



# Evaluation of an Overseas Field Office – Nairobi, Kenya

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Shaded portions of this report are redacted to protect sensitive information related to information technology security and physical and preservation controls. These redactions were coordinated with the Library of Congress.

**OFFICE OF  
INSPECTOR GENERAL  
LIBRARY**  
LIBRARY OF CONGRESS

**MEMO**

**Date** April 27, 2026

**To** Robert R. Newlen  
Acting Librarian of Congress

**From** Kimberly F. Benoit  
Inspector General

**Subject** Final Evaluation Report – *Evaluation of an Overseas Field Office – Nairobi, Kenya*, Report No. 2024-SP-105

This transmits our final report for the Office of Inspector General’s (OIG) evaluation of the Library of Congress’s (Library) Nairobi, Kenya overseas field office.

We reviewed management’s written response to the draft report. The Library agreed with the recommendations and described corrective actions. Per Library of Congress Regulation 9-160, *Rights and Responsibilities of Library Employees to the Inspector General*, §7.A, we have concluded that the proposed corrective actions are appropriate and, therefore, we consider all the recommendations resolved. The recommendations will remain open until the Library implements the corrective actions.

We appreciate the cooperation and courtesies extended by the Library.

CC: Deputy Librarian for Library Collections and Services  
Associate Librarian, Discovery and Preservation Services  
Director, Acquisitions and Bibliographic Access  
Chief Information Officer  
Chief Operating Officer  
Chief Financial Officer  
Director, Security and Emergency Preparedness Directorate  
General Counsel

## Executive Summary

The Library of Congress (Library) has six overseas offices located in Brazil, Egypt, India, Indonesia, Kenya, and Pakistan that acquire, catalog, and preserve collections from countries where such materials are essentially unavailable through conventional acquisition methods.

The Office of Inspector General (OIG) initiated the evaluation of the Library's Nairobi overseas field office to assess the effectiveness and efficiency of Library processes in the areas of financial management and reporting, information technology (IT) security, physical and preservation controls, payroll, and collection acquisition and processing.

### What the Evaluation Found

#### Financial Management and Reporting

The Nairobi overseas field office had not deobligated \$65,000 in open obligations related to expenses for fiscal years 2020 to 2023 in a timely manner and had not updated the Contracting Officer's Representative designation from the former Field Director to the current Field Director for utilities and rent expenditures. The former Field Director ceased serving in the Nairobi Field Director role in May 2014.

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#### Recommendations

We made seven recommendations to help the Library and the Nairobi overseas field office improve the effectiveness of their management related to financial management and reporting, IT security, and physical preservation controls.

#### Management Comments

Management concurred with the recommendations. Appendix B contains Library management response in its entirety.

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## Background

The Library has six overseas field offices located in Brazil (Rio de Janeiro), Egypt (Cairo), India (New Delhi), Indonesia (Jakarta), Kenya (Nairobi), and Pakistan (Islamabad) that acquire, catalog, and preserve collections from countries where materials are, for the most part, unavailable through conventional methods. The Acquisitions and Bibliographic Access Directorate (ABA), within the Library Collections and Services Group's (LCSG) Discovery & Preservation Services (DPS), administers the Overseas Field Office program for the Library.<sup>1</sup>

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*The Nairobi overseas field office's annual budget for fiscal year (FY) 2025 was approximately \$1.3 million.*

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The focus of our evaluation was the Nairobi, Kenya overseas field office. Established in 1966, the Nairobi overseas field office acquires and catalogs publications in all subjects except clinical medicine and technical agriculture from commercial, government, and nontrade sources in 30 sub-Saharan countries: Angola, Botswana, Burundi, Cameroon, Comoros, Democratic Republic of the Congo, Djibouti, Eritrea, Ethiopia, Gabon, Ghana, Kenya, Lesotho, Madagascar, Malawi, Mauritius, Mayotte, Mozambique, Namibia, Reunion, Rwanda, Senegal, Seychelles, Somalia, South Sudan, Swaziland, Tanzania, Uganda, Zambia and Zimbabwe. The Nairobi overseas field office also manages the African Cooperative Acquisitions Program that acquires material on a cost-recovery basis for participating institutions.

The Nairobi overseas field office had 19 local staff authorized positions and one American director based in Nairobi at the time of the audit. All materials acquired in Nairobi are cataloged prior to shipping to Washington, D.C. The Nairobi overseas field office's annual budget for fiscal year (FY) 2025 was approximately \$1.3 million.

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<sup>1</sup> The Library utilizes administrative services from the Department of State's International Cooperative Administrative Support Services for the Library's six overseas offices.

Figure 1. Map identifying countries served by the Nairobi overseas field office.



Source: mapchart.net

## What We Found

We performed evaluation procedures to determine whether the Nairobi overseas field office complied with Library policies and procedures in select areas: financial management and reporting, IT security, physical and preservation controls, payroll, and collection acquisition and processing. We did not have findings and recommendations in the last two areas.

### The Library Did Not Timely Deobligate Funds and Provide Adequate Monitoring of Open Obligations

Based on our review of a June 2024 *Open Obligations* report taken from the Library's financial management system, the Legislative Branch Financial Management System (LBFMS), we determined that the Nairobi overseas field office had not deobligated unliquidated balances of approximately \$65,000 in a timely manner. Additionally, the office had not updated the Contracting Officer's Representative (COR) designation in LBFMS from the former Field Director to the current Field Director for open obligations.

The Library records an obligation for salaries and expenses in LBFMS when it enters into an agreement, such as a purchase order, contract, or interagency agreement to purchase goods or services. Once recorded, obligations remain open until they are fully reduced by disbursements, deobligated, or the appropriation funding the obligation is closed. Unliquidated obligations represent binding agreements for goods and services that have not yet been delivered or received and will require future outlays.

As outlined in LCSG's Standard Operating Procedure (SOP) entitled *Unliquidated Obligations – Closing Unliquidated Obligations*, when anticipated future outlays are no longer anticipated, unliquidated obligations should be deobligated, which allows funds to be used for other purposes.<sup>2</sup> However, we determined that the Library was not timely in deobligating approximately \$65,000 in open obligations related to expenses for FYs 2020 to 2023. The failure to maintain effective controls over these obligations resulted in the Nairobi overseas field office not repurposing \$65,000 for other allowable activities on a timely basis. We identify this amount as funds put to better use since deobligating

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<sup>2</sup> On September 30, five FYs after the period of availability for an appropriation account ends, the account is closed and any remaining balance, whether obligated or unobligated, is cancelled. The remaining balance is no longer available for obligation or expenditure for any purpose.

in a timely manner could enable the Library to use the funds for other allowable activities.<sup>3,4</sup>

LCSG’s SOP also requires monitoring outstanding obligations. However, we determined that the Nairobi overseas field office had not updated the COR designation in LBFMS from the former Field Director to the current Field Director for open obligations. As a result, the former Field Director was still listed as the COR, which meant that automated LBFMS emails were not being sent to the current Field Director, increasing the risk of delayed actions such as timely deobligations. The former Field Director ceased serving in the Nairobi Field Director role in May 2014 and retired from the Library at the end of 2020.

We attributed these issues in part to the current Field Director not receiving automated open obligation reports, which would have alerted the Field Director to the need to deobligate the funds and that open obligations were still associated with the former Field Director. Further, prior to June 2024, the Field Director lacked clear written guidance on how to revise the COR designation in LBFMS.<sup>5</sup> Additionally, although the Contracts and Grants Directorate has automated controls to ensure current employees are designated as CORs on contract awards and task orders, these controls do not apply to obligations relating to non-contractual obligations. The current process requires overseas field offices to manually revise each applicable open obligation to reflect the current COR. Without an automated control in place, the risk remains of former Field Directors still being designated as CORs on open obligations.



<sup>3</sup> Funds put to better use are funds that could be used more efficiently if management took actions to implement and complete a recommendation, including: (1) reductions in outlays; (2) deobligations of funds from programs or operations; (3) withdrawal of interest subsidy costs on loans or loan guarantees, insurance, or bonds; (4) costs not incurred by implementing recommended improvements related to the operations of the establishment, a contractor, or grantee; and (5) any other savings that are specifically identified.

<sup>4</sup> Beginning in FY 2017, 2 U.S.C. § 182e: Library of Congress National Collection Stewardship Fund allows the Librarian of Congress to transfer available amounts appropriated for any fiscal year under the heading “salaries and expenses” to support collection stewardship activities. Beginning in FY 2012, 2 U.S.C. § 143d: Funds available for workers compensation payments, allowed available balances of expired Library appropriations to be available to the Library for deposit to the credit of the Employees’ Compensation Fund required by subsection 5 U.S.C. § 8147(b).

<sup>5</sup> In June 2024, the Library sent an email to all Field Directors with guidance on how to update who is listed as COR in LBFMS.

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## Recommendations

We recommend the Library:

1. Develop a reporting tool to generate and deliver periodic (e.g., monthly or quarterly) LBFMS generated open obligation reports directly to current Field Directors for review.
2. To the extent feasible, enhance LBFMS functionality to create automated controls that ensure current employees are designated as CORs on transactions associated with open obligations.

[REDACTED]

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## Management Response and OIG Evaluation

We provided a draft of this report to Library management, who concurred with all of our recommendations and outlined planned actions to address them. We find management’s comments responsive; accordingly, the recommendations are resolved and will be closed upon verification of the completion of the proposed corrective actions.

## Appendix A: Objectives, Scope, and Methodology

The evaluation's objectives were to evaluate the Library's overseas operations in Nairobi, Kenya, and assess the effectiveness and efficiency of Library processes in select areas including financial management and reporting, IT security, physical and preservation controls, payroll, and collection acquisition and processing. To the extent relevant to our objectives, we reviewed Library management's internal controls in these areas as part of our evaluation methodology. We also performed evaluation procedures to determine whether the Nairobi overseas field office complied with Library policies and procedures.

In order to gain an understanding of the Library's overseas operations, we conducted a review of applicable laws, regulations, directives, and SOPs, reviewed prior OIG audit reports,<sup>8</sup> and Nairobi overseas field office Annual Report.<sup>9</sup> We interviewed key personnel from the Office of the Chief Information Officer (OCIO), LCSG (i.e., DPS, ABA, Acquisitions Fiscal Overseas and Support Division, and Financial Management Directorate), SEPD, the Office of the Chief Financial Officer's Financial Services Directorate, and Nairobi overseas field office staff.

To assess financial management and reporting, we interviewed officials from the Nairobi overseas field office. We obtained relevant documents to gain an understanding of the financial reporting process, reviewed services provided by the International Cooperative Administrative Support Services, and assessed the fees paid for reasonableness. We gained an understanding of how the Library and the Nairobi overseas field office collaborate to ensure obligations and deobligations are accurately recorded. We reviewed petty cash policies and procedures and reviewed documentation for two months of petty cash activity. We also reviewed financial reports to determine compliance with Library regulations and policies.

To assess IT security, we interviewed key personnel from the IT Section Head in Nairobi and OCIO. We reviewed whether hard drives that were no longer in use were disposed of timely and sanitized. We also reviewed whether the Nairobi overseas field office had the latest IT security patches installed on computers.

To assess physical and preservation controls, we interviewed Nairobi staff and key SEPD personnel.

To assess payroll, we performed an analysis of GovTA, the Library's time-and-attendance system, and Library payroll records.<sup>10</sup>

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<sup>8</sup> See Report No. 2018-PA-101, Audit of Overseas Field Offices – Rio de Janeiro, Brazil, November 2019; Report No. 2023-PA-101, Audit of an Overseas Field Office – Jakarta, Indonesia, May 2024.

<sup>9</sup> Library of Congress Office – Nairobi, Kenya Annual Report FY 2023.

<sup>10</sup> The Library uses the payroll system operated by the U.S. Department of Agriculture's National Finance Center through an inter-agency agreement.

To assess collection acquisition and processing, we interviewed officials from the Nairobi overseas field office to gain an understanding of the collection, acquisition, and cataloging workflow process, including their prioritization and the measurement, tracking, and reporting of performance. To assess arrearage data, we reviewed two consecutive years of annual reports and interviewed officials from the office to gain an understanding of their arrearage procedures. We also interviewed officials from the Nairobi overseas field office for Nairobi's shipment process to determine the timeliness and efficiency of shipments to the Library and Cooperative Acquisition Program participants.

We initiated our evaluation in July 2024 and completed our fieldwork in December 2025. Due to regional security concerns and guidance from the Department of State, we did not conduct in-person fieldwork at the Nairobi overseas field office. We conducted this evaluation in accordance with the *Quality Standards for Inspections and Evaluations* (December 2020), issued by the Council of the Inspectors General on Integrity and Efficiency (CIGIE) and Library of Congress Regulation 1-140, *Inspector General*. CIGIE's standards require that we obtain sufficient, competent, and relevant evidence to provide a reasonable basis for our findings, conclusions, and recommendations. We believe that the evidence obtained provides such a reasonable basis.

## **Appendix B: Management Response**

Management's full response can be found on the next page.

## MEMORANDUM

**DATE** April 13, 2026  
**TO** Kimberly Benoit, Inspector General  
**FROM** Robert R. Newlen, Acting Librarian of Congress *Robert R. Newlen*  
**SUBJECT** Management Response to OIG Report 2024-SP-105, Evaluation of an Overseas Office – Nairobi, Kenya

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Thank you for providing the Library of Congress (Library) management with a draft of the Office of the Inspector General's (OIG) report.

The Library's overseas offices fulfill a mission-critical role by acquiring library and research materials from countries where such materials are essentially unavailable through conventional acquisitions methods. In addition, through the valuable relationships established with participating libraries in the Cooperative Acquisitions Program (CAP), the overseas offices play a key role in achieving the Library's strategic goals to expand access and enhance collections. Accordingly, we appreciate the OIG's recommendations to enhance the Library's services in the Nairobi office, which manages 30 sub-Saharan African countries.

The Library generally concurs with the recommendations in the OIG report and provides the following corrective action plans in response to the OIG's recommendations.

**Recommendation 1:** Develop a reporting tool to generate and deliver periodic (e.g., monthly or quarterly) LBFMS generated open obligation reports directly to current Field Directors for review.

**Library Response:** Agree. Automated reports are now generated and shared on a quarterly basis, detailing all open obligations relating to the Nairobi Office. Since September 2025, Nairobi Office has received three separate data calls to address unliquidated obligations. Corrective action is complete.

**Recommendation 2:** To the extent feasible, enhance LBFMS functionality to create automated controls that ensure current employees are designated as CORs on transactions associated with open obligations.

**Library Response:** Agree. It has been made mandatory to select only a current COR in LBFMS through a predefined dropdown list. Please note that the retired director's name has been removed from the CORs list in LBFMS to ensure that only active personnel's names are available for selection. Corrective action is complete.

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cc: David Brunton, Acting Associate Librarian for Discovery & Preservation Services  
Judith Conklin, Chief Information Officer  
Robin L. Dale, Deputy Librarian, Library Collections & Services Group  
Roberto Salazar, Chief Operating Officer  
Meg Williams, General Counsel