



Date:

June 08, 2020

To:

Director, U.S. Government Publishing Office

From:

Inspector General

Subject:

Review of U.S. Government Publishing Office (GPO) Directives System, Report No. 20-08

I asked my Inspections Division to conduct a review of the GPO Directives System and its corresponding GPO intranet website to assess their current status. This included their age, and the processes and procedures governing the Directives System. It was not our intent to review their content or usefulness. Our methodology is detailed in the appendix. Our findings are detailed below. The general intent of this Special Project (SP) is to provide information to GPO senior management for the purposes of improving GPO operations.

Summary

Overall, we found that while there are generally appropriate processes and procedures for the GPO Directives System, there are areas that could be improved; specifically with how documents are biennially updated and organized on the website¹. We looked at the policy process and found that biennial review could be better tracked. We found that on the website, there are multiple types of policy documents that could be better differentiated in order to facilitate quick discoverability. We also looked at the age of the policies and found that the average age of the documents is 17 years, and range from newly created to 48 years old. We found that 86 percent (259/302) of the documents are more than 2 years old. We offer more detailed analysis below and end with questions and considerations for the Administrative Services Division (ASD).

Policy Process

GPO has documented processes and procedures for the directives program. Per GPO Directive 001.1C, *GPO Directives System*, the ASD administers the GPO Directives System. Accordingly, each Business Unit is responsible for developing and updating their relevant directives, ensuring that the directives are neither duplicative nor contradictory. After a directive is approved, Internal Brand, Design, and Web Services posts the directive to the GPO intranet, and moves superseded or canceled directives to the “Archived Directives” intranet page. The Employee Communications Office then communicates the availability of

¹ <http://www.main.gpo.gov/Directives/deptbrowse.asp?Dept=ALL>

the directive to all GPO employees via LINK Message², Headlines³, and other appropriate means.

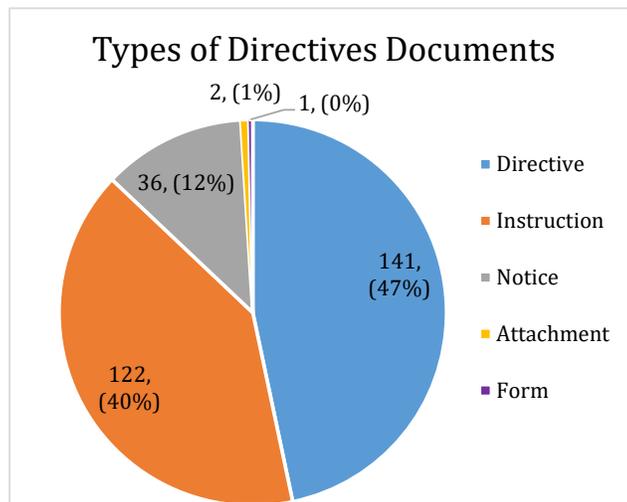
Additionally, per GPO Directive 001.1C, all active GPO directives shall be reviewed for applicability at least once every two years by the originating office, or more frequently as determined by the originating office.

While there are documented processes and procedures for the Directives System, GPO Directive 001.1C does not specify how the biennial reviews or website updates are managed. When reviewing a document we could not confirm that it contained the most recent and applicable information. It was also not readily apparent whether documents had been reviewed within the required two-years.

Policy Types

We examined all 302 documents listed on the Directives website, and found they consisted of GPO directives, instructions, notices, attachments, and forms. The policy website does not differentiate the policy types nor does GPO Directive 001.1C. Generally, directives establish policy, delegate authority, and must be complied with. Instructions usually provide the procedures to accomplish the directive policy. Multiple document types all called “directives” can create confusion as to which document is applicable to a particular need or task. Defining and distinguishing between the types of documents would make it easier for employees to find the information they need.

The breakout of the types of documents is shown below. Nearly half are labeled directives, 40 percent are labeled instructions, and the remaining 13 percent are notices, attachments, and forms.



² LINK is a communication channel that the Employee Communications Office uses to push information to all GPO workstation PCs (via screen savers) as well as to flat screen monitors located throughout GPO buildings.

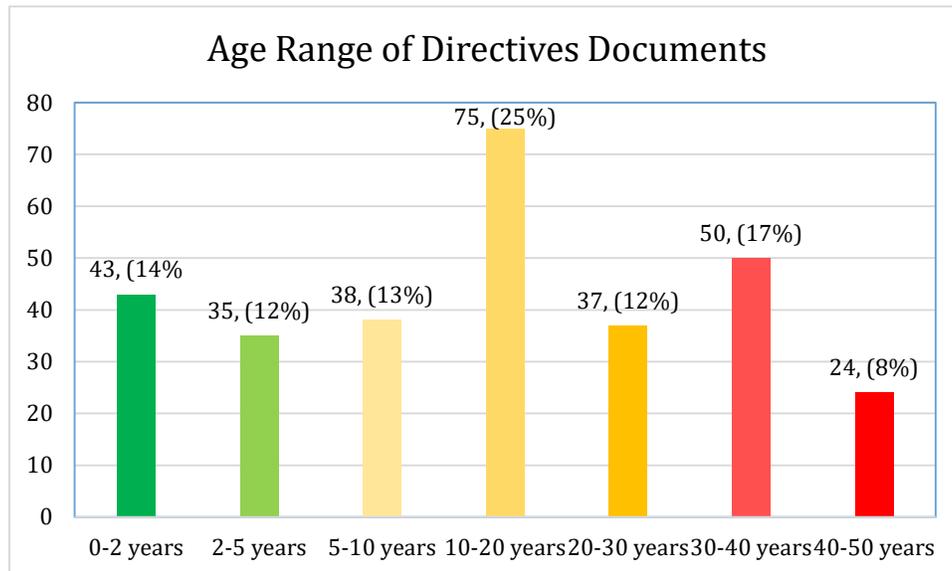
³ GPO Headlines are an internal communications document available to all employees on GPO’s main intranet page.

We believe GPO could improve the website’s readability and functionality by differentiating and/or organizing the site by the different policy types.

Policy Age

The average age of the policy documents is 17 years, 3 months. The two newest documents were created on April 13, 2020⁴, and the oldest document is dated July 7, 1971⁵ – nearly 49 years old. Overall, we found the majority of the documents were more than 2 years old: 86 percent (259/302). Further, 74 percent (224/302), were more than 5 years old.

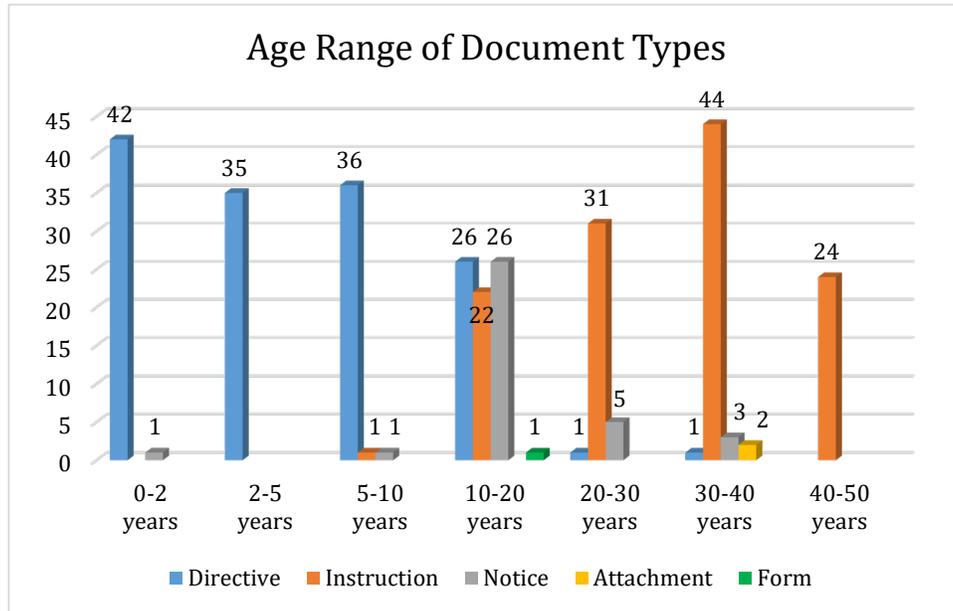
Age Range	Number of Directives in this Age Range	% in Age Range
0-2 years	43	14%
2-5 years	35	12%
5-10 years	38	13%
10-20 years	75	25%
20-30 years	37	12%
30-40 years	50	17%
40-50 years	24	8%
Total	302	100%



⁴ [670.58C Hazardous Waste Management Plan \[04-13-2020\]](#) and [825.44 Requirements for Information Technology Administrator Access \[04-13-2020\]](#)

⁵ [635.1 Instruction - Subject: Position Classification \[07-07-1971\]](#)

We paired the ages of the documents with their policy-type and found that the oldest single directive was in the 30-40 year age range, while 24 instructions are in the 40-50 year range. See image below.



Further, 4 percent (11/302) of the documents have expired (5) or have been superseded by an updated document (6). Eleven percent (33/302) of the documents appear to be changes, in the form of instructions, which were not incorporated into the original. For example, GPO Directive 625.6A, *Instruction – Training and Career Development*, has eleven change documents listed on the directives website, but does not have an updated document incorporating those changes. While these represent a small number of documents, moving them to the Archived Directives or updating the applicable document would help clean up the website and improve its readability and functionality. Additionally, addressing the older documents could minimize the need to distinguish the directive types, discussed above, as the above image shows that only three of the documents less than 10 years old are instructions or notices.

Results and Considerations⁶

While there are processes and procedures for the GPO Directives System, GPO could make a number of improvements. Updating the processes and procedures to specify how the biennial reviews or website updates are documented could make it easier to confirm that the documents on the website are still current. Differentiating the types of documents on the directives website and moving expired and superseded documents to the Archived

⁶ Considerations are suggested corrective actions to address potential deficiencies or problems. Considerations do not rise to the level of formal recommendations and are not tracked by the OIG.

Directives website or updating the applicable document could improve the website's readability, functionality and usefulness.

For this special project, we reviewed the documentation available on the directives website and did not request data or information from ASD. We ask that the ASD management consider answering the following questions in an effort to improve the GPO Directives System.

- Are biennial reviews of the directives necessary, and if so are they sufficient?
- How does ASD verify the originating offices review their directives on the required timelines?
- How does ASD verify the superseded or canceled directives are moved to the Archived Directives website?
- Has ASD considered requiring directives to be re-issued every two years to enforce currency? Alternatively, if the originating office does not re-issue the directive has ASD considered notifying the Business Unit that the directive will be moved to the Archived Directives website on an identified date?

If you have any questions or comments about this report, please do not hesitate to contact Nathan Deahl, Assistant Inspector General for Inspections, at (202) 227-5599 or me at (202) 512-0039.



MICHAEL P. LEARY
Inspector General

Enclosures:
Appendix 1: Special Project Methodology

cc:
Deputy Director
Acting Chief of Staff
Chief Administrative Officer

APPENDIX 1: Special Project Methodology

Special Projects (SP) are traditionally very specific in nature and are sometimes not listed in the Annual Audits and Inspections plan. SPs are usually ad-hoc and assigned by the IG. They can often take the form of research projects and don't necessarily need to conform to the CIGIE Quality Standards for Inspection and Evaluation, as is the case here.

The GPO Office of the Inspector General took the following actions for this special project between April 2020 and May 2020:

- Reviewed the 302 directives listed on the directives intranet website as of April 30, 2020.
- Conducted an analysis of the details of each document on that website, including number, title, effective date, type, and sunset or expiration date.

This project was an addition to the FY 2020 OIG Annual Audit and Inspection Plan.