



OFFICE OF THE INSPECTOR GENERAL SEMIANNUAL REPORT TO CONGRESS

MARCH 2025

THIS SEMIANNUAL FEATURES: WORKS PROGRESS ADMINISTRATION POSTERS

The Library of Congress (Library) houses the largest collection of Works Progress Administration (WPA) posters in the United States, containing over 900 original posters produced between 1936 and 1943. Out of the estimated 2,000 WPA posters still in existence, the Library's collection represents a significant portion. These posters were created as part of the Federal Art Project (FAP), a division of the WPA established during President Franklin Delano Roosevelt's New Deal to provide employment for artists during the Great Depression. The primary goal of the FAP was to support artists, but it also aimed to enrich American life by making art accessible to the public.

The posters in the collection cover a wide range of topics, reflecting the diverse programs and initiatives of the WPA and the social concerns of the time. This report highlights posters associated with reading, books, and library programs. Themes include:

Cultural Programs: Publicizing art exhibitions, theatrical and musical performances, and library events. Posters encouraged reading with, In March read the books you've always meant to read (cover).

Travel and Tourism: Encouraging Americans to explore their own country and visit national parks with, See America. The National parks preserve wildlife (Next Page).

Health and Safety: Promoting public health measures, disease prevention, and safety in workplaces and public spaces. Examples include posters encouraging dental hygiene such as, *Keep your teeth clean* (next page).

Community Activities: Announcing local events and initiatives like, Visit the zoo (next page).

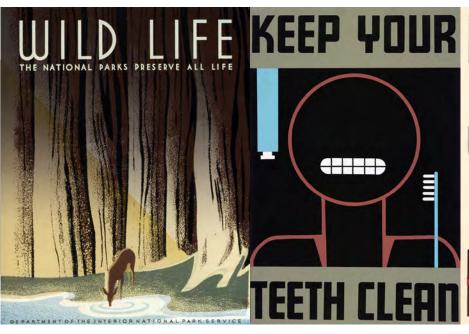
EDUCATIONAL PROGRAMS: PROMOTING EDUCATION AND CIVIC ACTIVITY.

World War II: Addressing themes related to national security and the war effort.

THE LIBRARY RECOGNIZED THE HISTORICAL AND ARTISTIC SIGNIFICANCE OF THESE POSTERS AS A UNIQUE RECORD OF AMERICAN LIFE DURING THE DEPRESSION ERA. THE COLLECTION PROVIDES VALUABLE INSIGHTS INTO THE SOCIAL, CULTURAL, AND POLITICAL LANDSCAPE OF THE UNITED STATES DURING THIS PIVOTAL TIME. THE IMAGES IN THIS REPORT ARE AVAILABLE ONLINE AT LOC.GOV.

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Message from the Inspector General

March 31, 2025

In November 2024, Dr. Hayden appointed me as the Library of Congress (Library) Inspector General. I am honored to be part of this historic institution, leading the Office of Inspector General (OIG) in providing meaningful, independent oversight resulting in improvements to Library programs and operations. I am pleased to submit our Semiannual Report to Congress for the first half of fiscal year 2025. This report highlights our activities for the six-month period ending March 31, 2025.

This semiannual period, the Library continued to advance its mission of engaging, inspiring, and informing Congress and the American people. The recently opened David R. Rubenstein Treasures Gallery, *Collecting Memories: Treasures from the Library of Congress*, the first phase of the Library's Visitor Experience Master Plan (VEMP) project, drew thousands of visitors to the exhibit. In January, the U.S. Copyright Office released Part 2 of its report on the legal and policy issues related to copyright and artificial intelligence (AI) which addresses the copyrightability of outputs created using generative AI.

This spring the Library introduced a new exhibit exploring the parallel lives of George Washington and King George III, hosted events related to Women's History Month, and featured guest speakers including award-winning author Mac Barnett, who was inaugurated as the 2025–2026 National Ambassador for Young People's Literature and bestselling author and acclaimed illustrator Dav Pilkey of the global phenomenon, *Dog Man* series.

One of the OIG's initiatives during this past semiannual period was to evaluate the Library's progress towards addressing its management challenges. The Library's investments in strategic planning initiatives have resulted in our office closing the Strategic Planning and Performance Management challenge, variations of which have existed since 2012. A further discussion of management challenges can be found on page 5. At the OIG, we furthered our mission of improving the economy, efficiency, and effectiveness of Library programs and operations and detecting and deterring fraud, waste, abuse, and mismanagement through our audits and investigations. Notably, within the Office of Audits, we issued the follow up

evaluation of the VEMP project. The VEMP project is an ambitious project focused on three new feature exhibits that the Library plans to add to the Thomas Jefferson Building: the Treasures Gallery, the Youth Center, and the Orientation Gallery. We identified the VEMP project as a management challenge in March 2024. Our follow-up evaluation issued this year identified that the project will likely not be fully completed by the congressional deadline of the United States' semiquincentennial in July 2026 and continues to experience significant cost fluctuations. We made several recommendations to the Library and outlined matters for congressional consideration to provide greater oversight of the project.

During this semiannual period, the Library implemented 63 of our audit recommendations.

Within the Office of Investigations, we received 58 new hotlines. While many of these matters were not actionable, we opened 10 investigations and made two referrals to management for action.

I would like to acknowledge OIG Legal Counsel Debbie Lehrich's leadership in the most recent transition period between appointed Inspectors General. Under Debbie's leadership, the OIG was a highly productive, highly responsive office. We will continue to provide independent and objective oversight of Library operations. We appreciate Congress's continued support of our oversight efforts and hope that you find this report informative.

Kimberly Benoit Inspector General

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PROFILES

LIBRARY OF CONGRESS

The Library is the research and information arm of the United States' national legislature and the world's largest knowledge reserve. The Library's mission is to engage, inspire, and inform Congress and the American people with a universal and enduring source of knowledge and creativity.

Founded in 1800, the Library is also the nation's first federal cultural institution, holding more than 178 million physical items on over 840 miles of bookshelves. These items include books and other print materials, recordings, photographs, maps, sheet music, and manuscripts. The Library occupies three buildings on Capitol Hill in Washington, D.C., and the Packard Campus of the National Audio-Visual Conservation Center (NAVCC) in Culpeper, Virginia. In addition, the Library operates six overseas offices and stores collections material in several other purpose-built facilities in Maryland.

The Library has six primary components:

- Office of the Librarian
- Chief Operating Officer Service Unit
- Office of the Chief Information Officer
- Library Collections and Services Group, which manages traditional library operations and includes:
 - Law Library
 - Researcher and Collections Services
 - Discovery and Preservation Services
 - National Library Service for the Blind and Print Disabled
- U.S. Copyright Office
- Congressional Research Service

The Office of the Librarian provides leadership and executive management to the Library, overseeing the implementation of the Library's mission. It includes the Principal Deputy Librarian of Congress, Strategic Planning & Performance Management (SPPM), Office of the General Counsel, Office of Communications and External Relations, Office of the Chief of Staff, and two centers that focus on user engagement and fostering access to the Library's collections for research, teaching, and visitor education: the Center for Exhibits and Interpretation and the Center for Learning, Literacy, and Engagement.

The Chief Operating Officer Service Unit manages and administers the Library's non-IT infrastructure functions and daily operations—including oversight of the Human Capital Directorate, the Financial Services Directorate, the Contracts and Grants Directorate, the Integrated Support Services Directorate, the Security and Emergency Preparedness Directorate, and Library Enterprises—that operate on a cost recovery basis.

The Office of the Chief Information Officer (OCIO) has agency-wide responsibility for the Library's IT strategies and resources and manages the Library's Digital Strategy. This includes guiding Library leadership on digital futures, advising on the technology market, and serving as a solution broker for the agency. It also includes assessing, designing, developing, maintaining, standardizing, optimizing, and protecting the Library's technology resources. Technology resources include all Library budgetary, personnel, equipment, data, and facilities resources and services that are primarily used for the management, operation, acquisition, disposition, and transformation or other activity related to the lifecycle of IT. The Library's digital collections content is managed by the service unit with statutory or curatorial responsibilities for a given collection.

The Library Collections and Services Group (LCSG) oversees units responsible for acquiring, stewarding, describing, and serving Library collections. LCSG is comprised of:

- The Law Library assists Congress and the legislative process by providing comprehensive research on foreign, comparative, international, and U.S. law and other legal reference services;
- **Researcher and Collections Services** (RCS) links more closely the Library's researcher, reference, and public service work as well as collection development, processing, and selected preservation activities. RCS brings together the Collection Development Office, NAVCC, the John W. Kluge Center, the General & International Collections Directorate, and the Special Collections Directorate, which includes programs such as the American Folklife Center and the Veterans History Project;
- **Discovery and Preservation Services** (DPS) leads the Library's collection acquisition, bibliographic description, and stewardship activities. DPS improves collection discovery and user access through description, digitization, and preservation workflows as the tangible and digital collections continue to grow; and
- National Library Service for the Blind and Print Disabled is a national program that circulates books and magazines in braille and audio formats to people with temporary or permanent low vision, blindness, or a physical disability that prevents them from reading or holding the printed page.

The **U.S. Copyright Office** promotes creativity and free expression by administering the nation's copyright laws and by providing impartial, expert advice on copyright law and policy for the benefit of all.

The **Congressional Research Service** supports the legislative process by providing, exclusively to Congress, objective, confidential, and nonpartisan assessments of public policy issues and legislative options for addressing those issues.

Office of the Inspector General

The Library's Office of the Inspector General (OIG) was established in 1988 as a non-statutory office deriving its authority from the Librarian of Congress. The OIG became statutory with the passage of the *Library of Congress Inspector General Act of 2005* (2 U.S.C. § 185) with a mandate to independently:

- conduct and supervise audits and investigations of fraud, waste, and abuse relating to the Library;
- lead, coordinate, and recommend policies to promote economy, efficiency, and effectiveness; and
- keep the Librarian of Congress and Congress fully and currently informed about problems and deficiencies relating to the administration and operations of the Library.

In 2019, the *Library of Congress Inspector General Act* was amended for the first time since its enactment, giving the office increased parity with executive branch IGs, statutory law enforcement authority, and defined independence with respect to budget and hiring.

Through the Council of Inspectors General on Integrity and Efficiency (CIGIE), we are part of a community of Inspectors General who collectively conduct and supervise audits and investigations relating to the programs and operations of their agencies in the executive and legislative branches.

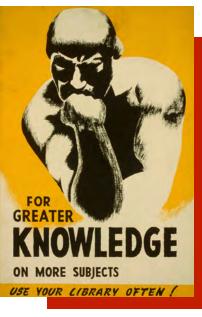
Every six months we provide Congress with this report detailing our independent oversight of Library programs and operations. Our semiannual report presents information on:

- the Library's top management challenges;
- significant audits, investigations, and other OIG activities;
- our review of legislation and regulations affecting the Library; and
- Library decisions on OIG recommendations and the status of implementation.

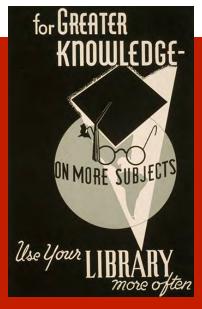
The **Office of Audits** conducts in-depth reviews that address the efficiency, effectiveness, and economy of the Library's programs, activities, and functions; provide information to Library management to improve accountability; facilitate oversight and decision-making; and recommend corrective action as needed.

The Office of Audits contracts with an independent public accounting firm that examines whether the Library's financial statements fairly present financial positions, results of operations, and budgetary resources. The firm also assesses whether the Library and its various service units have adequate financial reporting internal control systems that comply with applicable laws and regulations. OIG reports are available at www.loc.gov/about/oig.

The **Office of Investigations** investigates alleged or suspected wrongdoing by agency employees, contractors, or others responsible for handling federal resources. Violations of Library regulations or fraud committed against the Library can result in administrative sanctions and criminal or civil prosecution. Contact information for the OIG Hotline is located at the end of this report.









TOP MANAGEMENT CHALLENGES

A primary responsibility of Offices of Inspectors General is to annually identify Top Management Challenges for the agencies they oversee. We are committed to monitoring each of the current Library top management challenges. In this report, we highlight Strategic Planning and Performance Management and the Visitor Experience Master Plan (VEMP) project management challenges. We have previously identified four other top management challenges for the Library:

- IT Modernization. The key to the Library successfully developing a modern IT environment is OCIO using a strategic approach to improve its IT governance; establishing accountability for IT investments; implementing well-designed, secure, and business-driven networks and computing facilities; and employing IT best practices.
- Digital Strategic Planning and Execution. A more strategic approach
 to digital services and collections is necessary because of the pace of
 digital innovation and the need for the Library to act on many fronts
 to execute a timely and cost-effective digital transformation.
- Collections Services Workflow. The Library needs to broaden its
 capability to perform end-to-end monitoring of its collections services
 workflow in order to better manage its arrearage and number of items
 collected and stored. LCSG's collections storage activities are part of
 a supply chain that includes selection, digitization, preservation, and
 storage services, among other processes.
- Financial Management and Reporting. A reliable system of internal controls over financial reporting is vital for an agency to accurately and reliably report on its financial transactions and position.



Strategic Planning and Performance Management

Background

Strategic planning and performance management-related activities have been a long-standing top management challenge at the Library. In our September 2012 Semiannual Report to Congress, we identified "performance reporting" as a top management challenge. As a result of an OIG audit, and at the direction of Congress, the Library adopted a planning, budgeting, and management system based on the *Government Performance and Results Act of 1993* (GPRA). We determined the Library also needed to align and improve various processes, including strategic planning, budgeting, program planning, and performance management.

In the ensuing years, we redefined the challenge as relating more broadly to strategic planning and performance management. In our September 2016 semiannual report, we noted that many of the Library's management challenges flowed from the lack of proper strategic planning and performance management but stated that with the appointment of a new Librarian, Dr. Carla Hayden, the Library had the opportunity to strengthen its governance. At that time, there was a need for a new, more robust strategic plan, a disciplined focus on measuring progress, and a cohesive leadership team driving the plan's execution.

In our March 2017 semiannual report, we described improvements happening under Dr. Hayden's leadership. Dr. Hayden had expanded the Library's planning and performance improvement activities and, with the launch of a Library-wide envisioning initiative, was developing the Library-wide strategic plan supported by aligned service unit plans.

The Need for Persistent Focus Defined

In our March 2018 semiannual report and then in greater depth in our July 2018 report entitled *Continued, Persistent Focus Needed to Strengthen the Library's Strategic Planning and Performance Management*, we identified practices that would help the Library focus its efforts to strengthen strategic planning and performance management activities. One of these practices was to implement a planning and performance culture at the executive level. We stated that effective strategic planning and performance management required committed leadership at the topmost executive levels, which we noted the Librarian had already demonstrated by implementing the practice of discussing high priority cross-Library goals at Executive Committee meetings, something the OIG had identified as necessary. We also stated that the Library should consider instituting

^{1 2018-}SP-103, July 2018.

oversight that incorporated planning, performance management, and reporting processes. In our estimation, this approach would help the Library shift the focus of government decision-making and accountability away from a preoccupation with activities undertaken to a focus on the results of those activities—such as real gains in program quality.

Another practice was developing the capacity to gather information to assess performance. In our July 2018 report, we emphasized the importance of the Library utilizing quality data, an issue we had identified in several earlier reports.² Among other things, we noted the importance of the Library requiring SPPM to evaluate the adequacy of data used to measure progress toward performance targets.

The Library Has Resolved this Challenge, but the Need for Persistent Focus Continues

Based on our latest review of the Library's strategic planning and performance management,³ we are removing this area as a top management challenge. The Library has made significant progress since we first identified the challenge – Library management committed to incorporating strategic planning into its decision-making, SPPM led the Library to improved strategic planning with the issuance of its fiscal years (FY) 2019–2023 and 2024–2028 Strategic Plans, and, contemporaneous with the release of the FY 2019–2023 Strategic Plan, SPPM initiated the annual planning processes for Directional Plans developed by Library service units (SUs).

The Library should maintain focus on—and we will continue to monitor—these areas, particularly performance measurement and the Library's use of key performance indicators (KPIs). While the mangagement challenge has been resolved, SPPM's controls for KPIs had not been effectively designed and implemented. For example, although SPPM and the SUs had aligned KPIs to three of the four strategic goals in the Library's strategic plan, SPPM had not developed KPIs for the fourth strategic goal, "Foster Innovation." In addition, the Library stated it would perform an analysis of service unit performance goals and their associated risks to identify gaps that may need to be addressed. Since issuing our report in June 2024, the Library addressed these areas of concern and we closed all the report recommendations.

² Managing in the Spirit of GPRA: Developing Credible Performance Data is the Next Step, 2009-PA-104, March 2010; Performance-Based Budgeting: Working Toward the Spirit of GPRA - Library Services: Commendable Progress with Room for Improvement, 2010-PA-107, January 2011; and Working Toward the Spirit of the Government Performance and Results Modernization Act, 2013-PA-101, March 2013.

³ Evaluation of Library of Congress Strategic Planning and Performance Management, 2023-SP-105, June 2024.

Visitor Experience Master Plan Project

Background

The VEMP project, a joint effort between the Library and the Architect of the Capitol (AOC), was envisioned to help create more welcoming, functional, and inspirational spaces in the Library's Thomas Jefferson Building. The VEMP project's feature exhibits include the Treasures Gallery, the Youth Center, and the Orientation Gallery.⁴ As planned, the Treasures Gallery exhibits the Library's treasures, the Youth Center will provide education to visitors ages seven and up, and the Orientation Gallery will provide visitors the opportunity to discover the Library's history and mission upon entry into the building. We identified the VEMP project as a top management challenge in our March 2024 Semiannual Report to Congress while conducting a follow up evaluation that revealed the VEMP project was experiencing significant projected cost overruns and schedule delays.⁵

Project Schedules Continuously Changed

Our February 2025 follow up report stated that we were unable to assess whether the VEMP project was on schedule because the Library and AOC have continuously changed the VEMP project's opening and completion dates over time. Although portions of the project will open on time, the Orientation Gallery is not expected to be completed by the congressional deadline of the United States' semiquincentennial in July 2026.^{6,7}

We determined that the Library and AOC had not established the shared policies, processes, procedures, internal controls, and project management needed to ensure they maintained a consistent schedule to meet the established deadlines set by internal and external stakeholders. As a result, the project remains at risk of further delays until these measures are implemented.

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⁴ The VEMP project also includes a variety of other components including the welcome area, entry hall, Orientation Gallery door, Capitol Visitor Center entrance, and egress.

⁵ Follow Up Evaluation of the Library of Congress's Visitor Experience Master Plan Project, 2023-SP-104, February 2025. Our initial evaluation of the VEMP project was Report on the Evaluation of the Library of Congress's Visitor Experience Project, 2021-SP-101, May 2022. At the time, the Library was on schedule and cost estimates were reasonable, although the report noted that the project was still in the early stages of design and defining scope.

⁶ On June 27, 2023, the House Report, <u>H. Rept. 118-120</u> accompanying the Legislative Branch Appropriations Bill of 2024 stated, "Every effort must be made to complete this project in time for the nation's semiquincentennial celebration."

⁷ The Treasures Gallery opened to the public in June 2024, the Youth Center is expected to open in December 2025, and the Orientation Gallery is expected to open in March 2027.

Incomplete Cost Estimates Exceeded Available Funding

Additionally, as stated in our February 2025 report, we could not assess whether VEMP project cost estimates were reasonable because they continuously fluctuated and have exceeded the funding available to complete the project. The Library's project cost estimates remained unchanged since March 2023; however, AOC's construction cost estimates have continuously changed and grown. Reasons for this fluctuation included changing design documentation, ineffective coordination and communication, compressed scheduling, project management, and segregated cost-estimating processes.

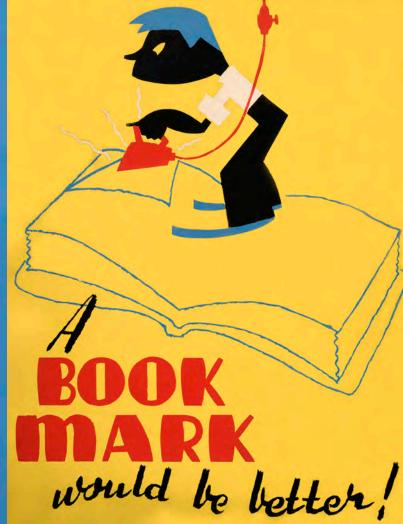
The original VEMP project budget approved by Congress in FY 2019 included \$42.4 million in appropriated funds and \$20 million in private donations to be raised by the Library. To address a forecasted budget shortfall, Congress approved an additional \$30 million in appropriations in March 2024, and the Library committed to raise an additional \$3.2 million in non-federal funds, bringing the VEMP project's cost estimate to \$95.6 million. However, the additional federal and non-federal funds will not entirely address the VEMP project's expected budget shortfall and guarantee full completion as designed.

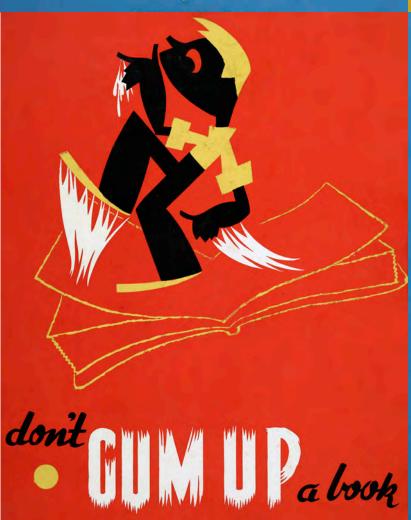
The Library is on target to raise more than the initially budgeted \$20 million in private funds for the VEMP project and plans to raise an additional \$1.5 million. The Library will continue exploring opportunities to raise additional non-federal funds to cover unanticipated construction costs and future programming.

The Path Forward

We made recommendations to the Library and identified matters for congressional consideration to assist Congress in conducting its ongoing monitoring activities. The recommendations were designed to address the lack of established and shared policies, processes, procedures, internal controls, and project management between the Library and AOC. We will continue to monitor the progress of the VEMP.









AUDITS, EVALUATIONS, AND REVIEWS

Follow-up Evaluation of the Library of Congress's Visitor Experience Master Plan Project

Report No. 2023-SP-104

February 2025

We contracted with the public accounting firm Sikich to perform a follow-up evaluation of the Library's VEMP project. The objectives of the evaluation were to determine whether: (1) the Library's Integrated Master Schedule and VEMP are on schedule and within budget; (2) cost estimates are reasonable and current and the Library updates these estimates with the actual costs as the project progresses or whenever requirements change; and (3) the Library is on target to raise the private funds pledged to complete the project on time and with the necessary funds.

In March 2024, we designated the VEMP project as a new top management challenge (discussed in the previous section) because we determined that the project was experiencing significant project cost overruns and schedule delays as part of this engagement. These issues were detailed in the February 2025 report. The report contained eight recommendations to address underlying causes, which included the lack of established and shared policies, processes, procedures, internal controls, and project management between the Library and the AOC. The report also included matters for congressional consideration aimed at improving effective collaboration and coordination between the Library and AOC as the project moves forward.

FY 2024 Audit of the Legislative Branch Financial Management System General IT Controls

Report No. 2024-FN-101 November 2024

We contracted with the public accounting firm KPMG to perform the audit of the Library's FY 2024 financial statements and to provide a report on the design, implementation, and operating effectiveness of relevant general information technology controls supporting the Legislative Branch Financial Management System (LBFMS) environment. KPMG performed the audit in accordance with U.S. generally accepted government auditing standards; the Government Accountability Office's (GAO) Financial Audit Manual, GAO's Federal Information Systems Controls Audit Manual; National Institute of Standards and Technology Special Publication 800-53, Recommended Security Controls for Federal Information Systems; and Library Information Technology Security Standards. KPMG did not identify any material weaknesses or significant deficiencies; KPMG did identify and convey to Library management certain deficiencies in internal control, but

they were not deemed significant. We are not providing specific information about the weaknesses because of the sensitive nature of the information contained in the report. The report was not issued for public release.

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REVIEW OF LEGISLATION AND REGULATIONS

Table 1: Review of Legislation

Reviewed	Comments by the Office of the Inspector General
_	No legislation was reviewed during this semiannual period.

Table 2: Review of Library of Congress Regulations (LCRs) and Directives (LCDs)

Reviewed	Comments by the Office of the Inspector General
LCD 5-720.1, Workstation Computer Deployment to Library Employees and Contractors	We made minor editing and referencing suggestions.





OFFICE OF INVESTIGATIONS DATA

Table 3: Investigative Data⁸

Activity	Total
Investigative Reports Issued (significant investigations summarized in this report) ⁹	8
Management Impact Reports/Fraud Alerts Issued	1
Referrals to the Department of Justice (DOJ)	4
Referrals to State and Local Authorities	0
Indictments/Criminal Informations Resulting from Prior Referral to Prosecuting Authorities	0
Suspensions and Debarments	0
Number of Convictions from Investigations	0
Investigations Opened	10
Investigations Closed	11
Investigations Forwarded to Library Management for Administrative Action	2
Complaints Opened	12
Complaints Closed	14
Complaints Converted to Investigations	5
Hotline Communications Received	58
Hotline Communications Converted to Investigations	5
Hotline Referrals to Management ¹⁰	26

Table 3: An overview of Office of Investigations' activities over this semiannual period.

⁸ Data were compiled from a review of the Office of Investigations' database and files.

⁹ Eight reports were issued, two of which were forwarded to Library management.

¹⁰ This category includes referrals to the OIG's Office of Audits, Library management, or entities outside the Library.

OFFICE OF INVESTIGATIONS ACTIVITIES

SIGNIFICANT INVESTIGATIONS

Employee Misconduct, Misuse of Government Computer

Pursuant to proactive efforts, the OIG identified a Library manager who was possibly misusing their Library-issued computer. We investigated and determined that the employee had used their computer to visit inappropriate internet sites. We issued a report of investigation to Library management for action. The employee agreed to a resolution, which included the equivalent of a 20-workday suspension without pay. The investigation was closed.

Employee Misconduct, Theft of Government Records

We received a hotline complaint of a theft of sensitive materials by a former Library employee. We investigated and determined that the employee removed several boxes of sensitive materials upon their retirement from the Library in 2008. The employee then donated the materials to a non-partisan organization within a law school. The organization alerted the Library and returned all sensitive documents to the Library, where they were catalogued and stored. The case was presented to the U.S. Attorney's Office and declined for prosecution. The investigation was closed.

Employee Misconduct by Architect of the Capitol Employee, Destruction of Government Property

The OIG received information that someone had been moving weight equipment in the Library weight room and that some of it appeared to be missing. A temporary camera in the weight room recorded an AOC employee moving around equipment. When the employee noticed the camera, they tore it down off the wall. We conducted a joint investigation with AOC OIG. The AOC employee was interviewed and admitted to tearing down the camera and damaging ceiling tiles. Further investigation revealed discrepancies in the employee's account of the incident; during a follow-up interview, the employee contradicted their earlier statement stating that they had not removed the camera but instead had placed it back into the ceiling tile. The AOC OIG later determined that the AOC employee was still in possession of the camera. The employee retrieved the camera and returned it to the Library, which determined the camera was rendered inoperable. In lieu of prosecution by the U.S. Attorney's Office, the AOC employee was permitted to fully reimburse the government for the damages caused and replace the camera. The employee has since left the AOC.

CLOSED, UNDISCLOSED INVESTIGATIONS INVOLVING SENIOR LEVEL EMPLOYEES

Conflict of Interest

The OIG Hotline was notified that a Senior Level manager (SL) may have a conflict of interest involving a relative. Our investigation determined that the SL's failure to report their relationship with a relative who was employed by a Library contractor while the contractor was competing for business in the SL's service unit may have created the appearance of impairing the SL's ability to act impartially and in the best interest of the Government regarding the contract in question.

Our investigation did not reveal any evidence to suggest that the SL benefited financially from these contracts. Investigation also found no evidence to substantiate that the SL attempted to inappropriately influence the technical review panel. The investigation was referred to the U.S. Attorney's Office and subsequently declined for prosecution. An investigative report was issued and referred to Library management to consider administrative action. The Library took no administrative action.

Alleged Reprisal Complaint for Filing a Protected Disclosure

We received an allegation via our hotline that a SL manager retaliated against a Library employee for making a protected disclosure. We interviewed key witnesses and reviewed emails and personnel and other records. A review of the evidence determined that this case did not meet the elements of retaliation. The investigation was closed.

SEMIANNUAL LAW ENFORCEMENT CERTIFICATION

In accordance with the requirements of the *Library of Congress Inspector General Act of 2005*, as amended,¹¹ the Inspector General hereby certifies that the OIG's law enforcement program has adequate internal safeguards and management procedures that comply with applicable standards for investigations. All supporting documentation is maintained in our office.

We obtained comments from Library management on the status of all open recommendations. We summarized the comments provided for recommendations made in our publicly released reports and provide them in Table 4. Responses to recommendations are the representations of Library management, not the OIG, although the OIG may summarize the updates. The status of recommendation updates has not been audited. We periodically perform follow-up audits, inspections and evaluations, and reviews to verify implementation of our recommendations. For this and future semiannual reports, we are including OIG recommendations made during this semiannual period in the table, whereas historically we waited a semiannual period before including them in the table.

Table 4: Significant Recommendations from Previous Semiannual Reports for which Corrective Action Has Not Been Completed

Subject	Report No. Issue Date	Office	Rec. No.	Summary of Recommendation and Action				
Office of the Librarian / Center for Exhibits & Interpretation (CEI)								
Follow Up Evaluation of the Library of Congress's Visitor Experience Master	2023-SP-104 February 2025	CEI	1.1	Report Summary: We conducted a follow up engagement as to the status of the Library's VEMP Project and identified significant schedule delays and projected cost overruns. Finalize design documentation for the two remaining feature galleries				
Plan (VEMP) Project				(Youth Center and Orientation Gallery) with the individual agencies' final approval by an agreed-upon date, to expedite the finalization of design documentation for both the Library and AOC, to lessen the risk of additional cost escalation on the VEMP project—The Library has submitted documentation and a request to close the recommendation. The documentation is under review.				
Follow Up Evaluation of the Library of Congress's VEMP Project	2023-SP-104 February 2025	CEI	1.2	Document and publish definitions of key terms specific to the design and construction of the VEMP project—The Library has submitted documentation and a request to close the recommendation. The documentation is under review.				
Follow Up Evaluation of the Library of Congress's VEMP Project	2023-SP-104 February 2025	CEI	1.3	Document and publish policies, procedures, definitions, and expectations specific to the Library's exhibition design and fabrication methodology—The Library has submitted documentation and a request to close the recommendation. The documentation is under review.				
Follow Up Evaluation of the Library of Congress's VEMP Project	2023-SP-104 February 2025	CEI	1.4	Document and publish an intergovernmental construction communication plan including roles and responsibilities for Library personnel—The Library has submitted documentation and a request to close the recommendation. The documentation is under review.				
Follow Up Evaluation of the Library of Congress's VEMP Project	2023-SP-104 February 2025	CEI	1.5	Document and publish expectations for the delivery and execution of final design documentation. Documented expectations for final design documentation could include expected documents, approvals, certifications, timing, and other relevant information that may be necessary to support a final design—The Library has submitted documentation and a request to close the recommendations The documentation is under review.				

Table 4: Significant Recommendations from Previous Semiannual Reports for which Corrective ACTION HAS NOT BEEN COMPLETED (CONTINUED)

Subject	Report No. Issue Date	Office	Rec. No.	Summary of Recommendation and Action
Follow Up Evaluation of the Library of Congress's VEMP Project	2023-SP-104 February 2025	CEI	1.6	Implement standing, periodic, working meetings with AOC, the AOC and Library project managers, and Library personnel to discuss and document scheduling changes that will then be reflected in the bi-weekly congressional report and the Visitor Experience Schedule—The Library has submitted documentation and a request to close the recommendation. The documentation is under review.
Follow Up Evaluation of the Library of Congress's VEMP Project	2023-SP-104 February 2025	CEI	2.1	Implement standing, periodic, working meetings with AOC, the AOC and Library project managers, and Library personnel to discuss and document cost estimation changes as a result of design changes to VEMP project cost estimations—The Library has submitted documentation and a request to close the recommendation. The documentation is under review.
Office of the Lil	brarian / Strate	egic Planni	ng & Peri	formance Management Office
Enterprise Risk Management	2020-PA-104 June 2021	COO/ FSD/ SPPM	4	Report summary: We reported on the adequacy of the Library's Enterprise Risk Management policies and procedures. Incorporate risk considerations into the Library's budgeting and resource approach—The Library continues to develop, delineate, and document the collaborative responsibility of linking resource allocation efforts and risk considerations during the budget formulation and execution phases. This includes SPPM and FSD/Budget Office working together to increase the linkage and interaction between the two organizations updating guidelines and designing, documenting internal work procedures. SPPM will be participating in budget formulation review. The estimated date of completion is the fourth quarter of FY 2025.
Office of the Ch				
Cloud Service Provider Governance	2020-IT-103 January 2022	OCIO	4.2	Report summary: We tested the Library's practices in implementing cloud technology. Perform an OCIO-wide skills gap assessment in support of the Library cloud strategy—OCIO staff completed the survey with a response rate adequate enough for identifying competency levels. The Office of Personnel Management (OPM) analyzed the survey results and will brief OCIO leadership on its findings. OPM continues to finalize the assessment report. The estimated date of completion is the fourth quarter of FY 2025.
Cloud Service Provider Governance	2020-IT-103 January 2022	OCIO	4.3	Based on the results of the OCIO-wide skills gap assessment, implement any necessary corrective actions—The Library will implement corrective actions that may result from the skills gap assessment being conducted in Recommendation 4.2 of this report. The estimated date of completion is the first quarter FY 2026.

Table 4: Significant Recommendations from Previous Semiannual Reports for which Corrective ACTION HAS NOT BEEN COMPLETED (CONTINUED)

Subject	Report No. Issue Date	Office	Rec. No.	Summary of Recommendation and Action
FY 2021	2021-IT-101	OCIO	2.3	Report summary: We tested select cybersecurity controls.
Cybersecurity Controls Maturity Evaluation	July 2022			Maintain a complete, accurate, and centralized repository of all hardware assets connected to the Library network—OCIO deployed the IT Asset Management Solution (ITAM) and Discovery which allow the Library to maintain a centralized repository of all hardware assets connected to the Library network. The recommendation is under review for closure at the Library's request.
FY 2021 Cybersecurity Controls Maturity Evaluation	2021-IT-101 July 2022	OCIO	3.2	Complete the implementation of its Configuration Management Database (CMDB) to track and manage the inventory of software assets—The acquisition process for acquiring professional services to implement the IT Operations Management suite of tools is complete. The vendor has been on-boarded and the project has begun. OCIO is now identifying sprints and developing user stories for implementation. The estimated date of completion is the third quarter of FY 2025.
Inventory Controls for End User Devices	2023-IT-101 July 2024	OCIO & Integrated Support Services (ISS)	2.1	Complete OCIO's development and implementation of an automated IT asset management solution—OCIO deployed the second and third releases of the ITAM solution and is working on the final release, which will update OCIO workflows to manage asset records. The estimated date of completion is the fourth quarter of FY 2025.
Inventory Controls for End User Devices	2023-IT-101 July 2024	OCIO & ISS	2,2	Finalize the development of formal procedures for maintaining an up-to-date inventory of hardware assets, from acquisition to final disposition, including all end user devices and MFDs, as well as such devices purchased without the involvement of Library logistics personnel—OCIO deployed the third release of the ITAM solution. The ITAM Product Owner (PO) piloted the new processes to onboard all new hardware assets. OCIO is now working on the final release, which will update OCIO workflows to manage asset records. The ITAM PO has expanded the processes to onboard new hardware and software assets. The estimated date of completion is the fourth quarter of FY 2025.
Tracking of Information Technology Project Direct Labor Costs	2023-IT-103 September 2024	OCIO	1	Report Summary: We examined the consistency, timing, and accuracy of the Library's IT project direct labor costs. Develop and implement internal controls to periodically reconcile GovTA direct labor hours to Project Portfolio Management (PPM) project hours on a regular basis—The Program Management Governance and Operations (PMO) division has identified and confirmed sources of prior discrepancies between LIB-540 LOC Time & Attendance (GovTA) and the PPM module with IT Design & Development (ITDD), Financial Services Directorate (FSD) and Human Capital Directorate (HCD). PMO is actively monitoring actual hours reported between LIB-108 LOC Reporting System (LCRS) and PPM for discrepancies. OCIO will schedule a meeting with FSD and HCD to discuss plans to develop and implement further internal controls to prevent and reconcile any discrepancies between GovTA, LCRS, and PPM project hours on a regular basis. The estimated date of completion is the fourth quarter of FY 2025.

Table 4: Significant Recommendations from Previous Semiannual Reports for which Corrective ACTION HAS NOT BEEN COMPLETED (CONTINUED)

Subject	Report No. Issue Date	Office	Rec. No.	Summary of Recommendation and Action	
Tracking of Information Technology Project Direct Labor Costs	2023-IT-103 September 2024	OCIO	2	Develop and implement internal controls to ensure that direct labor hours are correctly assigned to IT projects in both GovTA and PPM, including hours manually entered into PPM, but not reflected in GovTA—The PMO division has developed automated controls to prevent staff from manually reporting project hours directly into the PPM module in ServiceNow. OCIO will schedule a meeting with FSD and HCD to discuss plans to develop policies to ensure leave time is not charged to project accounts. The estimated date of completion is the fourth quarter of FY 2025.	
Tracking of Information Technology Project Direct Labor Costs	2023-IT-103 September 2024	OCIO	3	Implement a process to review project hours ignored by PPM at take follow-up actions to record ignored hours from timecards—TI PMO division has developed a process and tools to review proje hours ignored by PPM and to plan follow-up actions to record ignored hours from timecards. The PMO will identify and assign resources implement the process. The estimated date of completion is the four quarter of FY 2025.	
Tracking of Information Technology Project Direct Labor Costs	2023-IT-103 September 2024	OCIO	4	Complete the development and implementation of polices and/or procedures for the management of programs—The PMO division has completed development and implementation of the program chartering process, with 15 approved program charters to date and 12 remaining program charters in progress. The PMO is preparing the recently approved programs for the transition to the Program Delivery phase in keeping with GAO, PMI and Agile best practices. The estimated date of completion is the fourth quarter of FY 2025.	
Chief Operating	g Officer (CO	O)			
Inventory Controls for End User Devices	2023-IT-101 July 2024	ISS	4.1	Revise LCR 8-320, as well as other regulations and directives as appropriate, to accurately reflect the Library's desired operational control environment related to laptop and government mobile device physical security and the use of property passes—ISS revised LCR 8-320 to incorporate current practices at the Library and to align with related regulations and directives. The Acting Director of ISS has shared revisions with the Office of the General Counsel for final review and update of the LCR. The estimated date of completion is the third quarter of FY 2025.	

Table 4: Significant Recommendations from Previous Semiannual Reports for which Corrective ACTION HAS NOT BEEN COMPLETED (CONTINUED)

Subject	Report No.	Office	Rec.	Summary of Recommendation and Action				
	Issue Date	011102	No.					
Library Collecti	Library Collections & Services Group (LCSG)							
Library Services Needs to Strengthen Its	2018-SP-101 August 2019	LCSG	5	Report summary: We assessed the Library's capability to perform end-to- end monitoring of the effectiveness of its collections storage process across different collection formats through the use of performance measures.				
Performance Measurement of the Collection Services Workflow				Create a complete and accurate inventory of unprocessed electronic collection materials— A request to close Recommendations 5 and 7 is under development and will include, among other information, the following: a definition of electronic collection materials, a definition of processed born digital collections, and links to documented methodologies for counting processed and unprocessed collection items. Consistent with established practice, that data, combined with data on current born digital formats, will be used to set an outcome-oriented target for reducing the size of the inventory of unprocessed born digital collection materials. The estimated date of completion is the fourth quarter of FY 2025.				
Library Services Needs to Strengthen Its Performance Measurement of the Collection Services Workflow	2018-SP-101 August 2019	LCSG	7	Use complete and accurate data to establish plans to set an outcome- oriented target for reducing the size of the Library's inventory of unprocessed electronic collection materials (e.g., using a ratio of unprocessed electronic materials to electronic collection materials overall)—See the response for 2018-SP-101, Recommendation 5.				
Library Services Needs to Strengthen Its Performance Measurement of the Collection Services Workflow	2018-SP-101 August 2019	LCSG	10	Track the allocation of resources associated with outcome-based performance measures for all stages of the collection services workflow for analog and electronic collection materials—A request to close Recommendations 10 and 11 is under development and will describe current and planned ways of tracking Library collections through major events of the collection services workflow, as well as proposed interim and final measures for resources and capacity (including proposed methodologies to calculate those measures). The estimated date of completion is the fourth quarter of FY 2025.				
Library Services Needs to Strengthen Its Performance Measurement of the Collection Services Workflow	2018-SP-101 August 2019	LCSG	11	Establish capacity utilization performance measures that track the effectiveness of the collection services workflow—See the response for 2018-SP-101, Recommendation 10. The estimated date of completion is the fourth quarter of FY 2025.				
Not on Shelf Rate Remains Largely Unchanged but	2023-SP-101 January 2024	LCSG	2	Report summary: We assessed the Library's "not on shelf" rate, which refers to when materials requested by users cannot be found by the Library, and the timeliness and quality of the Library's material retrieval service.				
Improvements to Customer Service Can Be Made				Establish performance measures to begin measuring performance against the customer service standards for the CMD material retrieval service—Retrieval standards are drafted and the next steps is to establish performance measures. The estimated date of completion is the first quarter of FY 2026.				





REPORTING REQUIREMENTS

Table 5: Reporting Requirements under the Inspector General Act of 1978, as amended, and the Library of Congress Inspector General Act of 2005, as amended

	LENDED	
IG Act Section	REPORTING REQUIREMENTS	Page(s)
4(a)(2)	Review of legislation and regulations.	13
5(a)(1)	Significant problems, abuses, and deficiencies.	5–16
5(a)(2)	Recommendations for which corrective action has not been completed, including potential associated cost savings, when applicable.	17–21
5(a)(3)	Significant closed investigations.	14–16
5(a)(4)	Number of convictions from investigations.	14
5(a)(5)	Listing of completed audits, inspections and evaluations, and associated information.	11–12
5(a)(6)	Management decisions made with respect to issued audits, inspections, or evaluations.	11–12
5(a)(8)(9)(10)	Information regarding peer reviews involving the OIG.	24
5(a)(11)	Statistical tables pertaining to the OIG investigations.	14
5(a)(12)	Description of the metrics for the OIG investigative table.	14
5(a)(13)	Reports involving senior government employees where allegations of misconduct were substantiated.	N/A
5(a)(14)	Instances of whistle blower retaliation and related information.	14–16
5(a)(15)	Attempted agency interference with OIG independence and related information.	N/A
5(a)(16)	Circumstances of audits, inspections, and evaluations and investigations of senior government employees undisclosed to the public.	14–16
2 U.S.C. § 185(d)(3) (c)(i)	Semiannual certification of law enforcement program.	16

¹² This section was derived from section 5 of the *Inspector General Act of 1978 (IG Act)*, Pub. L. 95–452, which was set out in a former Appendix to Title 5. On December 23, 2022, Pub. L. 117–263, div. E, title LII, amended the *IG Act*, including the semiannual reporting requirements. On December 27, 2022, Pub. L. 117–286 codified the *IG Act* at 5 U.S.C. §§ 401–424. For applicability of the December 23, 2022 amendments to this section, see section 5(b) of Pub. L. 117–286, *Transitional and Savings Provisions*. The semiannual reporting requirements of section 5 (except (a)(7)) apply to the Library's OIG through the *Library of Congress Inspector General Act of 2005*, as amended, 2 U.S.C. § 185. Section 5 states, "Each Inspector General shall, not later than April 30 and October 31 of each year, prepare semiannual reports summarizing the activities of the Office during the immediately preceding six-month periods ending March 31 and September 30."

PEER REVIEW REPORTING

Office of Audits

The Office of Audits undergoes external peer reviews at least once every three years for our compliance with the GAO's audit standards and compliance with inspection and evaluation standards set by CIGIE.

Results of peer reviews under audit standards

We underwent a peer review for compliance with audit standards by the U.S. Consumer Product Safety Commission OIG for the period ending March 31, 2022. We received a "pass" rating.

We completed an audit peer review of the Smithsonian Institution OIG in September 2023 for the period ending September 30, 2023. We concluded that the OIG met the standards under review, issued a pass rating, and made one recommendation.

Results of peer reviews under audit standards

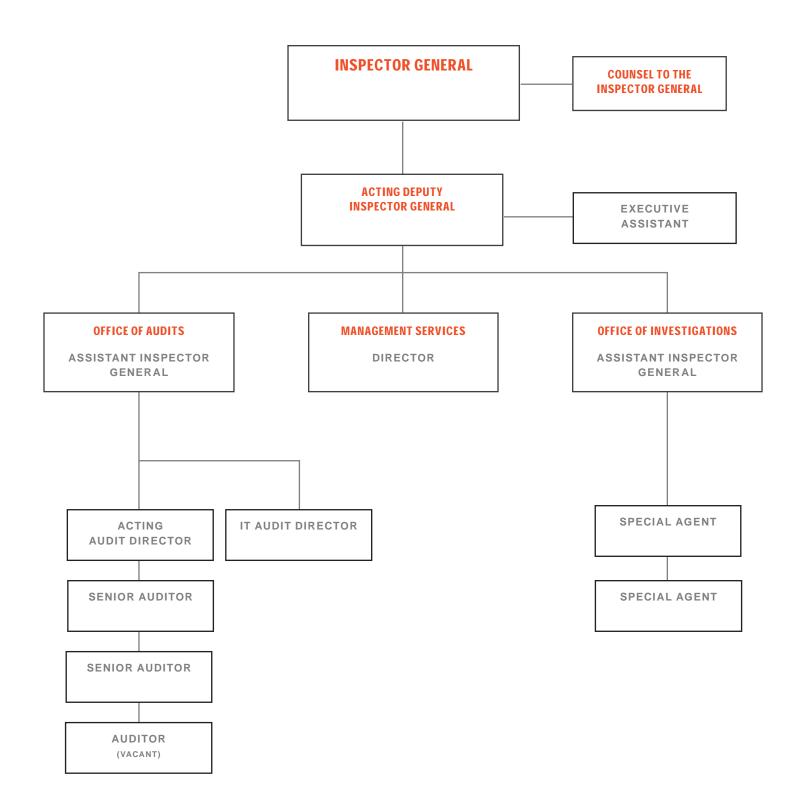
We underwent a peer review for compliance with inspection and evaluation standards by the Equal Employment Opportunity Commission OIG for the period ending March 31, 2024. We received a pass rating, the highest possible rating.

This semiannual period we completed an inspection and evaluation peer review of the Corporation for Public Broadcasting (CPB) OIG in March 2025 for the period ending September 30, 2024. We concluded that the CPB OIG met the standards under review and provided a pass rating, the highest possible rating. We made two recommendations. There were no outstanding recommendations from the previous peer review.

Office of Investigations

The Office of Investigations also undergoes external peer reviews for compliance with investigative standards set by CIGIE. This semiannual period we underwent a peer review by the AmeriCorps OIG for the period ending March 31, 2025. We received a pass rating.

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