Library Operations Follow-Up Audit
November 2013

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City Auditor's Office

Library Operations Follow-Up Audit
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Seven of twelve prior audit recommendations were fully implemented

Fully Implemented

Documenting waived fees

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Partially Implemented

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Not Implemented

E-commerce payment site

As part of the Fiscal Year 2013 Annual Audit Plan, the City Auditor's Office has completed a follow-up audit of the Library Operations Audit released in February 2013. The audit was conducted in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives. The audit objective was to determine the implementation status of prior audit recommendations.

The initial Library Operations Audit report included twelve recommendations. Management concurred with all twelve of those audit recommendations. Seven recommendations were fully implemented, four were partially implemented and one has not been implemented.

Audit follow-up indicated that the Library has fully implemented the following:

- Increased documentation of waived fees
- Restricted delinquent account holders from obtaining an additional library card
- Established a process to send monthly email notices to delinquent account holders
- Deleted safe combinations from the Library portal
- Included a copyright acknowledgement for each eBook vendor and other electronic sites
- Completed the implementation of the EZproxy software which restricts access to eBooks and other electronic sites
- Nullified the need to change access control language in the eBook contracts as the implementation of EZproxy controls 100% of access to eBooks and other electronic sites.

The Library has partially implemented the recommendation to ensure that all branch cash receipts are properly secured during and after hours of operation. During on-site inspections, the City Auditor's Office noted that two of six branches had not properly secured their daily receipts or keys as required by management.

Management has partially implemented the recommendation to prepare an aging schedule of delinquent account balances on a regular basis. The Library is currently in the process of reviewing an available aging schedule and identifying other data that would be relevant in assessing the effectiveness of the collection process.

Two other recommendations related to the collection of delinquent accounts have also been partially implemented. However, it should be noted that management initially identified March 2014 as the target implementation date for these recommendations. The City Auditor's Office noted the Library is in the process of performing a cost/benefit analysis to determine the effectiveness of mailing notices to delinquent account holders and is reviewing the feasibility of using a collection agency instead of the current in-house collection process.

According to various City staff (Financial Management Resources and Information Technology), as of the end of audit fieldwork, there has been no action taken regarding the implementation of a single e-commerce payment site.

Implementation Status Chart

Finding	Recommendation	Status	Page #
Monies received for library services were not properly secured.	Ensure receipts are properly secured	✓	5
Waived fees were not adequately documented.	Require the reason for waived fees be properly documented	✓	6
Library policies and related controls do not adequately facilitate the reduction of delinquent accounts.	Restrict delinquent account holders from obtaining a second library card	✓	7
	Conduct a cost/benefit analysis relating to mailing delinquent account notices	✓	9
	Prepare an aging schedule of delinquent account balances	✓	10
	Implement a process to send routine, system-generated email notices to delinquent account holders	✓	10
	Implement a single e-commerce payment site	**X**	11
	Consider using a collection agency or offering payment incentives to delinquent account holders	✓	12
Library safe combinations are not properly secured.	Properly secure Library safe combinations	✓	13
Library patrons are not required to acknowledge copyright laws when accessing eBooks.	Introduce a disclaimer and acknowledgement of copyright laws for eBooks	✓	14
Access controls do not exist for a publishing company's eBook website and an audio book vendor.	Implementation of EZproxy for access restrictions to audio and eBook vendor websites	✓	15
	Revise contract language for eBook vendors	✓	15

Implementation Status

✓**: Fully Implemented**
✓**: Partially Implemented**
X: Not Implemented

Audit Scope and Methodology

The City Auditor's Office reviewed Library Operations from March 2013 forward. The following methodology was used in completing the audit.

- Reviewed the Standard Operating Procedures
- Observed the security of daily deposits and bank bag/courier bag keys
- Tested waived fee documentation
- Tested the process which limits a delinquent account holder from opening a new account
- Discusses and effectiveness of the collection process
- Reviewed the process of sending delinquency notices
- Obtained an update relating to a single e-commerce payment site
- Reviewed costs associated with using an outside collection agency
- Reviewed access to e-Book and audio book vendor websites

Status of Prior Audit Recommendations

> *Prior Audit Finding 1*
> **Monies received for library services were not properly secured.**

Recommendation: The Director of Libraries should ensure that all branch cash receipts are properly secured during and after hours of operation.

*Management's Response***:** *Concur. Revenue reports and daily deposits for the previous day of business are generally prepared each morning for delivery to Library Administration via the library courier run. Each deposit and report is placed inside a locked bank bag that is then placed into a locked courier bag along with other items for courier pick-up. The scheduled arrival of the library courier run varies depending upon where on the delivery schedule a particular library location sits. In some instances, it could be several hours between the completion of the deposit and the arrival of the courier, in other cases, just several minutes. The exact procedure has varied from branch to branch and even from staff member to staff member as to how the locked bank bag was secured until the courier arrived. The Central Library deposit was immediately hand-delivered to Library Administration upon completion, or placed in the locked safe on Saturday and Sunday for delivery on Monday. In the six branches, it was handled in one of four ways:*

1. *The locked deposit bag was placed in a locked safe until the courier arrived.*
2. *The locked deposit bag was placed in the locked courier bag in the manager's office until the courier arrived.*
3. *The locked deposit bag was placed in a locked courier bag that was left out in the staff work area until the courier arrived with the key left in the lock of the courier bag.*
4. *The locked deposit bag was placed in an unlocked courier bag that was left out in the staff work area until the courier arrived with the key nearby.*

The maximum receipts at any one branch location never totals more than $200.00 and often times is less than $100.00 and the number of staff (or volunteers) having access to the funds while they might have been unsecured was limited. Upon recognizing the risk involved in not properly securing the daily receipts, staff have been directed to lock the locked bank-bag containing the completed deposit and revenue report within the safe located at each location. Upon the arrival of the library courier, the locked bank-bag with the deposit inside will be placed into the library courier bag itself then locked and passed on to the courier. All essential keys to bank bags, courier bags and office doors have also been secured within the safe at each location until needed. This process has been in place since December 1, 2012 and will be checked periodically by management to ensure it is implemented consistently.

   Target Date: December 1, 2012

   Responsibility:Division Administrator - Operations & Facility Management

Implementation Status: Partially Implemented.

The City Auditor's Office visited each of the six branch locations to determine if cash receipts were being properly secured. At one location, the daily receipts were in a locked bank bag and in a locked courier bag; however, the bag was hanging on the wall in the office. The keys were secured within the safe. In a different location, the daily receipts were properly secured within the safe; however, the keys to the bank bags were stored in an unlocked file cabinet in the office and the keys to the courier bags were on the shelf with the bags. In the other four branches, the daily receipts and keys were properly stored within the safe.

Prior Audit Finding 2
Waived fees were not adequately documented.

Recommendation: The Director of Libraries should require (and enforce) that reasons for waived fees be properly documented within the Polaris software.

Management's Response: Concur. Waives of fines and fees owed on a patron's account may be made for a number of valid reasons and codes have been created to identify those reasons. A daily report of fines and fees waived is produced and reviewed by the Supervisor in Charge of the building as they are preparing the deposit in order to ensure consistency with policy. Proper application of the correct codes has been identified as a training issue and the following plan is in place to ensure adequate training in the future:

- *The Operations Division Team will review waive codes to ensure that information contained is adequate to explain a reasoning for waives.   By the end of February 2013 the team will present recommendations for revised codes.*
- *The Operations Division Team will review training materials available for staff on when and how waives should be made, and how to properly document when a waive is made.*
- *The Public Services Coordinators who are charged with daily review of waives made by staff will ensure proper documentation has been entered. Upon determining that a waive is not correctly documented, the staff involved will be questioned in order to determine a reason and notes will be added to the patron's account. Staff will be retrained continuously in this procedure as needed.*
- *A Cash Handling SOP has been implemented that specifies the circumstances surrounding waives as follows:*
  - *No waives are made for charges for materials replacement costs or processing charges unless the items have been returned. Any decisions about otherwise waving replacement and processing charges due to valid explanations or disputes must be made either by the Operations Division Public Services Administrator or the Director of Libraries.*
  - *A cashier may waive fines or fees based upon valid explanations or disputes for up to $5.00. Any amount higher than $5.00 must be approved by a Public Services Coordinator or a shift Supervisor in Charge.*

- o *Proper documentation for all waives must be made in the notes field for each waived charge. Notes should be placed in the patrons account relating to any significant issues regarding large or frequent waives.*
- *Monthly reports will be produced by the Library's Business Administrator listing any waives that have been made without a reason code applied, as well as any variations to the operating principles listed above.*

Target Date: March 1, 2013

Responsibility: Division Administrator - Operations & Facilities Management   Library   Business Administrator

Implementation Status: Fully Implemented.

During this audit, the following items were reviewed:

1) Revised SOPs –   the revision includes more detail as to how to handle waived fees, including: a) proper documentation of waives on customer accounts; and b) daily review of waived fees by Library Public Service Coordinators (PSC), along with coaching/counseling of employees when errors are identified.

2) Lists of waived fees - a list of waved fees was obtained for a specific time period during June and July 2013. During the periods selected, the City Auditor's Office noted that only 21 (3.7%) of 566 waived fees were not properly documented. This exception rate is lower than during the original audit (11.7%).

3) Monthly management review – the City Auditors Office noted that each month the Library Business Administrator reviews waived fees and notifies the PSCs if there are instances where additional training may be necessary. PSCs also discuss the waive fee process during monthly staff meetings.

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Prior Audit Finding 3
Library policies and related controls do not adequately facilitate the reduction of delinquent library accounts.

Recommendation: The Director of Libraries should enforce the policy that restricts delinquent account holders from obtaining a second library card, possibly through additional staff training.

Management's Response: Concur. In the Library's automated circulation system there are patron accounts that are delinquent, i.e., expired accounts owing fines, or accounts not yet expired, but with a fine level at or above the $10.00 threshold for library usage. In some instances, it was found that patrons with delinquent accounts had been allowed to apply for an additional account. As a result, patrons could continue to check out materials and accrue additional fines and fees. Often this occurred when a patron already having a library card applied online for a card and the duplicate check process was not conducted, as it should have been. In other cases, the patron may have had a first and last name that is shared by as many as 20-30 other library patrons and the duplicate check

process was not conducted as effectively as it should have been. In both cases, additional staff training is called for in order to remedy the problem. In addition, a new system upgrade has provided an additional automated way of increasing the effectiveness of the duplicate check process.

- *Beginning in February 2013 the Operations Team will initiate training sessions both one on one, and during staff meetings to review the process for checking the system for accounts already on file when processing a new library card application.   By the end of March 2013 every staff member will have gone through at least one review session.*

- *Beginning in February 2013 the Operations Team will review the quality control process for library card applications to ensure staff members reviewing quality control for all library card applications are thoroughly checking the system for duplicate accounts.*

- *On February 14, 2013 a new software system feature was activated that automatically performs a duplicate check on the driver's license field of the record. As a result, when a staff member is adding a patron record and the driver's license number entered matches the driver's license number of an existing record, the staff member will be notified of the match. This will assist with patrons who apply for a card in-person but staff attention will still be required when verifying online applications.*

    Target Date: April 1, 2013

    Responsibility: Division Administrator - Operations & Facility Management

Implementation Status: Fully Implemented.

According to the Library Business Administrator, training is performed on a regular basis during PSC monthly staff meetings. Various areas are included in the training, including how to research records for duplicate accounts.   One-on-one training is also available as necessary for new employees or for other employees needing additional help. In addition, the City Auditor's Office noted that quality control steps have been developed in order to review new accounts to ensure that the account was entered accurately.

A Polaris software upgrade was implemented which will help to identify a duplicate account before it is processed. The system now performs a duplication test against the cardholder's driver license number. If the same DL# is entered on a new account that is already in the system, a warning pops up on the screen. It is then necessary for the Customer Service Agent to perform additional research prior to completing the new account process. This process was tested during the review and appears to be working as intended.

During this audit, the City Auditor's Office obtained a database of all delinquent accounts and also a list of all new cardholder accounts from March 1, 2013 forward. This information was used to determine if patrons with delinquent accounts were allowed to obtain another card. From March 1, 2013 to September 27, 2013, there were 13,030 new accounts processed. Of the 13,030 accounts, 233 were selected for review. After further review, only two accounts were identified as "possible" duplications.

Recommendation: The Director of Libraries should conduct a cost/benefit analysis regarding the cost effectiveness for mailing notices to patrons with delinquent library accounts.

*Management's Response***:**   *Concur.   The circulation account database sends out automated reminder notices to the customer based on their account notification selection (telephone, email, and text-message) at the following intervals:*

- *three days before an item is due;*
- *15 days after it is overdue, and*
- *30 days after it is overdue.*

Once the item is 45 days past due the billing and collection letter process starts.

Currently all billing notices are mailed. A billing notice informs the customer of any items checked out on the account that are overdue 45 days (long overdue.) The replacement cost is listed but includes a note that if the item is returned in good condition the replacement cost will be waived and only the overdue fines will be payable.

After the item is billed, collection letters are sent out under the return address of the City Attorney's Office at specified intervals for all accounts over $50.00.

The collection letters can be sent in the following ways:

- *via email, if an email is available in the account;*
- *if the email is rejected after being sent, then the letter is mailed; and*
- *if there is not an email listed on the account the letter is mailed.*

The collection process is suspended and the account is documented if the email and the mailing address are both found to be invalid and updated contact information is unavailable so that additional expense is not incurred in either time or postage.

In order to analyze the cost and benefit of overdue retrieval efforts, the following actions will be taken and reported on over the next 12 months:

1. *An aging report will be developed and reviewed monthly to analyze and track return rate on collection accounts.*
2. *Staff will continue to track the quantity of mail and email correspondence sent based on the billing and collection process.*
3. *Staff will track the amount of time spent on the billing and collection process.*
4. *Management will investigate collection agency options including cost.*
5. *Additional review will also be conducted on any new or upgraded capabilities the circulation database platform, Polaris, has to offer to automate or streamline the process.*
6. *After 6 months of data is collected, a recommendation report will be prepared outlining the cost and efficiency comparison between the existing process and any viable alternatives for final determination. Adjustments will be made according to these recommendations and will be reassessed after an additional 6 months of data collection.*

Target Date: March 1, 2014

Responsibility:Director of Libraries
                 Library Business Administrator

Implementation Status: Partially Implemented.

The City Auditor's Office noted that Library management is in the process of developing an aging report and analyzing collection efforts. However, as of the end of fieldwork, management had not prepared a report outlining the cost and efficiency comparison between the existing process and any viable alternatives.

During this process, Library management is performing the following steps:
- Tracking the quantity of overdue notices and collection letters being mailed and emailed;
- Tracking the amount of staff time spent on mailed and emailed notices;
- Reviewing possible options for using a collection agency; and
- Inquiring about software upgrades that could help with efficiency or effectiveness of the collection process.

Recommendation: The Director of Libraries should prepare an aging schedule of delinquent account balances on a regular basis in order to verify the effectiveness of the collections process.

Management's Response: Concur.

Target Date: June 1, 2013

Responsibility: Director of Libraries
                 Library Business Administrator

Implementation Status: Partially Implemented.

The Library is currently in the process of reviewing an aging schedule and identifying other data that would be relevant in assessing the effectiveness of the collection process. An aging schedule is available through the Polaris software system. This aging schedule separates delinquent accounts by both time (under 30 days, 30-60 days, etc.) and dollar value (under $10.00, $10.00 - $49.99, etc.). Management is trying to determine in what format the information should be presented.

Recommendation: The Director of Libraries should implement a process to send routine, system-generated email notices to delinquent account holders owing $10.00 or more. Each notice should include a link to the Library's on-line payment site.

Management's Response: Concur. The Library's automated circulation system software sends a reminder notice to the customer based on their account notification selection three days before an

item is due; 15 days after it's overdue, and a third notice is sent when the item is 30 days overdue. Once the item is 45 days past due the billing and collection letter process starts.

An additional courtesy email reminder notice, developed and approved in January 2012, is now sent via email to all accounts meeting set criteria. The notices are sent through Constant Contact, a bulk emailing service. Initially starting January 2012, this email reminder notice was sent in mass to all library cardholders with an email listed in the account that owed more than $10.00, both current and expired accounts.

Initially this reminder was sent every three months to all accounts meeting these criteria. Beginning in October 2012, the reminder email has been sent on a regular monthly schedule to all active library cardholders that owe $10 or more. The email reminder notice lists the payment options available to all customers. In addition to the reminder notices, access to all library services is suspended until the account is returned to good standing with a balance lower than $10.

> *Target Date: October 1, 2012*
>
> *Responsibility:Library Business Administrator*

Implementation Status: Fully Implemented.

The Library has implemented a process to send monthly email notices to cardholders with delinquent accounts over $10.00. During the audit, the City Auditor's Office reviewed monthly tracking reports which showed monthly mass e-mails being sent. In addition, a review was performed of the documentation maintained by Library personnel to track sent e-mails. For cardholders that remained on the delinquency list, those cardholders were sent an e-mail each month. The e-mail notice that is being sent contains a link to the Library payment site so cardholders may make a payment online.

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Recommendation: For future planning and after taking into consideration the prioritization of other IT-related projects, the City Manager should consider the implementation of a single e-commerce payment site which would allow citizens the opportunity to view and pay all outstanding balances due to the City (i.e. Library fines, traffic violations, red-light camera violations, water billings, etc.)

Management's Response: Concur.

> *Target Date: As soon as feasible*
>
> *Responsibility:City Manager's Office*
> *   Information Technology Department*

Implementation Status: Not Implemented.

As of the completion of the audit fieldwork, there had been no action taken with regard to this recommendation.

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Recommendation: The Director of Libraries should consider:

1) contracting with a collection agency; and/or
2) offering payment incentives for accounts over a certain age/ dollar value.

Management's Response: *Concur. Over the last several years, Library staff has continually initiated new process upgrades to efforts directed at collection of delinquent accounts, as well as those directed at preventing delinquent accounts from occurring. These have included the following:*

- *additional reminders by a variety of methods, including email and text message regarding overdue materials;*
- *regular reminder emails regarding delinquent accounts;*
- *payments by credit card at all library locations;*
- *online payment options via credit card through the library's online catalog; and,*
- *requirement of an account in good standing in order to use public computers and online databases.*

All of the efforts listed above have resulted in some manner of positive impact. In the next year, staff will also be investigating new technology that allows for payment of fines and fees at the Library's self-checkout machines.

Prior to FY 2007, the Library contracted with a collection agency for the retrieval of delinquent accounts over $50.00. A per account fee was charged for this service. In FY 2007, staff conducted a test comparing effectiveness of the collection agency at retrieving delinquent accounts as opposed to effectiveness of the use of the City Attorney's Office at collecting on delinquent accounts. After testing during FY 2007, it was determined that the CAO collection process was slightly more effective and this became the recommended method for account collection.

As discussed in a previous audit finding having to do with notification for delinquent accounts, Library staff will assess the effectiveness of the collection process over the next 12 month period. In addition, staff will compare these efforts to results achieved by libraries using a collection agency services and assess the costs and benefits of a contracted service.

> *Target Date: March 1, 2014*
>
> *Responsibility: Director of Libraries*
> *   Library Business Administrator*

Implementation Status: Partially Implemented.

Library management has contacted an outside collection agency (Unique Management, Inc.) to determine what fee schedules are available for sending collection accounts. Library management is currently in the process of determining the effectiveness of their in-house collection activities by reviewing their collection process over a 12-month period. Also, they plan to contact other libraries that use a collection agency, to assess the costs and benefits of the service. These steps are still in progress. The target completion date is scheduled for March 2014.

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Prior Audit Finding 4
Library safe combinations are not properly secured.

Recommendation: The Director of Libraries should ensure that Library safe combinations are removed from the Library portal and are properly secured.

Management's Response: *Concur. The Library has 33 staff positions that function as Supervisor in Charge (SIC) of a library facility. A SIC is on duty at all locations during all hours of operation.*

Hours of operation are:

- *Central Library is open Monday-Thursday 9 a.m. to 9 p.m., Friday-Saturday 9 a.m. to 6 p.m.*
- *Branch library locations are open Monday-Thursday 10 a.m. to 8 p.m., Friday-Saturday 10 a.m. to 5 p.m.*
- *The Central Library and the Southeast Branch are open on Sunday during the school year 2 p.m. to 6 p.m.*

While most SICs work in the same location(s) consistently, in practice the 33 staff positions that serve as SIC can be assigned to work at any location during any shift based on business needs. There are three specific duties that require all SICs to have access to the safe combinations at all location.

1) *SIC issues out and receives back cash funds from cashiers at the start and end cashier's shift.*
2) *The morning SIC prepares the revenue report and packages the revenue collected from the day before for transport to Library Administration for final processing.*
3) *Make change for cashiers using the location change fund.*

Currently the combinations to the safes in each of the seven locations are included in the Standard Operating Procedure (SOP) documents for the particular location. These SOPs are stored on the Library portal with restricted access to SIC staff only. At the time of audit review, all seven safes had seven different combinations, so it was deemed to be a lower risk to store the information here, since it seemed unlikely that any staff member would have the ability to memorize seven different safe combinations. In addition, it was expected that failure to provide this information in a centralized location would result in staff writing the combinations down and storing them in a less secure location such as a desk drawer or wallet.

In response to Audit's recommendation, a locksmith was contracted to change all of the combinations to a single sequence in order to eliminate the safe combination information from the SOP documents. Due to the age and varying models of the existing safes, this was not possible. Because of various limitations, only three safes were able to share the same combination. As of February 1, 2013, the remaining four still have different combinations. It is necessary to replace these four safes, at a cost of approximately $3,500, in order to meet this recommendation. At this time, all SICs need access to five separate safe combinations to complete their required duties at any library location so this information is still included in the SOP documents located on the portal. Funding to replace safes will be requested in the upcoming budget process for consideration and if

granted, the safe combinations can be removed from the portal documents at the beginning of the new fiscal year.

> *Target Date: November 1, 2013*
>
> *Responsibility: Division Administrator – Operations and Facility Management*

Implementation Status: Fully Implemented.

As of August 30, 2013, new safes at the four branch locations had been installed. The combinations to all seven Library safes were changed and now have the same combination. A review of the Library's portal showed that the link to the safe combinations had been removed. Supervisors were instructed to memorize the combination.

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Prior Audit Finding 5
Library patrons are not required to acknowledge copyright laws when accessing eBooks.

Recommendation: The Director of Libraries should introduce a disclaimer and acknowledgement of copyright laws when a patron is logging on to third party websites to access eBooks and other electronic publications.

Management's Response: *Concur.   The library currently has contracts with four e-content vendors. All four vendors provide links on their websites to copyright information. Overdrive has a link under "Important Copyright Information", Recorded Books One Click under their "Terms and Conditions", TumbleBooks under their "Terms of Use" and Ebsco under "Copyright". The library recognizes that this information is not highly visible to the public and will work with the City Attorney's Office to provide language on our library website detailing copyright law as it pertains to digital content.*

> *Target Date: June 1, 2012*
>
> *Responsibility:Director of Libraries*
> *Division Administrator – Content Management & Virtual Services*
> *City Attorney's Office*

Implementation Status: Fully Implemented.

Testing of various third party websites showed that a disclaimer and an acknowledgement of copyright laws have been included on the sign-in page for validation to the databases (including eBook vendors).

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> **Prior Audit Finding 6**
> **Access controls do not exist for a publishing company's eBook website and an audio book vendor.**

Recommendation: The Director of Libraries should continue with the implementation of the EZ proxy and ensure it is capable of access restrictions as required by the contracts with audio and eBook vendors.

Management's Response: Concur. The library began working towards implementing EZproxy as a method to control access to Databases in October, 2012. This product was successfully implemented on 11/30/2012.

> Target Date: November 30, 2012
>
> Responsibility:Division Administrator – Content Management & Virtual Services

Implementation Status: Fully Implemented.

EZproxy has been fully implemented. During testing, various websites (i.e. research websites, downloadable audiobook and eBook vendor websites) were reviewed. Access is restricted to persons with valid, active Arlington Public Library cards and passwords.

Recommendation: The Director of Libraries should negotiate to remove contract language that requires Arlington library to control access in the event of the vendor's inability to accommodate access controls in their websites.

Management's Response: Concur. Database vendors serve libraries of all sizes and those that may vary widely in technical expertise. To accommodate these differences, they offer a variety of methods to access their resources, including authentication by library barcode pattern (rather than exact number) in addition to more advanced methods. Authenticating by library barcode pattern does give the potential for individuals to make up library card numbers within the pattern to access and the vendors are aware of this since they are accommodating this method of access. The library has moved to implement EZproxy to exercise greater control and ensure authentication is by exact barcode rather than just matching on pattern. As vendor contracts are renewed throughout the next 12 month period, library staff will address this language in the vendor contracts and seek to have it modified or stricken where possible.

> Target Date: February 1, 2014
>
> Responsibility: Director of Libraries
>   Division Administrator – Content Management & Virtual Services City
>   Attorney's Office

Implementation Status: Fully Implemented.

Due to the implementation of EZproxy which controls 100% of access to vendor websites, this recommendation is no longer applicable; therefore, it is not necessary to address the contract language.

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