March 16, 2015

Dear Mr. Willemsen:

Thank you for the opportunity to comment on the draft Government Accountability Office (GAO) report, “Library of Congress: Strong Leadership Needed to Address Serious Information Technology Management Weaknesses” (GAO-15-315). I appreciate the Congress’ engagement with the Library and its direction to GAO to conduct this study. I also extend my thanks to you and your team for your work on this assignment.

Information technology (IT) is a fundamental resource that is critical to the success of the Library of Congress. I have taken steps to improve the management of the Library’s IT so that we may fully realize the possibilities of the digital era. I believe your report gives us a strong basis for further action.

Since December 2014, I have put in place a new and collaborative top management team to bring the Library’s traditional analog services and our digital services closer together. We now have an outstanding new Deputy Librarian of Congress, Chief of Staff, and Associate Librarian for Library Services. All three have already successfully exercised multiple responsibilities within the Library of Congress and in the broader library community. In addition, I have assigned an experienced manager with a strong background in IT to serve as Chief Information Officer (CIO) on an interim basis while we conduct a nationwide search for a permanent CIO. I expect a permanent CIO to be on board by September 2015. The interim CIO, supported by an acting Deputy CIO, is focused exclusively on IT matters—managing regular operations and planning for structural and strategic changes. I am confident that their work will establish a solid foundation for the incoming permanent CIO.

To help the Library improve the management of the IT systems that support our programs and operations, the draft report offers 29 recommendations in six key areas. The Library generally concurs with the recommendations and is developing a detailed plan for implementing them. Following are the highlights of our strategy in each of the six areas.

1. **Provide strategic direction for use of IT resources through strategic planning, enterprise architecture improvement planning, and human capital planning.**

   The Library will complete an initial IT strategic plan by April 2015. Prepared by the interim CIO in conjunction with Library service units, this plan will include a year-by-year implementation scheme for addressing each GAO recommendation as well as IT management recommendations made by the Library’s Inspector General. This initial plan will provide
immediate direction for refocusing our IT efforts. I am currently working with the service unit heads on the regular 5-year update of our agency’s strategic plan. When our new Library strategic plan is issued, we will adjust the IT strategic plan as necessary to ensure that it is aligned with the Library’s overall future direction.

The Library will finalize and validate the existing draft enterprise architecture (EA) by September 2015, with the assistance of an independent validation and verification team. This work will cover both the technical infrastructure and logical layers of the EA. Beginning in fiscal year (FY) 2016, the Library will implement an EA improvement plan – describing the target state for our EA and identifying steps to transition to the target. A senior IT manager has been assigned to coordinate the EA effort.

Having a diverse and highly skilled workforce is a fundamental strategic goal for the Library across all of our mission areas, including IT. By September 2015, the Library will complete an assessment of skills of IT staff throughout the agency. In early FY 2016, we will identify our future IT skills requirements and prepare a human capital development and hiring plan to address any gaps.

2. **Provide a framework for effective IT investment decision-making and investment management.**

Effective IT decision-making requires that the CIO and the executives who have legal and programmatic responsibility for the missions of their service units fully understand each other’s requirements. To that end, I have made the CIO a permanent member of the Library’s Executive Committee.

By September 2015, the Library will update its regulations and directives to clarify the decision-making roles and reporting responsibilities of the Executive Committee, the IT Steering Committee, and the Architecture Review Board with regard to IT investments – proposed new investments, those already in operation, and those in development. At the same time, we will formalize and resource an IT Investment Management Office charged with defining and managing the IT investment portfolio and supporting the IT Steering Committee and other IT governance bodies.

For FY 2016, the Library will implement a uniform method for service units to classify IT expenditures in the central financial system and an approach for maintaining a comprehensive inventory of Library IT assets. Such expenditure and asset data will inform our IT strategic planning and the links between planning, budgeting for FY 2017, and risk management.

3. **Plan and manage IT acquisitions to deliver required capabilities on time and within budget through cost estimating, scheduling, and risk management.**
During FY 2016, the Library will develop policies and implement the management disciplines of costing, scheduling and risk management for our IT acquisitions. This task will include a review of the Library’s current systems development life cycle practices.

4. **Protect IT systems and reduce the risk that they may be compromised.**

   The Library is committed to IT security – protecting our infrastructure, applications, web properties, and the data that is entrusted to us. The Library agrees that aligning our IT security policies and procedures more closely with those in use in executive branch agencies would be helpful. By the end of FY 2015, we will: ensure that our inventory of IT assets is up-to-date; update our information security plans and controls; implement continuous monitoring; fully document remediation efforts; enforce our existing requirement that employees, contractors, and volunteers complete IT security training; and conduct privacy impact assessments of our major IT systems. By the end of FY 2016, we will develop contingency plans following NIST Special Publication 800.53, “Security and Privacy Controls for Federal Information Systems and Organizations,” version 4.

5. **Ensure that IT services meet the needs of Library component units.**

   The Library agrees that satisfaction and accountability improve when IT service providers and their customers are working from a clearly documented set of shared expectations. By September 2015, we will update Library regulations to address the responsibilities of the Information Technology Services (ITS) directorate to Library components and require appropriate service level agreements between ITS and program offices. Such agreements, including service targets and satisfaction metrics, will be established by September 2015. The Deputy CIO will meet regularly with each service unit to discuss performance and review open IT issues. During FY 2016, the Library will implement a process to measure customer satisfaction with ITS services and to prioritize, resource, and resolve issues.

6. **Allocate IT resources efficiently and effectively, reducing duplication or overlap.**

   During FY 2016, the Library will identify potentially duplicative IT systems and operations for future review.

   The Library intends to deliver timely, effective service to the Congress, the copyright community, researchers, and the American public, and to be an effective steward of the precious collections entrusted to us for generations to come. Thank you for your expert perspective in ensuring that the Library’s IT will be up to this important task.
If you have any questions, please contact Elizabeth R. Scheffler, Interim Associate Librarian for Strategic Initiatives and Chief Information Officer, (202) 707-6042, esch@loc.gov.

Sincerely,

James H. Billington
The Librarian of Congress

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