

June 16, 2008

Board of Trustees  
London Public Library Board  
“via e-mail”

Dear Library Board Members:

I am writing to express concern regarding the evaluation processes underlying the current Internet Filtering Report. Please forgive my timing and this mode of communication, but given that the report was only posted today, it was not possible to respond to this report in a manner that would accommodate the regular Board mailing.

I have attached my previous letter of November 21, 2007 on this issue as reference. I wish to again draw the Board’s attention to a fundamental weakness in both the evaluation and formation processes which lead to the new Internet Filtering Policy. Given the importance of this policy, as it addresses the key core value of any public library – intellectual freedom – I trust the Board will receive the following recommendation for action with the due consideration it deserves.

It is common practice in public institutions that when considering a radical change to key foundational policy, to have the rationale and process leading to that change reviewed by a third party. This additional scrutiny can provide both oversight and due diligence ensuring that the integrity of the public service is not sacrificed to meet organizational goals that can easily be achieved using other mechanisms.

I ask the Board to set aside the current Internet Filtering Report, and invite a third party to review the evaluation process which lead to the current policy and practice, including; assumptions, methodology, design and data interpretation. The timing bodes well for a review of this nature now, as six months has elapsed since the policy was adopted and this distance of time will allow for a more dispassion review. To help facilitate this process I am instructing courses in program and policy evaluation in both the Master of Library and Information Science and the Master of Public Administration Programs in the fall, and would be willing to lend some student time to this very important effort.

Please feel free to make this correspondence part of the public record on this issue. I look forward to your response, and make myself available to follow up with more information if requested.

Sincerely

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November 21, 2007

Board of Trustees  
London Public Library Board  
“via e-mail”

Dear Library Board Members:

As an instructor in program evaluation courses at The University of Western Ontario, in both the Master in Public Administration Program and the Faculty of Information and Media Studies, I have been following London Public Library’s (LPL) program evaluation of the Internet filtering with great attention. In part given that I have a professional interest in identifying local examples of best practice which in future I may use as reference in the classroom.

In that light, I would like to share with you my observations of the validity of the program evaluation recently undertaken on LPL’s Internet filtering trial. As the governing board and the decision making body for the Library and its policies, I hope you consider the following information in the professional spirit in which it is offered. I apologize in advance for the brevity, and for the timing of my remarks – coming on the eve of your next Board meeting. Given my schedule, and the fact that this report was just released to the public, it is the best I could accommodate. However, if you wish to contact me to elaborate on any of my comments expressed here, or have further questions I would be happy to assist.

As you may be aware, there are three basic stages in the development of a Program Logic Model evaluation: the formative or design stage, the process or activity stage, and the summative or outcome/impact stage. Inadequate care taken at the formative stage in program and evaluation design can seriously question the validity of the overall evaluation, and certainly the outcomes at the summative stage. Particularly this is the case when a program evaluation is designed and implemented after a program is launched. The most accurate program evaluations are those that are developed simultaneously with program/pilot design, as this is the best time to deal with issues of evaluation validity.

It seems apparent that the evaluation model used to review LPL’s Internet filtering program was designed after the program launch. As such the validity of the identified outcomes is questionable. This conclusion is based on the following:

- Lack of a control group throughout the length of the study.
- No clearly stated and agreed to Board-Administrative statement of purpose prior to the program launch. The absence of a unified statement and understanding of program need from the Library’s Governance body (demonstrated in the June Board minutes) signals confusion at the time of

program launch which creates doubts regarding its actual design and purpose.

- Shifting foundational assumptions as to why this trial program was launched. These shifting assumptions include; who was the program designed for staff, users, or the public at large, and what was the reasons behind it, the expressed magnitude of the situation leading to the pilot/trial, and how would the intended outcomes be used to make future decisions on Internet policy and practice..
- Little, if any, consideration of program attribution issues, and thus any steps to mitigate them during the program delivery. These attribution issues include; the amount and type of media attention, the time of year the study was implemented, the type and level of staff interaction with Internet users during the trial period, and the universal nature of the trial's filtering in all Library locations.
- The establishment of no upfront benchmarks and no base-line data to be used for performance measures or program evaluation.

Given what appears to be a significant lack of consideration to the formative evaluation criteria, the validity of both the process and summative portions of this evaluation are debatable. That being said there is one process issue that should be discussed, that is the issue of gaming. Gaming is a common occurrence in program evaluation situations where the program deliverers are also the evaluators, as is the case here. Gaming describes the situation where those staff undertaking the evaluation gauge the rewards from management for positive or negative answers to an evaluation question and act accordingly. Sometimes these actions do not even occur at a conscious level, but their impacts to the program can be just as negative. As there is an absence of third party checks and balances in this case to ensure that gaming has not occurred, then all responses from the evaluators can potentially be seen as suspect, undermining the validity of the evaluation process itself.

Finally, in terms of the summative evaluation - as there is no baseline data or no statistically valid control groups, there is therefore little value to measures attributed to either the trial's outcomes or impacts. The outcomes are tainted.

In this type of situation, whatever conclusions and recommendations that are reached have little, if anything, to do with proven evaluative facts but are rather "political" by nature. As an independent Board, under the Provincial Library Act, it is certainly in your prerogative to make policy decisions for "political" reasons. In this situation, given the design limitations to this evaluation and the subsequent questions to the validity of its outcomes, that is the type of decision you will be making.

Sincerely,

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