

Mary Costabile <mcostabile@alawash.org>
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To: David C. Childs A-76comments/OMB/EOP@EOP

cc:

Subject: Comments Notice 11/19/02,FRv.67, No. 223

The American Library Association has a long history of interest in and concern about the issuance of Circular A-76 and its revisions, therefore we are commenting on the November 19, 2002 Federal Register notice in Vol. 67, No. 223, Proposed revision to Office of Management and Budget Circular No. A-76, "Performance of Commercial Activities."

The American Library Association is a nonprofit educational organization of 65,000 school, public, academic and special librarians, library trustees, library and information science educators and friends of libraries. We have members who are federal employees working in federal libraries and members who work for contractors in federal libraries.

In today's post 9/11 world, it is critical for the federal government to consider overall information and knowledge management strategy. Communication and accurate information are issues that various governmental agencies are struggling with anew. With the creation of the Homeland Security Agency, new challenges have arisen for managers in terms of accuracy and security of information as well as coordination of information and research services. Librarians are trained to develop information and knowledge management strategies. In addition, federal librarians are expert at retrieving information within and outside of government and have developed valuable depth of knowledge of agency mission and goals.

We would re-iterate our statement of March 21, 1994, to the Office of Management and Budget, that operation and maintenance of library resources and provision of research services are core library functions and are inherently governmental. We are concerned that in an attempt to streamline the process by these new requirements, OMB may be undermining basic sound management principles. The library and library professionals make substantive contributions to the efficient and effective functioning of each federal department. There is significant risk in destroying the management of the information and information resource function of the library, with subsequent effect on the information-seeking abilities of the user community.

Businesses and non-profit organizations across the country know and understand the value of knowledge management; in these organizations the library plays a central role in development of overall strategy. Not only does this ensure a successful information exchange but sets up a standard of management and protects proprietary information.

The presumption that an activity is commercial in the key substantive changes on p. 69772, would directly discard the expertise developed by federal librarians in developing resources and providing direct support for the specific mandates and goals of each department of government, and in addition would create for management an annual re-listing burden and would undermine employee confidence.

Emily Sheketoff
Executive Director
American Library Association Washington Office
1301 Pennsylvania Avenue, N.W., Suite 403
Washington, D.C. 20004-1701
(202) 628-8410
esheketoff@alawash.org
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