Date:
September 30, 2021

To:
Director, U.S. Government Publishing Office

From:
Inspector General

Subject:
Data Review of U.S. Government Publishing Office (GPO) Priority Projects, Report No. 21-12

Periodically, GPO senior leadership produces and disseminates a document titled "Priority Projects" which lists and details capital investments and acquisitions.[1] In furtherance of our statutory oversight mission, we sought to better understand how GPO's Priority Projects are selected and managed through completion, and how the Priority Projects are associated and linked with GPO's strategic planning. I directed my staff to conduct an initial data review of the GPO Priority Projects to assess how the Priority Projects are connected to GPO's strategic planning and to determine the current status of each Priority Project.

Because GPO identified a set of initiates as top Priority Projects and continues to pursue and expend resources on these Projects, going forward we intend to repeat these periodic reviews to provide information to GPO senior management.[2] The next iteration will include more in-depth information gathered from agency personnel to further inform our oversight efforts. Our methodology is detailed in the appendix. Our initial observations are detailed below.

Summary

Overall, while GPO has a directive to develop its strategic plan, this directive does not encompass GPO's self-titled Priority Project list, nor are there directives or other guidance used specifically in determining or managing the Priority Projects. Further, GPO's strategic planning directive does not include any mention of the Priority Projects. In this initial review, we were unable to clearly identify the process associated with and who has overall responsibility for producing the Priority Project list, nor to whom the Priority Project list is promulgated. Without guidance and a defined process for the Priority Projects, it is difficult, if not impossible, to determine either the origin or desired effect of all Projects, and there is a risk that GPO's investments are not aligned to its strategic priorities.

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[1] According to GPO, "...the list of GPO Priority Projects referenced in the draft report is actually a list comprised of both priority programs and projects, not just projects" (Appendix B).
[2] *FY19 Annual Performance Plan and FY17 Annual Performance Report*, undated

Background

According to GPO, the Priority Project list was instituted by previous Director Davita Vance-Cooks as a reflection of the Director's priorities.[3] Priority Projects were first referenced in agency reporting in the *FY19 Annual Performance Plan and FY17 Annual Performance Report*, undated, wherein highlighted initiatives were identified as GPO's top Priority Projects.[4] However, the *GPO FY18-22 Strategic Plan*, undated, did not include the Priority Project list, and did not describe any of the highlighted initiatives as Priority Projects. The *GPO FY18-22 Strategic Plan* would have been issued around the same time as the *FY19 Annual Performance Plan and FY17 Annual Performance Report*, allowing for possible inclusion of the Priority Projects. Although not specifically included in the strategic plan, GPO continued to reference Priority Projects in the *FY 2021 Annual Performance Plan and FY 2019 Annual Performance Report*, dated April 2020, and the *FY2022 Annual Performance Plan FY2020 Annual Performance Report*, undated.[5]

We issued a data call on May 4, 2021, requesting, among other things, that GPO describe its strategic planning process, including whether this planning process produces the Priority Projects. We also requested that GPO provide information and documents to describe the Priority Projects from inception through completion, including, but not limited to, the original proposal, business case, project management milestones, and periodic progress updates. GPO responded to our data call with a 28-page memorandum, 20 pages of which were applicable to strategic planning and Priority Projects, with links to 20 documents, and 78 additional attached documents. Our observations are detailed below.

Strategic Planning Process

GPO has a documented strategic planning process. Per GPO Directive 1100.1B, *Strategic Planning and Performance Reporting Within the Government Publishing Office*, dated September 19, 2014, it is GPO's policy to maintain a formal process for conducting, documenting, communicating, monitoring, and evaluating agency strategic planning activities in order to foster uniformity of purpose, consistency in decision making, and assurance of a concerted agency-wide effort towards the attainment of strategic goals and objectives.[6] However, this directive does not include any formal process for strategic planning and reporting, and does not identify where such information can be found. Further, the directive does not include any mention of the Priority Projects, which we understand to be initiatives used to achieve the strategic goals of the strategic plan.[7]

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[3] GPO's data call response dated June 11, 2021.

[4] "FY" means Fiscal Year.

[5] GPO does not list a FY20 and FY18 Annual Performance Plan and Performance Report on their website.

[6] In our recent Report Number A-2021-10, *Government Publishing Office Capital Investments*, August 20, 2021, we recommended GPO assess this directive to ensure policies and procedures are current and relevant, and update the directive as appropriate.

[7] We were unable to find a formal definition for Priority Projects. Therefore, we based our understanding on our review of the *GPO FY18-22 Strategic Plan* and GPO's Annual Performance Plans and Performance Reports.

GPO Directive 810.3C, *Organization and Functions of the Strategic Investment Planning Committee*, dated May 9, 2019, outlines the administrative procedures for evaluating capital investment proposals. GPO Directive 805.1G, *Required Approvals of GPO Procurements and Other Actions by the Joint Committee on Printing*, dated August 26, 2021, assures that any necessary approval by the Joint Committee on Printing is obtained prior to initiating a procurement action. Both of these directives are impacted by GPO's initiatives and goals to implement its strategic plan.

As reported in our recent audit report, Report Number A-2021-10, *Government Publishing Office Capital Investments,* August 20, 2021, the Strategic Investment Planning Committee reviews capital investment requests and designates them as necessary to support GPO's strategic initiatives. After approval by GPO's Director, the list of capital investments is then sent to the Joint Committee on Printing for their approval. Further, we reported that over half of the 17 Fiscal Year (FY) 2020 capital investment cases submitted to the Strategic Investment Planning Committee were identified as a priority program. However, GPO Directive 810.3C does not reference reviewing the strategic plan nor does it identify criteria for the Strategic Investment Planning Committee to use when determining whether the request is necessary to support GPO's strategic initiatives.[8] Additionally, GPO Directive 805.1G does not require that capital investment packages address GPO's strategic goals.

Developing Priority Projects

We examined the 98 documents provided in GPO's data call response, as well as documents available on GPO's internal and external websites, such as GPO's Annual Performance Plans and Annual Performance Reports.[9] We were unable to find any specific documented definition of "Priority Project." GPO views Priority Projects as important endeavors that are transformational for GPO and crucial to its success to transform from a print-centric to a content-centric information provider.[10] Yet, we found no guidance associated with Priority Projects, neither how they were connected to the strategic plan; how they were developed and approved as a Priority Project; how the Priority Projects were managed and monitored through their life cycle; nor how the Projects were assessed following completion. We were also unable to find any guidance or processes associated with producing and managing the Priority Project list, including who has the overall responsibility for the list and to whom the list is disseminated. Based on the data GPO provided, the priority programs and projects are generally initiated and/or carried out by GPO business units. Each business unit differed in their approach to providing an update on their Priority Projects. For example, some business units included milestones and dates, but others did not. Without

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[8] Report Number A-2021-10, *Government Publishing Office Capital Investments,* August 20, 2021, made five recommendations to improve GPO's evaluation and selection process of capital investments related to business case data and analysis; post implementation reviews; ranking and prioritizing business cases; investment committee resources; and documentation and retention of capital investment activities.
[9] These reports can be found on GPO's website: https://www.gpo.gov/who-we-are/our-agency/mission-vision-and-goals
[10] OIG data review and analysis of the *GPO FY18-22 Strategic Plan* and GPO's Annual Performance Plans and Performance Reports.

Priority Projects life cycle guidance, a defined process, and comprehensive agency level coordination and oversight, there is a risk that GPO's investments are not aligned to its strategic priorities.

Status of Priority Projects

GPO's *FY2022 Annual Performance Plan FY2020 Annual Performance Report*, undated, identified 13 Priority Projects. The Projects are:

- XPub
- NextGen Passports
- govinfo
- Digital Presses
- Plant Operations Manufacturing System (POMS)
- Digitizing Historic Publications (Digitization)
- United States Legislative Markup (USLM) Projects
- Publish
- Facilities Changes
- Data Center Relocation
- Government Invoicing (G-Invoicing)
- AskGPO Update
- Cloud Implementation

Although GPO included a table for each Priority Project identifying what happened in FY 2020, and the tasks to be completed in FY 2021 and FY 2022, they did not identify the end product that would complete each of these Priority Projects.

The two Priority Projects highlighted below show examples of the discrepancies found regarding Project status. One Project appears to have been completed, and then extended with new activity. The second Project appears to be a Project with no defined end. Clearly identifying the expected end product of the Priority Project will help GPO assess if the completed Priority Project is operating as intended and as the strategic impact planned.

Digital Presses

GPO identified the need to replace existing press equipment with digital presses as early as the *FY17 Annual Performance Plan and FY15 Annual Performance Report*. This initiative to transition to smaller, more digital presses would accomplish the strategic goal of strengthening their organizational foundation. In November 2019, GPO issued a press release stating that they had acquired six new ink jet presses, and completed the first project using the new ink jet presses.[11] This meant the Digital Presses Priority Project should have been completed as of FY 2020. However, in the *FY2022 Annual Performance Plan FY2020 Annual Performance Report*, GPO appeared to expand this Priority Project by adding on the installation of a standalone handfed binder, and by adding redundant binding capability. These capabilities were not part of the original digital presses Priority Project. By expanding the Priority Project to encompass more than what it originally entailed, GPO risks an incorrect initial budget request to accomplish the Priority Project,

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[11] No. 19-22, GPO Manufacturing Modernization Continues with Ink Jet Presses, November 18, 2019

potentially resulting in the need for additional budget requests; extending the timeframes in which they completed a Priority Project; and misstating the completion status of the Priority Project.

USLM

For USLM, GPO could benefit from identifying phases of the Priority Project. USLM references converting online documents into a format specifically for documents in the Federal Legislative process. This need was identified as early as the *FY17 Annual Performance Plan and FY15 Annual Performance Report*. The USLM description identified two sub-projects, or phases, to complete. The first phase was scheduled to be completed by the end of FY 2018, and involved finalizing data models for enrolled bills, public laws, Statutes at Large, and providing samples for House of Representatives and Senate stakeholder review and feedback. The second phase was scheduled to be completed in FY 2019, and entailed converting Statute Compilations into USLM. These sub-projects were in addition to working with the Legislative Branch Bulk Data Task Force to identify the initiatives, or phases, to convert documents into USLM. Because USLM is an ongoing Priority Project with no identified end state, the importance of the completion of these three sub-projects is diminished when clustered under the one overall title of "USLM." Defining the annual, or other phase, of a Priority Project could allow GPO to clearly determine if the phase of the Project is being completed and operating as intended.

Results and Considerations

While there is a directive for GPO's strategic plan, the strategic planning directive does not include any mention of the Priority Projects, and there are no directives or guidance used specifically in determining or managing GPO's Priority Projects. Without guidance and a defined process for the Priority Projects, there is a risk that GPO's investments are not aligned to its strategic plan.

We ask that the Director, GPO, consider the following[12]:
1. Include in the planned update to GPO Directive 1100.1B, language to address how Priority Projects intersect with strategic planning;
2. Update GPO Directive 810.3C with language to address how the strategic plan and the Priority Projects intersect with the Strategic Investment Planning Committee;
3. Establish guidance to identify how Priority Projects will be defined, created, managed, monitored, and assessed;
4. Ensure a robust, documented original proposal and business case for each Priority Project that includes why GPO chose to identify the project as a Priority Project and the expected end product; and
5. Clearly prioritize, or rank, the order of GPO's Priority Projects so their relative importance is clear to GPO employees and stakeholders.

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[12] 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.

While we will not formally track the above considerations, we may initiate a review of these related issues in the future.

Because GPO continues to pursue and expend resources on its Priority Projects, we will follow-up periodically on the status of the Priority Projects, to include:
1. Updates on the expected completion dates;
2. Budget status;
3. Highlights of issues or risks;
4. Accomplishments; and
5. Next steps in the Priority Project.

If you have any questions or comments about this report, please contact Connie M. Greene, Assistant Inspector General for Inspections, at (202) 512-1597 or me at (202) 512-0039.

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MICHAEL P. LEARY
Inspector General

Enclosures:
Appendix A: Special Project Methodology
Appendix B: Agency Response to the Draft

Cc:
Deputy Director
Chief of Staff (Acting)
Chief Financial Officer

APPENDIX A: Special Project Methodology

Special Projects are traditionally very specific in nature and are oftentimes not listed in the Annual Work Plan. Special Projects are usually ad-hoc and assigned by the Inspector General. They can often take the form of research projects and do not necessarily need to conform to the CIGIE Quality Standards for Inspection and Evaluation, as in this case.

The GPO Office of the Inspector General took the following actions for this Special Project between May 2021 and August 2021:
- Reviewed GPO's data call response dated June 11, 2021, which included links to 20 documents, and 78 additional attached documents.
- Reviewed documentation available on GPO's inter- and intra-net, including GPO directives, annual reports, and strategic plans.
- Conducted an analysis of the information received and available on each of the Priority Projects.

This project was conducted in addition to the FY 2021 OIG Annual Work Plan.

APPENDIX B: Agency Response to Draft

HUGH NATHANIAL HALPERN
Director

GPO

MEMORANDUM

Date:	September 29, 2021
To:	Inspector General
From:	Director, GPO
Subject:	Response to Draft Special Project Report on the Data Review of GPO Priority Projects, Report No. 21-12

Thank you for the opportunity to provide comments on the factual accuracy of the draft special project report on the Data Review of GPO Priority Projects, Report No. 21-12.

I would like to point out that the list of GPO Priority Projects referenced in the draft report is actually a list comprised of both priority programs and projects, not just projects.

This acknowledges that some of the initiatives listed are programs that include ongoing operational work along with new initiatives or various projects under a program.

In the future, we will endeavor to ensure that headings and captions fully reflect the contents of this document.

If you have further questions about this matter, please contact Mr. Ric Davis, Acting Chief of Staff, at rdavis@gpo.gov, if there are any questions regarding this information.

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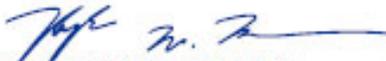
HUGH NATHANIAL HALPERN
Director, U.S. Government Publishing Office

cc:
Deputy Director
Acting Chief of Staff