ILS are interfaced, we believe that the Cataloging Directorate needs to make a notation for all materials initially selected.

APPENDIX A

RESULTS OF SAMPLE TESTING

<i>Status</i>	<i>Number</i>	<i>Percentage</i>
<i>Verified</i>	64	77.1
<i>Titles Not Found</i>	8	9.7
<i>Titles Not Found But Surplused</i>	6	7.2
<i>Titles Ordered But Not Received From Dealer</i>	3	3.6
<i>Title Traced to Loan Division</i>	1	1.2
<i>Order Cancelled</i>	1	1.2
<i>TOTALS</i>	83	100.0

Eight titles not found:

1. Curious Cats: In Art and Poetry, British Museum Press, 1999, received via exchange program: Sent to BCCD 10/31/00 and MARC record updated to NOT CHARGED. Neither CMD nor BCCD could locate.
2. Greek Vases, Dyfri Williams, 2nd edition, British Museum Press, 1999, received via exchange program: Sent to BCCD on 01/19/01 and MARC record updated to NOT CHARGED. Neither CMD nor BCCD could locate.
3. Stockholmsfarg, invoice dated December 19, 2000: Sent to BCCD on 03/03/01 and MARC record updated to NOT CHARGED. Neither CMD nor BCCD could locate.
4. Kronika, Carl Hamilton, invoice dated December 19, 2000: MARC record indicates NOT CHARGED. CMD could not locate. Record does not have a call number.
5. Poltox I (1991-1993), Cambridge Scientific Abstracts, 1999 edition, received via 408 Copyright deposit on September 3, 1999: Science and Technology Division could not locate the 1999 edition. Serial Record Division had received and processed.
6. BNA Employment Guide on CD (April 1999), received via 408 Copyright deposit on May 7, 1999: Law Library could not locate the April 1999 edition. Law Library had the most recent edition and stated that each new edition includes all information from previous editions. However, Law Library had kept editions prior to April 1999.
7. Cinema: The Living Camera, produced by Document Associates Production, 1971, received via 408 Copyright deposit on November 2, 1999: MBRS could not locate. Item not recorded in the ILS. MBRS keeps a paper file to locate the material at Landover.
8. Heart of Darkness, Joseph Conrad, 1999, received via 408 Copyright deposit on August 31, 1999: Cataloging Directorate could not locate. Cataloging Directorate believed that the MARC Record came from a "vendor download."

*The Library of Congress
Audit Report No. 2001-PA-103*

Office of the Inspector General

March 2002

The Library of Congress
Office of the Inspector General

Audit Report No. 2001-PA-103
March 2002

APPENDIX B

SUMMARY OF BUDGET REQUESTS - FY 1997 to FY 2001

ILS Tracking and Inventory Control:					
Contract services, supplies and equipment to transfer data into ILS from sheet shelflist and manual files in Law, Music, G&M, and Rare Book					2,691,109
28 FTEs to conduct physical inventory					1,141,275
12 FTEs for subscription claiming					389,118
5 FTEs for bar coding, tracking and transporting new acquisitions					192,216
Security Personnel:					
Additional Police Officers and Contract Guards to operate x-ray machines at public entrances	1,092,725				
Security Officer& staff	204,243				
Mail Clerks to screen incoming mail with x-ray	206,538				
Dock master	56,727				
2 nd Guard at Landover	76,500				
Contract Guards to assist LC Police		400,000			
13 Security Aides to operate x-rays at public entrances			355,331		
44 New Police Officers, 2 Police Supervisors, overtime, 5 support staff			1,157,960	1,084,040	2,451,800 79,086
Training and Equipment			118,000		
Physical Upgrades, Hardware, Software and Materials:					
Command Center Consolidation, Intrusion Detection System, and Screening Equipment			1,091,000	4,300,000	
Closed Circuit Television			210,000		1,390,000
Access Control			4,950,000		484,000
Physical Upgrades			300,000		
			3,564,000		
2 Metal Detectors, 11 x-ray machines, 143 cameras, 123 transmitters, 49 recorders and monitors	1,060,000				
X-ray scanners and metal detector upgrades			270,000		
Membership in theft Reporting Network	5,000				
Studies and Analysis			200,000		
Reading Room, Deck Staff, Cloak Room:					
7 deck staff	197,145				
Contract staff for cloak rooms	66,000	249,000			
Tech to sit with patrons using platinum collections				38,844	
Contract Guards/monitors for Reading Rooms	171,000			370,188	
Risk Assessments:					
Contract for 6 Risk Assessments			210,000		
Copyright Assessment			225,000		
Reader Registration:					
Photo-identification Cards, software, equipment	100,000			111,749 (223,497 requested)	
Staff for 2 reader registration stations		393,410		121,647 (243,294 requested)	
Reader Registration software for Copyright			47,500		
Marking and Tagging Materials:					
Staff or contractors in Copyright Office to insert detectors and attach labels	154,904	160,072		476,378	
Theft detection devises and ownership marking materials for Copyright	82,000	82,000	993,500		

(Bold is money approved by the Congress and non-bold is a request not approved)

As of January 2, 2002, the Capitol Police Board had not transferred the FY 1999 no-year funding of \$4,950,000 and FY 2001 no-year funding of

The Library of Congress
Audit Report No. 2001-PA-103

Office of the Inspector General

March 2002

\$484,000 for access control. Transfer of these funds is pending approval by the Joint Committee on the Library.

The Library of Congress
Audit Report No. 2001-PA-103

Office of the Inspector General

March 2002

Appendix C
(Page 1 of 8)

*The Library of Congress
Audit Report No. 2001-PA-103*

Office of the Inspector General

March 2002

UNITED STATES GOVERNMENT

Memorandum

LIBRARY OF CONGRESS

DATE: February 22, 2002

TO : Karl Schornagel
Inspector General

FROM : Winston Tabb
Associate Librarian for Library Services

SUBJECT : Collection Security; Draft Audit report No. 2001-PA-103

Thank you for the opportunity to comment on the draft audit report referenced above. I particularly appreciate your noting the strong action that senior management has taken "to provide an effective internal control structure over safeguarding library materials," even though more remains to be done.

While the Office of the Director of Security has responded separately to you, I have also included his comments here for the convenience of having a single document responding to the audit and because our staff work so closely together on collections security issues.

Under the rubric of fact-checking, there is one significant item in the report that need to be corrected before the final draft is issued. It follows:

Background—pg 2, last paragraph'.....The Library also increased its covert surveillance.....'
Change cover to overt.

The Library does not use covert surveillance as one of the tools in collections security. Rather, the Library uses overt surveillance believing the more visible the surveillance device, the more it acts as a deterrent to criminal behavior.

With respect to your recommendations concerning the control of materials in the custody of the Motion Picture, Broadcasting and Recorded Sound Division (MBRS), I have provided a short response to the recommendation; but I have also appended to this response a fuller response from the Chief and Senior Staff of the division. While our reaction to the rest of the audit was quite reasonable, both the findings and the recommendations regarding MBRS elicited such strong reaction that I believe another look is merited before your audit is finalized. After you have reviewed the comments of MBRS, I hope you will see fit either to retest in that division or to eliminate this collection area from this audit. I will be happy to talk with you and/or your staff about this component of the audit at any time.

The Library of Congress
Audit Report No. 2001-PA-103

Office of the Inspector General

March 2002

Appendix C
(Page 2 of 8)

*The Library of Congress
Audit Report No. 2001-PA-103*

Office of the Inspector General

March 2002

Recommendations: Section I

- A. MBRS establish a minimal ILS record for materials as soon as received and abandon the independent tracking system.

Response: ILS records are established for all materials other than motion pictures. Please see a fuller explanation attached.

- B. Send directly to the appropriate custodial division materials not requiring binding. Continue efforts to interface data in the LARS with the ILS.

Response: Materials not requiring binding (or labeling) are sent directly to the appropriate custodial unit. As the labeling function is decentralized (full decentralization is in process) all materials not requiring binding/labeling will go directly to the custodial unit. With some few exceptions, the labeling function will be moved from BCCD to the cataloging divisions, providing much greater efficiencies. Thus, action on the first part of Recommendation B. has been taken and is ongoing.

The Preservation Directorate continues to urge, through the National Library Operations Directorate infrastructure support group which oversees the ILS, that Voyager provide the promised (and contracted for) circulation and binding modules that will interface effectively with vendor software (LARS or any alternative) to allow accurate tracking of materials sent for commercial library binding. We will continue to press the vendor to provide this functionality

- C. Remind staff of the importance to update the ILS status during processing and to be alert for an incorrect status.

Response: Concur. The Cataloging Directorate will look for instances of "Not Charged" being improperly retained in records for items forwarded by cataloging staff, and will remind staff to take appropriate action to prevent such occurrences.

- D. Continue efforts to fully implement the ILS charge-out system in the Main Reading Room

Concur. It is not yet practical to accomplish internal tracking for items requested in the Main Reading Room. As the ILS is refined to permit online requests by researchers, and as the baseline inventory proceeds, thus ensuring that items are already established in the ILS, we will phase in internal tracking for researcher requests.

- E. CIP and Cataloging Directorate staff ensure that materials received without an accession

*The Library of Congress
Audit Report No. 2001-PA-103*

Office of the Inspector General

March 2002

Appendix C
(Page 3 of 8)

*The Library of Congress
Audit Report No. 2001-PA-103*

Office of the Inspector General

March 2002

stamp receive the proper stamp.

Response: Concur. Accession stamps will be acquired for the cataloging teams so that items may be stamped at point of discovery.

Recommendations: Section II

A. CMD and the Library Security Office emphasize to their staff the importance of ensuring that locked doors are fully closed and secured and question any persons in restricted areas not displaying proper credentials. Further, contract janitorial staff should be reminded that it is inappropriate to prop open doors to secured areas.

Response from OS: Concur. The Office of Security, in collaboration with the Operations subcommittee chaired by the Chief, CMD, will launch Site Assistance Visits (SAVs) beginning in April, 2002. The SAV's will focus on security practices of staff, and concerns raised in the OIG audit will be addressed as special interest items. The OS anticipates that all LC divisions will be visited over an 18 month period. SAV reports will be sent to division chiefs with an information copy to the Director of Security.

B. Ensure that the doors in acquisition areas that exit into public hallways are secured from the inside to prevent unauthorized access. Resubmit the request to the AOC for the installation of card readers.

Response from Library Services: Concur. Office of the Director of Security advises that there is no need to re-request that the doors in Acquisitions Directorate be secured. They are aware of the requests and will implement when the Capitol Police Board selects the mag-lock system that will be used in the Library.

Response from OS: Concur. The Director of Acquisitions has already addressed the doors issue with her division chiefs. Unmet requirements for card readers are now being revisited, and validated needs will be submitted to the Office of Security.

Recommendations: Section III

A. Collections Management Division should take action to ensure that the LJ-100 doorway is monitored at all times to prevent the public from unauthorized entry and to ensure that collection materials are not removed from the Reading Room.

Response: Concur conceptually. However, Library Services and the Office of Security will further explore ingress and egress routes in the Main Reading Room and the best way to ensure collections security consistent with staffing patterns and safety requirements.

*The Library of Congress
Audit Report No. 2001-PA-103*

Office of the Inspector General

March 2002

Appendix C
(Page 4 of 8)

B. Security Office should direct the Contract Security Guard stationed at the main entry to the Main Reading Room to visually inspect all patrons leaving the Reading Room and question anyone attempting to exit with library materials.

Response: Concur. Post orders for the Main Reading Room exit are being modified to include a procedure for exit inspection.

Recommendations: Section V

A. CMD record in the ILS the date received for each item.

Response: Concur. This will be incorporated into workflow as part of the CMD/Loan Divisions merger and the full functioning of the new Collections Access, Loan and Management (CALM) Division.

B. Binding and Collections Care Division record in ILS the date material is transferred to the CMD and the other custodial divisions.

Response: The Preservation Directorate suggests that improved inventory control would result if CMD and other custodial units assume responsibility for removing the "in process" status when materials actually arrive in their custodial units. It could be inaccurate and misleading for BCCD to remove the "in process" status in the ILS when the materials leave BCCD, because it may be days or occasionally even weeks before the materials are actually shelved and become available to readers in the appropriate custodial divisions. This change will speed the flow of materials through BCCD, and place responsibility for updating the status of items at its logical place.

C. ILS management staff periodically produce a report of titles that indicate the titles sent by BCCD to CMD more than two months ago (for example), but not received by CMD.

See response to B. above

Recommendations: Section VI

Cataloging Directorate should closely examine materials to ensure the Copyright Office and the Acquisitions Directorate have marked the material.

Response: Partially Concur. The Director of Cataloging has reminded all CAT DIR staff to provide this quality assurance and security assurance step in the process. However, we do not

*The Library of Congress
Audit Report No. 2001-PA-103*

Office of the Inspector General

March 2002

Appendix C
(Page 5 of 8)

The Library of Congress
Audit Report No. 2001-PA-103

Office of the Inspector General

March 2002

agree that all special collections items can or should be marked. We fully support the identification of LC materials, particularly special collections materials, but we are seeking a technology(ies) that does no harm to the underlying material, which in many cases has high artifactual and research value that might be damaged by markings. We do not believe that marking the containers provides any additional security to the item housed within and may in fact give staff a false sense that the material is secure.

Recommendation: Section VIII

Reader Registration staff should request a second form of identification whenever there are any doubts regarding the first form of identification.

Response: Concur. The supervisor has been reminded (and through him the staff) of the need to be assured that the photo on the identification card is indeed the individual requesting reader registration.

Recommendation: Section IX

Cataloging Directorate should note in the MARC 955 field whenever a copy is surplus.

Response: Library Services does not have the staff to record receipt and disposal of materials not selected for the permanent collections. We believe that as long as an arrearage exists awaiting bibliographic control, we must focus our resources on this much more critical aspect of collections security.

Attachment: "M/B/R/S Response to the 2/6/02 Draft Audit Security Report from the IG's Office"

*The Library of Congress
Audit Report No. 2001-PA-103*

Office of the Inspector General

March 2002

Appendix C
(Page 6 of 8)

*The Library of Congress
Audit Report No. 2001-PA-103*

Office of the Inspector General

March 2002

February 15, 2002

M/B/RS Response to the 2/6/02 draft Security Audit Report from the IG's Office

Introduction

The Motion Picture, Broadcasting and Recorded Sound Division (M/B/RS) has separate processing units for moving image and recorded sound materials. Not surprisingly, the methods and procedures of the two units often differ significantly due primarily to fundamental differences in the formats themselves. Since videocassettes and audio compact discs are the two formats specifically mentioned in the M/B/RS portion of the security audit report, this response will include separate responses from each of the two sections.

In the IG report, both formats are lumped together in a confusing and inaccurate summary of the Division's processing procedures. Mention is made of a "separate tracking system" used instead of the ILS. Presumably this reference is to MAVIS, but because the authors failed to identify the system, it is difficult to know with certainty, particularly since no such system (MAVIS or otherwise) is used for either of the materials mentioned in the report. Furthermore, the fundamental premise of the report, namely that these formats are not being cataloged on the ILS and should be, is completely wrong. In fact, both of these formats are cataloged with item-level bibliographic records on the LC-ILS.

M/B/RS has long recognized the need to quickly create a database record for incoming commercial audio and video formats that are considered high risk for theft. In the Recorded Sound Section we have devised a workflow for processing audio compact discs in a highly innovative and efficient processing stream, utilizing data from MUZE, Inc. and the Copyright Office to create IBC records instantly in the ILS, with an automated OCLC bib-record replacement process downstream. The Moving Image Section also utilizes a conversion program to put Copix data into the ILS. As a whole, the Division has made every effort to utilize data created by the Copyright Office in our cataloging, recognizing that this step was vital for our processing to keep up with the influx of new receipts. It is safe to say that we are converting more copyright data to the ILS than any other division in the Library of Congress, and have done so for years. M/B/RS is both a key stakeholder and an active participant in the Copyright BPR process, and we are at the forefront in advocating full data sharing compatibility between Copyright and Library databases. It is unfortunate that the IG Report fails to recognize and advocate an initiative so vital to the security of M/B/RS collections.

In the following sections, the two processing units of M/B/RS respond separately to the report. Excerpts from the IG Report are put in quotes and are followed by the M/B/RS response.

Recorded Sound

"MBRS Does not Immediately Input Records Into the ILS"

"MBRS does not immediately input compact disks ...into the ILS due to a backlog of materials to catalog. Instead, MBRS assigns a tracking number and maintains a tracking system separate from the ILS to locate the item."

Incoming commercial CDs received in M/B/RS are counted, sorted, and hand delivered to the Special Materials Cataloging Division (SMCD) within two days of receipt. SMCD creates an ILS record for every new CD, and adds second copies to existing ILS records. Typically, CDs are processed in the ILS as they are received, and every attempt is made to minimize holding time. The discs are labeled with shelf numbers and assigned item barcodes which are wanded into the ILS, then returned to M/B/RS where they are immediately shelved in permanent, secure storage. There is no backlog of commercial CDs at any point in this workflow. This workflow has been in place for almost two years, accounting for nearly 30,000 ILS bibliographic records

*The Library of Congress
Audit Report No. 2001-PA-103*

Office of the Inspector General

March 2002

Appendix C
(Page 7 of 8)

*The Library of Congress
Audit Report No. 2001-PA-103*

Office of the Inspector General

March 2002

controlling over 40,000 items.

"In our opinion, the ILS should be used to the extent possible to (1) establish accountability at the earliest stage, (2) better track collection materials, and (3) share information with other divisions. One of the strengths of the ILS is the ability to share information among divisions and researchers. By not immediately inputting the record into the ILS, Library staff and researchers are less likely to find the material when needed."

We regret that no meeting between the authors and M/B/RS Recorded Sound was convened to discuss the substance of this report. Had that discussion taken place we would have explained to the authors that we are processing all published recordings in the ILS, that we have a method in place for quickly processing current receipts of at-risk formats in the ILS, and that there is no backlog of current compact discs.

"An ILS record did not exist for 17 (10 compact disks and 7 videocassettes) of the 20 M/B/RS items included in our sample. and videocassettes into the ILS due to a backlog of materials to catalog.. We note that MBRS located 19 of the 20 items. MBRS could not locate one videocassette."

Specifically regarding the compact discs, there are two possible explanations for these results: (1) the items sought were not current material, but rather items received two or more years ago, prior to implementation of the current workflow. The arrearage of older material is being processed as efficiently as staffing allows. (2) the authors failed to search the ILS in the staff module. By agreement with MUZE Inc., the bib records for compact discs generated by converting their data are suppressed from the OPAC until they can be replaced by the OCLC replacement process or by original cataloging. Had the authors consulted with staff in the Recorded Sound Section, they would have known to search in the ILS staff module for compact discs. In addition, it is good to note that 100% of the compact discs were retrieved.

Moving Image

"MBRS does not immediately input compact disks and videocassettes into the ILS due to a backlog of materials to catalog. Instead, MBRS assigns a tracking number and maintains a tracking system separate from the ILS to locate the item."

The point made in the IG's report that M/B/RS does not immediately input videocassettes into the ILS due to a backlog of materials is true. However, the point made in the report that M/B/RS **instead** assigns a tracking number and maintains a tracking system separate from the ILS to locate the item is not true.

When videocassettes are processed in M/B/RS, they receive a shelf number that designates the location of the item. We presume that the tracking number being referred to in the IG's report is this shelf number. Not only do we assign a shelf number (or call number) to these materials, we assign shelf number to ALL our materials, as do units all over the library. So, whether an item is immediately entered into the ILS or not, it receives a shelf number.

In addition, the IG's finding does not clearly spell out the nature of the aforementioned "tracking system" that is separate from the ILS. We assume the IG is referring to MAVIS. If so, the IG's finding is inaccurate since none of the type of material used in the audit is ever entered into MAVIS. When it does get entered into an automated system, that system is Voyager.

Although we assume the report refers to MAVIS as the tracking system separate from the ILS, it may be referring to some other system. The data sheets that arrive with these materials are filed into filing cabinets after the material is processed and sent to its permanent and secure location. When these items are cataloged the data sheets are the source for the cataloging. In this case it's true that M/B/RS maintains a tracking system separate

*The Library of Congress
Audit Report No. 2001-PA-103*

Office of the Inspector General

March 2002

Appendix C
(Page 8 of 8)

*The Library of Congress
Audit Report No. 2001-PA-103*

Office of the Inspector General

March 2002

from the ILS to locate the item— a paper tracking system.

The report recommends that M/B/RS establish a minimal ILS record for materials as soon as they are received and abandon the independent tracking system. For these materials, M/B/RS completely agrees with this recommendation and there are multiple efforts being pursued in the Division to reach that goal.

One is a copyright conversion program written by our Automation Coordinator that converts data from the COPICS database into the ILS. The other, a more formidable library wide effort, is the Copyright BPR program. We are advocating that that process incorporate a workflow that includes the immediate transfer of data from the copyright system to the ILS. This issue is of Library-wide concern and should be included in the IG report if it is not already.

For the record, the Division as a whole is actively pursuing the implementation of data exchange capability between MAVIS and ILS so that items that are entered into MAVIS will also be appear in the ILS. However, we once again point out that the video materials of the kind used in the IG audit are not processed or tracked in MAVIS, but rather are cataloged in the ILS.

*The Library of Congress
Audit Report No. 2001-PA-103*

Office of the Inspector General

March 2002

Appendix D
(Page 1 of 2)

COPYRIGHT
OFFICE

United States
Government

MEMORANDUM



LIBRARY
OF
CONGRESS

to: Karl W. Schornagel
Inspector General

from: Ginny Kass *GK*
Copyright Security Manager

via: Robert Dizard *RD*
Staff Director

date: February 22, 2002

subject: Comments on Draft Audit Report No. 2001-PA-103/February 6, 2002

Below are comments submitted by Copyright Office regarding the Draft Audit Report No. 2001-PA-103/February 6, 2002: *Collection Security: Library is Addressing Collection Security Issues But Effective Tracking and Restricting Access Remains a Challenge.*

OBJECTIVES, SCOPE AND METHODOLOGY

For clarity's sake, it must be pointed out that the second sentence in the fourth paragraph on page 3 could be misinterpreted. A reader might mistakenly infer that the total number of sample items tested (83) consisted entirely of "order documents." The § 408 deposits are not generated as a result of an order document. Also, none of the 47 Copyright Office samples tested were received as a result of an order document.

FINDINGS AND RECOMMENDATIONS

I. Shortcomings of Tracking System Affect Library's Ability to Locate Collection Materials **E. Copyright Material May Have Cataloging in Publication Accession Stamp**

The Copyright Office believes that this occasional problem can be ameliorated by further stressing to the staff the importance of placing the accession stamp on all materials as they are received.

The recommendations listed on page 6 are not in proper alphabetical order.

VI. Special Collections Materials More at Risk Due to Lack of Ownership Markings on the Actual Items.

As above, the Copyright Office believes that the problem of missing accession stamps can be ameliorated by further stressing to the staff the importance of placing the stamp on all materials as they are received. For Special Collection Materials, the Copyright Office places the accession stamp only on the container, and a laser-engraved ownership mark is placed on the item.

IX. Copyright Cataloging Not Interfaced With the ILS

The text of this section does not appear to be in agreement with the heading or the recommendation and we are not clear as to the specific problem being addressed.

*The Library of Congress
Audit Report No. 2001-PA-103*

Office of the Inspector General

March 2002

Appendix D
(Page 2 of 2)

*The Library of Congress
Audit Report No. 2001-PA-103*

Office of the Inspector General

March 2002

SUMMARY OF BUDGET REQUESTS - FY 1997 to FY 2001

The funding listed for FY 1999 and FY 2000 should be represented as follows:

For FY 1999 the Copyright Office requested \$1.2 million:

- \$225,000 for Risk Assessments, which was not approved;
- \$ 47,500 for Reader Registration software, which was not approved;
- \$993,500 for Marking and Tagging related initiatives (\$691,750 for Copyright staff to insert detectors and attach labels; \$301,750 for theft detection devices and ownership marking materials). However, the requirement for technical research to be performed beforehand made it impossible to use all the funds in FY 1999. As a result, the Copyright Office received Congressional reprogramming approval for one year to use \$780,000 of the \$993,500 for other purposes (i.e., IT technology and overtime).

For FY 2000 the Copyright Office did not request or receive funding for security.

cc Marybeth Peters
Winston Tabb

File: OIG Draft Audit Report No. 2001-PA-103 Collections Security

The Library of Congress
Audit Report No. 2001-PA-103

Office of the Inspector General

March 2002

Appendix E
(Page 1 of 2)

*The Library of Congress
Audit Report No. 2001-PA-103*

Office of the Inspector General

March 2002

UNITED STATES GOVERNMENT

Memorandum

LIBRARY OF CONGRESS

TO : Karl W. Schornagel
Inspector General

DATE: February 26, 2002

FROM : Kenneth E. Lopez *K. E. Lopez*
Director of Security

SUBJECT : *Collection Security: Library is Addressing Collection Security Issues
But Effective Tracking and Restricting Access Remains A Challenge*
Draft Audit Report No. 2001-PA-103

Listed below are responses to the findings and recommendations contained in the Office of Inspector General (OIG) audit of the Library of Congress' collections security as requested in your memorandum dated February 6, 2002.

Recommendation II A. "CMD and the Library Security Office emphasize to their staff the importance of ensuring that locked doors are fully closed and secured and question any persons in restricted areas not displaying their credentials. Further, contract janitorial staff should be reminded that it is inappropriate to prop open doors to secured areas."

- Concur. The Office of Security, in collaboration with the Collections Security Oversight Committee's Operations Subcommittee, chaired by the Chief, CMD, will launch Site Assistance Visits (SAVs) beginning in April 2002. The SAVs will focus on security practices of staff. Concerns raised in the OIG audit will be addressed as special interest items in those visits. The Office of Security anticipates that all Library custodial and processing divisions will be visited over an 18-month period. SAV reports will be sent to division chiefs with an information copy to the Director of Security.

Recommendation II B. "Ensure that the doors in acquisition areas that exit into public hallways are secured from the inside to prevent unauthorized access. Resubmit the request to the AOC for the installation of card readers."

- Concur. The Director for Acquisitions has already addressed the doors issue with her division chiefs. Unmet requirements for card readers are now being revisited, and validated needs will be submitted to the Office of Security for forwarding to the AOC.

BUY U.S. SAVINGS BONDS THROUGH THE PAYROLL PLAN

The Library of Congress
Audit Report No. 2001-PA-103

Office of the Inspector General

March 2002

Appendix E
(Page 2 of 2)

*The Library of Congress
Audit Report No. 2001-PA-103*

Office of the Inspector General

March 2002

Recommendation III B. “Security Office should direct the Contract Security Guard stationed at the main entry to the Main Reading Room to visually inspect all patrons leaving the Reading Room and question anyone attempting to exit with Library materials.”

- Concur. The Office of Security, in coordination with the Acting Chief, Collections Access, Loan, and Management Division (CALM), will modify the contract Library Security Officer’s post orders to include inspection of items leaving the Main Reading Room.

In addition, I request that you reconsider using the term “covert surveillance” in the final paragraph of the “**Background**” section on page 2 of the audit report. The Library’s closed circuit camera system is used only to conduct overt security monitoring in public places to deter criminal activity.

cc: Nancy Davenport, LS/ACQ