

The Library of Congress
Office of the Inspector General



Library Services
Congressional Research Service
Law Library

Reading Room Space
Allocations Should
Be Reevaluated

Final Audit Report No. 2003-PA-104
March 2004



Memorandum*Office of the Inspector General*

TO: James H. Billington
Librarian of Congress

March 31, 2004

FROM: Karl W. Schornagel
Inspector General



SUBJECT: *Reading Room Space Allocations Should Be Reevaluated*
Final Audit Report No. 2003-PA-104

This transmits our final audit report prepared by the Office of the Inspector General, Office of the Librarian. The Executive Summary begins on page *i*, and complete findings and recommendations appear on pages 6 to 14.

Library Services, the Congressional Research Service, and the Law Library generally concur with the report's recommendations. The Service Units' responses to our draft report are briefly summarized after individual recommendations appearing on pages 7, 8, 13 and 15. The complete responses are included as appendices D, E, and F.

We request that you appoint a committee to standardize a methodology and conduct the analyses recommended in the report, and develop an action plan in accordance with LCR 1519-1, *Audits and Reviews by the Office of the Inspector General*, Section 4.B. The plan should be completed within 30 calendar days and include specific actions to be taken in response to the audit report, including milestones and implementation dates.

We appreciate the cooperation and courtesies extended by the Service Units during the audit.

cc: Deputy Librarian
Associate Librarian for Library Services
Director, Congressional Research Service
Law Librarian

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EXECUTIVE SUMMARY

The Library's mission is to make its resources available and useful to the Congress and the American people and to encourage greater use by the general public through programs that stimulate interest, increase knowledge, and encourage more citizens to use the collections on-site and electronically. On-site, the collections can be accessed from 23 reading rooms and information centers that are organized by subject, language, and material format. Library Services has 20 reading rooms/information centers, the Congressional Research Service (CRS) has two, the Jefferson Congressional and LaFollette, and the Law Library has one. The manner in which the Library's resources are made available is constantly changing and improving through the use of new and emerging technologies. Unparalleled resources are shared via the Library's websites which contain more than 8.5 million items and growing, and the Library continues to expand its electronic gateway.

The objective of our audit was to determine whether there is underutilized reading room space given the dramatic growth in electronic information and improved access. We found that, in general, Library Services and the Law Library accumulate inconsistent and inaccurate reference statistics and inconsistent patron data to make informed assessments of reading room utilization. However, while there are limitations on the usefulness of the statistics and data collected, there is evidence of a substantial decline in the number of patrons making in-person visits to the Library.

There is some consideration within the Library for better utilizing reading room space. The Law Library recently converted some of its reading room space to offices and CRS will examine the LaFollette reading room and reconsider its needs. Library Services has implemented some modifications to its reading rooms over the last few years such as closing the Machine Readable Collections Reading Room and incorporating this activity into existing rooms, and merging science and business into one reading room. However, there needs to be a concerted Library-wide effort to better prepare for the rapidly changing space requirements associated with operating in a digital environment. The Service Units should establish standard criteria for analyzing utilization, develop a structured requirements analysis to determine reading room floor space needs, and consider modifying or reallocating underutilized space for offices or collections storage and/or consolidating underutilized rooms. Also, Saturday reading room hours of operations should be reevaluated.

Analysis of requirements and better utilization of space could result in significant economy and efficiency by reducing expansion and/or consolidation of off-site facilities to Capitol Hill. The following paragraphs explore these issues further.

Library Services and the Law Library Should Obtain More Accurate and Useful Reading Room Usage Data

A long-standing pattern of inconsistent reading room statistical practices exists in these Service Units. Internal committees have reviewed the accumulation and reporting of reference statistics and several useful changes have been made, however, Library Services and the Law Library continue to accumulate and report inconsistent and inaccurate information. The use of a uniform

sampling methodology would improve the reliability and efficiency of reference counts and create greater uniformity across reading rooms (see page 6).

Also, the Law Library and Library Services expend considerable effort performing hourly patron counts that produce inconsistent information. Not all reading rooms count hourly and therefore management cannot compare data. Some personnel are unclear on the definition of a patron, and there are varying methods for measuring other reading room activity. Inconsistent methods make it more difficult to analyze resource requirements. The Law Library and Library Services should utilize a non-invasive sign-in form or other acceptable method to measure reading room utilization. The methodology should provide data to analyze peak demand and usage per time of day (see page 7).

Library Services, CRS, and the Law Library Should Analyze Reading Room Requirements

For many years, most of the Library's reading rooms have been in the same physical location and space requirements have not been formally reevaluated, although the number of visiting patrons is continuously declining. According to the Library's statistics, the number of in-person reference questions has steadily declined from over 1.2 million in fiscal year 1988 to approximately 425 thousand in fiscal year 2002, a reduction of 65 percent.

In-person visits in some reading rooms/information centers have declined more rapidly than in others. The Asian, Microform, LaFollette, CRS Jefferson Congressional, Main, Geography and Map, and Prints and Photographs reading rooms have experienced some of the largest declines. Figure 4 on page 9, Table 2 on page 10, and Appendices A and B on pages 16 and 17 show the decline in patron counts and reference questions over various time periods.

The patron decline can be attributed in part to alternative sources of information. Alternative sources include local, regional, and university libraries that share books and information through the Online Computer Library Center. We were told that some Area Studies patrons that formerly came to the Library's reading rooms for foreign newspapers now access these newspapers online. Also, some information that was difficult to access in the past (like the Gutenberg Bible) is now available online. CRS, the Law Library, and Library Services should perform structured requirements analyses to determine reading room floor space requirements (see page 9).

The Saturday operations for most of the reading rooms are very busy, however the Microform, LaFollette, and Performing Arts reading rooms show limited use. Adjusting the reading room hours of operation could reduce personnel expenses. The Library should reevaluate requirements for Saturday operations (see page 14).

In their responses to the draft report, the Congressional Research Service and Law Library generally agreed with our findings and recommendations. Library Services' response did not specifically address the draft report's recommendations. However, they did provide a response to our notice of findings and recommendations (our preliminary conclusions communicated last Fall), and concurred with our recommendation to develop a structured requirements analysis to determine reading room space requirements. Library Services provided additional comments on

the draft report. We made changes to the report where necessary to address their concerns. The written responses from the three Service Units are included as Appendices D, E and F of this report.

INTRODUCTION

This report presents the results of our audit of floor space considerations in the Library's reading rooms. The Library has in its collections well over 125 million items, in hundreds of different languages and virtually every format including books, prints, drawings, government documents, photographs, microforms, films, sound and video recordings, manuscripts, and other formats. The collections can be accessed from 23 reading rooms and information centers comprising about 143,949 square feet of floor space and are organized by subject, language, and material format as shown in Table 1.

Table 1. Floor Space Allocations in Reading Rooms and Information Centers

Reading Rooms and Information Centers	Approximate Square Footage
African & Middle Eastern	3,682
American Folklife Center	1,680
Asian	3,685
Business Reference	10,030
Children's Literature	Note 1
Computer Catalogue	3,195
European	3,667
Geography & Map	5,738
Hispanic	4,670
Jefferson Congressional	1,610
LaFollette (Congressional)	4,215
Law Library (Note 2)	17,897
Local History & Genealogy	2,370
Main	31,585
Manuscript	9,087
Microform	2,038
Motion Picture & Television	3,710
Newspaper & Current Periodical	10,000
Performing Arts	8,100
Prints and Photographs	12,425
Rare Book & Special Collections	3,500
Recorded Sound Reference Center	1,065
Science Reference	Note 3
Total	143,949

Note 1: Square footage is included in the Main reading room space.

Note 2: The Law Library has reallocated approximately one-half of its reader area for construction of office space and relocation of collections.

Note 3: Square footage is included in the Business Reference reading room space.

Library reading rooms have various access restrictions. The public reading rooms are open to all researchers above high school age possessing a Library reader identification card. High school students are allowed to access the public reading rooms if they meet certain conditions.¹ CRS's Jefferson Congressional and LaFollette reading rooms are not open to the public.

The reading rooms vary in size and the type of equipment required by patrons to perform research. Many have computer workstations that are available for catalog, database, and Internet searching while others contain special equipment for copying large maps, viewing and printing the Library's approximately 6 million microform items, and other uses. Figures 1 below and 2 (next page) show digital images of the Main and Geography & Map reading rooms respectively.

Figure 1. Main Reading Room - August 13, 2003



BACKGROUND

Disparity in the Library's methodology of collecting reading room statistics has been the subject of several internal Library studies dating back 30 years. A 1972 report urged the Library to keep statistics in a uniform manner. In 1990, an internal committee conducted an extensive survey of reading room statistics and reported that the Library's use of multiple methods of reporting readers was especially troublesome. The report recommended using simple sampling techniques that could produce more valid figures with considerably less effort. In 1996, the Library's

¹ In September 2003 a Library task force issued a memorandum recommending that current restrictions be relaxed for minors 16 to 18 years of age.

Reference Policy Committee made additional recommendations and developed a revised form to report quarterly statistics. Most reading rooms presently use this form.

Figure 2. Geography & Map Reading Room - November 24, 2003



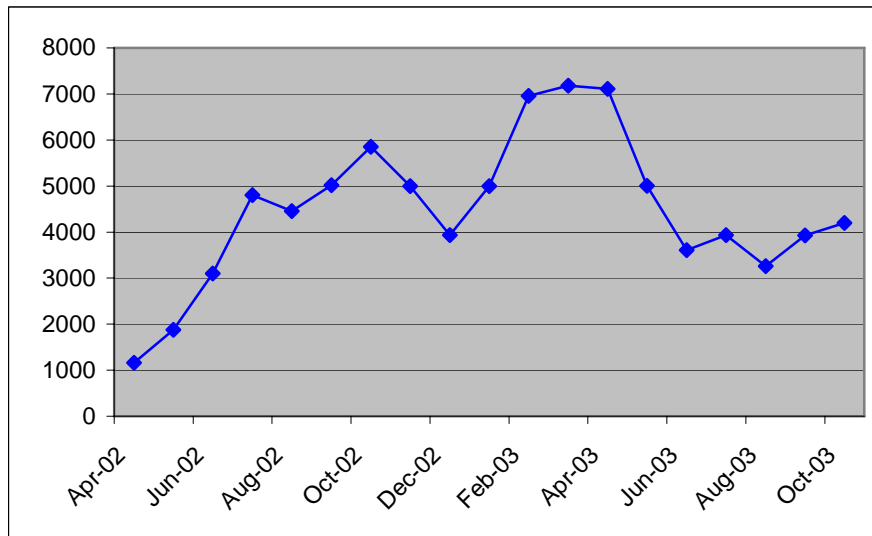
In 1999, the Library formed the Reading Room Use Statistics Committee to address statistics for all of the Library’s reading rooms. The committee made recommendations regarding consistency issues, periodic sampling, and the need for all reading rooms to conduct hourly reader counts. The Committee also reported that there was an assumption that lower statistics would result in fewer resources and that staff in a few reading rooms had devised methods of counting that could be characterized as “unrestrained.”

New initiatives through these groups were introduced to provide patrons more convenient access to the Library’s resources. In fiscal year (FY) 2002, the Library launched QuestionPoint, a new online reference service, in collaboration with the Online Computer Library Center.² The QuestionPoint service provides library users with access to a growing collaborative network of reference librarians in the United States and around the world through the user’s local library website. Questions can be asked at any time of day or night and be directed to a specific reading room. A staff member answers the question online or forwards the question to another participating library. This service, which is available to libraries by subscription, is free for library patrons and is increasingly popular. As shown in Figure 3 (next page), the number of

² Founded in 1967, the Center is a nonprofit, membership, computer library service and research organization dedicated to the public purposes of furthering access to the world’s information and reducing information costs. More than 45,000 libraries in 84 countries and territories around the world use the Center’s services to locate, acquire, catalog, lend, and preserve library materials.

monthly reference questions has increased from 1,163 e-mails in its inception in April 2002, to 4,200 e-mails in October 2003.

Figure 3. Monthly QuestionPoint E-mail Volume



Established in FY 2001, the Library's Office of Strategic Initiatives is responsible for the strategic planning for the Library's digital initiatives. Digital conversion activities are taking place as the product of an integrated program between the Library and other repositories. At the end of FY 2003, more than 8.5 million items from the Library and other institutions were available online or in digital archives.

A chat reference service is another new facet of increasing access that the Library provides to its collections and expertise via new technologies. The chat service enables library patrons to discuss their information needs directly with distant reference librarians through the Internet.

OBJECTIVES, SCOPE, AND METHODOLOGY

The overall objective of our audit was to determine whether floor space in the Library's reading rooms is adequately utilized. Specific steps taken to accomplish our objective include:

- Visiting the 23 reading rooms/information centers and three CRS research centers;
- Analyzing the Library's statistics for reading room usage by patrons;
- Interviewing Library Services, Law Library, CRS, and Facility Services personnel;
- Observing reading room activities;
- Analyzing reading room square footage space and viewing the reading room layouts;
- Reviewing prior Library internal committee reports;
- Analyzing patron usage on Saturdays including observing operations;
- Analyzing the hourly patron counting methodology;

- Comparing actual patron attendance to hourly counts. We took a judgmental sample of five reading rooms and observed the number of patrons over a three-week period. We compared these results to the hourly counts performed by reading room personnel; and
- Evaluating the accumulation, recording, and use of reference statistics.

Our fieldwork was performed from April to August 2003. Our audit covered reading room activity from 1979 to the current period. We conducted exit conferences with CRS on July 8, 2003, Library Services on August 28, 2003, and the Law Library on October 31, 2003. The audit was conducted in accordance with *Government Auditing Standards* issued by the Comptroller General of the United States and LCR 1519-1, *Audits and Reviews by the Office of the Inspector General*, October 18, 1999.

All patron numbers and reference statistics in this report were provided by Library management and could not be audited because of internal control weaknesses in the design of the Library's overall counting methodology and the lack of documentation to evaluate data accuracy. Specifically, the Library's methods of collecting statistics among reading rooms are inconsistent and changing.

Although the usefulness of the Library's reading room statistics is limited, we believe the information is sufficiently valid to demonstrate general trends of decreasing in-person Library visits.

FINDINGS AND RECOMMENDATIONS

Overall we found that there has been a significant decline in the number of patrons visiting the Library's reading rooms/information centers in recent years, and consequently, there may be an underutilization of reading room/information center floor space. However, the data the Library collects to analyze reading room resource needs is not always consistent and useful. Therefore, our findings and recommendations focus on improving the data, then analyzing resource requirements and reallocating reading room floor space to offices or collections storage based on cost/benefit and other considerations. This includes combining underutilized reading rooms. We also address adjusting Saturday operating hours in certain reading rooms in response to low demand.

I. Library Services and the Law Library Should Obtain More Accurate and Useful Reading Room Usage Data

The accuracy and consistency of reference statistics could be improved by using sampling techniques to count reading room patrons.

A. The Accumulation of Library Services and Law Library Reference Statistics Should Be Improved

There is a long-standing pattern of inconsistent reading room statistical practices. Internal committees have reviewed the accumulation and reporting of statistics and as a result, several useful changes have been implemented. However, inconsistencies and inaccuracies remain. The following are examples of inconsistencies that, in some cases, contribute to inaccuracies in reading room statistics:

- Patrons are counted hourly by some and by sign-in sheets (when entering) by others;
- Directional questions are counted by some, estimated by others, and not counted by a few; and
- Some personnel who do the counting are unclear on the definition of a reference question versus a directional question.

Inconsistent patron counting methods hinders comparison among reading rooms as discussed in finding I.B. on the next page. The accumulation and reporting of directional questions is time consuming and the usefulness of this data is questionable. Managers stated that they are not sure why these statistics are accumulated, and to their knowledge, are not used for any management purpose.

There is a high volume of reference questions in some reading rooms and a considerable amount of staff resources are consumed in recording these questions. For example, the Newspaper & Current Periodical reading room reported answering approximately 20,000 in-person reference questions and 4,300 directional questions in the fourth quarter of FY 2002. The use of sampling could improve the reliability and efficiency of reference counts and create greater uniformity across reading rooms.

The American Library Association recommends various methods to accumulate reference statistics and Library Services and the Law Library have adopted some of them. However, many libraries operate in environments significantly different from the Library of Congress and accumulate reference statistics for different reasons. For example, patrons visiting local libraries browse for books. The Library's patrons cannot browse for books and the nature of reference questions could be different.

Prior internal committees have studied these issues and recommended that the Library consistently accumulate statistics and use sampling techniques. These recommendations were not implemented because of disagreements among the reading rooms. For example, several reading room managers responded that they did not want to count directional questions because the information was meaningless. Sampling was not implemented because there are some start-up costs associated with developing a statistically valid sampling plan.

Recommendations

Library Services and the Law Library together should:

1. Develop a uniform sampling methodology that accumulates periodic reference statistics for all of the Library's public reading rooms.
2. If there is no demonstrated need, eliminate actual counts of directional questions. An estimate can be employed for this figure based on actual amounts, and periodic updates utilized for future estimates.

Service Unit Responses and OIG Comments

Library Services did not address these recommendations. The Law Library replied that it supports the recommendation that all reading rooms in Library Services and the Law Library develop and utilize consistent statistical capture and reporting mechanisms, including standardized use of valid statistical sampling methods.

*A. Library Services and the Law Library Should Count
Reading Room Patrons in a More Useful Manner*

The Library is expending considerable effort to perform hourly patron counts that produce misleading statistics. Not all reading rooms count hourly and therefore management cannot compare reading room counts. Inconsistent methods may also make it more difficult to analyze resource requirements.

Hourly counting results in a much higher number than the actual number of patrons visiting a reading room, although, some senior-level managers believe that the hourly counts equate to the number of visiting patrons. With hourly counting, the same patron can be counted multiple times if present in the reading room for more than an hour. Conversely, a patron who remains for less than an hour may not be counted. Also, there is no clear guidance on who qualifies as a patron. Some reading rooms count interns and Library employees as patrons, others don't.

We analyzed the hourly counting methodology to determine how statistics developed by reading room personnel compared to the actual number of in-person visitors received by the Library. We compared data developed by the reading rooms to our in-person observations in five reading rooms over a three-week period. Our analysis included the Manuscript and four Area reading rooms.³ We found that on average, each patron visiting the Library was included in three hourly counts.

Hourly counting can be very useful in determining when patrons are visiting, but misleading as an indication of the number of in-person readers coming to the Library. Also, hourly counting statistics are only accumulated for the total number of patrons for the quarter; they are not accumulated for capacity utilization at a given time during the day, or day of the week. Capacity utilization could be useful to identify periods of nonuse or peak periods of patron usage.

The American Library Association recommends hourly counting. The Library adopted this method of counting although it has a greater percentage of patrons performing research than many other libraries. In the research environment, patrons remain in the reading room longer and the hourly counting easily overstates in-person visits.

Library management encourages reading room managers to bring more people to the Library. Many reading room managers feel that requiring patrons to sign-in would disturb them and provide another reason for not visiting, although reading rooms that currently have sign-in requirements have not reported disturbances or troubles with the sign-in forms.

Recommendations

1. The Law Library and Library Services should utilize a non-invasive sign-in form or other acceptable method to measure reading room utilization that will provide utilization data by the time of day, etc. Sampling should be considered.
2. Whichever counting method is selected, all reading rooms should employ it so that management can fairly compare statistics and make informed resource decisions.

Service Unit Responses and OIG Comments

Library Services did not address these recommendations in their formal response to the draft report. However, in its response to our notice of findings and recommendations (our preliminary conclusions communicated last Fall), Library Services agreed that standardization of counts and definition of terms is necessary and suggested scanning reader identification cards as an alternative to a sign-in-form. The Law Library also agreed with our finding stating that counting patrons on an hourly basis is labor intensive and does not provide useful statistical information about the number of people who use the reading rooms. The Law Library also suggested using card reader technology. Regardless of the method chosen to collect the statistics, we believe that standardizing the counts of in-person readers will provide more accurate and useful data to determine resource requirements.

³ The four Area reading rooms include Asian, African and Middle Eastern, European, and Hispanic.

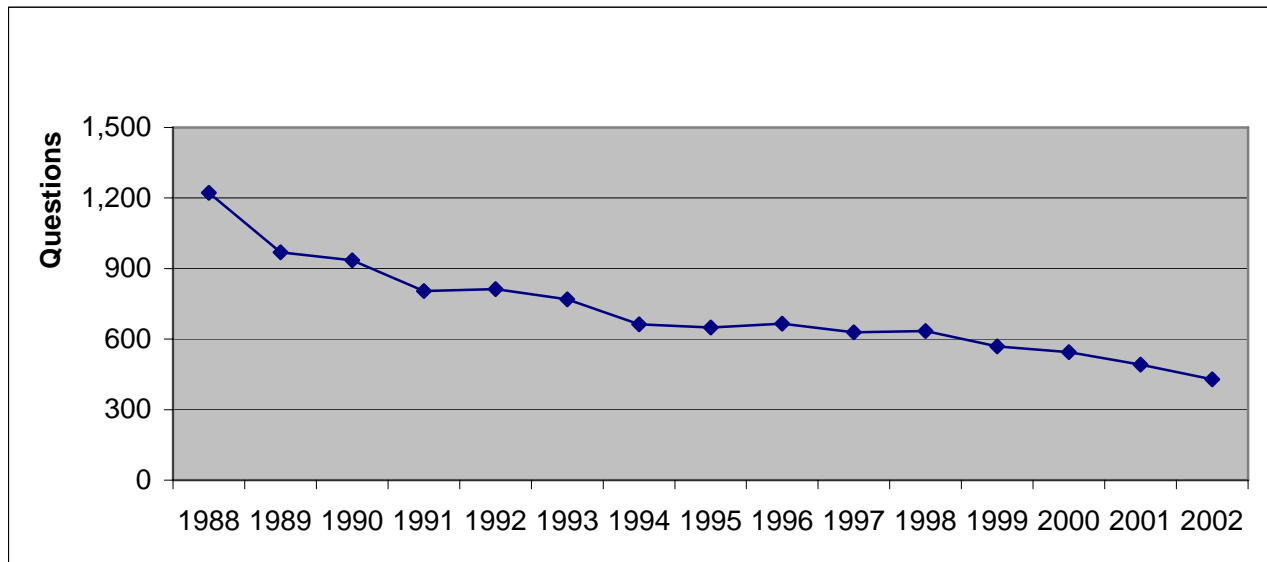
II. Library Services, CRS, and the Law Library Should Analyze Reading Room Requirements

The Service Units should analyze their needs for accommodating visiting patrons and reference resources and use the results to reevaluate use of floor space. The Service Units should also reevaluate Saturday operating hours.

A. Reading Room Space Should Be Used More Efficiently

Most of the Library's reading rooms have been in the same physical location for many years and space requirements have not been formally reevaluated, although the number of in-person reference questions have declined 65 percent since FY 1988 and continue to decline as shown in Figure 4. The data is based on actual in-person reference questions, which are related to the number of visiting patrons as shown in Table 2 on page 10. The two tables in Appendices A and B, pages 16 and 17, show more detailed in-person reference statistics for individual reading rooms for 10 and 15 year periods. See accompanying notes for qualifications of the data. Although there has been a decline in in-person questions/visitors taken as a whole, the numbers in some reading rooms has declined more rapidly than others. Table 2 shows some of the largest reductions in visiting patrons from FY 1998 to FY 2002 as measured by hourly in-person counts by Service Unit staff.

Figure 4. Total In-Person Reference Questions (Fiscal Years)



Although the four Area reading rooms have experienced little or no patron decline since FY 1998, the rooms have a modest number of visiting patrons. Many of the reading rooms, particularly the Area reading rooms, have stepped up efforts to increase patron visits. Outreach efforts include public tours; lunch seminars; promotional mailings; participation in professional societies; and contacts with book publishers, universities, and embassies to bring in researchers,

authors, university classes, and embassy officials. The Library recently contracted with a consultant to develop and implement a plan to increase local universities' use of the reading rooms.

Table 2. Counts of Visiting Patrons in Selected Reading Rooms (Notes 1 & 2)

Reading Room	FY 1998	FY 1999	FY 2000	FY 2001	FY 2002	Notes
Asian	8,546	5,497	5,625	5,177	3,416	2
African & Middle Eastern	N/A	8,815	9,799	8,921	7,921	3
European	7,660	7,577	11,024	9,340	8,501	2
Hispanic	2,797	2,641	3,141	2,927	2,921	
Microform	34,303	22,590	19,427	17,312	16,174	2
CRS – LaFollette	7,962	5,761	4,571	3,823	2,163	
CRS – Jefferson Congressional	204	224	83	54	63	4
Main	221,662	207,950	199,721	191,480	159,274	2
Performing Arts	N/A	6,665	6,750	6,771	6,077	3
Geography & Map	5,926	5,116	4,303	3,870	3,139	
Law Library	N/A	N/A	N/A	N/A	N/A	3
Prints & Photographs	8,304	7,312	6,377	5,149	4,499	
Motion Picture & Television	3,371	2,522	2,400	2381	2,147	
Rare Book	3,947	3,359	3,397	3,363	3,219	

Note 1: All patron numbers and reference statistics in this report were provided by Library management and could not be audited because of internal control weaknesses in the design of the Library's overall counting methodology. Specifically, there are varying methods employed by the reading rooms for collecting the data, and we could not verify its accuracy.

Note 2: The numbers for these reading rooms were determined by counting people in a reading room each hour. We determined that this counting methodology is not an indication of the number of patrons who visit the Library. We found that hourly counts result in the same patron getting counted three times. See finding I.B. on page 7 for more information on the counting methodology.

Note 3: 'N/A' indicates that information is not available.

Note 4: CRS designated the Jefferson Congressional reading room as a Member-only facility in FY 2000.

Reading rooms whose use has declined substantially may underutilize the floor space they occupy. Fewer visitors to the Library means that user requirements are changing, and that the Service Units should rethink the need for reading room space in light of rapid growth in digital information and electronic communication, and also reconsider the skill sets of Library personnel that operate the reading rooms and field reference questions. More efficient use of reading rooms combined with any additional underutilized space identified in our upcoming audit of Library-wide space planning could free-up needed space for collections storage and/or offices. Also, consolidation of off-site activities in leased facilities such as the Taylor Street Annex could result in considerable savings. There have been several internal proposals that recommended

different scenarios for merging reading rooms, however, none were implemented due to apparent disagreements between Service Units/Subunits on which mergers or consolidations should take place.

The decline in in-person patrons can be attributed in part to alternative sources of information, and the difficulty in traveling to Washington D.C. to visit Library reading rooms. Alternative sources of information include other libraries and the Internet. For example, some Area Studies patrons formerly came to the reading rooms to access foreign newspapers. Reading room personnel stated that they have noticed a decline in these patrons because these newspapers are now available online. The University of Texas put the Gutenberg Bible on the Internet, making it easier for scholars and others to browse one of the Library's most valuable books.

By the end of FY 2003, there were 8.5 million American historical items available on the Library's website. Also, the availability of local, regional, and university libraries that share books and information through the Online Computer Library Center (described in footnote 2 on page 3) contributes to the decline in patron visits to Library reading rooms. The number of 'hits' on the Library's websites has steadily increased as the Library makes its resources more widely available. In FY 2003 there were 2.6 billion hits, up from 2 billion and 1.3 billion in FY 2002 and FY 2001 respectively.

The General Services Administration's *Office Space Use Review* (in Federal Agencies), September 30, 1997, states "there is value in bringing key issues to Federal agencies' attention, encouraging the incorporation of space use objectives into the strategic planning process, measuring space use performance, and letting agencies manage accordingly. Each agency should measure and control its space use as a responsible manager of taxpayer funds." The Library's strategic plan states that to accomplish its mission, space should be allocated to maximize efficiency and productivity.

Library Services has implemented some modifications to its reading rooms over the last few years such as closing the Machine Readable Collections Reading Room and incorporating this activity into existing rooms; eliminating the plan for the Special Materials Reading Room, and instead incorporating it into an existing room; eliminating plans for a separate Children's Literature Center Reading Room; and merging science and business into one reading room. The Law Library recently converted some of its reading room space to offices and CRS will examine LaFollette reading room usage and consider utilizing the reading room for additional internal support to CRS analysts, however, more needs to be done on a Library-wide scale.

The Library does not have formal criteria to establish reading room requirements and therefore has not fully responded to the declining number of in-person reference questions and visiting patrons. The Office of the Inspector General conducted a brief review of space planning in 2002, and in a memorandum to the Deputy Librarian we reported, "the Library has not developed a systematic and strategic approach to space management. Facility Services has not evaluated whether space is efficiently utilized, determined what space is expected to become vacant or how the space should best be used, and lacks the organizational authority to implement and enforce such a plan." To complement this audit, our office will soon begin a more comprehensive

analysis of Library-wide space planning. We expect to make recommendations as a result of the audit that will help Facility Services establish criteria for evaluating and improving Library-wide space utilization.

Recommendations

CRS, the Law Library, and Library Services should perform a structured requirements analysis to determine reading room floor space requirements including:

1. Developing a decision model for determining reading room space requirements. The model should consider:
 - A. Trends of reading room use as analyzed using a consistently applied counting methodology;
 - B. Unique or changing patron needs for varying material formats;
 - C. Collections growth and security;
 - D. Trends in the availability of free online resources available to people at home; and subscription-based research information available at Library of Congress, college/university, and public library reading rooms;
 - E. The marginal cost/benefit and impact of additional outreach efforts and whether outreach should be increased and/or more narrowly focused;
 - F. The need for hardcopy reference materials and related shelf space in reading rooms, and electronic workstations;
 - G. The future of librarian duties and staffing considering the growth of information and technology aids;
 - H. Any additional social, economic, or other forms of considerations or assumptions (and the basis for them);
 - I. Hours of service;
 - J. The feasibility of combining certain reading rooms, including reconsideration of previous recommendations made by Library Services; and
 - K. The cost/benefit, including the pay back period, of converting any reading room space to office/operations or storage space. This analysis should be coordinated with the Library's Integrated Support Services.

2. Using the decision model to make decisions about reading room, office space, and storage requirements:
 - A. Set up time frames to establish the counting methodology, study reading room requirements, and make decisions;
 - B. Gather data; and
 - C. Analyze the data and make decisions about how to best satisfy patron requirements and efficiently utilize the Library's floor space.

Service Unit Responses and OIG Comments

CRS responded that it is currently reviewing the need for reading rooms and research centers as a part of a larger effort to reorganize information service functions in CRS. Library Services commented that the OIG failed to consider that reading rooms often have requirements outside of strict reader counts, most significantly the need for adjacency of the reading room to the collections. Additionally, Library Services stated that it modified some of its readings rooms over the last few years, in response to recognizable shifts in the way research is conducted onsite and through the Library's web site. However, these modifications were not included in the draft audit report.

The Law Library responded that it recently requested a thorough space utilization analysis and redesign of its reading room consistent with readership trends, collections growth, technological changes in accessing information, and collection security requirements. Further, it began re-engineering the function and role of its reference librarians in 1989 by slowly expanding the scope and nature of work assignments in order to enhance client services.

We commend CRS, Library Services, and the Law Library for their efforts to address evolving reading room needs over the last several years. However, a consolidated, more structured analysis and decision making process is needed to ensure that the Library has accurate, current, and useful information for efficient use of all reading rooms. Together, the Service Units should develop an action plan that outlines a structured and detailed examination of reading room requirements.

We agree with Library Services that the adjacency of reading rooms to the collections is an important factor that should be included in the analysis as an additional consideration as recommended in 1.H. on the previous page. We added to the report the modifications that Library Services made to its reading rooms over the last few years.

B. The Service Units Should Reconsider Saturday Reading Room Hours

The Library has Saturday operations in the following 11 reading rooms: Business Reference, Computer Catalogue, LaFollette, Law Library, Local History & Genealogy, Main, Manuscript, Microform, Newspaper & Current Periodical, Performing Arts, and Science Reference.

The Saturday operations for most of the reading rooms are very busy, however, the Microform, LaFollette, and Performing Arts rooms show limited use. For the same reasons that in-person reading room patronage is declining during the week, Saturday patron visits in some rooms are also declining. For example, the Performing Arts reading room averaged 11.5 patrons per Saturday over the 13 weeks prior to July 26, 2003. The same reading room averaged 17.5 patrons in the preceding 48-week period. We were unable to determine whether cyclical or seasonal variations were responsible for the difference. We observed very few patrons in the LaFollette and Microform reading rooms during our Saturday visits.

The Microform reading room is staffed with one employee and the LaFollette and the Performing Arts reading rooms are staffed with two weekend employees. Adjusting the reading room hours of operations could produce savings by eliminating employee labor and fringe benefit expenses for hours worked on Saturdays. Staff could work during the regular Monday through Friday schedule allowing management to make changes in current staff configurations for more efficient operations.

The *Standards for Internal Controls in the Federal Government* (GAO/AIMD-00-21.3.1), November 1999, states that internal controls should provide reasonable assurance that the effectiveness and efficiency of operations are achieved, including the use of the entity's resources.

The Library does not have uniform policies and procedures for identifying criteria for evaluating or changing reading room hours of operation. Many of the reading room hours have been in effect for many years and several reading rooms do not accumulate and report Saturday patron statistics.

Recommendations

CRS, the Law Library, and Library Services should:

1. Establish criteria for determining requirements for Saturday operations and a decision model for establishing hours of operation;
2. Establish a timeframe to study user needs;
3. Accumulate Saturday statistics including seasonal and/or cyclical and hourly fluctuations, with special emphasis on the Microform, LaFollette, and Performing Arts reading rooms; and
4. Analyze the data and make decisions about hours of operation.

Service Unit Responses and OIG Comments

Both CRS and the Law Library stated that they are obligated by statute to provide services when Congress is in session. CRS staff work on complex requests, write reports, and update web pages when they are not serving Congressional clients. Also, whether or not there are in-person users on Saturday, CRS would still have to have staff there to answer the phone and reply to inquiries. Library Services replied that it planned to look at Saturday hours but did not believe that eliminating Saturday service would result in cost savings. We concur that it is not feasible for CRS and the Law Library to eliminate Saturday operations, however, the feasibility of reducing Saturday hours should be considered if it is determined during the analysis that there is insufficient activity to justify current operating hours. For example, analysis may show that there is little or no activity during the first or last hour or more of Saturday operations. We also believe that Library Services should review its requirements for Saturday operations. A reduction in Saturday hours would reduce total resources devoted to staffing reading rooms and result in a corresponding reduction in staffing expenses.

Major Contributors to This Report:

Anita Scala, Assistant Inspector General
Stuart G. Axenfeld, Auditor

Appendix A

Annual In-Person Reference Statistics by Reading Room, FY 1993-2002

READING ROOM	1993	1994	1995	1996	1997	1998	1999	2000	2001	2002
African & Middle Eastern	12,222	12,116	11,470	8,808	9,765	9,885	9,937	6,222	7,203	7,655
American Folklife	1,099	1,797	2,065	2,001	2,176	5,619	3,725	4,008	3,518	3,249
Asian	12,671	11,954	10,191	10,904	13,255	12,288	10,569	10,686	11,282	5,671
Children's Literature	259	188	227	190	160	121	99	178	251	112
Collections Access, Loan, & Mgt.⁴	44,532	33,284	36,230	40,449	37,905	35,300	23,163	18,954	17,882	16,824
European	6,516	8,794	6,661	6,599	6,074	7,795	7,823	9,370	9,338	7,232
Geography & Map	27,924	26,392	28,889	24,709	23,852	30,745	26,444	21,135	19,463	15,764
Hispanic	22,883	18,369	21,295	23,856	23,488	26,408	29,530	33,771	10,082	13,197
Humanities & Social Sciences	190,438	187,329	183,493	165,308	164,790	141,722	128,769	97,243	85,929	70,163
Law Library	95,268	81,000	67,277	70,484	48,090	85,919	83,542	84,991	75,209	66,057
Manuscript	33,339	33,228	32,974	29,818	28,046	38,923	37,805	40,495	47,046	45,583
Motion Picture	26,455	9,058	15,686	6,998	6,674	7,542	4,314	4,122	3,865	3,693
Newspaper & Current Periodical	141,902	121,770	121,914	105,532	108,661	126,385	124,846	106,750	112,619	89,386
Performing Arts	25,295	19,346	14,832	10,439	5,659	7,795	6,352	8,811	8,238	7,037
Prints & Photographs	53,227	48,368	45,950	41,820	40,472	41,522	36,056	31,885	25,745	22,495
Rare Book & Special Collections	4,850	4,899	4,938	5,417	5,136	4,989	2,998	4,623	3,130	2,560
Science & Business	67,974	42,456	42,962	110,624	103,180	51,073	31,956	60,879	50,684	51,890
TOTAL	766,854	660,348	647,054	663,956	627,383	634,031	567,928	544,123	491,484	428,568

All patron numbers and reference statistics here and elsewhere in this report were provided by Library management and could not be audited because of internal control weaknesses in the design of the Library's overall counting methodology. Specifically, there are varying methods employed by the reading rooms for collecting data, and we could not verify its accuracy. Also, the reference statistics include in-person questions, and do not include e-mails, phone calls, or handwritten correspondence. All figures from this table were taken from the statistical tables of the Library's annual reports.

The Main Reading Room numbers are included in the Humanities and Social Sciences Reading Room. CRS reference statistics were not included in the annual reports and are not included in this appendix, and a number of other reading rooms are not presented separately because they are combined by the Library for annual reporting purposes.

⁴ Although we did not include the Collections Access, Loan and Management Division as a reading room or information center in the scope of our audit, we added it here and in Appendices B and C at the request of Library Services.

Appendix B

In-Person Reference Statistics in Five-Year Intervals, FY 1987-2002

READING ROOM	1987	1992	1997	2002
African & Middle Eastern	10,553	11,723	9,765	7,655
American Folklife	14,300	1,600	2,176	3,249
Asian	14,703	13,864	13,255	5,671
Children's Literature	440	434	160	112
Collections Access, Loan, & Management	30,138	37,484	37,905	16,824
European	15,559	3,622	6,074	7,232
Geography & Map	16,939	17,094	23,852	15,764
Hispanic	15,573	12,949	23,488	13,197
Humanities & Social Sciences	315,585	212,617	164,790	70,163
Law Library	547,760	143,087	48,090	66,057
Manuscript	10,596	33,235	28,046	45,583
Motion Picture	20,401	21,860	6,674	3,693
Newspaper & Current Periodical	99,283	154,321	108,661	89,386
Performing Arts	15,456	16,675	5,659	7,037
Prints & Photographs	41,969	45,730	40,472	22,495
Rare Book & Special Collections	5,910	4,518	5,136	2,560
Science & Business	27,127	78,975	103,180	51,890
TOTAL	1,202,292	809,788	627,383	428,568

All patron numbers and reference statistics here and elsewhere in this report were provided by Library management and could not be audited because of internal control weaknesses in the design of the Library's overall counting methodology. Specifically, there are varying methods employed by the reading rooms for collecting data, and we could not verify its accuracy. Also, the reference statistics include in-person questions, and do not include e-mails, phone calls, or handwritten correspondence. All figures from this table were taken from the statistical tables of the Library's annual reports.

The Main Reading Room numbers are included in the Humanities and Social Sciences Reading Room. CRS reference statistics were not included in the annual reports and are not included in this appendix, and a number of other reading rooms are not presented separately because they are combined by the Library for annual reporting purposes.

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Reading Room and Information Center Descriptions

1. *African & Middle Eastern Reading Room*—Provides reference services pertaining to publications of all areas of Africa south of the Sahara. Materials in the Middle Eastern languages (e.g., Arabic) are also serviced here.
2. *American Folklife Center*—Provides access to the Library's extensive collection of non-book folklore materials.
3. *Asian Reading Room*—Provides reference services for and access to all materials, except law, in the languages of China, Japan, Korea, and southern Asia.
4. *Business Reference Services*—Provides assistance in the fields of business and economics and maintains a reference collection of over 20,000 volumes.
5. *Collections Access, Loan and Management Division*—Provides special search services in the general reading rooms for items not located when initially requested and advance reserve for out of town researchers who wish to know whether the material they need is available, and to have it held for their arrival.
6. *Children's Literature Center*—Serves those organizations and individuals who study, produce, collect, interpret, and disseminate children's books, films, television programs, or other forms of materials destined for children's information and recreational use, usually outside the classroom.
7. *Computer Catalogue Center*—Maintains workstations for searching the Library's online catalog. These workstations also provide general access to the Internet, including a number of Internet-based subscription services. The Center has dedicated workstations for searching the Main reading room CD-ROM network, as well as special equipment for researchers with disabilities.
8. *European Reading Room*—Provides reference services and programs pertaining to the cultural, political, and socioeconomic life of all areas of Europe except the British Isles, Spain, and Portugal.
9. *Geography & Map Reading Room*—Provides reference assistance for and access to special collections on geography and cartography, including the largest map collection in the world of over four million pieces.

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10. *Hispanic Reading Room*—Offers reference and bibliographic services pertaining to Spain, Portugal, Brazil, the Caribbean, and Spanish-speaking America.
11. *Jefferson Congressional Reading Room*—Reserved for use by Members of Congress.
12. *LaFollette Congressional Reading Room*—Reserved for use by Members of Congress, their families, and their staff members.
13. *Law Library Reading Room*—Provides reference assistance and access to the Law Library collection, one of the most comprehensive collections of legal materials ever developed, in all languages and covering all legal systems, from ancient to modern. International and foreign law service is provided through the reading room or in specialized divisions.
14. *Local History & Genealogy Reading Room*—Provides reference assistance and access to comprehensive collections in the fields of U.S. local history, genealogy, and heraldry.
15. *Main Reading Room*—Serves as the primary entrance into the Library's research collections, and the principal reading room for work in the social sciences and humanities. It provides access to and assistance in using approximately 70,000 volumes of print reference works, a wide variety of CD-ROM and online databases, and a number of bibliographies and guides to the Library's collections.
16. *Manuscript Reading Room*—Makes available for inspection and study over 35 million manuscripts and documents, including the personal papers of 23 presidents and the papers of such other great Americans as Clara Barton, Alexander Graham Bell, Felix Frankfurter, Benjamin Franklin, Alexander Hamilton, John J. Pershing, Booker T. Washington, and Walt Whitman.
17. *Microform Reading Room*—Provides delivery of, and facilities for viewing, items from the Library's general microform collection of over four-and-one-half-million pieces. These holdings include preservation monographs and serials, as well as specialized collections containing early imprints, manuscripts, early state records, pamphlets, doctoral dissertations, dramas, statistical publications, press summaries, transcripts and/or translations, trade catalogs, inventories of libraries and archives, biographies, and oral histories. The materials available cover all subject areas, but focus on the humanities and social sciences.
18. *Motion Picture & Television Reading Room*—Offers reference service for the Library's collections of films and television materials. Access to items in the collections is restricted to scholars doing research beyond the undergraduate level.

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19. *Newspaper & Current Periodical Reading Room*—Provides reference assistance and access to all newspapers, current and retrospective, whether in print or microform, and in languages using Roman script, excluding all issues in Asian and Middle Eastern languages and all current issues of Slavic-alphabet materials. This reading room also provides access to current unbound issues of serials and periodicals except those in music and law, with the same language restrictions indicated above. Current and retrospective federal documents in the U.S. Depository Library Program are also available, along with United Nations depository materials, both current and retrospective.

20. *Performing Arts Reading Room*—Provides reference assistance for and access to music materials in the custody of the Music Division, including rare books and manuscripts, special collections of personal and organization archives, printed scores, literature about music, and microforms. Major holdings include manuscripts by virtually all important composers from the eighteenth century to the present, opera full scores, vocal scores, librettos, and American popular sheet music. Facilities for audio playback of sound recordings are available in conjunction with the reference service offered in a contiguous reading room, the Recorded Sound Reference Center.

21. *Prints & Photographs Reading Room*—Provides reference assistance and delivery of materials for pictorial items such as prints, drawings, posters, photographs, fine and graphic arts, and pictorial documentation of American history and American architecture.

22. *Rare Book & Special Collections Reading Room*—Offers reference assistance for and access to rare books, rare Bibles, pamphlets, and special collections in such areas as gastronomy, Lincolniana, and magic. The division also houses the libraries of such persons as Susan B. Anthony, Thomas Jefferson, Theodore Roosevelt, and Woodrow Wilson.

23. *Recorded Sound Reference Center*—Provides reference assistance pertaining to sound recordings, including radio, and access to the Library's vast audio collections. Commercial recording highlights include extensive opera, chamber music, and American popular music collections. Significant radio collections include material from NBC Radio, National Public Radio, and the British Broadcasting Corporation.

24. *Science Reading Room*—Provides reference service in all fields of science and technology, with a reference collection of over 10,000 volumes and access to all major indexing and abstracting services in the fields of science and technology. Current issues of selected science journals and a large technical reports collection are also available.

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Memorandum

February 26, 2004

TO: Karl W. Schornagel
Inspector General

FROM: Daniel P. Mulholland
Director, Congressional Research Service

SUBJECT: CRS Comments on *Reading Room Space Allocations Should Be Reevaluated*; Draft Audit Report No. 2003-PA-104

My colleagues and I have reviewed the above-referenced draft audit report on reading room space allocation. As a general matter, I concur with the overall findings regarding CRS. I have summarized the report's findings and recommendations as they relate to CRS, and submit the following comments:

Report Finding II: CRS should analyze reading room requirements. CRS should analyze its needs for accommodating visiting patrons and reference resources; use the results to analyze floor space; and reevaluate Saturday operating hours.

A. Reading Room Space Should be Used more Efficiently.

CRS, and other service units, should perform a structured requirements analysis to determine reading room floor space requirements including:

1. Trends in reading room use as analyzed by using a consistently applied counting methodology;
2. Unique or changing patron needs for varying material formats;
3. Collections security;
4. Trends in the availability of free online resources available to people at home; and subscription based research information available at LOC, college/university, and public library reading rooms;
5. The marginal cost/benefit and impact of additional outreach efforts and whether outreach should be increased and/or more narrowly focused;
6. The need for hardcopy reference materials and related shelf space in reading rooms, and electronic work stations;
7. The future of librarian duties and staffing considering the growth of information and technology aids;
8. Any additional social, economic, or other forms of considerations or assumptions (and the basis for them.)
9. Hours of service;
10. The feasibility of combining certain reading rooms, including reconsideration of previous recommendations made by Library Services; and

Congressional Research Service Washington, D.C. 20540-7000

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11. The cost/benefit, including the pay back period, of converting any reading room space to office/operations or storage space. This analysis should be coordinated with the Library's Integrated Support Services.

Using the decision model to make decisions about the reading rooms, office space and storage requirements, CRS should: (1) set up time frames to establish the counting methodology, study reading room requirements, and make decisions; (2) gather data; and, (3) analyze data and make decisions about how to best satisfy patron requirements and efficiently utilize the Library's floor space.

Comment:

Analyzing reading room requirements and space allocations, with the overriding purpose of serving the Congress while achieving maximum efficiency and productivity, are on-going efforts in CRS. CRS continues to make every effort to enhance CRS service to Congress, eliminate duplication, and hold down overall costs. In 1995, with the approval of oversight and appropriations committees, the research center located in the Ford House Office Building was closed in response to budget constraints and the loss of personnel. Today, usage of our research centers and reading rooms is increasingly affected by the greater reliance on computer-based assets in Member and committee offices.

Currently, CRS is reviewing once again, its need for reading rooms and research centers. In doing so we are taking into consideration such factors as trends in reading room use, changing patron needs and information seeking behaviors, and the other factors listed on pp. 11 and 12 of the report. Recommendations are being made to me to convert the use of the Rayburn and Senate Research Centers to CRS conference and training facilities, to alter the mission and space of the La Follette Congressional Reading Room, as well as to make adjustments in staffing requirements. This is part of a larger effort to reorganize information service functions in CRS. In response to a steady decline in usage over the past three years and the value of realigning the resources directed to the Longworth Research Center (LRC) to higher priority areas, the LRC is closing on March 1st, with the approval of the Committee on House Administration.

The report notes that CRS is examining La Follette Reading Room (LCRR) usage and considering utilizing the reading room for additional internal support to CRS analysts. Possible changes would thus allow the LCRR to not only serve congressional clients but also serve as a research facility for CRS analytical staff. The LCRR space has been re-configured twice since moving to this building. Staffing, work assigned to the LCRR, collections and hours of service have all been modified over the years.

The LCRR collections are continually reviewed. As more indices and collections are available in electronic format, evaluations are done. During the last configuration of LCRR space, the collections were substantially reduced and space they occupied was put to other uses. The LCRR retains print collections, especially those that support the Hotline service which is also run out of the LCRR. The remaining collections include areas not exhaustively covered electronically or those that are highly specialized, such as entire books on the quotations of specific individuals, retrospective collections of congressional materials, such as a complete set of the *Congressional Directory*, or unique collections, such as the ones on the histories of Washington, D.C. and the Capitol which contain obscure information of interest to our clients.

All modification to CRS reading rooms and research centers must, of course, be accomplished in a manner that does not diminish our obligation to support the Congress.

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While CRS is alert to the need to make the most efficient use of space, it is obligated to provide services required by its mission, and to consult with appropriate congressional entities when making significant modifications that may affect such services.

B. CRS should reconsider Saturday reading room hours.

CRS should:

1. Establish criteria for determining requirements for Saturday operations and a decision model for establishing hours of operation;
2. Establish a time frame to study user needs;
3. Accumulate Saturday statistics included seasonal and/or cyclical and hourly fluctuations, with special emphasis on the Microform, LaFollette, and Performing Arts reading rooms; and
4. Analyze the data and make decisions about hours of operation.

Comment:

CRS is obligated by statute to make its research “available and serviceable” to committees and Members. (2 U.S.C. 166). The Service has long interpreted this obligation to mandate that our services be available when the Congress is doing its work – i.e., when either chamber is in session. This understanding has been reinforced by guidance received from our oversight committees over the years. With that in mind, the Service has nevertheless made appropriate adjustments over time, with congressional acquiescence, that achieve efficient use of resources while allowing us to continue to meet this obligation.

The LCRR hours for Saturday and Sunday service have been monitored and modified over the years to reflect changes in patron usage, while meeting congressional needs. CRS has been collecting and analyzing client use of the LCRR since its inception in the Madison building in 1980, and prior to that time (since 1968 as the “Congressional Reading Room”) in the Jefferson building. In response to declining usage figures, in November of 1994 (at the same time that we sought permission to close the Ford facility) our oversight committees gave CRS approval to reduce weekend hours of service during official periods of recess and adjournment. In November of 1995, after further study, we eliminated the Sunday weekend hours of service of 1-5:00 PM (unless Congress is in session), and reduced staffing by one library technician on Saturdays. Again, implicit in the committee approval process for these changes was recognition that weekend hours remained an expectation of the Congress when it is in session.

The LCRR serves as the contact and resource center for CRS outside of traditional work hours. The Service has criteria for Saturday service and it involves representing all of CRS on Saturday when Congress is working in Washington. (This also applies to snow days, hurricanes, and other disasters that force closure of library buildings to all but essential personnel.) We are closed on Saturdays during recess periods. The LCRR represents the presence of CRS on Saturdays. Our first value, client service, and our goal of accessibility requires that there be a way that Congress and their staff can reach, in person, CRS experts when they are working in Washington, and this is accomplished on Saturday through the presence of CRS staff in the LCRR.

CRS has addressed the issue of efficient use of staff on Saturdays. Staff take work from their desk with them to the LCRR. They may use the time when they are not serving congressional clients to work on complex requests, write reports and update web pages. Also,

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whether or not there are in-person users on Saturday, CRS would still have to have staff here to answer the phone and reply to inquiries.

CRS continues to monitor and evaluate our clients' needs for weekend assistance.

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UNITED STATES GOVERNMENT

Memorandum

LIBRARY OF CONGRESS

DATE: March 2, 2004

TO : Karl W. Schornagel
Inspector General

FROM : Deanna B. Marcum
Associate Librarian for Library Services

SUBJECT: Comments on Draft Audit Report No. 2003-PA-104

We were very pleased to see that almost all of the comments we made on the draft "notification of findings" last October have been considered, and in most cases incorporated into this February 9 version. We do have a few comments:

- We made the point that, especially for the reading rooms serving special format collections, these reading rooms often have requirements outside of strict reader counts, most significantly the need for adjacency of the reading room to the collections. For example, with very few exceptions, the special format collections are "Gold" collections, and the recommended configuration for the reading room has been to place it adjacent to the collections storage area housing that material, so that the reading room, collections storage area (and often the staff area) form one security envelope. Regrettably, the IG's study did not address the vulnerability of collections if they were not served in adjacent reading rooms, especially since collections security is a major focal point for the IG's office. However, as part of his recommendations, the IG did acknowledge that collections security should be part of our decision modeling. We agree that it must.
- Library Services has implemented modifications to its reading rooms over the last few years, in response to recognizable shifts in the way research is conducted onsite and through the Library's Web site. We brought these modifications to the attention of the IG in our earlier response but they did not make this report and we believe they should. Among the examples we provided: closing the Machine Readable Collections Reading Room and incorporating this activity into an existing room (Main and Microform); eliminating the plan for the Special Materials Reading Room, and instead incorporating it into an existing room; eliminating plans for a separate Children's Literature Center Reading Room; merging science and business into one reading room (although maintaining two reference alcoves).
- There is a statement in the Draft Report: "Also, considerable savings may be achieved by consolidating reading rooms and off-site activities currently in leased facilities." We are not sure what this means, and to what the IG is referring. The numbers of items housed in off-site locations vastly exceed the space that would be accrued by consolidating reading room spaces.

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- There is a statement in the Draft Report: "Adjusting the reading room hours of operations could produce savings by eliminating employee labor and fringe benefit expenses for hours worked on Saturdays." We plan to look at Saturday hours; however, we do not believe that the current staffing configuration for Saturday hours would result in a cost savings. Normally, Saturday staff is a skeletal staff, and is comprised of employees on regular schedules who rotate onto Saturdays, and have a day off during the week. Eliminating Saturday service would result in a Monday-Friday schedule for these people, but not a cost saving.

- The table: Annual In-Person Reference Statistics by Reading Room(Appendix A), lists the Collections Access, Loan and Management Division. However, Appendix C, Reading Room and Information Center Descriptions, does not. I recommend adding:

Collections Access, Loan and Management Division - Provides special search services in the general reading rooms for items not located when initially requested; advance reserve for out of town researchers who wish to know whether the material they will need is available, and to have it waiting upon their arrival.

We believe this most recent iteration of the Report provides a useful document on which to base Library Services's continuing analysis and work on use of the Library's reading rooms.

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UNITED STATES GOVERNMENT

MEMORANDUM

LAW LIBRARY OF CONGRESS
Office of the Law Librarian

DATE: February 23, 2004

TO: Karl W. Schornagel
Inspector General

FROM: Rubens Medina
The Law Librarian of Congress



SUBJECT: THE LAW LIBRARY'S RESPONSE TO THE INSPECTOR GENERAL'S AUDIT
REPORT ON READING ROOM SPACE ALLOCATION REPORT 2003-PA-104

The Law Library's response to the Inspector General's February 9, 2004 draft report on Library of Congress reading room space allocation (Report number 2003-PA-104) follows:

Develop and utilize consistent reading room statistical capture and reporting mechanisms

The Law Library supports the recommendation that all public reading rooms in Library Services and the Law Library develop and utilize consistent statistical capture and reporting mechanisms, including standardized use of valid statistical sampling methods. The Law Library concurs that the results of counting patrons on an hourly basis is labor intensive and does not provide useful statistical information about the number of people who use the reading rooms.

The Law Library supports a non-invasive approach of counting readers who use its reading room. For example, through the public reader registration program, technology may now allow for reader cards (which are required for public users to gain access to the facility) to be swiped upon entrance and exit to generate accurate statistical data on the number of users. Because this methodology does not capture Law Library clients who are exempt from the reader registration program (Members of Congress, their families and their staffs, former Members and Senators, U.S. Supreme Court personnel,¹ federal court judges,² and cabinet members and spouses), an alternative counting mechanism would be required. Further, a statistical capture mechanism to count internal researchers (CRS staff and others) who use staff entrances to access

¹ U.S.C. § 137 (2000).

² U.S.C. § 137c (2000).

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the Reading Room would need to be adopted to accurately account for their use of the Reading Room's services and collections.

1. Analyze Reading Room requirements based on usage.

A. The Collections:

The Law Library recently implemented space utilization modifications eliminating approximately fifty percent (50%) of available reader space by converting it to critically required reference staff offices. Further, in FY 2002, the Law Library initiated conversations (which continue) with Facility Services to request a thorough space utilization analysis and re-design of its reading room consistent with readership trends, collections growth, technological changes in accessing information, and collection security requirements. The Law Library supports the recommendation that such analysis be conducted subject to the following principles unique to legal information and law library standards:

- **Congress's Law Library collection:** As Congress's law library, the Law Library has complied with congressional expectations to provide immediate access to the official (print source) legal publications of the Federal Government and of the fifty (50) states and other U.S. possessions and territories represented by Members of and Delegates to Congress and Senators. It should be noted that Representatives, Senators, and their staffs use the Law Library's federal and state collections in support of their legislative function. Historically and politically, ready access to these materials in print format is critical;
- **National Law Library reference collection:** As the national law library, the Reading Room should contain core federal and state primary and standard secondary sources easily and readily available for all researchers to consult. Accordingly, the Law Library must be able to accommodate at least 70,000 print volumes; microform collections of approximately two million items consistent with the Law Library's unique mission and priorities; sufficient information technology hardware and basic bibliographic and specialized software to support legal and legislative research; and simultaneously it must provide space sufficient for clients to conduct their research with some degree of privacy as a result of the inherently confidential nature of the research being conducted;
- **Official publications of federal law:** Federal law dictates that official sources of legal information are published in print format only. Therefore, although the Internet and other electronic products provide quick access to legal and legislative information, they do not replace the need to have ready access to print sources in order to verify the authenticity of the information.³ Accordingly, as Congress's law library and the national law library, sufficient space is necessary for the reading room's core collections of primary source publications containing the enacted and codified versions of laws, regulations and court

³See, e.g. 1 U.S.C. §§ 112, 112a, & 204 (2000).

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decisions, in addition to secondary sources and finding aids that often are only available in print format; and

- **Academic law library collection requirements:** The ABA Standards for accrediting law schools includes specific requirements for the size and nature of an acceptable legal and legislative collection. These standards are recognized by the Law Library as the minimum standards for the size and scope of its reading room's collection in light of its mission to provide legal and legislative information services to Congress and the Nation. (See ABA Accreditation Standard 606, specifically ABA Accreditation Interpretation 606-6 attached hereto).

B. Effective and Efficient Use of Human Resources:

The Law Library began re-engineering the function and role of its reference librarians in 1989. Embracing changes in the scope, nature and demands for legal reference services, the Law Library initiated modifications of duties and responsibilities by slowly expanding the scope and nature of work assignments in order to enhance client services. As in-person usage declined, reference staff assumed new and more expansive roles that further contributed to the Library's and Law Library's mission and strategic priorities. For example, reference staff are expected, among other public and collection service duties, to:

- develop and manage collections resulting in a more complete and current national law library collection while simultaneously enhancing the staff's professional skills and expertise in the relative strengths and weaknesses of various areas of the collection (beginning in 1989);
- participate in congressional outreach programs involving the design and instruction of legal and legislative research seminars (at one point training more than one thousand (1000) congressional staff annually) and conducting orientations for new congressional staff each week (beginning in 1991);
- contribute to the development and maintenance of digital information products and resources such as *The Guide to Law Online* and *The Multinational Collections Database*, both of which are Law Library "born-digital" research products for Congress and the Nation (beginning in 1995); and
- actively participated in the information architectural design, development, and production of one of the largest and most comprehensive projects for the National Digital Library Program involving the digital conversion and electronic re-publication of approximately one thousand (1000) print volumes of laws, legislation, congressional documents, debates and other publications relating to the lawmaking function of the national government covering the period from 1774 to 1873 in the *Century of Lawmaking for a New Nation* website (1995 to 2000).

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Today, the reference staff - a total of seven (7) librarians - are responsible for a myriad of programs and projects that expand their roles as legal information managers and service providers by embracing new technologies.

Therefore, out of necessity relating to limited resources, the Law Library has systematically utilized re-engineering processes to address human resource allocation inefficiencies, enhance information services utilizing new media, while simultaneously continuing to offer standard core in-person services to the Law Library Reading Room's clients.

C. Saturday hours of operation:

The Law Library Reading Room services were the subject of a recent thorough and intensive cost-benefit analysis conducted by the Library's PMED office. This analysis supported the Library's recommendation to the Joint Committee on the Library of Congress to reduce Law Library Reading Room's evening hours of public service, while remaining open to the public on Saturdays (the only day that many researchers are now able to use resources of the Law Library).⁴ Further, many congressional staff work on Saturdays and often require access to Law Library collections and/or services. Accordingly, the Law Library's historical mission of service to Congress requires it to be open and available for Congress and CRS on Saturdays.⁵

3. Conclusion:

The Law Library supports recommendations to:

- develop a uniform and systematic approach to capturing and reporting meaningful statistical information, including valid statistical sampling techniques;
- adopt a non-invasive and statistically meaningful approach of counting and reporting users of its reading room;
- ensure that reference librarian responsibilities reflect in-person and electronic usage trends which more effectively deploys and efficiently utilizes its human resources, (however, noting that it has been systematically engaged in re-engineering efforts since

⁴ Washington, D.C. has no public law library unlike most jurisdictions in the United States. Although many of the academic law libraries in Washington offer some public access to their collections and some services, there are times that these institutions are closed to the public for various reasons. The Law Library functions as a national public law library in Washington, and is frequently used by both out-of-town researchers and metropolitan Washington residents on Saturdays.

⁵The Law Library is required to remain open for Congressional service anytime either chamber of Congress is in session, a mandate reiterated by the Chairman of Joint Committee on the Library in 2000 when responding to the Librarian's letter informing the Committee of the Library's decision to reduce the Law Library's evening hours of public service (See 2 U.S.C. § 138 (2000)).

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1989); and

- undertake a thorough space utilization analysis and a complete re-design of the Law Library Reading Room to maximize the shelf space for core legal collections, information technology workstations, and provide appropriate and sufficient space for researchers.

However, as a caveat, the size and scope of the Law Library Reading Room collections must reflect its unique role as Congress's law library, the national law library, and consistent with the minimum standards reflected in the ABA accreditation requirements.