



Date

May 19, 2022

From

Inspector General

Subject:

Final Report – OIG Transmittal Letter for CG Strategy – GPO Organizational Transformation Evaluation, Report No. 22-06

The Office of the Inspector General (OIG) contracted with CG Strategy, Inc. to evaluate GPO's transformation from a print-centric to a content-centric organization. The evaluation focused on the status of GPO's transformation into a modern, world-class, and trusted source of published products and information. The baseline for this report stemmed from GAO transformation recommendations that were adopted by GPO in reports from 2001, 2003, and 2004 as well as from recommendations by the National Academy of Public Administration's (NAPA) 2013 report. As our report notes, GPO has endeavored during the last 20 years to improve both their financial viability and their overall performance with some success. Nonetheless, transformation depends on strategically evolving to meet the future needs of GPO's customers and after 20 years, GPO still has much to do.

This report contains four findings, and made 17 recommendations to address the agency's ability to execute its existing mission, as well as its capacity to transform into a modern publisher and information disseminator. GPO concurred in full with 13 recommendations, concurred in part with 2 recommendations, and non-concurred with 2 recommendations. The majority of GPO's comments were responsive to meeting the recommendations' intent even in cases where they did not concur. As these recommendations are CG Strategy's, my office will make a separate determination of which recommendations to adopt and track. We will inform GPO and our other stakeholders when this is determined.

As the report points out, GPO has made targeted progress in modernizing its products and services while simultaneously improving its financial health. However, GPO continues to face challenges in meeting its current commitments and taking the bold steps needed to truly transform into a modern, digital publishing organization. Many of the vulnerabilities identified in prior GAO and OIG reviews, particularly those related to attracting the future workforce; chronic shortfalls in acquisitions functioning and vision; and limited strategic thought on its business model remain vulnerabilities for GPO today.

We provided GPO with an opportunity to review the draft report and comment on the recommendations. We originally gave GPO 21 days to provide comments and granted a request for a 7-day extension. This practice is a courtesy and common throughout the

Inspector General community. Formal management comments provide an opportunity for the inspected organization to concur or nonconcur with the recommendations, propose alternative actions, and inform the OIG of any corrective actions taken thus far. Management comments also allow the inspected organization to identify recommendations that are not achievable. Acting in accordance with Council of the Inspectors General on Integrity and Efficiency (CIGIE) standards, the comments were reviewed and considered for relevancy and completeness and included verbatim in the report. GPO's management comments went well beyond CIGIE's stated purpose and contained a number of references attributing to the report opinions and implications neither expressly stated nor necessarily intended. However, GPO did not actually dispute any of the findings and their proposed actions were responsive to the recommendations. Nonetheless, based on some of the agency's comments, CG Strategy made appropriate changes to the report and these changes are noted throughout.

The 135 senior staff hours expended by GPO in completing the management comments showed their level of seriousness. However, in spite of the time spent, the comments fall short of addressing the report's strategic focus. Regardless, I believe this report will have value to other stakeholders and decision makers, in addition to the agency.

We appreciate the courtesies extended to CG Strategy and our staff. We continue to look forward to working with GPO's leadership and staff on addressing these recommendations and future projects to improve the agency's operations and programs. If you have any questions or comments about this report, please contact Ashley Kehoe, Office Manager, at akehoe@gpo.gov.



MICHAEL P. LEARY
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Attachment

U.S. Government Publishing Office Organizational Transformation Evaluation

Submitted To: GPO OIG

Report Number: 22-06

Date: May 19, 2022

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RESULTS IN BRIEF

This inspection assessed the U.S. Government Publishing Office's (GPO) modernization transformation, including the organizational, public administration, and human capital dynamics that contribute to or result from the transformation efforts. The organizational scope of this inspection includes all components, programs, and functions of the GPO.

WHAT WE DID

The Office of the Inspector General (OIG) initiated a review of GPO's transformation efforts to explore past and current strategic advancements, as well as future opportunities for GPO to sustain and expand its relevance to the American public. The inspection focused on understanding progress made to date, as well as what is needed to further transform GPO into a modern, world-class, and trusted source of published products and information.

WHAT WE FOUND

This inspection produced 4 findings and 15 sub-findings. The findings address the agency's ability to execute on its existing mission,¹ as well as its readiness to launch itself into the future and transform into a modern publisher and information disseminator. Taken together, these findings indicate that GPO has made targeted progress in modernizing its products and services while simultaneously improving its financial health.

However, GPO continues to face challenges in meeting its current commitments and taking the bold steps needed to truly transform into a modern, digital publishing organization. Many of the vulnerabilities identified in prior reviews, particularly those related to human capital management and acquisitions functions, remain vulnerabilities for GPO today. Compounding those vulnerabilities is GPO's business model which reflects a disparate portfolio of products, services, and customers, and arguably do not all align with the agency's mission.²

This inspection concludes that GPO needs to redefine its identity and business model, and redouble its investment in modernization efforts, if it wants to ensure a future in which it has the operational leadership, discipline, and support necessary to meet the needs of the future.

Finding 1: GPO has made significant progress toward accomplishing a strategic modernization as recommended by previous reviews; however, progress has been inconsistent across GPO and, at times, more reactionary than visionary.

Finding 2: The practices that helped GPO modernize over the past decade are inconsistently used across business units and insufficient to get GPO to where it needs to be a decade (or more) from now.

¹ Government Publishing Office. GPO FY18-22 Strategic Plan. Available at <https://www.gpo.gov/docs/default-source/mission-vision-and-goals-pdfs/gpo-strategic-plan-fy2018-2022>.

² Ibid.

Finding 3: Persistent challenges related to Human Capital and Acquisition Services have impeded GPO’s ability to be adequately organized, staffed, equipped, and trained to implement transformation.

Finding 4: GPO’s wide-ranging responsibilities hinder its ability to focus and deliver on its core mission.³

Figure 1 captures the findings from this inspection and links them to the corresponding inspection objectives.

Figure 1. Inspection Findings and Objectives.

INSPECTION FINDINGS	APPLICABLE INSPECTION OBJECTIVES
Finding 1	<ul style="list-style-type: none"> • Objective 1: To assess GPO’s progress toward accomplishing a strategic modernization as recommended by previous reviews and reports.
Finding 2	<ul style="list-style-type: none"> • Objective 2: To determine key factors in promoting and/or hindering the effective implementation of recommendations from previous reviews and reports including GPO’s progress to identify, hire, and retain talent that will position GPO to be a competitive modern publisher and information disseminator. • Objective 3: To assess the extent to which GPO’s current strategy and related activities will achieve its stated vision and deliver maximum value to customers.
Finding 3	<ul style="list-style-type: none"> • Objective 2: To determine key factors in promoting and/or hindering the effective implementation of recommendations from previous reviews and reports including GPO’s progress to identify, hire, and retain talent that will position GPO to be a competitive modern publisher and information disseminator. • Objective 5: To determine if GPO is adequately organized, staffed, equipped, and trained to strategically plan and implement an organizational transformation toward modern digital publishing and information dissemination.
Finding 4	<ul style="list-style-type: none"> • Objective 2: To determine key factors in promoting and/or hindering the effective implementation of recommendations from previous reviews and reports including GPO’s progress to identify, hire, and retain talent that will position GPO to be a competitive modern publisher and information disseminator.
Findings 1-4*	<ul style="list-style-type: none"> • Objective 4: To identify new strategies and/or approaches for GPO to achieve its stated mission and vision most efficiently and effectively. <p><i>*Note:</i> Objective 4 is addressed throughout this inspection in the recommendations included within each Finding.</p>

³ Government Publishing Office. GPO FY18-22 Strategic Plan. Available at <https://www.gpo.gov/docs/default-source/mission-vision-and-goals-pdfs/gpo-strategic-plan-fy2018-2022>.

WHAT WE RECOMMEND

This inspection includes recommendations for each finding aimed at ensuring GPO is planning for future publishing, information dissemination, and workforce needs as well as considering the financial sustainability of the organization as it modernizes. Additional recommendations are specifically focused on ensuring that all business units are performing at the highest caliber to achieve GPO’s mission and vision.

Each recommendation is labeled as “prior” or “new,” depending on whether it was a recommendation made in prior reviews and reports re-affirmed by this inspection or it is a brand-new recommendation resulting from this inspection.

INTRODUCTION

A. **BACKGROUND**

1. **Context of the Inspection**

GPO's programs, practices, and processes have been the subject of several reviews and reports over the past several decades. These reviews yielded recommendations aimed at transitioning GPO from an entirely paper-based printer to a modern digital and paper publisher.

The GPO OIG initiated a review of GPO's transformation efforts to explore past and current strategic advancements, as well as future opportunities for GPO to sustain and expand its relevance to the American public. This inspection builds on prior reports and recommendations to understand the progress made to date, areas that still require attention, and new opportunities that should be explored. The inspection is focused on producing recommendations that will further transform GPO into a modern, world-class, and trusted source of published products and information dissemination.

2. **Organizational Overview**

The GPO has a deep and rich history as a critical information broker and publishing house for the United States (U.S.) Government. For 161 years, GPO has served as the official and secure source for producing, protecting, preserving, and distributing the official publications and information products of the Federal Government. Opening its doors for the first time in 1861, GPO's mission motto "keeping America informed" highlights the broad scale of GPO's responsibility to the American public. GPO aims to adopt the most efficient and cost-effective production methods for delivering authentic and secure government-related documents and products to the American public.

GPO is not immune to the environmental factors affecting the publishing industry in general. Like the rest of the publishing industry, GPO is navigating how best to manage the decline of print media and to transition strategically and wisely to digital publishing. At the same time, GPO faces the challenge of performing broader government responsibilities in an increasingly digital world and within the constraints of outdated legislative mandates and authorizations.

3. **Statutory Background**

GPO operates within the confines of Title 44 of the United States Code (U.S.C.). On one hand, Title 44 has benefited GPO. Title 44 specifies the production, dissemination, retention, and availability of government information by or through the GPO.⁴ Title 44 has played a critical role in preserving key functions of GPO by codifying laws relating to public printing and documents. Other countries do not have a Title 44 equivalent even though they provide similar

⁴ Government Printing, Publications, and Digital Information Management: Issues and Challenges. Nov 8, 2017. Obtained here: <https://sgp.fas.org/crs/misc/R45014.pdf>.

public printing and/or public information dissemination services as GPO. Some experts have concluded that Title 44 affords GPO an important statutory foundation and that other countries lacking a similar statutory foundation may be operating at greater risk than necessary (discussed in section *Sub-Finding 4.A*, page 34).⁵ On the other hand, Title 44 was crafted in a print-centric time. The statute does not mention “digital” publications and its standards are exclusively for print. There have been several unsuccessful efforts to revamp Title 44, including a push in 2017 to revise sections related to the Federal Depository Library Program (FDLP), which ensures that the American public has access to government information in depository libraries across the U.S. and its territories.

B. INSPECTION SCOPE AND OBJECTIVES

This inspection focuses on GPO’s modernization including the organizational, public administration, and human capital dynamics that contribute to or result from the transformation efforts. The scope of this inspection includes all components, programs, and functions of the GPO.

The objectives of this inspection are:

- **Inspection Objective 1:** To assess GPO’s progress toward accomplishing a strategic modernization as recommended by previous reviews and reports.
- **Inspection Objective 2:** To determine key factors in promoting and/or hindering the effective implementation of recommendations from previous reviews and reports including GPO’s progress to identify, hire, and retain talent that will position GPO to be a competitive modern publisher and information disseminator.
- **Inspection Objective 3:** To assess the extent to which GPO’s current strategy and related activities will achieve its stated vision and deliver maximum value to customers.
- **Inspection Objective 4:** To identify new strategies and/or approaches for GPO to achieve its stated mission and vision most efficiently and effectively.⁶
- **Inspection Objective 5:** To determine if GPO is adequately organized, staffed, equipped, and trained to strategically plan and implement an organizational transformation toward modern digital publishing and information dissemination.

⁵ A. Wakaruk and S. Li. (2019). *Government Information in Canada*. University of Alberta.

⁶ Government Publishing Office. *GPO FY18-22 Strategic Plan*. Available at <https://www.gpo.gov/docs/default-source/mission-vision-and-goals-pdfs/gpo-strategic-plan-fy2018-2022>.

C. INSPECTION BENEFIT

This inspection serves as an independent evaluation of the progress GPO has made to become a more modern, digital publishing and information dissemination organization. Anticipated benefits to GPO of adopting and implementing this inspection's recommendations, include:

- Improved line-of-sight and alignment between agency-level strategic planning, organizational unit implementation plans, and individual leadership and staff performance plans.
- Improved capability to attract and retain key talent.
- Improved demonstration of GPO's exceptional value to customers as a modern, digital publishing and information dissemination organization.
- Increased staff morale through recognition of staff accomplishments to date and successes experienced during GPO's transformational journey, including intentional actions taken to continue to evolve GPO into a modern, digital publishing and information dissemination organization.
- Increased resource savings realized from recommended improvements and enhancements to efficiency, effectiveness, and/or sustainability of GPO operations, programs, or policies.
- Increased retention of deep institutional knowledge even during staff turnover.
- Increased readiness, both now and in the future, for organizational transformation and workforce shifts.

D. PRIOR COVERAGE

Since 1994, there have been seven comprehensive reviews of GPO or GPO functions, including four by the U.S. Government Accountability Office (GAO), and one each by the National Academy of Public Administration (NAPA), U.S. Office of Personnel Management (OPM), and a private contractor. The scope of each assessment varied from narrow, such as focusing on specific business units, to organization-wide. **Figure 2** (page 7) contains the list and brief overview of each prior review and report.

Figure 2. Overview of Prior Reviews and Reports of GPO from 1994 to 2021.

YEAR	SOURCE	TITLE OF REPORT	REFERENCE
1994	GAO	<p><i>Legal and Regulatory Framework is Outdated for New Technological Environment (GAO/NSLAD-94-157)</i>⁷</p> <p>In 1994, GAO reviewed how legal and regulatory frameworks were reflected in public sector publishing operations. The report did not issue recommendations, but rather reviewed the impact and relevance of existing laws and regulations on technological advances in the publishing environment and compared operational factors of the GPO to the Defense Printing Service.</p>	GAO 1994
2001	GAO	<p><i>Information Management: Electronic Dissemination of Government Publications (GAO-01-428)</i>⁸</p> <p>In 2001, GAO studied the impact of two major changes to GPO: providing documents to the public entirely in electronic format; and transferring the depository library program to the Library of Congress. The report did not issue recommendations, but rather assessed the feasibility and compared the advantages and disadvantages of each change.</p>	GAO 2001
2003	GAO	<p><i>Advancing GPO's Transformation Effort through Strategic Human Capital Management (GAO-04-85)</i>⁹</p> <p>In 2003, GAO conducted a general management review of GPO that focused on issues related to GPO's management and transformation. In its report, GAO made 28 recommendations to help GPO strengthen its human capital management. Of the 28 recommendations, only three were marked as “not completed” at the time of report closeout and are included in this assessment.</p>	GAO 2003

⁷ Government Accountability Office. (1994). Legal and Regulatory Framework is Outdated for New Technological Environment. (GAO Publication No. GAO/NSIAD-94-157). Available at <https://www.gao.gov/products/nsiad-94-157>.

⁸ Government Accountability Office. (2001). Information Management: Electronic Dissemination of Government Publications. (GAO Publication No. GAO-01-428). Available at <https://www.gao.gov/products/gao-01-428>.

⁹ Government Accountability Office. (2003). Advancing GPO's Transformation Effort through Strategic Human Capital Management. (GAO Publication No. GAO-04-85). Available at <https://www.gao.gov/products/gao-04-85>.

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YEAR	SOURCE	TITLE OF REPORT	REFERENCE
2004	GAO	<p><i>Actions to Strengthen and Sustain GPO's Transformation (GAO-04-830)</i>¹⁰</p> <p>In 2004, GAO examined the current state of printing and dissemination of public government information and was requested by Congress to conduct a general management review of GPO. In its report, GAO recommended that GPO leaders take steps to improve planning and goal setting for the transformation. GAO also recommended that GPO begin adopting leading practices of world-class organizations in financial and information technology management. Of the 35 total recommendations, only four were marked as “not completed” at the time of report closeout and are included in this assessment.</p>	GAO 2004
2013	NAPA	<p><i>Rebooting the Government Printing Office: Keeping America Informed in the Digital Age</i>¹¹</p> <p>In 2013, Congress mandated that NAPA study GPO's current role, operations, and future direction. NAPA concluded that GPO's core mission remained valid, but that the agency—along with the rest of the Federal Government—would need to continue to “reboot” policies and procedures to maintain relevance in the digital age. In its report, NAPA made 15 recommendations to help position the Federal Government for the digital age, strengthen GPO's business model, and build the GPO of the future. All 15 recommendations are included in this assessment.</p>	NAPA 2013
2019	OPM	<p><i>Human Capital Management Evaluation Government Publishing Office</i>¹²</p> <p>From 2018 to 2019, OPM assessed GPO's strategic management of human capital, including the efficiency and effectiveness of its human resources programs and compliance with merit system principles, laws, and regulations in relation to the Human Capital Framework. OPM found GPO's “human capital programs operate in accordance with laws and established regulations.” OPM required 10 actions and recommended an additional 18 actions. GPO provided a formal response to each of the 10 required actions.¹³ Only the 18 recommended actions (for which progress was not reported) are included in this assessment.</p>	OPM 2019

¹⁰ Government Accountability Office. (2004). Actions to Strengthen and Sustain GPO's Transformation. (GAO Publication No. GAO-04-830). Available at <https://www.gao.gov/products/gao-04-830>.

¹¹ National Academy of Public Administration. (2013). Rebooting the Government Printing Office: Keeping America Informed in the Digital Age. Available at https://www.gpo.gov/docs/default-source/congressional-relations-pdf-files/gpo_napa_report_final.pdf?sfvrsn=2.

¹² U.S. Office of Personnel Management. (2019). Human Capital Management Evaluation Government Publishing Office. Document provided by OIG during background research.

¹³ GPO Human Capital Management Team. (2020). OPM Audit: GPO Responses and Results. Document provided by OIG during the August-September 2021 data call.

YEAR	SOURCE	TITLE OF REPORT	REFERENCE
2021	KAA Federal	<i>Report on Findings and Recommendations for the GPO Acquisition Services</i> In 2021, GPO commissioned a private contractor (KAA Federal) to conduct an external assessment of Acquisition Services. The assessment analyzed feedback from interviews with both stakeholders and employees from Acquisition Services. The resulting report contained 10 tactical recommendations, but first called on GPO to determine its to-be state. Only the major strategic recommendation is included in this assessment.	<i>KAA 2021</i>

E. INSPECTION METHODOLOGY

The inspection team used multiple methods to assess GPO’s demonstrable progress. Progress was assessed by reviewing more than 100 documents submitted by GPO in response to a data call and through fieldwork, including conducting 19 interviews with GPO Officials, collecting supplemental publicly available information, and conducting a benchmarking analysis. The quantitative and qualitative information gathered through this process was then synthesized, reconciled, and used to identify recommendations.

1. Assessment of Previous Recommendations

The inspection team assessed GPO’s progress in executing recommendations from the prior reviews and reports listed in **Figure 2**. There were a total of 34 unique recommendations spanning services, programs, and business model (15 recommendations); human capital (18 recommendations); and acquisitions (1 recommendation). Of the 34 unique recommendations, 31 were mostly or entirely within GPO’s control to implement.

Each unique recommendation was assessed and categorized as one of the following:

- **Completed or Sufficient Progress:** This category was used for recommendations that were completed and recommendations where GPO has demonstrated enough progress that indicates no clear or significant concerns with completion. If a recommendation contained multiple actions, progress was assessed against all actions for which GPO has control.
- **Progress, but Concerns Remain:** This category was used for recommendations where GPO has demonstrated progress, but a subset of GPO Officials remain concerned by the state of the progress.
- **Not Initiated:** This category was used for recommendations where there is no evidence from the data call, fieldwork, or publicly available information that GPO initiated any action.
- **External Control:** This category was used for recommendations that are outside of GPO’s control such as recommendations for Congress to consider.

- **Not Applicable or Unable to Assess:** This category was used for recommendations that are outdated and no longer applicable or recommendations evaluators could not assess progress from the data call, fieldwork, or publicly available information.

2. Benchmarking to Compare Functions Across Organizations

The inspection team identified a series of countries, states, professional organizations, and political and economic unions to benchmark GPO activities, priorities, and strategies against. The benchmarking analysis supplemented the fieldwork by identifying best practices, solutions, and recommendations that may not have been previously presented to or considered by GPO.

The benchmarking analysis included developing an overall strategy, selecting a mix of entities to benchmark against, and identifying comparison points and themes. The inspection team used a series of metrics and indicators to better understand how GPO compares to similar organizations in other countries, such as the existence of an online repository of information and types of certifications held. Findings from the benchmarking process have been incorporated in this inspection report where applicable.

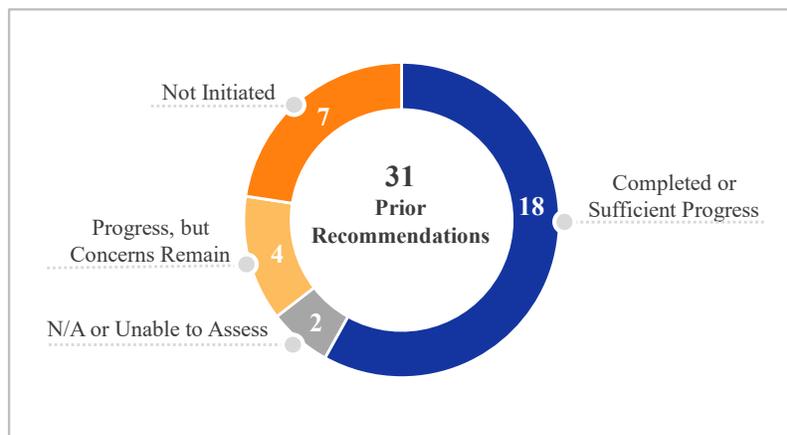
INSPECTION RESULTS

I. FINDING 1

GPO has made significant progress toward accomplishing a strategic modernization as recommended by previous reviews; however, progress has been inconsistent across GPO and, at times, more reactionary than visionary.

The inspection team assessed GPO’s progress in executing recommendations from as far back as 1994 and as recent as 2021. There were a total of 34 unique recommendations spanning services, programs, and business model (15 recommendations); human capital management (18 recommendations); and acquisition support and services (1 recommendation). Of those, 31 were mostly or entirely within GPO’s control with respect to implementation. GPO has completed or made sufficient progress on 18 of 31 recommendations (**Figure 3**).¹⁴

Figure 3. Status of GPO's Overall Progress Towards Implementing Prior Recommendations.



Refer to the Appendix section *IX. GPO Progress Toward Implementing Prior Recommendations* for a list of the unique recommendations, as well as descriptions of observed progress, where available, and determination of status.

GPO has made significant progress implementing recommendations associated with modernizing its services and programs and increasing revenue, especially within business units with external customers. The most comprehensive of the reports to assess GPO’s progress in these areas was the 2013 NAPA report; therefore, most recommendations in this category are 9+ years old.

GPO has also made progress implementing recommendations associated with strengthening its human capital management practices, although there are still some significant issues. GPO is most behind in making progress toward strengthening its acquisition support and services. While

¹⁴ See *Inspection Methodology* (page 9), including each prior recommendation and rationale for each assessment.

only 6 months have elapsed since a separate and independent assessment of GPO’s Acquisition Services was completed, interviews with GPO Officials confirmed significant and ongoing issues ranging from inadequate training to inadequate technology and processes.

Finding 1 includes three sub-findings:

- **Sub-finding 1.A:** GPO has made significant progress in implementing recommendations associated with its services, programs, and business model.
- **Sub-finding 1.B:** GPO has made progress in implementing prior recommendations related to human capital, although some significant issues remain.
- **Sub-finding 1.C:** Acquisition Services continues to struggle with clarifying its roles and responsibilities, as well as maintaining a well-trained and effective workforce.

Each sub-finding is described in greater detail in the subsequent sections.

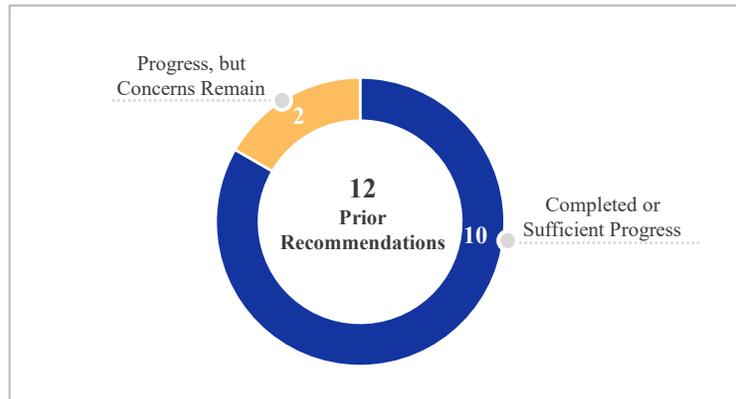
A. SUB-FINDING 1.A

GPO has made significant progress in implementing recommendations associated with its services, programs, and business model.

Of the 12 recommendations made from the 2013 NAPA and 2003 and 2004 GAO reviews, GPO has completed or made sufficient progress implementing 10 recommendations. Progress has been made on the two other recommendations, but concerns remain (Figure 4).

GPO has made significant progress related to modernizing its services and products and increasing revenue since 2013. In terms of products and services, the development of **govinfo.gov** (“**govinfo**”), which provides free public access to official publications from all three branches of the Federal Government, has been one of GPO’s most significant accomplishments over the past decade. The site has logged 9 billion retrievals since its launch in 2016.¹⁵ From March 2020 to March 2021 alone, GPO submitted

Figure 4. Status of GPO's Progress Towards Implementing Prior Recommendations Related to Services, Programs, and Business Model.



¹⁵ According to gpo.gov archives.

approximately 300,000 content packages to **govinfo**, representing a 33% increase over the prior 12 months.¹⁶

GPO's Programs, Strategy, and Technology (PST) business unit led an effort to certify **govinfo** as a trustworthy digital repository. After being assessed against 109 criteria covering topics ranging from infrastructure and security risk management to organizational infrastructure, the site became certified under International Organization for Standards (ISO)-16363 in 2018. Another significant accomplishment has been the development and launch of XPub, a new system that supports the production of congressional bills in XML format.¹⁷ Transitioning to XPub offers users search retrieval capabilities as well as interoperability with other congressional systems than was available under the previous system (i.e., Microcomp).

In terms of equipment, GPO transitioned to high-efficiency inkjet printers and acquired new industrial binding equipment. Both upgrades are expected to increase the speed and lower the cost of printing operations by the end of FY 2022 (discussed in section *II.C. Sub-Finding 2.C*, page 21). GPO Officials note that demand for print has shrunk but *not* disappeared despite the major transition to digital. Customers, including Congress, still request print copies and agency demand for GPO's print services may increase given private sector market factors, including access to fewer printers and higher costs. Therefore, to meet customer needs, GPO is not aiming to be exclusively digital, but rather to continue to calibrate its mix of products and services in print and digital forms.

One example of this calibration is the FDLP, whose mission is to provide free, ready, and permanent public access to Federal Government information, now and for future generations. GPO has revised its policies governing the FDLP to increase flexibility among depository libraries in choosing the right mix of print and digital government information. In addition, GPO has developed a comprehensive plan for preserving the print collection of government documents. The proposed "National Collection" would compile information from all three branches of the Federal Government.

GPO has also made progress in exploring ways to generate revenue, with mixed success. On one hand, GPO's Security and Intelligent Documents (SID) business unit has significantly expanded its secure document services—from fingerprint cards¹⁸ for the Federal Bureau of Investigation (FBI) to the Veterans Affairs (VA) health benefit cards and personal identity verification

¹⁶ <https://www.gpo.gov/who-we-are/news-media/news-and-press-releases/gpo-achieves-nine-billion-retrievals-of-government-information>.

¹⁷ According to the World Wide Web Consortium (W3C), XML stands for eXtensible Markup Language. XML is an open-standard based coding language designed "to meet the challenges of large-scale electronic publishing." (W3C. [2021]. Available at: <https://www.w3.org/XML/>). XML-based systems are also designed to be both human- and machine-readable.

¹⁸ Report revised, per GPO Management Comments, to reflect that GPO has a contract with the FBI to produce fingerprint cards, not secure IDs.

(PIV)/retired military cards—which has resulted in the largest revenue gains for GPO. GPO is looking to further increase its revenue by continuing to promote services, such as 508 compliance and digital design support and offer software-as-a-service.

On the other hand, GPO has unsuccessfully tried to reduce the bookstore’s costs through two approaches. In the mid-2000s, GPO tried to transition to print-on-demand. However, resources were not dedicated to the effort and requests from Congress were prioritized, resulting in long delays (6-8 weeks) in fulfilling non-congressional orders. GPO also closed its last “brick and mortar” bookstore in 2021 to contain costs and in response to reduced customer foot traffic. Chapter 17 of Title 44 authorizes the Superintendent of Documents to offer certain categories of documents for sale to the public, which Publication and Information Sales has transitioned to an online bookstore.¹⁹ But despite the transition from “brick and mortar” stores with pre-determined stock levels (the “Barnes and Noble” approach²⁰) to an online presence with an option for print-on-demand (the “Amazon” approach), revenue from the GPO bookstore has continued to decline.

One of the goals in the Publication and Information Services business unit strategic plan is to “increase use of print-on-demand to reduce inventory, increase content availability, and improve delivery to customers.”²¹ The measurable milestone associated with this goal was to process at least 20 titles per year to Amazon specifications and submit them to Amazon. It is unclear if this milestone was met. It is also unclear if the current approach—to meet the demands of Title 44 while transitioning online without the right model and infrastructure to achieve print-on-demand—is feasible. Meeting online book orders at a speedy and inexpensive production rate is challenging, and GPO may not be able to ever fully meet this need. Currently, the online bookstore program cannot recover its costs. As GPO continues to modernize, the operations of an online bookstore, at least in its current form, will need to be altered.

GPO has continued to reduce the footprint of its Customer Services Procurement regional offices and identify opportunities to lease out or share space with other Federal Agencies.²² GPO launched a new automated print procurement system called “Publish” to both reduce internal administrative costs and improve revenue.

GPO also revamped its processes and policies related to investment management. GPO’s Strategic Investment Planning Committee now requires more rigorous analysis when considering new investments.

¹⁹ Report revised, per GPO Management Comments, to reflect that Title 44 authorizes but does not require the Superintendent of Documents to offer certain categories of documents for sale to the public.

²⁰ GPO. (2017). *Transforming GPO for the 21st Century and Beyond: Hearing Before the Committee on House Administration, First Session*. Testimony of Ms. Davita Vance-Cooks.

²¹ According to documents provided by Publications and Information Sales during the August–September 2021 data call.

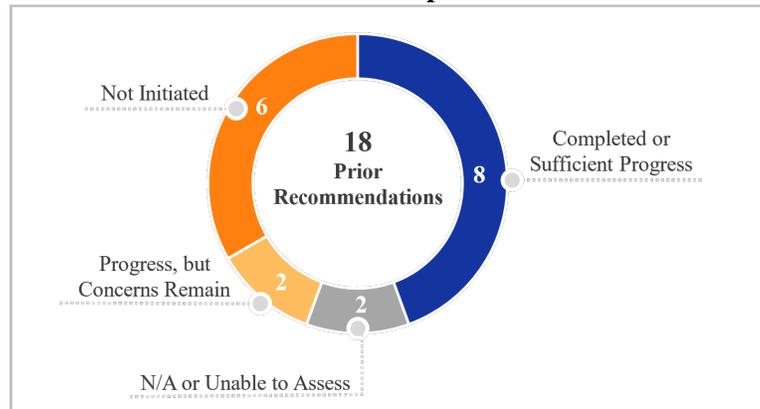
²² GPO OIG published an omnibus site visit report that addressed these efforts.

B. SUB-FINDING 1.B

GPO has made progress in implementing prior recommendations related to human capital, although some significant issues remain.

Of the 18 recommendations made regarding human capital from the 2019 OPM, 2013 NAPA, and 2003 GAO reviews, GPO has completed or made sufficient progress implementing eight recommendations. Progress has been made on two recommendations, but concerns remain. Activities to address six recommendations were not initiated and two recommendations were not applicable, or progress could not be assessed (**Figure 5**).

Figure 5. Status of GPO's Overall Progress Towards Implementing Prior Recommendations Related to Human Capital.



Human Capital has made progress in operational efficiencies including partial transitioning from paper-based to electronic-based processes. Position descriptions are being moved to electronic files and automation is helping with tasks such as classification and development of position descriptions. In addition, there are now dozens of standard operating procedures and trainings.

Human Capital has also worked with GPO leadership to address challenges with attracting, retaining, and training qualified employees as recommended by previous reviews. The two most cited accomplishments in this area were GPO's transition in 2021 to 100% telework and remote work options for eligible teammates—one of the most flexible in the Federal Government—and its new and diversified recruitment and retention strategies, including partnering with SkillsUSA and the use of recruitment bonuses and relocation allowances. GPO is also standardizing performance management infrastructure with OPM and providing more funding for training.

However, of the 16 non-Human Capital business units interviewed, at least seven noted persistent delays in hiring and how those delays impacted GPO's ability to attract top talent. From initiation of the hiring process to onboarding, it can take up to 6 months to hire someone, even for non-sensitive positions.²³ Because the hiring process is so long, candidates often get offers from other Federal Agencies or the private sector and remove themselves from the applicant pool. According to GPO Human Capital data, positions at GPO are vacant, on average, for more than 160 days. GPO Officials noted that the prolonged time to fill positions is in part

²³ Based on information collected during fieldwork, November 2021.

due to external factors such as OPM policies and is exacerbated by GPO's small size and reliance on a unique blend of skillsets.

Prior to 2018, one key and strategic concern noted in previous assessments was how to right-size the organization. Now, the primary concern is how GPO will build a workforce to meet its future needs and how it can better forecast the impact of innovation such as automation and artificial intelligence on the workforce. OPM flagged the need to adopt workforce planning in its 2019 assessment of GPO. The OIG reiterated this need and noted that strategic workforce planning remains a vulnerability within GPO and may require outside expertise to evaluate and develop. The OIG identified “attracting, developing, and maintaining” a workforce as one of its four top challenges for fiscal years (FYs) 2021 and 2022. The OIG noted that the challenge is “potentially more harmful” because GPO operates on a revenue-based business-like model and excessive vacancies could lead to lower throughput and production, which could lead to reduced revenues.²⁴

C. SUB-FINDING 1.C

Acquisition Services continues to struggle with clarifying its roles and responsibilities, as well as maintaining a well-trained and effective workforce.

The 2021 external assessment of Acquisition Services identified major operational weaknesses and capacity constraints within the business unit. The report cited a combination of human capital issues such as high turnover and vacancies, low staff morale, and inadequate training with a general disconnect between Acquisition Services and the needs of other business units. These issues compounded a lack of basic systems needed to complete acquisition-related tasks effectively and efficiently, ultimately resulting in errors such as missing signatures or invoices.

The external assessor, KAA Federal, made 10 tactical recommendations, first urging the GPO to determine its ideal to-be state because “growing Acquisition Services into a larger, high-performing contracting organization will take time, money, training, and will be slow to materialize.”²⁵ Three alternative to-be states were proposed for GPO's consideration.

INSPECTION CHALLENGE: While conducting fieldwork interviews for this inspection, the inspection team requested access to the Director of Acquisition Services for an interview. After initially agreeing to the interview, the Director of Acquisition Services failed to appear. After repeated attempts to meet with the interviewee, the inspection team was informed that the interviewee would not cooperate and the agency could not produce the interviewee. Another GPO Official was made available in lieu of the original interview candidate.

²⁴ GPO OIG. (2020). GPO's Top Management Challenges for Fiscal Year 2021. (Report No. 21-02). Available at https://www.gpo.gov/docs/default-source/inspector-general/final-top-management-challenges_10222020.pdf.

²⁵ KAA 2021.

Not being able to interview the Director of Acquisition Services resulted in the inspection team having to explore other, sub-optimal avenues for institutional context about Acquisition Services. For example, GPO's reaction to the 2021 assessment by KAA Federal and reflection on the to-be state of Acquisition Services could only be observed through interviews with other business units and GPO Officials less familiar with the historical context than that of the Director of Acquisition Services. Without having access to this institutional knowledge and history of the business unit's challenges, the inspection team largely gleaned information about Acquisition Services through interviews with other business units and an interview with a GPO Official who had only recently been hired into Acquisition Services within the last 6 months and who acknowledged a lack of institutional knowledge or historical context about the business unit.

Interviews with GPO Officials from other business units confirmed that many issues identified in the 2021 assessment still persist, including high staff turnover, inadequate training, low staff morale, lack of standard operating procedures, and insufficient contracting language software. Interviewees called on Acquisition Services to review and revamp its policies and processes. As a legislative branch agency, GPO faces unique procurement rules given its reliance on the Materials Management Acquisition Regulation (MMAR), which has not been updated since 2003, as opposed to the Federal Acquisition Regulations (FAR), which is used by most Federal Government Agencies and is updated regularly.²⁶ Nevertheless, modernization and investment in training and hiring will be required to align Acquisition Services with GPO's strategic goals.

D. INSPECTION RECOMMENDATIONS

- **Inspection Recommendation 1:** Prioritize greater investment in recruiting employees with knowledge of modern systems that can streamline/modernize GPO operations, retain staff, and train existing employees to ensure that human capital and expertise is leveled across the agency. *(Reaffirmation of prior recommendation)*
- **Inspection Recommendation 2:** Evaluate recently implemented recruitment and retention initiatives and document lessons learned. *(Reaffirmation of prior recommendation)*
- **Inspection Recommendation 3:** Adopt and execute strategic workforce planning. *(Reaffirmation of prior recommendation)*
- **Inspection Recommendation 4:** Determine the to-be state of Acquisition Services and then ensure that the right infrastructure is in place and staff are sufficiently trained. *(Reaffirmation of prior recommendation)*

²⁶ GSA. (2022). FAR. Available at <https://www.acquisition.gov/browse/index/far>.

II. FINDING 2

The practices that helped GPO modernize over the past decade are inconsistently used across business units and insufficient to get GPO to where it needs to be a decade (or more) from now.

Although GPO has made progress since the publishing of the 2013 NAPA report, the agency still lacks a forward-leaning mindset that will ensure it is prepared for the future. Additionally, because the practices that contributed to progress made to date are not consistently applied across all business units, some business units continue to struggle with developing a forward-leaning mindset. Time and resources are spent catching up to the present day, rather than planning for the GPO of the future. Overall, GPO should shift from a reactive to a proactive stance if the agency hopes to continue delivering on its mission over the next decade. Instead of waiting for and reacting to criticism and addressing recommendations, GPO should proactively anticipate future needs across all of its business and support units and implement plans to meet them. Shifting to a more proactive and forward-looking mindset would help GPO more quickly adapt to customer needs and deliver increased value.

Finding 2 includes six sub-findings:

- **Sub-finding 2.A:** While some business units actively research the latest developments in technology, others do not, resulting in uneven progress toward modernization.
- **Sub-finding 2.B:** Solicitation and incorporation of customer feedback is inconsistent across business units.
- **Sub-finding 2.C:** While GPO has significantly improved its financial health over the last decade, its future financial health is tenuous and could hinder investments needed for further modernization.
- **Sub-finding 2.D:** Title 44 contributes to GPO's tenuous future financial health and constrains GPO from modernizing its full suite of products and services.
- **Sub-finding 2.E:** Congress has been an important ally in GPO's modernization efforts, although there are challenges with long-term strategic partnering given the statute governing the Joint Committee on Printing (JCP).
- **Sub-finding 2.F:** Strategic planning across the agency has been a helpful tool for modernization, but identification of strategic goals has been uneven across business units and there is limited centralized monitoring.

Each sub-finding is described in greater detail in the subsequent sections.

A. SUB-FINDING 2.A

While some business units actively research the latest developments in technology, others do not, resulting in uneven progress toward modernization.

While all business units face constraints to staying informed of technological developments, such as limited resources and competing priorities, the modernization of many business units was in part due to proactive and consistent scanning for technological developments. Both Plant Operations and SID explicitly noted that they routinely identify new technology, equipment, and developments in the publishing world through research, conference attendance, and site visits. For instance, GPO Officials from Plant Operations visited the University of Virginia to learn what others are doing, in the field, and to better understand how to modernize GPO's power plant and make it safer. In an effort to anticipate the needs of the future, GPO Officials from SID are actively researching components necessary for future generations of U.S. passports. Library Services and Content Management (LSCM) actively liaises with and visits depository libraries to better understand challenges and library-specific solutions. However, not all business units research the latest developments in technology or focus on actively looking to the future.

B. SUB-FINDING 2.B

Solicitation and incorporation of customer feedback is inconsistent across business units.

GPO strives to make its products and processes, both for external and internal customers, customer-oriented and customer-aligned. To that end, the agency values feedback from its users to determine whether it is fulfilling customer needs and improving the user experience.

A subset of GPO's business units, such as Customer Services and LSCM, routinely solicit feedback from external customers and use that feedback to refine services. For example, as noted in *Sub-Finding 1.A*, LSCM updated policies for repositories based on feedback from libraries and other stakeholders. However, other business units do not routinely solicit feedback from customers and stakeholders. One impediment is technological constraints. For example, a common platform for soliciting external customer feedback is often blocked by government firewalls. In addition, the internal "We Hear You" survey, which was scheduled for release in 2019, has been delayed given the high percentage of GPO staff without regular access to a computer. Although GPO Officials noted that the "We Hear You" was delayed partly due to ongoing COVID-19 pandemic circumstances, it was unclear why surveying GPO staff through this mechanism was put on hold indefinitely. Incomplete or imperfect feedback is better than no feedback.

In addition, while some business units are diligent in routinely surveying customers and turning feedback into action plans, others only release surveys during product launches or do not use feedback to adapt or update products or services. In the absence of regular, ongoing surveys and incorporation of feedback, certain GPO business units (Human Capital, Acquisition Services)

may find it difficult to assess how products and services fare over time and may struggle to discern future customer needs.

C. SUB-FINDING 2.C

While GPO has significantly improved its financial health over the last decade, its future financial health is tenuous and could hinder investments needed for further modernization.

GPO is one of a few Federal Agencies, along with the United States Postal Service (USPS) and the National Railroad Passenger Corporation (“Amtrak”), that acts as a quasi-business. GPO relies on a combination of appropriated funds, revenue, and the Business Operations Revolving Fund (funds for investments in modernization). Approximately 85% of GPO’s funding comes from revenue. This model has been scrutinized over the course of GPO’s history and was a subject of the NAPA report given GPO’s poor financial health in 2013.

Since the NAPA report in 2013, GPO has managed to continually improve its financial health without requesting additional funding from 2013 to 2020 despite undertaking a wide-ranging and costly effort to update GPO operations to the needs of the digital age. GPO accomplished this by executing several large-scale, cost-saving measures, including:

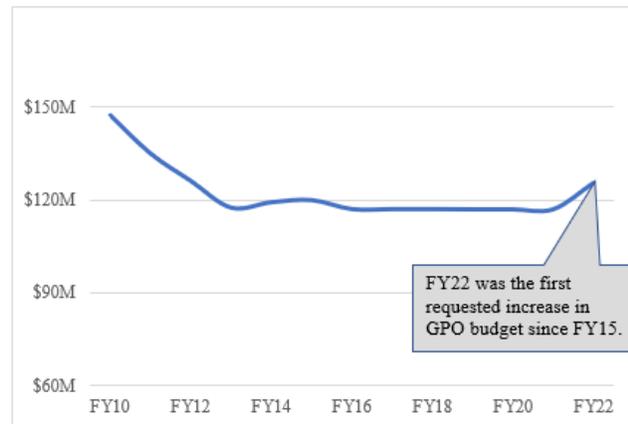
- Closing GPO’s “brick and mortar” bookstore.
- Shifting to a 4-day, 40-hour workweek in SID facilities.²⁷
- Implementing workforce buyouts.
- Closing a subset of Customer Services regional offices.
- Consolidating its storage facilities.

While financial challenges presented by the COVID-19 pandemic impacted GPO’s bottom line, as of 2021, GPO returned to operating at a net profit. In FY 2022, GPO requested its first budget increase since 2013 to accelerate investment in new products, services, and infrastructure (**Figure 6**, page 21).

²⁷ Report revised, per GPO Management Comments, to reflect that only SID facilities currently operate on a 4-day, 40-hour workweek. Plant Operations still operates on a 5-day, 40-hour workweek on three shifts to meet customer requirements.

However, GPO’s future financial health remains tenuous, largely because GPO is so heavily reliant on revenue from print and — like the private sector — is still determining how to optimize revenue from its digital content. In addition, GPO’s sources of revenue are not particularly diverse. For example, more than 30% of GPO’s annual revenue is generated by passport production for the State Department. In the early months of the COVID-19 pandemic, passport production for the State Department was paused—highlighting the risk of being overly dependent on any one revenue source.

Figure 6. GPO Appropriated Budget, FY10 – FY22.



Source: U.S. Government Publishing Office (2021), Budget Justification: Fiscal Year 2022.

In 2013, GPO strengthened the role of the Strategic Investment Planning Committee and required business unit leadership to justify the expected return on investments to the committee. Despite this upfront justification, GPO struggles with quantifying the exact cost savings of investments after-the-fact, particularly for less straightforward purchases. For example, GPO can pinpoint the dollars saved in transit benefits due to the shift to telework. However, during fieldwork GPO was asked to specify the actual, realized cost savings associated with purchasing new printers and publishing equipment. In response, a GPO Official indicated that GPO had not yet conducted this type of post-implementation cost savings assessment.²⁸ Financial accountability and advocacy for investment for these types of upgrades by business unit-level leadership will likely continue to pay dividends as the agency phases out older, costlier systems and infrastructure for new technology that allows GPO to do “more with less.” Evaluating and quantifying the impact of these measures to budget authorities becomes even more important as GPO products become increasingly digitized.

There is a risk that critical components of GPO will not further modernize at the desired pace without a close examination of GPO’s business model and maturation of return on investment analysis. Unfortunately, some GPO programs and functions providing clear public goods to the American public currently and unnecessarily compete for limited, revenue-generated funds. For example, **govinfo** is critical to the agency’s mission, as it serves to provide the public with free access to official government publications. Despite its importance, **govinfo** is not fully funded through appropriations and competes with other agency priorities for revolving funds. Until or

²⁸ In GPO’s Management Comments, the Agency subsequently reported that the reduction in staffing realized from investment in digital press technology yielded approximately \$1,078,100 in labor and benefits cost savings.

unless critical components such as **govinfo** are fully appropriated, they are in danger of becoming marginalized due to revenue constraints that could be beyond GPO's control. While the NAPA review recommended that GPO consider including **govinfo** as a separate line-item appropriation, there is debate among GPO Officials regarding whether the funding amounts and funding mechanism for **govinfo** will allow room for innovation and adaptation to new technologies.

D. SUB-FINDING 2.D

Title 44 contributes to GPO's tenuous future financial health and constrains GPO from modernizing its full suite of products and services.

Because GPO's smart credentialing services were consistently generating revenue, the NAPA review recommended expanding this line of business to state and local governments. As noted in *Sub-Finding 1.A*, GPO's SID business unit has creatively and actively expanded its service offerings to include printing fingerprint cards²⁹ for the FBI as well as health benefit cards and personal identity verification/retired military identification cards for VA. Although Title 44 does not directly or explicitly restrict state and local governments from purchasing smart cards from GPO, section 501 states that "Printing and binding may be done at the Government Publishing Office only when authorized by law."³⁰ Since no provision in law authorizes work for State and/or local governments, GPO is practically unable to provide printing or binding goods or services for these potential clients.³¹ Therefore, GPO's ability to generate maximum revenue from this line of work is limited.

As was also noted in *Sub-Finding 1.A*, Title 44 authorizes the Superintendent of Documents to make certain items available for sale to the public, which GPO had historically offered through a dedicated bookstore. Despite its transition from "brick and mortar" stores to an online store, GPO has been losing money on its bookstore for more than a decade.

Title 44 also constrains GPO from modernizing its full suite of products and services. For example, the scope of the FDLP program is supposed to include published materials from all three branches of government including congressional bills, committee hearings, House and Senate documents and reports, and publications from executive agencies. When documents were generated via paper (i.e., "tangible"), there was a clear process in place allowing GPO to receive, catalog, and disseminate materials. However, most U.S. Government products are now generated

²⁹ Report revised per footnote 18.

³⁰ 44 United States Code § 501.

³¹ Report revised, based on GPO Management Comments, to clarify that the issue at hand is a lack of explicit authorization, not a statutory restriction.

electronically and are considered “born digital.”³² But because Title 44’s definition of “publication” does not explicitly say “digital,” materials that should be included in the FDLP are often not. As a result, there are millions of documents missing from the FDLP.³³

Although GPO-proposed changes to Title 44 would codify GPO’s responsibilities in a digital context and provide room for modernization, there seems to be little traction to formally adjust Title 44. When asked for the most recent proposed changes to Title 44, GPO Officials directed the inspection team to comments GPO submitted to Congress in January 2018 but these comments have not yielded any specific statutory change.^{34,35} These circumstances introduce a challenge to GPO as it is caught between a need to modernize and keep pace with innovation and yet it remains constrained by an outdated statute. Although GPO does this while operating within the oversight of the JCP, the question remains how much further can GPO modernize without the necessary statutory foundation to support its efforts.³⁶

E. SUB-FINDING 2.E

Congress has been an important ally in GPO’s modernization efforts, although there are challenges with long-term strategic partnering given the statute governing the Joint Committee on Printing.

According to GPO Officials, Congress is one of GPO’s most important customers, if not the most important customer. Maintaining effective and open communication with Congress is essential to the appropriation of adequate funding and ensuring that GPO’s essential print functions outlined in Title 44 meet the needs of Congress as it continues to modernize the production and delivery of documents. At the center of GPO-Congressional relations is the JCP, a joint House and Senate committee “composed of five Representatives and five Senators, the panel oversees the operations of the U.S. Government Publishing Office (GPO).”³⁷

³² According to the Association of Research Libraries, approximately 97% of U.S. Government products are now “born digitally.”

³³ According to multiple sources including the Association of Research Libraries and the Preservation of Electronic Government Information project.

³⁴ GPO (2018). Comments on Draft Legislation to Amend Title 44, U.S.C. (December 11, 2017 version; Comments submitted January 31, 2018). Available at: <https://www.fdlp.gov/comments-on-draft-legislation-to-amend-title-44-u-s-c-december-11-2017-version-comments-submitted-january-31-2018>.

³⁵ GPO reported in its Management Comments that it had formally shared a package of proposed legislative changes on at least 2 occasions – one in July 2020 and one in March 2022. Although these packages were referenced in GPO Management Comments the content was not shared with the OIG or the project team for review. As such, the project team was unable to assess or evaluate the nature of these legislative proposals.

³⁶ GPO reported in its Management Comments that it had received endorsement for the establishment and expansion of smart credentialing services in multiple correspondences with the JCP. However, these were not shared with the OIG or the project team for review.

³⁷ <https://cha.house.gov/subcommittees/joint-committee-printing-116th-congress>.

GPO’s Congressional Relations business unit is devoted to managing the relationship with the JCP, including producing annual reports to keep committee members abreast of GPO operations, financial health, and other metrics, and regularly testifying before the committee. These communications channels have enabled GPO to advocate for its needs and have helped ensure adequate funding to date for modernization efforts and Title 44 print obligations.

Another challenge GPO encounters with making greater progress with congressional partners is the frequency of changes in JCP leadership, membership, and committee staff. According to one GPO Official, these changes hinder long-term co-planning as members and committee staff turnover affects deep familiarity with the subject matter or history of GPO.

F. SUB-FINDING 2.F

Strategic planning across the agency has been a helpful tool for modernization, but identification of strategic goals has been uneven across business units and there is limited centralized monitoring.

In 2014, GPO adopted a formal process for conducting, documenting, communicating, monitoring, and evaluating agency strategic planning activities across business units. GPO is in the midst of updating its agencywide strategic plan. On March 31, 2022, GPO released a draft of its next strategic plan for public comment. For the purposes of this report the inspection team used the published GPO plan covering FY18-22. GPO’s published agencywide strategic plan goals and associated strategies (**Figure 7**) were well-communicated across the agency and GPO leadership afforded business units with guidance and flexibility to develop solutions. As a result, the strategic plans of most business units reflect the priorities of the agencywide plan.

Figure 7. GPO FY 2018-2022 Strategic Plan Goals and Strategies.

GOALS	STRATEGIES
Strategic Goal 1: Exceed our stakeholders’ expectations.	Strategy 1: Meet evolving stakeholder needs with a modern publishing portfolio of print and digital products and services.
	Strategy 2: Provide the most trusted secure credentialing products and services in government.
	Strategy 3: Use analytics to improve the customer experience.
	Strategy 4: Streamline Customer-Facing Processes to Optimize the Customer Experience.
	Strategy 5: Meet the evolving needs of Congress.

GOALS	STRATEGIES
Strategic Goal 2: Enhance access to Federal Government information.	Strategy 1: Increase the amount of U.S. Government information available for free to the public and enhance access to information to meet evolving user needs.
	Strategy 2: Support access and discoverability through the Federal Depository Library Program and the Cataloging and Indexing Program.
	Strategy 3: Ensure security, authenticity, and accessibility of the nation’s publications for future generations.
Strategic Goal 3: Strengthen our position as the governmentwide authority on publishing.	Strategy 1: Provide best practices, standards, and training to support evolving Federal agency publishing needs.
	Strategy 2: Provide products and services at every stage of the publishing lifecycle.
	Strategy 3: Communicate our unique value and evolved portfolio of products and services.
Strategic Goal 4: Promote collaboration and innovation within government.	Strategy 1: Provide shared services across government and connect Federal Agencies with private sector businesses through procurement program.
	Strategy 2: Form strategic partnerships where collaboration and innovation can flourish.
	Strategy 3: Support governmentwide innovation and interoperability.
Strategic Goal 5: Engage employees and enhance internal operations.	Strategy 1: Build and retain a workforce that is talented, diverse, motivated and committed.
	Strategy 2: Reduce our environmental footprint.
	Strategy 3: Modernize and streamline internal processes and systems.

GPO’s success in communicating both agencywide and business unit-level strategic goals resulted in widespread “buy in” and awareness of how seemingly routine improvements support overall goals. For example, GPO’s agencywide strategic plan cited the goal of more effectively marketing the agency’s services to customers and stakeholders. As a result, most business units developed strategies to use modern communication tools like social media to actively market GPO products and services.

However, the maturity of the strategic plans varies across business units in terms of the measurability of specific goals and their long-term impact. Similarly, the currency of the strategic plans also varies across business units. Some have specific, measurable goals that support a long-term vision, while others have unmeasurable goals that only support a short-term vision. In addition, there was no evidence of routine monitoring or evaluation of business unit-level goals.

Figure 8 shows that of the 15 business unit strategic plans the project team received and the agencywide strategic plan, only 4 were found to be current, 2 are outdated by 1 fiscal year, and 10 are outdated by more than 1 fiscal year. One business unit (Customer Services) is outdated by more than 2 fiscal years. One business unit (Acquisition Services) provided no specific business unit strategic plan.

During fieldwork, GPO Officials noted ongoing work to develop the next agencywide strategic plan. However, when the inspection team inquired about outdated business unit strategic plans, especially those outdated by more than 1 fiscal year, GPO Officials indicated that they were waiting for the pending agencywide strategic plan to be completed before updating individual unit plans. The inspection team further inquired whether business units considered extending the existing plans to be applicable through the current fiscal year despite the pending agencywide strategic plan update. GPO Officials provided no justification as to why business units with outdated plans could not or did not update their plans to cover the current fiscal year, regardless of an upcoming agencywide strategic plan update.

The challenge of modernization has fallen heavily on the Information Technology and Systems (ITS) business unit. While the agencywide strategic plan does not directly specify how to achieve its goals, ITS preemptively developed a strategic plan to enhance access to Federal Government information (Strategic Goal 1) by transitioning GPO’s data infrastructure to modern, resilient, cloud-based systems. Additionally, they worked to strengthen GPO’s position as the governmentwide authority on publishing (Strategic Goal 3) by aggregating most operations to a single system of record and phasing out siloed “single-use systems.” They also promoted collaboration and innovation within the U.S. Government (Strategic Goal 4) by improving shared access across the U.S. Government to GPO information and supporting interoperability by switching to modern file formats like XML and implemented shared government systems for print procurement.

Figure 8. Status of Strategic Plans by GPO Business Unit.

Business Unit	Strategic Plan Coverage (in FYs)
Acquisitions Services	None Provided
Customer Services	2015–2019
Equal Employment Opportunity	2016–2020
Human Capital	
Information Technology and Systems	
Library Services and Content Management	
Official Journals of Government	
Programs, Strategy, and Technology	
Publications and Information Sales	
Security and Intelligence Documents	
Office of General Counsel	2016–2021
Plant Operations	2017–2021
Administrative Services	2017–2022
GPO (Agencywide)	2018–2022
Finance	2021–2025
Security Services	2021–2026

>1 FY Outdated
<1 FY Outdated
Current

G. INSPECTION RECOMMENDATIONS

- **Inspection Recommendation 5:** Conduct an environmental scan of the private sector and other government publishing entities to discover newly available technology to potentially implement at GPO. *(New recommendation)*
- **Inspection Recommendation 6:** Establish and implement clear customer satisfaction standards and metrics for all GPO organizational units. Include customer satisfaction standards and metrics in all organizational unit strategic plans. Identify, document, and implement improvements based on customer feedback. *(New recommendation)*
- **Inspection Recommendation 7:** Develop a forecast of expected needs of Federal Government Agencies and other customers, both in the short- and long-term (e.g., 3-D printing). *(Reaffirmation of prior recommendation)*
- **Inspection Recommendation 8:** Develop and implement a standard operating procedure for assessing and quantifying the post-implementation return on investment of capital investments and policy changes. *(New recommendation)*
- **Inspection Recommendation 9:** Communicate to Congress the ways statutory authority (Title 44) constrains GPO efforts to modernize and recommend Congress change statutory authority to enable GPO to expand its lines of business and generate additional revenue. *(New recommendation)*
- **Inspection Recommendation 10:** Increase net budgetary requests if additional resources are needed to keep GPO's products and services in pace with digital transformation and to ensure GPO can maintain **govinfo**. *(New recommendation)*
- **Inspection Recommendation 11:** Update business unit-level strategic plans, where outdated, to cover current fiscal year efforts. Ensure that plans include realistic timeframes with both short- and long-term goals and corresponding metrics for success for accountability purposes. Ensure GPO leadership is aligned on and providing consistent messaging about agencywide priorities and business unit-level strategic plans. *(New recommendation)*

III. FINDING 3

Persistent challenges related to Human Capital and Acquisition Services have impeded GPO’s ability to be adequately organized, staffed, equipped, and trained to implement transformation.

As noted in *Sub-Finding 1.B* and *Sub-Finding 1.C*, there are outstanding actions needed to strengthen GPO’s Human Capital and Acquisition Services business units. The responsibilities carried out by these business units are crucial for both conducting routine business and supporting agencywide transformation.

Finding 3 includes four sub-findings:

- **Sub-finding 3.A:** With nearly 50% of its workforce eligible to retire in the next 5 years, GPO is facing an imminent and major disruption to its workforce.
- **Sub-finding 3.B:** Implementation of strategic recommendations has been slowed by high turnover in senior leadership positions and missing, centralized mechanisms for managing and monitoring strategic change.
- **Sub-finding 3.C:** Continued reliance on paper-based and manual systems slows hiring processes and acquisition transactions.
- **Sub-finding 3.D:** Chronic, system-wide issues with acquisitions stymy GPO’s ability to acquire the materials, tools, and services necessary to fully achieve strategic goals.

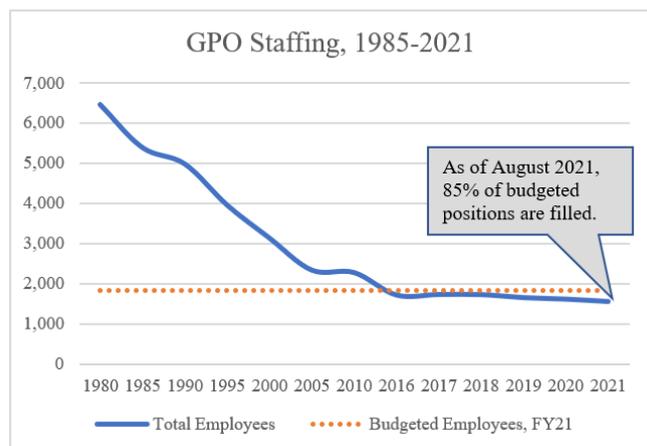
Each sub-finding is described in greater detail in the subsequent sections.

A. SUB-FINDING 3.A

With nearly 50% of its workforce eligible to retire in the next 5 years, GPO is facing an imminent and major disruption to its workforce.

Up to 50% of GPO’s workforce is eligible for retirement over the next 5 years and, as of the end of 2021, nearly all GPO business

Figure 9. Overview of GPO Staffing, FY1985 – FY2021.



Sources: U.S. Government Publishing Office (2021).
Budget Justification: Fiscal Year 2022.

units were understaffed despite available slots (**Figure 9**, page 28).³⁸

As one example, there were specific areas and positions within Plant Operations (e.g., Testing & Technical Services, Graphic Systems Development) with vacancy rates as high as approximately 40%, despite Plant Operations' role on the leading edge of GPO's modernization efforts.^{39,40}

As noted in *Sub-Finding 1.B* and in previous external assessments, GPO has difficulties attracting, retaining, and training qualified employees. GPO has begun to address these issues by implementing a suite of recommendations from OPM including standardizing performance management infrastructure, offering greater flexibility and telework options, expanding and diversifying its recruitment strategies, and providing more funding for training. Some of these efforts are designed to attract workers with expertise in cutting-edge digital technology and other efforts are designed to preserve skills within GPO that are no longer commonly taught. For example, GPO plans to roll out an apprenticeship program in 2022 to teach skills like bookbinding. This program is of critical importance as trade schools that previously served as training grounds for future GPO staff are dwindling in size or have shut down. As stated in several interviews with GPO Officials, the agency will never be fully digital; thus, maintaining these skills remains necessary for GPO products that are still printed.

However, the effectiveness and impact of these collective efforts have been neither documented nor assessed. As *Sub-Finding 1.B* notes, hiring delays persist and are exacerbated by competing demands for digital expertise from the private sector. With a high volume of expected vacancies and a hiring process that can take up to 6 months, GPO is at risk of not adequately being staffed or having adequately trained staff. In addition, GPO does not have a knowledge management strategy. Knowledge capture and transfer were flagged as concerns by several business units given the high volume of imminent retirement-eligible staff. Potential implications of inadequate and/or poorly trained staff include longer project timelines, production and process delays, and increased risk of errors.

Though GPO has enjoyed relatively strong retention of its employees, a tenured workforce such as GPOs also has the potential to hinder modernization efforts. Employees who have remained with the agency for decades (**Figure 10**, page 30) may require additional training on modern systems and digital literacy that would help move GPO into the 21st century.

³⁸ According to documents provided by Finance during the August-September 2021 data call.

³⁹ According to documents provided by Human Capital during the August-September 2021 data call.

⁴⁰ Report revised per GPO Management Comments.

Figure 10. GPO Employee Length of Service Compared to Other Large Independent U.S. Government Agencies with >1,000 employees.

LENGTH OF SERVICE	SHARE OF GPO WORKFORCE	SHARE OF WORKFORCE, OTHER LARGE INDEPENDENT AGENCIES
<10 years	26%	35%
11-20 years	34%	35%
>20 years	40%	30%
Average Length of Service	19 years	15 years

Source: U.S. Office of Personnel Management (2021), Fed Scope: Employment Statistics.

While GPO Officials indicated that the agency is exploring alternatives for developing new talent from within through apprenticeship programs, there was scant information about what GPO’s plans are for its large retirement-eligible workforce. If GPO intends to offer sweeping professional development opportunities to retrain and build new skillsets as new technology and equipment come online then this approach has not yet been reflected in its budget request (Figure 6, page 21). Alternatively, if GPO continues to primarily acquire new talent and skillsets through attrition, it may be jeopardizing how quickly it can implement modernization efforts if staff are unable or unwilling to learn the new skills and capabilities needed.

B. SUB-FINDING 3.B

Implementation of strategic recommendations has been slowed by high turnover in senior leadership positions and missing, centralized mechanisms for managing and monitoring strategic change.

While overall strategic goals have been consistent through changes in senior leadership, high turnover has hindered implementation. For example, between 2016 and when Director Halpern assumed office in December 2019,⁴¹ there have been five different acting GPO Directors.⁴² Due to differences in how senior leaders approach achieving strategic goals, high leadership turnover has resulted in spent energy as business units frequently shift their approach to achieving strategic goals and implementing recommendations. Because senior leadership positions are appointed, selecting leaders with consistent strategic goals is largely outside of agency control. Greater emphasis should be placed on tracking and managing progress from a centralized location to ensure continuity of guidance and streamlined monitoring of GPO modernization efforts regardless of senior leadership changes. Doing so establishes a clear history of agency

⁴¹ Report revised, per GPO Management Comments, to reflect Director Halpern’s assumption of office in December 2019.

⁴² Based on information collected during fieldwork, November 2021.

vision, which may help senior leadership remain aligned with previous strategic goals and recommendations.

C. SUB-FINDING 3.C

Continued reliance on paper-based and manual systems slows hiring processes and acquisition transactions.

As noted in *Sub-Finding 1.B*, Human Capital is gradually progressing from paper-based to electronic records of organizational charts, position descriptions, and position identification numbers. Monster Classification, which allows managers to complete a position description within the system and develop a position description library, is an example of an automated system that Human Capital has begun shifting toward; previously, this was done manually, with hardcopy position descriptions being stored in filing cabinets or not at all.

However, Human Capital's transition efforts have been hampered by operational bottlenecks. One such bottleneck is Human Capital's reliance on a single individual as the primary developer for Human Capital technology.⁴³ Furthermore, this developer is a contractor who has other duties and responsibilities outside of a GPO portfolio and is not fully dedicated to serving only GPO's Human Capital development needs. Though GPO Officials indicated that they would like this contractor to work full-time on a Human Capital workforce management module, this is not currently a possibility due to contractual obligations. Such a bottleneck threatens to impede modernization progress across the agency as it hinders getting the right staff into the jobs needed to fill to prepare appropriately for the future. GPO Officials were asked whether having a sole developer working on Human Capital technology development needs presented a unique risk as a single-point-of-failure. The interviewed GPO Officials responded by saying that these circumstances did not present a particular concern and did not rise to a significant level of risk for GPO Human Capital. Additionally, GPO Officials stated that attempting to bring in more resources or developers to expedite the development process was its own risk and that staying the course was preferred over bringing in more developers.⁴⁴

Furthermore, until the transition to more digital and automated solutions is complete, GPO will continue to face hiring delays because of issues such as the need to track down signatures, discrepancies in organizational charts between business units, and lost or outdated position descriptions. One extreme example noted during interviews is that when someone left GPO and their corresponding position description was revisited for the open role, it was discovered that the position description had not been updated since 1989.

⁴³ Multiple GPO Officials indicated during fieldwork that there is a GPO Human Capital employee managing and directing the Human Capital technology development work, but that this work is being performed exclusively by a single contracted developer.

⁴⁴ Based on information collected during fieldwork, November 2021.

Upkeep of organizational charts is also challenging because it is currently a distributed responsibility that lies with individual business units rather than a centralized responsibility for Human Capital. While some business units routinely update charts to match their workforce, others do not, which leads to imprecision in forecasting training and hiring needs. For example, some business unit organizational charts were last approved in 2019, while some were last approved in 2021, suggesting these charts are not regularly updated when staff turnover occurs.⁴⁵ Without that information, GPO will continue to face challenges with modernizing if it cannot see a full and comprehensive picture of its current state.

In a similar manner as Human Capital, Acquisition Services is gradually progressing from manual to automated systems. Until the transition is complete, GPO will continue to face delays in procurements and face errors in everyday tasks such as writing contracts and processing payments. For example, contracting specialists manually copy and paste clauses into contracts instead of relying on contracting writing software. In addition, several GPO Officials noted that contracting specialists take hours or even days to respond to basic contracting emails that they could quickly respond to if the information was all centrally captured and documented.⁴⁶ These delays ultimately promote the perception that Acquisition Services is poorly trained and inadequate in performing its responsibilities serving agency customers, a common refrain heard from GPO Officials across the agency.

D. SUB-FINDING 3.D

Chronic, system-wide issues with acquisitions stymy GPO’s ability to acquire the materials, tools, and services necessary to fully achieve strategic goals.⁴⁷

As noted in *Sub-Finding 1.C*, an independent review and previous GPO OIG reports identified significant problems with Acquisition Services that are impacting GPO’s ability to efficiently modernize its products and services. Previous findings pointed to insufficient technology as one system-wide issue. Previous findings also point to issues with acquisitions business processes that are inefficient, inconsistent, unclear, and undocumented. According to the 2021 KAA report, “the three most often heard customer complaints are the lack of communication, lack of standard process, and lack of attention to detail.” Delays persist throughout the contract lifecycle, which in isolation lead to minor delays (e.g., “PR packages are held for weeks before someone calls to say something is missing”) but in the aggregate lead to major delays.

These issues are exacerbated by GPO’s reliance on outdated procurement directives and processes. For example, the agency relies on “confusing instructions...and out-of-date guidance” in its procurement activities.⁴⁸ One GPO Official from Acquisition Services indicated that

⁴⁵ According to documents provided by Human Capital during the August-September 2021 data call.

⁴⁶ Based on information collected during fieldwork, November 2021.

⁴⁷ KAA 2021.

⁴⁸ Ibid.

addressing these confusing instructions and outdated guidance, is a critically important first step, and that updating the acquisitions regulations in the MMAR could conservatively require at least one full-time equivalent (FTE) staff member dedicated to updating it. Even then, it might take 2 to 3 years to update and overhaul the MMAR appropriately.

Addressing some of Acquisition Services' issues, such as updating the MMAR, requires substantial investment that appears to have been neglected in the past and will be exacerbated if other Acquisition Services issues are not also resolved. For example, previous findings note that Acquisition Services does not have enough staff. One interviewee portrayed Acquisition Services as being "crippled with vacancies." In addition to not having enough staff, Acquisition Services staff is not adequately trained and credentialed to support the needs of the agency. One GPO Official noted that Acquisition Services should have at least four warranted Contracting Officers (COs) to oversee and manage the unit's contract workload but that currently there are only two warranted COs responsible for serving as the signature authority for the entire agency. A lack of COs presents an operational risk that could hinder and impede everyday GPO operations.

E. INSPECTION RECOMMENDATIONS

- **Inspection Recommendation 12:** Incorporate business unit-level progress toward execution of strategic plans in an Executive-level monitoring tool, such as the GPO Executive Dashboard. *(New recommendation)*
- **Inspection Recommendation 13:** Appoint a Chief Strategy Officer to help ensure agency vision and goals are consistent across business units and leaders. *(New recommendation)*
- **Inspection Recommendation 14:** Accelerate progress toward electronic-based records management and use of automation in Human Capital and Acquisition Services to make processes more efficient, effective, and accountable. Invest in additional infrastructure and dedicated staff to implement enabling tools for digitization of paper-based processes. *(New recommendation)*
- **Inspection Recommendation 15:** Add a running list of pending procurement actions, by stage, to the GPO Executive Dashboard to increase accountability and awareness of processing time for various actions. *(New recommendation)*

IV. FINDING 4

GPO’s wide-ranging responsibilities hinder its ability to focus and deliver on its core mission.

GPO’s portfolio of products and services range from binding physical documents for Congress to managing the “Google of government information.” Furthermore, some of the products and services that GPO deliver are directly tied to its mission motto to “keep America informed” while others are tied to generating revenue.⁴⁹ A subset of GPO Officials noted a tendency for GPO to prioritize the needs of Congress and efforts of revenue-generating functions like passport production to the detriment of other core functions such as print procurement and human capital for GPO.

Finding 4 includes two sub-findings:

- **Sub-finding 4.A:** Compared to government publishing activities in peer countries, GPO executes a wide range of responsibilities.
- **Sub-finding 4.B:** GPO’s varied focus and hybrid business model has resulted in silos of excellence. These silos of excellence tend to have external customer accountability.

Each sub-finding is described in greater detail in the subsequent sections.

A. SUB-FINDING 4.A

Compared to government publishing activities in peer countries, GPO executes a wide range of responsibilities.

The benchmarking analysis revealed that the U.S. is unique when measured against peer countries⁵⁰ for scope of government publishing and printing responsibilities. Within Canada, the United Kingdom (UK), and the European Union (EU), GPO-equivalent functions are divided among at least three separate agency-equivalents and some functions have been privatized. And at the extreme, the Australian government phased out their GPO-equivalent agency in the 1990s and passed control of printing and publishing to individual offices and agencies. Essential centralized functions, like passport production and hosting of government documents to improve public access, are now handled by individual organizations with narrow responsibilities in Australia.

⁴⁹ Government Publishing Office. GPO FY18-22 Strategic Plan. Available at <https://www.gpo.gov/docs/default-source/mission-vision-and-goals-pdfs/gpo-strategic-plan-fy2018-2022>.

⁵⁰ When selecting peer countries, due to language constraints, the project team was restricted to countries that primarily use English in their legal documents. The project team also focused on countries with government responsibilities comparable to those of the U.S. Government. The project team also looked at states and private industry but found a lack of comparable information.

While the agency’s SID business has been a clear success in terms of revenue generation and modernization, this function arguably falls outside of GPO’s stated mission motto of “keeping America informed as the official, digital, and secure source for producing, preserving, and distributing official Federal Government publications and information products for Congress, Federal Agencies, and the American public.”⁵¹ SID’s work is about producing secure documents and credentials. Regardless of how well or efficiently it is done, this service does not clearly fit within the scope of information dissemination and publication production, preservation, or distribution as stated in GPO’s core mission.⁵²

Other functions may benefit from either consolidation within another agency or outright separation. For example, previous external reviews and GPO Officials noted that the functions performed by LSCM could be conducted—and may even be conducted more efficiently—by the Library of Congress or the National Archives and Records Administration. Both may be better aligned to and supportive of the functions LSCM performs today. The benchmarking analysis revealed that the GPO’s diverse focus, and at times hyper-focus on revenue-generating business units, has hindered modernization efforts for some business units. For example, GPO Officials noted several struggles LSCM faces within GPO in its efforts to modernize including the lack of prioritization of hiring for LSCM, the lack of familiarity among Human Capital for writing LSCM-specific position descriptions, and procurements for LSCM that stalled or procurements that were never posted. In addition, the benchmarking analysis revealed that the U.S. stands alone in combining the functions of LSCM within the same agency that is also responsible for providing a government bookstore, disseminating public information (e.g., **govinfo**), and producing passports and legislative documents (**Figure 11**, page 36).

⁵¹ Government Publishing Office. GPO FY18-22 Strategic Plan. Available at <https://www.gpo.gov/docs/default-source/mission-vision-and-goals-pdfs/gpo-strategic-plan-fy2018-2022>.

⁵² Ibid.

Figure 11. Scope of Responsibilities Under GPO Versus Other Countries and Political and Economic Unions Selected for Benchmarking Analysis.

COUNTRY / POLITICAL AND ECONOMIC UNION ⁵³	GOVERNMENT LIBRARY SERVICES	GOVERNMENT BOOKSTORE	GOVINFO EQUIVALENT	PASSPORT PRODUCTION	LEGISLATIVE DOCUMENTS
U.S.	GPO is responsible for all of these functions.				
Australia	National Library of Australia	National Library of Australia	Each government agency is responsible for hosting/publishing their own documents. After a set number of years, documents are hosted in the National Library of Australia archives.	Note Printing Australia ⁵⁴	Handled internally by Australian Parliament.
UK	Agency for Legal Deposit Libraries	The Stationary Office (private company)	National Archives	Thales (public company) ⁵⁵	Handled internally by UK Parliament.
EU	European Archives Group	Publications Office of the EU	Publications Office of the EU	Handled by each individual country	Handled internally by EU Parliament.
Canada	Depository Services Program	Public Services and Procurement Canada	Public Services and Procurement Canada	Canadian Bank Note	Handled internally by Canadian Parliament.

⁵³ Report revised, per GPO Management Comments, to reflect that the European Union is a political and economic union.

⁵⁴ Report revised, per GPO Management Comments, to reflect that passport production in Australia is provided by Note Printing Australia, a wholly-owned subsidiary of the Reserve Bank of Australia which is an Australian Government entity.

⁵⁵ Report revised, per GPO Management Comments, to reflect that passport production in the UK is provided by Thales, which purchased Gemalto (as the draft report stated) and its assets in 2019.

B. SUB-FINDING 4.B

GPO’s varied focus and hybrid business model has resulted in silos of excellence. These silos of excellence tend to have external customer accountability.

SID is perceived by GPO Officials as one of the highest-performing business units and a “silo of operational excellence” in the agency. GPO Officials indicated this perception is a result of SID’s high degree of accountability to U.S. Government agencies and the American public and efforts to maintain ISO certification. Thus, the business unit has clear indicators and metrics for success and failure. Additionally, the revenue generated and benefits of housing the production of secure credentials and passports under a centralized agency have benefited the broader U.S. Government and its citizens.

However, secure credentials and passport production could be considered a departure from GPO’s stated mission motto of “keeping America informed.”⁵⁶ Although Title 44 instructs Federal Agencies to use GPO for printing needs, many have found other solutions for secure credentials that do not include GPO. Regardless of how well it is done and how much revenue is generated, this service does not clearly fit within the scope of information dissemination and publication production, preservation, or distribution as stated in GPO’s core mission.⁵⁷ In contrast, GPO’s print procurement services business unit faces chronic challenges yet provides centralized print and publishing capabilities for which the agency was designed.

The over-emphasis on revenue generation seems to have diluted the resources and effort devoted to modernizing the functions of the agency that generate little to no revenue but are directly aligned with GPO’s mission.⁵⁸ By focusing on core functions—and with a revamped Title 44 that fits the 21st century—GPO would have a clear focus on which business units require the greatest effort and investment for modernization.

C. INSPECTION RECOMMENDATIONS

- **Inspection Recommendation 16:** Develop a report that evaluates options to reorganize certain GPO functions or responsibilities, possibly in partnership, under more appropriate government entities to right-size GPO's scope of work with their budget and workforce. *(New recommendation)*

⁵⁶ Government Publishing Office. GPO FY18-22 Strategic Plan. Available at <https://www.gpo.gov/docs/default-source/mission-vision-and-goals-pdfs/gpo-strategic-plan-fy2018-2022>.

⁵⁷ Ibid.

⁵⁸ Ibid.

V. POSITIONING GPO FOR THE FUTURE: REIMAGINING THE AGENCY'S ROLE AND BUSINESS MODEL IN MODERN GOVERNMENT

The implementation of recommendations made to GPO to date have advanced the agency's modernization efforts, but to truly position the agency for the future (i.e., the next decade and beyond), GPO will need to first determine if its mission and business model can coexist.

Although GPO has made substantial progress toward meeting the demands of a modern publishing agency, a self-evaluation of its role and mission is needed. The agency must undertake a more forward-looking forecasting initiative to discern where GPO needs to be in the next decade and beyond, rather than continuing to catch up over the next decade.

- **Inspection Recommendation 17:** Conduct a strategic, enterprise-wide, and forward-looking forecasting initiative to discern where GPO needs to be in the next decade and beyond.
(New recommendation)

While the agency has made meaningful progress toward modernizing itself and its products and services to catch up to current technology, GPO is unlikely to keep pace or be at the forefront of modernization without reassessing its identity and core mission and focusing on responsibilities that best fit its strengths. Many of the recommendations prescribed or suggested to GPO from prior reviews have focused on adapting the status quo to modern operations, such as investment in new equipment, streamlining and consolidating processes into digital systems, and shifting hardcopy paperwork to digital. And as GPO's responsibilities have expanded, the agency has had to simultaneously update and modernize disconnected processes, systems, and tasks, creating a major headwind to true strategic modernization. Instead of narrowing the question to whether GPO is capable of fulfilling its current responsibilities with modern, digital systems, a broader question is how GPO can become a strategically, forward-leaning agency that can influence modern government publishing and the digital transformation.

What is clear, from this inspection and prior reviews, is that the factors that have allowed GPO to “catch up” to where it is today will not be the same factors necessary to propel it into the future. If the agency continues in the future to operate in the same mission space and with the same business model, organizational structure, customer base, and strategic focus, then it may yield incremental progress, but it will not achieve a transformative change.

By reimagining its business model, GPO could pare back its scope of responsibilities to isolate functions where it can add the most value to government operations. A fundamental dimension to consider is the agency's revenue-generating business model. Of revenue-generating government agencies, GPO consistently returns a net profit. However, this inspection, in conjunction with prior reviews, of GPO's modernization efforts and internal operations raises three key questions for agency leaders and Congress to consider when developing strategic priorities that dictate GPO's role in the future.

Key Question 1: What is the best business model for GPO?

GPO currently functions as one of a few revenue-generating agencies. GPO's current operational focus has been on returning a net profit or at the very least breaking even. This aim stands in stark contrast to the other revenue-generating agencies who generally operate at a loss. However, this approach by GPO has resulted in GPO not requesting increased appropriations to fund broader strategic investments until recently.

Despite an operational focus on generating revenue, GPO's core mission is fulfilled by traditionally non-revenue-generating functions. With a core function of handling Congress' printing needs and official journals of government, GPO has limited opportunities to generate revenue through essential and mission-critical responsibilities. **Govinfo** is a prime example. The **govinfo** system is inherently a public good that fulfills the mandate of keeping Americans informed, albeit with little identified opportunity to increase agency cash flow. On the other hand, prime revenue-generating activities either fall outside of GPO's enumerated obligations (e.g., SID) or are authorized under Title 44 with little actual income from services (e.g., online bookstore).

Key Question 2: Does it make sense for GPO to be the primary agency responsible for certain tasks?

While SID's credentialing and passport printing services are a key "silo of excellence" within GPO, this service seems to be beyond the scope of GPO's primary mission. There are obvious efficiencies for this function to be housed in a centralized U.S. agency that provides whole-of-government support and creates economies of scale. However, is it an operational necessity that these functions be deliberately housed within GPO? Security and Intelligent Documents functions could be completely separated from the agency without affecting its ability to fulfill its core mission and Title 44 obligations.⁵⁹ The same question could be asked of other functions. For example, previously-documented chronic and system-wide issues with Acquisition Services stymie GPO's ability to acquire the materials, tools, and services necessary to support GPO's modernization efforts.⁶⁰ It may make more sense to outsource this function as has been previously proposed for consideration.⁶¹

⁵⁹ Government Publishing Office. GPO FY18-22 Strategic Plan. Available at <https://www.gpo.gov/docs/default-source/mission-vision-and-goals-pdfs/gpo-strategic-plan-fy2018-2022>.

⁶⁰ KAA 2021.

⁶¹ Ibid.

Key Question 3: Where should GPO focus?

GPO should take a critical look at what it does best and what functions are within its core mission and expertise while also pursuing changes to statutory authorities (Title 44).

Modernization efforts have suffered from a scattered focus on a wide range of tasks and responsibilities (**Figure 12**).

Figure 12. Characteristics of Selected GPO Products and Services.

GPO Product or Service	Customer	Core to GPO’s Mission	Specified in Title 44?	Revenue-generating?	Other Agencies with Similar Expertise
Official Journals of Government	Congress and public	Yes	Yes	Yes	N/A
Govinfo	Public	Yes	Yes	No	National Archives and Records Administration
Online bookstore	Public	Yes	Yes	Yes	N/A
Federal Depository Library Program	Libraries and public	Yes	Yes	No	Library of Congress
Security and Intelligent Documents	Federal Government and public	No	No	Yes	N/A
Customer Services contract printing	Federal Government	No ⁶²	Yes	Yes	General Services Administration (GSA)

One example is GPO’s online bookstore. While the agency is well equipped for printing, warehousing, etc., the online bookstore consistently fails to generate a net profit. Although this financial burden itself is typical for government agencies providing a public good, it is at odds with GPO’s current operational focus and business model. Operating a storefront—online or otherwise—as one of a multitude of agency tasks seems to dilute the level of effort that can be devoted to effectively operating its other business lines.

In addition to this examination of functions and focus, GPO should simultaneously explore what statutory and regulatory changes may be necessary to help hone its strategic focus. It is important that GPO pursue these two efforts in parallel so that the agency has both a sound statutory foundation and a strong clarity of purpose as it explores future operating environments.

⁶² Customer Services provides contract printers to Federal Government clients. In doing so, Customer Services serves as a specialized acquisition clearinghouse, which arguably overlaps with functions performed by the GSA which provides acquisition and contract solutions for “private sector services, equipment, supplies, and IT to government organizations and the military.” (GSA. About Us. Available at <https://www.gsa.gov/about-us>).

VI. POTENTIAL COURSES OF ACTION

GPO's path to becoming a center of innovation is uncertain and its success unlikely without adjustments to its budget, mission, and/or business model. This would require taking a critical look at what the agency does best, what it needs to do best, and what functions are outside the scope of its statutory authorities and stated mission.⁶³ Instead of trying to do more with less—which has been a guiding principle over the past decade—GPO could do the *right* things better with less. By honing the agency's focus on a narrower set of responsibilities and moving a subset of its activities to other government agencies, GPO could potentially become a strategic leader. GPO may benefit from a wider strategic evaluation of their identity and business model. A range of potential approaches to reorganization around a cohesive emphasis includes:

- **Deemphasize the need to generate revenue and acknowledge that increased congressional appropriations will be needed to fund future investments.**
GPO's clearest peers—USPS and Amtrak—consistently operate at a loss and are ultimately reliant on congressional appropriations to fulfill their essential and popular public good mission. An over-emphasis on headline profit-loss numbers dilutes the agency's efforts to fulfill their primary mission set with maximum value for the American public. To continue delivering its broad and disparate portfolio, GPO would need to make a strategic request for additional congressional funding that will provide direct investment for its modernization efforts.
- **Divest non-revenue-generating business lines to focus on revenue-generating business lines, which requires a shift in mission.**
GPO faces headwinds to their profit maximization due to requirements to fulfill a wide range of codified and/or associated printing tasks that do not generate consistent revenue. GPO could consider pursuing a shift of its non-revenue-generating functions to agencies that might be more appropriate (e.g., transferring responsibility of the FDLP and govinfo to the Library of Congress and/or the National Archives) and focusing on the functions and responsibilities that consistently yield a net profit (e.g., SID and other profitable business units).
- **Divest revenue-generating business lines to focus on core mission functions.**
GPO operates within a conflicted business model that requires GPO to fulfill essential government functions—e.g., congressional support, official journals of government—while simultaneously generating revenue. This mismatch results in mission-essential, yet non-revenue-generating, business units lagging behind other business units in terms of modernization, primarily due to a lack of focus and/or investment. By removing the need to generate revenue altogether, the agency can focus on fulfilling these essential functions and

⁶³ Government Publishing Office. GPO FY18-22 Strategic Plan. Available at <https://www.gpo.gov/docs/default-source/mission-vision-and-goals-pdfs/gpo-strategic-plan-fy2018-2022>.

allocate the majority of its strategic improvement efforts and investment to modernizing these business units—and request realistic budget increases from year to year. In this approach, GPO would operate like other traditional, Federal Government Agencies.

This inspection also considered a course of action for GPO that assumes continuation of the status quo approach. Ultimately, this pathway was set aside because of the challenges and inefficiencies discussed in the Findings and Sub-findings. In addition, the status quo has primarily yielded operational and tactical advancements, not strategic transformation. Should GPO continue with the status quo approach, it should articulate its change efforts as optimization and continuous improvement rather than strategic transformation.

VII. CONCLUSION

Over the past decade, GPO has demonstrated an aptitude to initiate and implement operational changes to its systems and processes to reflect the increasingly digital nature of its work. Although GPO has largely shown a willingness to plan for and implement recommendations from prior evaluations, most of its progress has been focused on operational- and tactical-level adjustments to bring its systems and processes up to date with modern government capabilities.

The agency’s efforts have largely stopped short of making the hard decisions needed to develop a strategic framework to modernize its workforce, functions, and organizational structure. Due to its wide-ranging mission⁶⁴ and functions, GPO’s current trajectory appears focused on catching up to present-day needs rather than establishing a forward-leaning agency that anticipates and prepares appropriately for future needs. To truly achieve a strategic modernization, agency leaders across the GPO enterprise must be willing to challenge the status quo and reevaluate the scope of the agency’s responsibilities.

Over the next decade, with effective planning and coordination, GPO can build on prior progress to initiate and execute a strategic vision and plan that capitalizes on its strengths and refocuses agency priorities. Changing GPO’s strategic focus from perpetual “catch up” to leading the pack will be challenging, but GPO has the opportunity to find and implement novel ideas for the right portfolio of its products and services that can truly modernize agency operations and yield exceptional performance to the benefit of the Federal Government and the American public.

⁶⁴ Government Publishing Office. GPO FY18-22 Strategic Plan. Available at <https://www.gpo.gov/docs/default-source/mission-vision-and-goals-pdfs/gpo-strategic-plan-fy2018-2022>.

APPENDIX**VIII. ABBREVIATIONS**

CBO	Congressional Budget Office
CHCO	Chief Human Capital Officer
CLM	Contract Lifecycle Management
D&I	Diversity and Inclusion
EEO	Equal Employment Office
EU	European Union
FAR	Federal Acquisition Regulation
FBI	Federal Bureau of Investigation
FDLP	Federal Depository Library Program
FEVS	Federal Employee Viewpoint Survey
GAO	Government Accountability Office
GPO	Government Publishing Office
GSA	General Services Administration
HC	Human Capital
HR	Human resources
ITS	Information Technology and Systems
JCP	Joint Committee on Printing
LSCM	Library Services and Content Management
MMAR	Materials Management Acquisition Regulation
MPP	Merit Promotion Plan
NAPA	National Academy of Public Administration
OIG	Office of the Inspector General
OPM	Office of Personnel Management
P&IS	Publications and Information Sales
PD	Position descriptions
PIV	Personal identity verification
PST	Programs, Strategy, and Technology
SID	Security and Intelligent Documents
UK	United Kingdom
U.S.	United States
VA	Veterans Affairs

IX. GPO PROGRESS TOWARD IMPLEMENTING PRIOR RECOMMENDATIONS

A. *PRIOR RECOMMENDATIONS: GPO SERVICES, PROGRAMS, AND BUSINESS MODEL*

Figure 13. Prior Recommendations: GPO Services, Programs, and Business Model.

GPO SERVICES, PROGRAMS, AND BUSINESS MODEL	
PRIOR RECOMMENDATIONS (SOURCE, RECOMMENDATION #)	GPO PROGRESS AND ASSESSMENT
<p>1 To enable the Federal Government to carry out its role of providing information to its citizens, Congress should establish a collaborative interagency process, and designate a lead agency or interagency organization, to develop and implement a governmentwide strategy for managing the lifecycle of digital government information. (NAPA 2013, 1)</p>	<p>Assessment: External Control</p> <p>Since 2013, the transformation to digital government information has changed significantly, as has the landscape of agencies involved in digital government information and the broader digital transformation. While it does not appear that Congress has established a collaborative interagency process to develop a governmentwide strategy for managing the lifecycle of digital government information, GPO Officials do not see this as a hindrance to its transformation, and one GPO Official noted that development of a governmentwide strategy is not within GPO’s control or mission. Several GPO Officials noted their continued engagement in multiple interagency groups. For example, they provide advice to the Legislative Branch’s Bulk Data Task Force, Library of Congress, and National Archives and Records Administration. In addition, GPO actively engages with the Federal Publishing Council, which serves as an advisory council to GPO and provides a forum for the exchange of ideas among Federal printing and publishing representatives.⁶⁵ While a charter for the Federal Publishing Council was drafted in 2017, it has yet to be finalized.⁶⁶</p>
<p>2 To ensure GPO can carry out its mandate of providing permanent public access to government information, GPO should enhance its position and capabilities by offering an expanded set of services on a cost-recovery basis that contribute to the lifecycle management of government information. These services could include content management, metadata creation, authentication, preservation, and cataloging. GPO should develop strategies to encourage executive branch agencies to provide publications to GPO to enable permanent public access. (NAPA 2013, 2)</p>	<p>Assessment: Progress, but Concerns Remain</p> <p>GPO has enhanced, and continues to think of ways to further enhance, its position and capabilities to remain financially sustainable. Specifically, GPO is developing in-house products and services that can be used by other Federal Agencies.</p> <ul style="list-style-type: none"> • Products: GPO is transitioning from MicroComp to XPub, a new composition system (XML open-standard format) that enables export to multiple

⁶⁵ The full scope of the Federal Publishing Council is available at <https://www.gpo.gov/how-to-work-with-us/agency/federal-publishing-council>.

⁶⁶ According to a document provided by Customer Service during the August-September 2021 data call.

GPO SERVICES, PROGRAMS, AND BUSINESS MODEL	
PRIOR RECOMMENDATIONS (SOURCE, RECOMMENDATION #)	GPO PROGRESS AND ASSESSMENT
<p>3 To safeguard the historical documents of our democracy for future generations, GPO should work with depository libraries and other library groups to develop a comprehensive plan for preserving the print collection of government documents. This plan should include cataloging, digitizing, and preserving tangible copies of government publications, a timeline for completion, and options for supporting the effort financially, as well as a process for ingesting digitized copies into the Federal Digital System. Congress should appropriate funds for the purpose of cataloging, digitizing, and preserving the government collection. (NAPA 2013, 3)</p>	<p>formats including Word and PDF. XPub will save resources currently needed to rekey and proof documents. GPO is exploring its ability to offer XPub to other agencies. GPO is also exploring its ability to offer software-as-a-service for document authentication on a cost-recovery basis.</p> <ul style="list-style-type: none"> • Services: GPO is increasingly supporting agencies in non-print work, such as digital design support and facilitation of 508 compliance. GPO is also exploring its ability to offer technical assistance for document authentication on a cost-recovery basis. <p>GPO is continuing to find ways to obtain publications produced by executive branch agencies. GPO’s approach is multi-pronged to encourage agencies to provide information by raising awareness about GPO’s functions, periodically crawl and archive agency websites, and to strengthen legislation. In 2021, GPO proposed a revision to Title 44 Chapter 19 to broaden the definition of government information (to include “digital” government information) and to ensure that information from all three branches of government is included in its proposed “National Collection” (see more information on the National Collection below). However, the proposed changes were not made.</p> <p>Assessment: Completed or Sufficient Progress</p> <p>GPO has drafted the five-year <i>National Collection of U.S. Government Public Information: Strategic Plan for FY 2022–FY 2026</i>.⁶⁷ GPO’s vision is to cull materials from depository libraries, govinfo, and the Cataloging and Indexing program into a “National Collection.” The strategy acknowledges various challenges, such as the proliferation of born-digital publications, lack of a library at GPO headquarters to store tangible collections (permanently or until digitized), uncertainty as to the extent and condition of holdings in depository libraries, and the weeding/discarding of tangible documents. While the long-term vision will not be realized for 15 years, the five goals put forth in the strategic plan will help “lead (GPO) down the path to meeting the long-term goals.”</p>

⁶⁷ Document provided by LSCM during the August–September 2021 data call.

GPO SERVICES, PROGRAMS, AND BUSINESS MODEL	
PRIOR RECOMMENDATIONS (SOURCE, RECOMMENDATION #)	GPO PROGRESS AND ASSESSMENT
<p>4 To ensure the long-term preservation and access of digital government publications, GPO and Congress should explore alternative funding models govinfo⁶⁸ in order to ensure a stable and sufficient funding source. (NAPA 2013, 4)</p>	<p>During interviews, GPO Officials from LSCM reiterated the long-term nature and intense level of effort to fill gaps in building the National Collection. For example, to understand the extent of materials, GPO Officials noted the need to physically visit libraries and take inventory samples. However, this is not currently feasible given there are only three staff at the GPO responsible for digitizing the FDLP. One GPO Official (LSCM) noted that if they could invest anywhere within the FDLP program, it would be to assemble project managers and teams to begin scanning libraries.</p> <p>In terms of partnerships, GPO Officials noted that, since release of the NAPA report, GPO has built and maintained several key partnerships to both preserve and digitize tangible materials. For example, they are collaborating with the Law Library of Congress to digitize the historic serial set and with a network of library partners (the Federal Information Preservation Network) to preserve tangible and digital information in FDLP. In addition, they are collaborating with the University of Virginia’s Alderman Library to compare their metadata with GPO’s metadata.</p> <p>Assessment: External Control</p> <p>According to one GPO Official, in 1993, the Congressional Budget Office (CBO) estimated that the operational costs of govinfo ranged from \$3 Million to \$11 Million. According to GPO’s Budget Justification, FY 2022,⁶⁹ operational costs of govinfo are \$6.8 Million—in other words, they are within the CBO-estimated range, despite inflation.</p> <p>GPO uses funds from its Business Operations Revolving Fund—as opposed to appropriated funds—to operate govinfo. According to one GPO Official, only on occasion has Congress provided GPO with direct capital through appropriations. There are different perspectives on the benefits of securing appropriated funds for govinfo. One GPO Official</p>

⁶⁸ **Govinfo** was formally called the Federal Digital System (FEDSys) and therefore the NAPA report refers to FEDSys.

⁶⁹ Accessible at <https://www.gpo.gov/docs/default-source/congressional-relations-pdf-files/budget-submission/budget-submission-fiscal-year-2022.pdf>.

GPO SERVICES, PROGRAMS, AND BUSINESS MODEL	
PRIOR RECOMMENDATIONS (SOURCE, RECOMMENDATION #)	GPO PROGRESS AND ASSESSMENT

5 To preserve the relevance and viability of the FDLP, GPO should continue to collaborate with depository libraries and the broader library community to **develop a national strategic plan for the program** that gives libraries the flexibility and tools they need to provide permanent public access to government information in the digital age. (NAPA 2013, 5)

from Finance cautioned that if funds were appropriated to **govinfo** via “Salaries and Expenses,” any unspent prior-year balances exceeding 5 years would be returned to Treasury. On the other hand, the lack of stable funding was identified as both a weakness and a threat in PST’s Strategic Plan FY 2016–FY 2020.⁷⁰ One GPO Official from PST noted that **govinfo** would benefit from being fully appropriated—doing so would allow GPO not only to continue ongoing support for systems and infrastructure, but also provide funds needed for innovation.

Assessment: Completed or Sufficient Progress

Since release of the NAPA report, GPO has made significant progress in giving libraries greater flexibility and the tools to provide permanent public access. First, in August 2014, GPO revised the Legal Requirements and Program Regulations of the FDLP. Doing so allowed new selective libraries to opt to be entirely online so they do not have to store tangible resources and existing selective libraries with tangible publications to weed the bulk of their historical tangible collection. Depository libraries had the discretion to determine which materials should be tangible versus digital or both based on their own goals and user needs. Second, in 2015, the JCP approved GPO’s proposal to allow regional depository libraries to withdraw materials from their collections under certain specified conditions.

Most recently, in August 2021, GPO released a policy statement titled *Regional Depository Libraries Online Selections*. The policy allows regional depository libraries to select “online” as a format without having to make a corresponding tangible selection pending: (a) the title is accessible through **govinfo**, digital preservation steward partners, or trusted digital repositories of Federal agency; and (b) four geographically-dispersed print selectors have been secured.

As previously noted, GPO has drafted the *National Collection of U.S. Government Public Information: Strategic Plan for FY 2022–FY 2026*.⁷¹ One of the

⁷⁰ Document provided by PST during the August–September 2021 data call.

⁷¹ Document provided by LSCM during the August–September 2021 data call.

GPO SERVICES, PROGRAMS, AND BUSINESS MODEL	
PRIOR RECOMMENDATIONS (SOURCE, RECOMMENDATION #)	GPO PROGRESS AND ASSESSMENT
	<p>goals in the strategy is for GPO to increase interaction with depository libraries. The strategy also calls for assembling a task force to understand the impact of an all-digital FDLP. The task force is slated to present its findings in December 2022.</p> <p>Finally, GPO continues to collaborate closely with depository libraries to understand their needs and challenges. For example, per Title 44, GPO is required to report on the state of FDLP every 2 years. In doing so, GPO surveys libraries and analyzes needs. GPO also hosts conferences and presentations and travels to various libraries to build relationships and solicit feedback.</p>

6 To ensure the Publications and Information Sales Program (P&IS) continues to play a role in information dissemination and is able to recover costs, GPO should **continue to aggressively research and expand into new markets.** (NAPA 2013, 6)

Assessment: Progress, but Concerns Remain

Chapter 17 of Title 44 the Superintendent of Documents to offer certain categories of documents for sale to the public, which P&IS has done through various sales channels.⁷² As several GPO Officials noted, P&IS generated revenue before information became accessible and free online. Therefore, P&IS is trying to balance the competing need to generate revenue with its mission to provide access to government information.

According to its strategic plan for FY 2016–FY 2020, P&IS was trying to expand its market by optimizing the search engine for the GPO online bookstore, enabling mobile device compatibility within its online bookstore, advertising through social media, and hosting seminars and webinars to attract customers.⁷³ The strategy also highlighted steps to increase “print-on-demand.”⁷⁴ For example, P&IS was going to order fewer copies for sales inventory at the time of initial printing, use a print-on-demand vendor to replenish stock in small quantities, and continue to pursue Amazon as a print-on-demand sales channel. Specific milestones in the strategy included: (1) documenting workflow and business model for placing files and metadata into the Amazon database, and (2) processing

⁷² Report revised, per GPO Management Comments, to reflect that Title 44 authorizes the Superintendent of Documents to offer certain categories of documents for sale to the public.

⁷³ Document provided by P&IS during the August–September 2021 data call.

⁷⁴ Print-on-demand is an order fulfillment method where items are printed when an order is placed, thus eliminating waste and the need for storage.

GPO SERVICES, PROGRAMS, AND BUSINESS MODEL	
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and submitting at least 20 titles per year to Amazon. A more current strategic plan is not available.

During the data call, P&IS documented three additional activities related to market expansion: (1) targeted marketing campaigns; (2) reviewing pricing of each title to verify that GPO is capturing the minimum revenues detailed in Title 44; and (3) reviewing titles and revamping policies to optimize revenue.⁷⁵

Despite these activities, one GPO Official noted that P&IS has been losing money since the digital transformation began and the online bookstore had not recovered costs as a program. While that GPO Official applauded P&IS for trying to generate interest, they cited lack of specific goals as a barrier. They noted that a big challenge for P&IS is how to transition from bulk production to print-on-demand, which requires a different business model and not how GPO was originally designed. For example, it currently takes 6 to 8 weeks to distribute a book, but customer expectations have changed to immediate access.

7 To enable further cost reductions, Congress should consider changes in its demand for print. GPO should **develop estimates of cost savings that could be realized through potential changes in the requirements for printing the Congressional Record**. GPO should quantify the savings that could be realized through such options as printing fewer copies of the Congressional Record or ending the daily start-of-business print requirement while continuing to provide electronic access. (NAPA 2013, 7)

Assessment: External Control

Two GPO Officials nuanced this recommendation from NAPA. They noted that printing costs are not incremental; the costs to ready the press to print the first copy such as information technology and hosting comprise the majority of costs, so a reduction in the number of print copies doesn't result in expected savings—reducing the number of print copies by 50% does not decrease costs by 50%. A report from the Congressional Research Service⁷⁶ independently raises this point, noting that, without reliable cost models for digital information systems, it is hard to verify the assertion that the elimination of paper versions of some publications such as the Federal Register and Congressional Record could result in cost and other resource savings.

The current number of copies—1,500, down from 20,000 in the 1990s—is intentional and at the explicit

⁷⁵ Information provided by PIS during the August-September 2021 data call.

⁷⁶ Government Printing, Publications, and Digital Information Management: Issues and Challenges. Nov 8, 2017. Obtained here: <https://sgp.fas.org/crs/misc/R45014.pdf>.

GPO SERVICES, PROGRAMS, AND BUSINESS MODEL	
PRIOR RECOMMENDATIONS (SOURCE, RECOMMENDATION #)	GPO PROGRESS AND ASSESSMENT
	request of Congress. Several GPO Officials noted that they will continue to provide print copies so long as there is demand from Congress.

8 To continue to realize governmentwide benefits, GPO should **continue to perform executive branch printing**, while further reducing costs and improving customer service. (NAPA 2013, 8)

Assessment: Completed or Sufficient Progress

GPO has continued to perform executive branch printing while further reducing costs and improving customer service. In FY 2021, the highest billings were all executive agencies: Department of State, Department of Health and Human Services, the VA, Department of Homeland Security, and Defense Logistics Agency.⁷⁷ More recently, GPO has begun discussions with the Department of Justice.

To improve efficiencies and customer service, GPO (1) adopted a new ordering system that provides customers from all three branches of the Federal Government the opportunity to access GPO’s products and services (Publish); (2) deployed a new interagency invoicing system (G-invoicing); (3) deployed a secure file transfer protocol system so customers can transmit materials through a secure site as opposed to physical transfer; and (4) created Agency Procurement Services Teams to handle agencies requirements for products and services from start to finish. Customer Service has a marketing plan and tracks status against its plan on a quarterly basis.⁷⁸ The plan highlights activities to raise awareness of GPO’s mission and capabilities such as “GPO Basic Training Boot Camp” sessions, “30 Minutes with GPO” webinars, and the “How to do Business with GPO” guide.

While it is not possible to isolate executive agency customers from legislative agency customers, results from the 2020 Customer Service Satisfaction Survey revealed a “very satisfied customer base.”⁷⁹ When asked about their overall experience with GPO’s organizations, procurement programs, and services in the past 2 years, 96.9% rated as “highly satisfied” or “satisfied.”⁸⁰ This represents an increase of 4.4% from 2018.

⁷⁷ Documents provided by Executive Office during the August-September 2021 data call.

⁷⁸ Documents provided by Customer Service during the August-September 2021 data call.

⁷⁹ Ibid.

⁸⁰ Ibid.

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PRIOR RECOMMENDATIONS (SOURCE, RECOMMENDATION #)	GPO PROGRESS AND ASSESSMENT
<p>9 To generate additional revenue, GPO should continue to pursue smart card business. To assist GPO in growing this business and to leverage GPO’s smart card expertise for public benefit, Congress should consider whether to allow GPO to respond to state and local government requests for smart cards. (NAPA 2013, 9)</p>	<p>Assessment: Completed or Sufficient Progress</p> <p>Title 44 allows Federal Agencies, Congress, Puerto Rico, and the DC government to purchase smart cards under GPO but does not authorize state and local governments to do so.⁸¹ GPO Officials are unaware of whether there is traction with Congress to amend Title 44 to allow GPO to expand its smart card program to state and local governments. They reiterated legal restrictions and other considerations. For example, GPO leadership raised two concerns: issues of federalism (need for states to produce state identification cards) and displacement of private sector organizations that are currently serving state and local markets.</p> <p>Despite perceived restrictions against expansion to state and local markets, GPO’s SID has expanded its smart card business. GPO now prints FBI fingerprint cards⁸² and is actively soliciting expansion to printing VA health benefit cards and PIV/retired military cards. The current smart card program generated approximately \$50 Million in 2021, and GPO Officials from PST noted that they have retained every Federal customer since program inception in 2008. They largely attribute the success of the smart card business to GPO’s willingness to invest time and resources into obtaining ISO 9001 certification.</p>
<p>10 To ensure it is able to continue to plan for and respond to future changes, GPO should continue its transformation by enhancing its strategic planning capabilities, broadening its change management efforts, and continually reviewing customer product and service needs. (NAPA 2013, 11)</p>	<p>Assessment: Completed or Sufficient Progress</p> <p>GPO continues to plan for and respond to future changes, particularly in terms of surveying its customers and forecasting and predicting their needs. For example, GPO Customer Services continually surveys agency needs, asking questions such as “With the continual migration of publications for printed to digital media, which of the following describes the direction of your organization?”</p> <p>Several officials noted areas where GPO is planning for future changes. A subset of those areas is captured below:</p>

⁸¹ Report revised, based on GPO Management Comments, to clarify that the issue at hand is a lack of authorization, not a statutory restriction.

⁸² Report revised per footnote 18.

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- GPO will execute Congressional work with greater speed when XPub is fully operational, allowing GPO to explore opportunities with other agencies.
- GPO is increasingly supporting agencies in digital publication needs, such as design support and facilitation of 508 compliance.
- GPO is exploring its ability to offer software-as-a-service and technical assistance for document authentication on a cost-recovery basis to other agencies.
- In response to customer needs and preferences, GPO closed its final “brick and mortar” retail operations in 2021.

Finally, GPO noted that overall trends in the printing industry including but not limited to closure of smaller businesses, less competition, and higher costs are increasing demand for GPO’s printing services.

11 The Public Printer should direct the GPO CIO to **establish the appropriate security and business continuity policies, procedures, and systems** to ensure that its information products are adequately protected. (GAO 2004, 4)

The Public Printer, in conjunction with the Chief Human Capital Officer (CHCO), should **maintain continuity during leadership transitions** by focusing on a broad set of programmatic priorities. (GAO 2003, 3)

Assessment: Completed or Sufficient Progress

GPO has prioritized security and business continuity. A top priority for 2022 is relocating its physical server from the GPO main office to a secure, alternative computing facility in three phases. According to a GPO Official (PST), Phase 1 has been completed, Phase 2 is in progress, and Phase 3 should be completed in 2022. The main office will transition to a secondary server. To further increase security and resiliency, GPO is implementing a cloud-first strategy for all new software and a cloud-smart strategy for existing legacy systems.⁸³ GPO is implementing a next-generation firewall and ITS has developed a strategic plan for cybersecurity enhancement based on recommendations from the National Institute of Standards Technology and executive orders.

In addition, Official Journals of Government and Plant Operations conduct exercises with the House, Senate, and the Office of the Federal Register to ensure continuity of operations during a range of emergencies.

⁸³ According to a document provided by PST during the August-September 2021 data call.

GPO SERVICES, PROGRAMS, AND BUSINESS MODEL	
PRIOR RECOMMENDATIONS (SOURCE, RECOMMENDATION #)	GPO PROGRESS AND ASSESSMENT
	Finally, GPO has developed a broad set of programmatic priorities, outlined in its draft 2023-2027 strategic plan, which will increase its resilience during leadership transitions.

12 To achieve future organizational and operational cost savings in the Customer Services program, GPO should **further consolidate regional office locations, space, and staff and continue to identify and implement best management practices** (such as cross training, telework, work sharing arrangements, and increasing managerial spans of control) and available technologies to the greatest extent possible. (NAPA 2013, 12)

Assessment: Completed or Sufficient Progress

At the time of the NAPA report, GPO employed 72 staff in regional Customer Services Procurement Offices and 98 staff in the GPO central Customer Service Office. Regional staff were spread across 13 offices. NAPA noted that GPO leased regional offices or co-occupied space with other Federal Agencies. Because many regional offices were small in terms of dollar value of procured printing and the number of GPO staff assigned, and many were in close proximity, NAPA suggested consolidation. While GPO contended that local presence is important for customer service, NAPA noted that—according to the 2011 Customer Service Satisfaction Survey—only 31.5% of print procurement customers indicated that proximity to a GPO office was influential in their choice of where to request work.

Currently, there are 11 regional Customer Services Procurement Offices. The San Diego regional office closed in January 2021 and the Chicago regional office closed in December 2021 and staff transitioned to a flexible workspace setup, resulting in approximately \$160k savings per year. While this represents consolidation from 2013, there are still regional offices that are small in terms of dollar value of procured printing and the number of GPO staff assigned. For example, five regional offices had negative annualized contribution margins in FY 2021 (Boston, San Francisco, Seattle, Denver, and Atlanta) and there are less than three employees in four of the regional offices (Boston (one staff), San Antonio (one staff), Charleston (two staff), and Philadelphia (three staff)).⁸⁴ However, according to the 2020 Customer Satisfaction Survey,⁸⁵ 58% of customers indicated that “proximity to my office” was one of the factors considered when choosing where to engage with GPO—an increase from the 2011 survey. It is uncertain whether new tools

⁸⁴ Data provided by Customer Service during the August–September 2021 data call.

⁸⁵ Document provided by Customer Service during the August–September 2021 data call.

GPO SERVICES, PROGRAMS, AND BUSINESS MODEL	
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being used by GPO like secure file transfer will impact this sentiment.

GPO has made progress in implementing best management practices, yet there are constraints in some areas.

- **Cross training and work sharing:** One business unit (Customer Service) is considering the use of cross training and work sharing to enable operational efficiency.⁸⁶ However, Human Capital flagged challenges with cross training and work sharing because GPO is heavily unionized.
- **Telework:** As previously noted, the agency’s telework policy is one of the strongest in the Federal Government. In addition to boosting recruitment and retention, the telework policy will reduce costs of employee transit benefits.
- **Managerial spans of control:** Could not assess.

13 To realize significant potential savings and enhance revenues (as well as improve customer service), GPO should **accelerate the development and deployment of a new automated print procurement system.** (NAPA 2013, 13)

Assessment: Completed or Sufficient Progress

After release of the NAPA report, GPO acknowledged the print procurement system as a weakness. In its Strategic Plan 2015–2019, Customer Service noted that “GPO’s current print procurement systems have been developed as needed to support a wide range of business unit needs. Unfortunately, these systems are often stove piped, provide redundant functionality, lack desired capabilities, and are operating on outdated infrastructure. In order to meet GPO’s goals, a system is needed to provide better transparency and procurement services to GPO customers. Standardized processes will allow GPO employees to perform their operations more efficiently.”⁸⁷

According to a GPO Official, a new system called “Publish” is under development. Publish will allow customers to submit and order in a streamlined and transparent fashion. Publish better matches customer expectations and is similar to the Amazon ordering platform. The minimally viable product was launched in May 2021, and there are currently 470 customers registered to use Publish and 311 orders have been

⁸⁶ According to a document provided by Customer Service during the August-September 2021 data call.

⁸⁷ Customer Services indicated during fieldwork that its strategic plan is currently being updated.

GPO SERVICES, PROGRAMS, AND BUSINESS MODEL	
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	placed. GPO is aiming to release version 1.2 in January 2022. GPO Marketing staff are gathering real-time feedback from customers.
<p>14 To reduce GPO’s facilities footprint while increasing the leasing of unused building space, GPO should continue pursuing incremental lease arrangements. (NAPA 2013, 14)</p>	<p>Assessment: Completed or Sufficient Progress</p> <p>According to its Strategic Plan covering FY 2019–2023, Plant Operations will continue supporting strategic partnerships with Federal partners to establish leasing agreements for consolidated space.⁸⁸ One GPO Official confirmed that GPO continues to identify opportunities to lease out or share space with other Federal Agencies but securing agreements has been challenging given the unpredictable future patterns of telework. Another GPO Official noted that consolidation of operations at the Laurel Fulfillment Center is projected to save \$700k.</p>
<p>15 The Public Printer should ensure that GPO's strategic planning process includes development of a description of program evaluations used to establish or revise strategic goals, and a schedule for future program evaluations. (GAO 2004, 1)</p> <p>The Public Printer should direct the GPO CIO to begin an effort to develop and implement an investment management process by (1) developing guidance for the selection, control, and evaluation processes and then (2) establishing an investment review board responsible and accountable for endorsing the guidance, monitoring its implementation, and executing decisions on projects based on the guidance. (GAO 2004, 2)</p>	<p>Assessment: Progress, but Concerns Remain</p> <p>Program evaluations are not consistently implemented at GPO. For example, program evaluations of recently implemented policies and initiatives in Human Capital have not been evaluated to determine impact.</p>

⁸⁸ Document provided by Plant Operations during the August–September 2021 data call.

GPO SERVICES, PROGRAMS, AND BUSINESS MODEL	
PRIOR RECOMMENDATIONS (SOURCE, RECOMMENDATION #)	GPO PROGRESS AND ASSESSMENT
<p>The Public Printer should direct the GPO CIO to develop and implement a comprehensive plan for software development and acquisition process improvement that specifies measurable goals and time frames, sets priorities for initiatives, estimates resource requirements (for training staff and funding), and defines a process improvement management structure. (GAO 2004, 3)</p>	<p>In terms of investments, in August 2021, GPO’s OIG completed an audit of its capital investments. The OIG made six recommendations related to evaluation and selection of capital investments including software, such as the need to ensure adequate non-financial and financial details and perform a post-implementation review of capital investments to determine whether investments were completed on schedule, came within budget, and provided the intended benefits.⁸⁹ GPO’s Management agreed with all recommendations and was on track to implement all recommendations by December 2021.⁹⁰ Additionally, the organizations and functions of the Strategic Investment Planning Committee are now codified in a GPO directive. However, despite the requirement to justify a return on investment, GPO continues to struggle with quantifying cost savings of investments.</p>

⁸⁹ GPO. (August 2021). Government Publishing Office Capital Investments. (A-2021-10). Available at <https://www.oversight.gov/sites/default/files/oig-reports/GPO/FinalCapital-Investment-Audit-Report-2021-10.pdf>.

⁹⁰ GPO. (August 2021). Management Response to IG Audit 21-10 - Government Publishing Office Capital Investments (A-2020-001). Available at <https://www.govinfo.gov/app/details/GPO-RESPONSE-IG2110>.

B. PRIOR RECOMMENDATIONS: GPO HUMAN CAPITAL
Figure 14. Prior Recommendations: GPO Human Capital.

GPO HUMAN CAPITAL	
PRIOR RECOMMENDATIONS (SOURCE, RECOMMENDATION #)	GPO PROGRESS AND ASSESSMENT
<p>16 To effectively integrate and align the agency’s human resource policies, programs, and practices with its strategies for achieving mission success and desired programmatic results, GPO should develop and institutionalize a human capital planning capacity. GPO should make strategic human capital planning a high priority and use multiple strategies to ensure the recruitment, retention, development, and rewarding of a highly motivated and diverse workforce. (NAPA 2013, 10)</p> <p>Develop and implement an agencywide strategic recruitment plan to strategically recruit for the future and mitigate risks. (OPM 2019, 6)</p> <p>Develop, implement, and evaluate retention strategies to determine if intended effect was achieved. (OPM 2019, 10)</p>	<p>Assessment: Progress, But Concerns Remain</p> <p>Several GPO Officials highlighted progress by Human Capital. Highlights below are categorized by recruitment, retention, development, and rewards.</p> <p><u>Recruitment</u></p> <ul style="list-style-type: none"> • The process for developing, storing, and numbering position descriptions (PDs) has evolved from manual to automated via “Monster Classification.” • HC now collaborates closely with the business unit that is hiring to revamp the existing position description (instead of reusing the existing and oftentimes outdated PD). • HC is collaborating with subject matter experts from hiring business units to review resumes, which one Official said was increasing the quality and competitiveness of new hires. • HC expanded its recruiting network. GPO now recruits through ZipRecruiter, is partnering with SkillsUSA to spread awareness of job opportunities at the GPO through trade schools and high schools and hosts an apprentice/internship program. • In February 2020, GPO’s Director approved the use of recruitment bonuses for new appointments and relocation allowances for current Federal employees. <p><u>Recruitment and Retention</u></p> <ul style="list-style-type: none"> • GPO does not currently or is not always able to offer incentives that other agencies offer, such as student loan reimbursement, which, according to GPO Officials overseeing recruiting efforts within HC, is detrimental to recruitment and would benefit from further exploration.⁹¹ From a retention standpoint, GPO’s relatively small overall size introduces upward mobility and retention challenges, with many staff leaving for grade increases elsewhere. However, GPO’s new telework policy—100% telework and remote work options for eligible teammates—is one of the strongest in the Federal Government and is predicted to help recruit and retain staff. In addition, GPO is increasingly hiring entry-level staff and supporting their professional development to maximize the length of time staff remain with GPO.

⁹¹ Report revised, per GPO Management Comments, to reflect that GPO has authority to offer a student loan repayment program and has done so historically, it is not currently doing so.

GPO HUMAN CAPITAL	
PRIOR RECOMMENDATIONS (SOURCE, RECOMMENDATION #)	GPO PROGRESS AND ASSESSMENT
	<p><u>Development</u></p> <ul style="list-style-type: none"> GPO prepared a training plan for FY 2021 to 2023 based on an agencywide skills gap analysis. In addition, GPO hosts several management and leadership trainings, including the GPO Lead Program, Excellence in Government Fellowship Program, New Supervisor/Manager Training Program, and a refresher course on supervision/management, and is piloting the Supervisor to Manager Development Program in 2022. However, GPO Officials noted the limited training budget exacerbated the issue because Human Capital is not a revenue-generating business unit. <p><u>Rewarding</u></p> <ul style="list-style-type: none"> The GPO began an assessment of its award program in 2020. <p>While GPO Officials noted various lingering operational challenges, the most cited was recruitment. Of the 10 non-HC business unit officials interviewed, seven noted persistent delays in hiring. While officials attributed part of this challenge to overall Federal hiring systems and OPM policies, the long time to fill a position is critical to address given that up to 50% of GPO’s workforce is eligible to retire in the next 5 years.</p> <p>Another persistent lingering operational challenge is reliance on paper-based organizational charts and ensuing version control issues between HC and business units.</p> <p>While GPO has channels to collect feedback from its staff, it has not evaluated the impact of its recruitment, retention, or development strategies.</p>

17 To address workforce skills imbalances, GPO should **continue to pursue targeted, gradual staffing reductions** in specific areas, as well as functional consolidations, when feasible and appropriate. (NAPA 2013, 15)

Assessment: Completed or Sufficient Progress

GPO completed three rounds of early retirements and separations “buyouts” in 2011, 2014, and 2018. According to one GPO Official, the 2014 round was not targeted and GPO lost too many staff. The 2018 round was more targeted, but there remains a need to “build back up” the workforce given the current demands. Another GPO Official echoed the utility of buyouts in reducing staff but argued for a more sensible and targeted approach.

GPO is using other approaches to right-size. For example, GPO no longer automatically backfills positions when staff depart. Instead, HC collaborates with business unit contacts to determine the need for the position using newer data-reliant human resource systems.

GPO HUMAN CAPITAL	
PRIOR RECOMMENDATIONS (SOURCE, RECOMMENDATION #)	GPO PROGRESS AND ASSESSMENT
	<p>One GPO Official noted that these prompts have been useful, as business units with specialties that are phasing out are no longer backfilling positions.</p> <p>By 2026, up to 50% of GPO’s workforce will be eligible to retire. Therefore, there is more concern with recruiting and retention than shrinking the workforce.</p>
<p>18 Communicate the existence of the FY2016-2020 Human Capital Strategic Plan to all employees and ensure the plan is operationalized. (OPM 2019, 1)</p>	<p>Assessment: Not Applicable or Unable to Assess</p> <p>The current HC strategic plan (covering FY 2016 to 2020) is outdated and has been for over a year. GPO Officials indicated a new HC strategic plan is under development as HC would like to align its goals and objectives with the broader GPO strategic plan, which is undergoing update at the time of this report and has not yet been disseminated.</p>
<p>19 Identify mission-critical operations and competencies to establish a baseline for developing strategies to support human capital planning. (OPM 2019, 2)</p>	<p>Assessment: Completed or Sufficient Progress</p> <p>In FY 2020, GPO required all business units to complete a succession planning exercise. Managers identified all key positions or mission-critical operations in their business unit. For each position, managers identified factors such as critical knowledge and skills required for success, future knowledge and skills requirement, training strategies, and potential candidates (both candidates currently ready and those that could be trained). The succession planning analysis, coupled with a skills gap analysis (see below, Prior Recommendation 20), were used to develop GPO’s Training Plan.</p> <p>It is unclear if GPO plans to complete another succession planning exercise in the near future to ensure continued relevance.</p>
<p>20 Use an Agencywide skills assessment to determine ways to better leverage development opportunities and resources. (OPM 2019, 4)</p> <p>The Public Printer and the CHCO should complete a workforce gap analysis to identify critical skills and competency gaps that could</p>	<p>Assessment: Completed or Sufficient Progress</p> <p>In FY 2020, GPO conducted an agencywide skill gap analysis. Managers were asked to identify training needs for their staff across four categories: business skills, computer skills, leadership skills, and supervisory skills.⁹² Results were submitted to the Chief of Workforce Development, Education, and Training, who used the combined results to develop a needs analysis survey. That survey asked all supervisors, managers, and executives to consider 60 training topics and determine if training was needed and, if so,</p>

⁹² Document provided by HC during the August–September 2021 data call.

GPO HUMAN CAPITAL	
PRIOR RECOMMENDATIONS (SOURCE, RECOMMENDATION #)	GPO PROGRESS AND ASSESSMENT
<p>affect GPO's ability to achieve its mission and transform the organization. The workforce gap analysis should include (1) an analysis of the current workforce to develop an inventory of employees' skills and competencies and (2) a systematic identification of the new skills and competencies that GPO will need in the future so that it can pinpoint any gaps that could affect its mission accomplishment and transformation. (GAO 2003, 1)</p>	<p>prioritize the needed training and determine the number of staff who would benefit from each training. The resulting training plan (FY21–23 Training Plan and Survey Results)⁹³ contains training topics prioritized for FY 2021, 2022, and 2023.</p>
<p>21 Develop and implement a formal knowledge management strategy that provides a framework for systematically capturing and sharing critical information across GPO. (OPM 2019, 5)</p>	<p>Assessment: Not Initiated</p> <p>Agencywide, GPO has not developed and implemented a formal knowledge management strategy. Knowledge transfer was flagged as a concern by several business units, particularly because per OPM policies there cannot be overlap between new staff and their incumbents. With up to 50% of the workforce eligible for retirement in 5 years, knowledge transfer is critical.</p> <p>However, some individual business units have recognized the need for and importance of knowledge management and are piloting different approaches for capturing knowledge. For example, HC is developing position-specific guidebooks for new staff.</p>
<p>22 Provide training to hiring officials regarding hiring flexibilities, options, and the examining process. (OPM 2019, 7)</p>	<p>Assessment: Completed or Sufficient Progress</p> <p>Human Capital has developed a repository of standard operating procedures to train hiring officials, including but not limited to training on USA Jobs hiring paths and selective factors and qualitative rankings during examination.⁹⁴</p>

⁹³ Document provided by HC during the August–September 2021 data call.

⁹⁴ Ibid.

GPO HUMAN CAPITAL	
PRIOR RECOMMENDATIONS (SOURCE, RECOMMENDATION #)	GPO PROGRESS AND ASSESSMENT
<p>23 Build upon current efforts to collect and analyze workforce data; identify trends and factors that may impact retention in MCOs. (OPM 2019, 8)</p>	<p>Assessment: Completed or Sufficient Progress</p> <p>According to one GPO Official in HC, they are collaborating with a contractor to analyze human resources (HR)-related data for each business unit, which will feed into five-year planning discussions. In addition, the succession planning analysis identified some factors that may impact retention including retirement status and assessed the risk of the incumbent’s departure for staff in key positions.</p>
<p>24 Analyze data collected from the workforce planning initiative to identify skill gaps, retention, and turnover numbers to determine strategies to prepare for the future and close skill gaps. (OPM 2019, 3)</p> <p>Incorporate workforce analysis findings into the strategic planning process. (OPM 2019, 9)</p>	<p>Assessment: Not Initiated</p> <p>While some elements of a workforce analysis were incorporated into GPO’s succession planning and skills gap analyses, GPO has not initiated a workforce analysis. One GPO Official suggested that, because a workforce analysis requires specialized expertise and intense effort, it may be better executed with external support. This echoes the opinion of the OIG, which noted that a remaining challenge for GPO is to develop a process for strategic workforce planning and that “this analysis and planning may require outside expertise to effectively evaluate and develop.”⁹⁵</p>
<p>25 Review and update GPO's 8-year-old Merit Promotion Plan (MPP) in support of the required action above. (OPM 2019, 11)</p>	<p>Assessment: Progress, but Concerns Remain</p> <p>In its response to the OPM assessment, GPO indicated that HC had drafted a revised MPP that would be finalized in 2020. However, according to a GPO Official, the draft will not be ready for review until April 2022. No specific explanation or justification was provided as to why there was a gap between the planned finalization and delivery of the revised MPP in 2020 and the timing shift to April 2022. If continued delays persist, implementation of the revised MPP could be delayed even further, which would continue inefficiencies and gaps noted by OPM originally in 2019.</p>
<p>26 Review and update human capital policies and procedures to align with MPP updates; institute quality control measures to ensure all human capital specialists identify and refer best qualified candidates in a consistent manner. (OPM 2019, 12)</p>	<p>Assessment: Not Initiated</p> <p>Completion of this recommendation is dependent on the completion of <i>Prior Recommendation #25</i> (see above).</p>

⁹⁵ GPO OIG. (2020). GPO’s Top Management Challenges for Fiscal Year 2021. (Report No. 21-02). Available at https://www.gpo.gov/docs/default-source/inspector-general/final-top-management-challenges_10222020.pdf.

GPO HUMAN CAPITAL	
PRIOR RECOMMENDATIONS (SOURCE, RECOMMENDATION #)	GPO PROGRESS AND ASSESSMENT
<p>27 Reinstitute the Federal Employee Viewpoint Survey (FEVs) or develop a similar tool to assess employee engagement and satisfaction. (OPM 2019, 13)</p>	<p>Assessment: Completed or Sufficient Progress</p> <p>GPO is not required to implement the Federal Employee Viewpoint Survey (FEVS). According to one GPO Official, GPO historically only asked two questions from the FEVS, which provided limited feedback. Beginning in/around 2016, GPO began conducting focus groups every other year (known as “We Hear You” campaigns). While the focus groups provided more insight to staff needs and concerns than the FEVS, GPO was transitioning to a “We Hear You” survey. Execution of the first survey has been delayed due to the COVID-19 pandemic (up to 50% of GPO staff do not have regular access to a computer).</p>
<p>28 Establish a formal collaboration and data sharing process between the Equal Employment Office (EEO) and the Human Capital office. (OPM 2019, 14)</p>	<p>Assessment: Completed or Sufficient Progress</p> <p>Per its strategic plan covering 2016-2020, one of the EEO’s strategic priorities was to “integrate data from all available systems to analyze hiring, training, promotion and separation actions at the agency.”⁹⁶ As previously noted, HC is collaborating with a contractor to analyze HR data by business unit, which will be sent to all business units for five-year planning discussions.</p>
<p>29 Provide leaders and employees with additional training and communication on GPO’s Diversity & Inclusion (D&I) programs. (OPM 2019, 15)</p>	<p>Assessment: Completed or Sufficient Progress</p> <p>While no interviews were conducted with officials from GPO’s EEO, the <i>EEO Strategic Plan 2016-2020</i> contains two relevant goals: (1) to periodically educate employees and managers on diversity and inclusion in conjunction with HC, and (2) to effectively communicate with employees and management on D&I issues.⁹⁷ In addition, the EEO widely communicates Special Emphasis Observances such as African-American History Month and Women’s History Month.</p>
<p>30 Evaluate the quality of work-life programs to determine if the programs are effect at creating a more positive work environment, contributing to recruitment and retention goals, and whether results are used to improve the programs. (OPM 2019, 16)</p>	<p>Assessment: Not Initiated</p> <p>As previously noted, while GPO has channels to collect staff feedback, it has not evaluated the impact of work-life programs on recruitment and retention.</p>
<p>31 Evaluate existing Performance Improvement Plans (PIPs) to ensure</p>	<p>Assessment: Not Applicable or Unable to Assess</p>

⁹⁶ Document provided by EEO during the August–September 2021 data call.

⁹⁷ Ibid.

GPO HUMAN CAPITAL	
PRIOR RECOMMENDATIONS (SOURCE, RECOMMENDATION #)	GPO PROGRESS AND ASSESSMENT
adherence to agency, regulatory, and legal requirements. (OPM 2019, 17)	No specific information on Performance Improvement Plans was provided during the data call for this inspection.
32 Provide training to rating officials to document sufficient justification for Exceeds Expectations and Outstanding level ratings. (OPM 2019, 18)	Assessment: Not Initiated One standard operating procedure ⁹⁸ contains the FAR definitions of “Exceeds Expectations” and “Outstanding” ratings, but does not contain additional guidance or provide examples. In addition, no training material could be identified that covers justification for these ratings.
33 The Public Printer, in conjunction with the CHCO, should require individuals to take follow-up actions on identified performance gaps to address organizational priorities , which underscores the importance of holding individuals accountable for making progress on their priorities. (GAO 2003, 2)	Assessment: Not Initiated According to GPO’s FY 2020 Agency Strategic Performance Plan, all employees are given an opportunity to create an individual development plan and establish training/development goals. ⁹⁹ However, GPO does not require individuals with performance gaps to take follow-up actions.

⁹⁸ Document provided by HC during the August-September 2021 data call.

⁹⁹ GPO OIG. (2020). GPO’s Top Management Challenges for Fiscal Year 2021. (Report No. 21-02). Available at https://www.gpo.gov/docs/default-source/inspector-general/final-top-management-challenges_10222020.pdf.

C. PRIOR RECOMMENDATIONS: GPO ACQUISITION SERVICES
Figure 15. Prior Recommendations: GPO Acquisition Services.

GPO ACQUISITION SERVICES	
PRIOR RECOMMENDATIONS (SOURCE, RECOMMENDATION #)	GPO PROGRESS & ASSESSMENT
<p>34 Growing Acquisition Services into a larger, high-performing contracting organization will take time, money, training, and will be slow to materialize. Meaningful instructions are non-existent; the Contract Lifecycle Management (CLM) is minimally functional; and many disparate procedures do not work as designed. (KAA 2021, 1)</p>	<p>Assessment: Not Initiated</p> <p>Officials with institutional knowledge from Acquisition Services were unavailable for interviews and the only document provided by Acquisition Services was the external assessment. Therefore, progress against each of the 10 recommendations could not be made.</p> <p>However, interviews with other business units confirmed that challenges persist in Acquisition Services. Multiple GPO Officials noted persistent staffing issues in Acquisition Services, particularly staff turnover. GPO leadership noted training shortfalls. Another GPO Official thinks Acquisition Services “needs a fresh evaluation of structures and requirements/definitions to best meet needs.” In addition, one of the top four management challenges in FY 2021 identified by GPO’s OIG is improvement to its procurement processes.¹⁰⁰ The OIG encouraged GPO “to explore strategic and systematic improvements to procurement programs in the areas of governance, internal controls, and fundamental program management.”¹⁰¹ The issues are exacerbated by outdated regulations governing GPO’s procurement — GPO adheres to the Materials Management Acquisition Regulation, which has not been updated since 2003.</p>

¹⁰⁰ GPO OIG. (2020). GPO’s Top Management Challenges for Fiscal Year 2021. (Report No. 21-02). Available at https://www.gpo.gov/docs/default-source/inspector-general/final-top-management-challenges_10222020.pdf.

¹⁰¹ Ibid.

X. BLUEPRINT

Figure 16. Inspection Recommendations.

REC. NUMBER	INSPECTION RECOMMENDATION	PRIORITY LEVEL ¹⁰²	BENEFITS	BARRIERS
22-06-01	Prioritize greater investment in recruiting employees with knowledge of modern systems that can streamline/modernize GPO operations, retain staff, and train existing employees to ensure that human capital and expertise is leveled across the agency.	1	Ensures human capital sustainability. Closes skills gaps. Ensures staff are properly trained for their roles.	Time and resources
22-06-02	Evaluate recently implemented recruitment and retention initiatives and document lessons learned.	1	Articulates successes of and growth areas for recruitment and retention efforts.	Time and resources
22-06-03	Adopt and execute strategic workforce planning.	1	Ensures human capital sustainability. Develops a forward-thinking mindset.	Time and resources
22-06-04	Determine the to-be state of Acquisition Services and then ensure that the right infrastructure is in place and staff are sufficiently trained.	1	Sets up Acquisition Services for success.	Time and resources Staff pushback
22-06-05	Conduct an environmental scan of the private sector and other government publishing entities to discover newly available technology to potentially implement at GPO.	2	Ensures GPO remains on the cutting-edge of technology. Ensures all business units are conducting some sort of research and development on their own.	Time and resources
22-06-06	Establish and implement clear customer satisfaction standards and metrics for all GPO organizational units. Include customer satisfaction standards and metrics in all organizational unit strategic plans. Identify, document, and implement improvements based on customer feedback.	2	Cultivates a culture of accountability Encourages business units to incorporate feedback to better serve their customers.	Time and resources
22-06-07	Develop a forecast of expected needs of Federal Government Agencies and other customers, both in the short- and long-term (e.g., 3-D printing).	2	Ensures GPO remains in a forward-thinking mindset.	Time and resources

¹⁰² Priority level determined by the project team.

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REC. NUMBER	INSPECTION RECOMMENDATION	PRIORITY LEVEL¹⁰²	BENEFITS	BARRIERS
22-06-08	Develop and implement a standard operating procedure for assessing and quantifying the post-implementation return on investment of capital investments and policy changes.	1	Ensures GPO's financial sustainability. Cultivates healthy financial practices.	Time and resources
22-06-09	Communicate to Congress the ways statutory authority (Title 44) constrains GPO efforts to modernize and recommend Congress change statutory authority to enable GPO to expand its lines of business and generate additional revenue.	1	Allows GPO to potentially pursue new business lines in the future.	Congressional interest
22-06-10	Increase net budgetary requests if additional resources are needed to keep GPO's products and services in pace with digital transformation and to ensure GPO can maintain govinfo .	2	Ensures GPO can continue to make modernization progress.	Time and resources
22-06-11	Update business unit-level strategic plans, where outdated, to cover current fiscal year efforts. Ensure that plans include realistic timeframes with both short- and long-term goals and corresponding metrics for success for accountability purposes. Ensure GPO leadership is aligned on and providing consistent messaging about agencywide priorities and business unit-level strategic plans.	1	Creates consistent processes.	Time and resources
22-06-12	Incorporate business unit-level progress toward execution of strategic plans in an Executive-level monitoring tool, such as the GPO Executive Dashboard.	1	Ensures agency-level awareness of business unit progress. Cultivates a culture of accountability.	Time and resources
22-06-13	Appoint a Chief Strategy Officer to help ensure agency vision and goals are consistent across business units and leaders.	1	Ensures consistent goals and vision across all business units and leaders.	Time and resources
22-06-14	Accelerate progress toward electronic-based records management and use of automation in Human Capital and Acquisition Services to make processes more efficient, effective, and accountable. Invest in additional infrastructure and dedicated staff to implement enabling tools for digitization of paper-based processes.	1	Moves GPO toward more modern systems.	Time and resources Staff pushback Training

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REC. NUMBER	INSPECTION RECOMMENDATION	PRIORITY LEVEL¹⁰²	BENEFITS	BARRIERS
22-06-15	Add a running list of pending procurement actions, by stage, to the GPO Executive Dashboard to increase accountability and awareness of processing time for various actions.	2	Cultivates a culture of accountability.	Time and resources
22-06-16	Develop a report that evaluates options to reorganize certain GPO functions or responsibilities, possibly in partnership, under more appropriate government entities to right-size GPO's scope of work with their budget and workforce.	1	Ensures GPO can balance priorities.	Time and resources Staff pushback
22-06-17	Conduct a strategic, enterprise-wide, and forward-looking forecasting initiative to discern where GPO needs to be in the next decade and beyond.	1	Ensures cohesion of GPO business model, mission space, and budget.	Time and resources Staff pushback Congressional support

XI. RESPONSE TO AGENCY MANAGEMENT COMMENTS ON DRAFT REPORT RECOMMENDATIONS

Figure 17. Response to Agency Management Comments on Draft Report Recommendations.

REC. NUMBER	INSPECTION RECOMMENDATION	GPO CONCURRENCE WITH REPORT RECOMMENDATIONS	RESPONSIVENESS OF GPO MANAGEMENT COMMENTS REGARDING DRAFT REPORT RECOMMENDATIONS
22-06-01	Prioritize greater investment in recruiting employees with knowledge of modern systems that can streamline/modernize GPO operations, retain staff, and train existing employees to ensure that human capital and expertise is levelized across the agency.	Agency concurred in part.	GPO Management Comments are responsive to the intent of this recommendation.
22-06-02	Evaluate recently implemented recruitment and retention initiatives and document lessons learned.	Agency concurred.	GPO Management Comments are responsive to the intent of this recommendation.
22-06-03	Adopt and execute strategic workforce planning.	Agency concurred.	GPO Management Comments are responsive to the intent of this recommendation.
22-06-04	Determine the to-be state of Acquisition Services and then ensure that the right infrastructure is in place and staff are sufficiently trained.	Agency concurred.	GPO Management Comments are responsive to the intent of this recommendation. However, GPO provided no tentative date or projected date for completion for the re-examination of current organizational structure of Acquisition Services, targeted recruitment strategies, creation of career ladder, and/or implementation of supplemental contract staff where needed.

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REC. NUMBER	INSPECTION RECOMMENDATION	GPO CONCURRENCE WITH REPORT RECOMMENDATIONS	RESPONSIVENESS OF GPO MANAGEMENT COMMENTS REGARDING DRAFT REPORT RECOMMENDATIONS
22-06-05	Conduct an environmental scan of the private sector and other government publishing entities to discover newly available technology to potentially implement at GPO.	Agency concurred.	<p>GPO Management Comments are not responsive to the intent of this recommendation.</p> <p>GPO Management Comments indicate some environmental scanning occurs today but fall short of a commitment to implementing a centralized mechanism for management or at a minimum visibility. In addition, GPO Management Comments reference GPO business units, but omit explicit inclusion of support units, which would also benefit from environmental scanning activities. Lastly, since GPO did not commit to a specific action in its comments it is unclear what, if any timeframe would be used to assess progress on agency action.</p>
22-06-06	Establish and implement clear customer satisfaction standards and metrics for all GPO organizational units. Include customer satisfaction standards and metrics in all organizational unit strategic plans. Identify, document, and implement improvements based on customer feedback.	Agency concurred.	GPO Management Comments are responsive to the intent of this recommendation.
22-06-07	Develop a forecast of expected needs of Federal Government Agencies and other customers, both in the short- and long-term (e.g., 3-D printing).	Agency concurred.	GPO Management Comments are responsive to the intent of this recommendation.
22-06-08	Develop and implement a standard operating procedure for assessing and quantifying the post-implementation return on investment of capital investments and policy changes.	Agency concurred.	<p>GPO Management Comments are responsive to the intent of this recommendation.</p> <p>However, GPO response requires clarification and confirmation of implementation timing in detail, which is currently absent.</p>

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REC. NUMBER	INSPECTION RECOMMENDATION	GPO CONCURRENCE WITH REPORT RECOMMENDATIONS	RESPONSIVENESS OF GPO MANAGEMENT COMMENTS REGARDING DRAFT REPORT RECOMMENDATIONS
22-06-09	Communicate to Congress the ways statutory authority (Title 44) constrains GPO efforts to modernize and recommend Congress change statutory authority to enable GPO to expand its lines of business and generate additional revenue.	Agency concurred.	GPO Management Comments are not responsive to the intent of this recommendation. Although GPO’s response reports regular communication with Congress it did not provide copies of these communications which would explicitly demonstrate whether its communication to date has included or been related to Title 44 impediments to GPO modernization.
22-06-10	Increase net budgetary requests if additional resources are needed to keep GPO’s products and services in pace with digital transformation and to ensure GPO can maintain govinfo .	Agency concurred.	GPO Management Comments are responsive to the intent of this recommendation.
22-06-11	Update business unit-level strategic plans, where outdated, to cover current fiscal year efforts. Ensure that plans include realistic timeframes with both short- and long-term goals and corresponding metrics for success for accountability purposes. Ensure GPO leadership is aligned on and providing consistent messaging about agencywide priorities and business unit-level strategic plans.	Agency concurred in part.	GPO Management Comments are responsive to the intent of this recommendation. However, GPO’s response requires clarification and confirmation of whether GPO intends to implement its action within FY22 or FY23.
22-06-12	Incorporate business unit-level progress toward execution of strategic plans in an Executive-level monitoring tool, such as the GPO Executive Dashboard.	Agency concurred.	GPO Management Comments are responsive to the intent of this recommendation.
22-06-13	Appoint a Chief Strategy Officer to help ensure agency vision and goals are consistent across business units and leaders.	Agency did not concur with recommendation as written.	GPO Management Comments are responsive to the intent of this recommendation. Although GPO non-concurred with the recommendation as written, GPO articulated a plan of action that satisfies the intent of this recommendation.

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REC. NUMBER	INSPECTION RECOMMENDATION	GPO CONCURRENCE WITH REPORT RECOMMENDATIONS	RESPONSIVENESS OF GPO MANAGEMENT COMMENTS REGARDING DRAFT REPORT RECOMMENDATIONS
22-06-14	Accelerate progress toward electronic-based records management and use of automation in Human Capital and Acquisition Services to make processes more efficient, effective, and accountable. Invest in additional infrastructure and dedicated staff to implement enabling tools for digitization of paper-based processes.	Agency concurred.	GPO Management Comments are partially responsive to the intent of this recommendation. Although GPO provided examples of the progress toward electronic-based records management progress towards implementation of automation in HC or Acquisition Services is absent or not explicit if present.
22-06-15	Add a running list of pending procurement actions, by stage, to the GPO Executive Dashboard to increase accountability and awareness of processing time for various actions.	Agency concurred.	GPO Management Comments are responsive to the intent of this recommendation.
22-06-16	Develop a report that evaluates options to reorganize certain GPO functions or responsibilities, possibly in partnership, under more appropriate government entities to right-size GPO's scope of work with their budget and workforce.	Agency did not concur with recommendation.	GPO Management Comments are responsive to the intent of this recommendation.
22-06-17	Conduct a strategic, enterprise-wide, and forward-looking forecasting initiative to discern where GPO needs to be in the next decade and beyond.	Agency concurred.	GPO Management Comments are not responsive to the intent of this recommendation. GPO's response omits a commitment to specific action and provides only hypothetical timelines for assessing whether or not to move this work forward.

XII. GPO MANAGEMENT COMMENTS ON DRAFT REPORT

See attachment for GPO Management Comments on Draft Report.

MEMORANDUM

Date: May 6, 2022
To: Inspector General
From: Director, GPO
Subject: Agency Response for CG Strategy Draft Report — Government Publishing Office Organizational Transformation Evaluation, Project No. 21-04-II

Thank you for the opportunity to offer the Agency's comments on the CG Strategy Draft Report — Government Publishing Office Organizational Transformation Evaluation, Project No. 21-04-II. We welcome this opportunity to respond.

In General

The 2013 NAPA study was written in the aftermath of an extended period of poor financial performance at GPO and at a juncture where GPO was struggling to find its way as the world was moving to a digital-first environment for information. GPO's customers were moving quickly to embrace new digital methods for distributing information while GPO struggled to keep pace. In many ways, that study framed GPO's strategic planning and execution for nearly a decade.

We appreciate the draft report's recognition of the progress made by GPO in the intervening years. We concur with many of the findings that the Agency must significantly improve in a number of areas to continue our progress. In fact, we believe that many of those findings came from interviews with GPO teammates and documents provided by the Agency.

Timing of the Draft Report and GPO's Strategic Planning Cycle

We note that the IG's contractors conducted this inspection over approximately the last 18 months of the current strategic plan cycle, which concludes at the end of the current fiscal year. The draft report acknowledges that the Agency "is in the midst of updating its agency wide strategic plan" (p. 23)¹ and that a draft of the next strategic plan was available for public comment at the time the draft report was made available to the Agency (See <https://www.gpo.gov/docs/default-source/mission-vision-and-goals-pdfs/draft-fy2023-2027.pdf>)².

¹ All page references are to the draft report dated April 4, 2022.

² Please note that complete URLs are provided throughout as emended links will not function because this memorandum will be reproduced as an unsearchable image in the final report. For a fully searchable version of this memorandum, as well as other Agency responses to the IG, please

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With that acknowledgement, the draft report assumes the persistence of the Agency’s strategies, mission, vision, and values into the next planning period, even though the draft strategic plan is significantly different than the one currently in effect. The draft report seems to place greater importance on GPO’s self-generated motto or mission of “*Keeping America Informed*” than its statutory authorities and obligations under title 44 of the United States Code. It also does not acknowledge that the Agency intends to update its mission and vision statements³ as the Agency concurs that the prior mission statement of “*Keeping America Informed*” does not adequately convey the breadth and depth of GPO’s obligations to the American people and its Federal customers.

We recognize that this draft strategic planning document was not available to the IG’s contractors while they were conducting fieldwork or crafting the draft report as the Agency was in the midst of its own strategic planning process, something made clear by the Agency’s leadership to the IG on several occasions. We respectfully suggest that the timing of this exercise could have been better – and yielded better results – had it occurred ahead of the Agency’s strategic planning process or after the Agency’s next strategic plan became effective.

Mottos, Missions, and Laws

Section 501 of title 44, United States Code, requires that all Federal executive and judicial branch agencies (other than the Supreme Court) use GPO for printing, binding, and blank-book work, subject to certain limited exceptions.⁴ That section is commonly referred to as “the printing mandate.”

In its discussion of the production of secure identification products, including passports and smart cards, the draft report acknowledges that those activities are within GPO’s statutory authority (“Although Title [sic] 44 instructs Agencies to use GPO for printing needs, many have found other solutions for secure credentials that do not include GPO.”; p. 36), but ignores the fact that, because Federal agencies are mandated to use GPO for

visit <https://www.govinfo.gov/collection/GPO-management-responses?path=/GPO/GPO%20Management%20Responses%20to%20IG%20Reports>.

³ As proposed in the draft strategic plan, the Agency’s new mission statement is to “Publish trusted information for the Federal Government to the American people” and its vision statement is “America Informed.”

⁴ “All printing, binding, and blank-book work for Congress, the Executive Office, the Judiciary, other than the Supreme Court of the United States, and every executive department, independent office and establishment of the Government, *shall* be done at the Government Publishing Office* * *.” (44 U.S.C. 501; emphasis added).

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those services, GPO is *obliged* to provide those same services. For instance, a passport produced by GPO is literally a blank book and directly falls within the printing mandate. Rather than look to the law for Congress' intent with respect to the services that GPO must provide, the draft report focuses on GPO's long time motto, "*Keeping America Informed*" and draws its own conclusions about what falls within the ambit of that motto. It is as if the Agency could determine its own authority merely by declaring a new motto without regard to its existing statutory authority or obligations.

Interestingly, the draft report appears to suggest that the very programs that could fulfill the authors' own apparent understanding of that mission — the Federal Depository Library Program and the Agency's other public information programs, such as **govinfo** — be divested to the Library of Congress. That ignores the fact that a broader reading of that mission could easily include all of GPO's products, including secure identification products. For instance, a Customs and Border Protection agent needs to be "informed" that the individual presenting himself or herself at the immigration checkpoint is actually an American citizen, and the U.S. passport manufactured by GPO, the most secure identification document in the world, fulfills that purpose.

As noted above, during its strategic planning process for its upcoming 5-year plan, the Agency determined that its motto of "*Keeping America Informed*" did not fully encompass its activities or mission and revised its mission statement accordingly. While the Agency also agrees that its authorizing statute is long overdue for an update, we believe that the statute, along with those activities authorized by the Joint Committee on Printing and appropriated for by Congress, is the proper benchmark by which to measure the Agency's activities, not its long-time motto.

A Lack of Analysis Undermines the Link between Findings and Recommendations

As a general matter, the draft report does not address the measures used to arrive at findings or as the basis of recommendations. For instance, the topic of the report is GPO's organizational transformation, but there is little in the way of specific measures of how GPO has "transformed" to date or how much farther it needs to go. Without a defined end-state, the draft report appears to imply that GPO must constantly transform itself with no goal other than that of "transformation."

In another similar example, the draft report implies that a narrow band of other countries, e.g. English-speaking countries with information about their publishing activities readily accessible information available on the Internet, are performing their printing and publishing functions better than the United States simply because they divide certain

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functions among governmental and private entities. According to the draft text, the authors conducted a “benchmarking analysis” that found that “the US [sic] is unique when measured against peer countries for scope of government publishing and printing responsibilities.” (p. 34.) Nowhere in the draft report is there a description of the benchmarks used or any qualitative analysis finding that those entities are providing better services than GPO or doing so at a lower cost. Given that this finding at least in part is used to justify the draft report’s apparent marquee recommendation that GPO prepare a report with options to “spin off” its business units to other organizations (p. 36), it would be appropriate to describe those benchmarks and describe where GPO is falling short. These are just a few examples. The Agency believes that being transparent and showing the underlying work would build confidence in the draft report’s conclusions and recommendations.

Recommendations, Inaccuracies, and Disputed Findings

The remainder of this memorandum is divided into two sections: (1) Agency responses to the specific recommendations in the draft report, and (2) a listing of matters in the report where the Agency believes the information is inaccurate or disputes the finding.

With regard to the inaccuracies, the Agency believes that they were simply the result of lack of communication between the IG’s consultants and Agency personnel. The authors of the 2013 NAPA study essentially embedded with GPO staff and were thus available to ask questions in real time and clarify answers. We recognize that the IG’s consultants were not similarly situated and may have based certain statements in the draft report on raw data provided by GPO and the limited interviews conducted with GPO’s teammates, all of which could have lacked some clarity or context. These items are included in an effort to ensure that matters cited in the draft report are accurate and can be relied upon for the findings and recommendations contained therein.

Agency Response to Recommendations in the Draft Report

Recommendation 1: *Prioritize greater investment in recruiting employees with knowledge of modern systems that can streamline/modernize GPO operations, retaining staff, and training existing employees to ensure that human capital and expertise is levelized across the agency. (Reaffirmation of prior recommendation)*

GPO concurs with this recommendation in part.

GPO does not concur with the statement that retention is currently an issue for the Agency. For FY 16-21, the annual rate of separations from GPO varied between 6.2 percent

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and 3.4 percent annually. According to the Bureau of Labor Statistics, the median rate of total separations across the Federal Government during the same period was 15.5 percent.⁵ The Agency does recognize that an impending wave of possible retirements continues to be a major vulnerability.

GPO acknowledges our current personnel challenges both in timely hiring and the potential near term personnel shortage if the majority of retirement eligible personnel leave the Agency. GPO has implemented several initiatives to improve recruiting of employees with knowledge of modern systems, retaining key staff, and training existing employees. Highlights include—

1. One of the most flexible telework policies to be found in the Federal Government;
2. A policy change allowing remote work, enabling the recruitment of talent outside the Washington, D.C. area without relocation costs or barriers; and
3. A reinvigorated intern/recent graduate program which is currently hiring and a new apprenticeship program which will begin in the 3rd quarter of 2022.

GPO also acknowledges that the current hiring process is lengthy and leaves the Agency vulnerable to losing applicants to other opportunities before the OPM hiring process can be completed. While the Agency has decreased its time-to-hire, GPO must further improve its performance. In the coming year, the Agency plans on finding further efficiencies in the hiring process, educating GPO hiring managers in areas where they can speed up the process, such as properly updating position descriptions (PDs), and increasing transparency in the hiring process to increase visibility between Human Capital (HC) and its internal customers.

By November 30, 2023, the Agency will produce a report documenting progress on this recommendation.

Recommendation 2: Evaluate recently implemented recruitment and retention initiatives and document lessons learned. (Reaffirmation of prior recommendation)

GPO concurs with this recommendation.

GPO has made significant gains in active and proactive recruiting. The Agency continues to collect data regarding those initiatives and regularly assesses their effectiveness. Two

⁵ Data extracted from Job Openings and Labor Turnover Survey, BLS.
<https://data.bls.gov/PDQWeb/jt>.

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examples of areas for evaluation are the Agency's telework policy and remote work opportunities for our white-collar workers, as well as our 4-day, 40-hour work week in SID. Additionally, as noted above, our historical data does not indicate we have a current challenge with retention.

By November 30, 2023, the Agency will produce a report documenting progress on this recommendation.

Recommendation 3: Adopt and execute strategic workforce planning.
(Reaffirmation of prior recommendation)

GPO concurs with this recommendation.

GPO has implemented the five-steps of OPM's workforce planning model:

1. Set Strategic Direction — GPO has a current Strategic Plan (2018-2022) that sets the strategic direction for the Agency and GPO has an updated plan draft and posted for public comment.
2. Analyze the Workforce, Identify the Skill Gaps, and Conduct a Workforce Analysis — GPO accomplished this in late 2018 and early 2019 by conducting a workforce management/planning offsite, a skill gap analysis, and developing succession plans for key positions to including critical, hard to fill positions. In addition, in 2021 GPO analyzed its workforce, identifying eight critical, hard to fill positions (including skills for modern systems, such as XPub) resulting in the development of the Apprenticeship and Recent Graduates Programs.
3. Develop Action Plan — GPO developed action plans to address succession planning, training and development, and to address the projected shortage of critical skills. All the plans are still relevant and active.
4. Implement Action Plan — In 2020, GPO released the 1st year of a 3-year training and development plan to address the skill gaps identified in 2019. Current succession plans have been implemented and, in a few cases, GPO has used understudies to fill critical positions prior to key personnel retiring. In addition, we are working to bring our first cohort of apprentices and recent graduates onboard this summer.
5. Monitor, Evaluate and Revise — GPO has done this several times over the last decade. Our next evaluation will be conducted next year, once the updated Agency Strategic Plan is finalized.

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Our next steps are to develop workforce planning policy to clearly articulate GPO's requirements and compliance standards, and implement a workforce management software (WMS) platform that enhances GPO's ability to successfully align our workforce to execute our business strategies and operations.

The Agency can provide the documentation described above if requested.

Recommendation 4: *Determine the to-be state of Acquisition Services and then ensure that the right infrastructure is in place and staff are sufficiently trained. (Reaffirmation of prior recommendation)*

GPO concurs with this recommendation.

Acquisitions Services is working with IT to both reassess potential issues of the current Oracle Contract Lifecycle Management (CLM) software as well as to assess future requirements for an upgrade or replacement of the software so as to ensure business unit requirements are met. Additionally, in collaboration with IT, a new training plan for those current staff using CLM is currently in development and will be deployed by the end of CY22.

Acquisitions Services is also working with Human Capital to re-examine the current organizational structure of the unit. This analysis will address recruitment strategies, such as the Pathways program. It will also include the creation of career ladder positions to create more upward mobility and improve retention, along with creation of entry level positions at the PG 7/9/11/12/13 levels and team leader PG 14 positions. Along with recruiting permanent staff, the Agency will supplement this unit's capacity with contract staff for additional expertise where appropriate and within approved funding limits.

The Acting Managing Director of Acquisitions Services recently adopted the Federal Acquisitions Institute (FAI) guidance on required training levels for all 1102 series employees. This requires all Contracting Officers to have certain levels of training and certifications in order to obligate GPO funds. For example, in order to be awarded an unlimited warrant, a PG 14 must possess a FAI Level 3 certification. All PG 12-14s will have all required training completed by the conclusion of FY23.

The Acting Director of Acquisitions Services is also leading the effort to update the Materials Management Acquisition Regulation (MMAR). This document was last updated in 2003, and with Congressional approval, the Agency anticipates completion by the end of

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CY 2023. Additionally, GPO will continue to request through Congress that section 311(c) of title 44, United States Code, include a provision to mirror the Federal Acquisition Regulation (FAR) with respect to the small purchase threshold.

Recommendation 5: *Conduct an environmental scan of the private sector and other government publishing entities to discover newly available technology to potentially implement at GPO.*

GPO concurs with this recommendation.

GPO's business units routinely conduct market research and explore new technologies for existing and potential problems in production and support functions.

The Agency's Chief Technology Officer (CTO) and Chief Information Officer (CIO) have the explicit responsibility to explore and investigate new and state-of-the-art technologies that could benefit GPO's businesses. Additionally, GPO has formal organizations and annual processes such as the Technical Change Review Board (TCCB) and the Strategic Investment Committee (SIC) that document, track, and approve new and emerging technologies and investments therein. Also, GPO analyzes return on investment of previous technological advances as it considers future initiatives, strategic plans, goals and projects through the formal Annual Performance Plan and Annual Performance Report (APP/APR) process.

Historically, seeking out new technologies was delegated to each business unit as it related to their customer's requirements. However, GPO may consider organizing modernization efforts under the CTO for centralized management and visibility.

Recommendation 6: *Establish and implement clear customer satisfaction standards and metrics for all GPO organizational units. Include customer satisfaction standards and metrics in all organizational unit strategic plans. Identify, document, and implement improvements based on customer feedback.*

GPO concurs with this recommendation.

GPO's business units have a variety of methods of collecting and evaluating customer satisfaction measures. For instance, both Customer Services and LSCM use regular surveys (in the case of LSCM, as required by law), while SID uses the ISO 9001 Quality Management System, which has a variety of touchpoints designed to elicit customer

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feedback and increase transparency around failures to meet expected quality standards. However, as identified by the draft report, the methodologies and data tend to be heavily siloed and difficult to measure agency-wide.

Agency leadership will encourage individual business and support units to identify customer service measurements for inclusion in their FY 23 strategic plans and goals. By November 30, 2022, the Agency will attempt to identify customer satisfaction measurements that can be applied agency-wide (or nearly so) in furtherance of standardization of measures. The Agency will also increase the use of tools to gather internal and external customer and employee satisfaction data. While tools and methodologies may vary by unit, there should be some consistency with the measurements used.

Recommendation 7: Develop a forecast of expected needs of Federal Government Agencies and other customers, both in the short- and long-term (e.g., 3-D printing).

GPO concurs with this recommendation.

Through a variety of methods, GPO collects information from its customers about their short- and long-term needs. For instance, Customer Services conducts a formal biennial survey of customers to review both internal performance and identify future requirements. Additionally, Customer Services supports and promotes the Federal Publishing Council and its activities and participates in discussions on customer requirements and emerging technologies. GPO's Official Journals of Government organization contains the Office of Congressional Publishing Services, which serves as the liaison between GPO and Congress. This office assists Members and officials of Congress and its committees and support staffs regarding the printing, binding, and electronic availability of the numerous products required to carry out the legislative schedule and daily operations. Part of this organization's mission is to stay in constant contact with its customers to meet their current needs and assess future requirements. Notably, the Superintendent of Documents organization also conducts surveys of its customers to ascertain their current and future needs.

In order to formalize the process for collecting and collating this data, the Agency will add a section to its annual report forecasting near- and long-term needs for publishing, printing, and related services based on information gathered from GPO's customers, other Federal agencies, and the state of the industry. This process will begin with the current fiscal year and will first appear with the annual report for FY 22, anticipated to be published in the spring of 2023.

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Recommendation 8: *Develop and implement a standard operating procedure for assessing and quantifying the post-implementation return on investment of capital investments and policy changes.*

GPO concurs with this recommendation.

GPO will benefit from reviewing our current policies, identifying improvements, and updating processes to ensure that the Agency can objectively evaluate and document the expected return-on-investment (ROI) from capital investments and policy changes. In addition, the Agency should ensure that it has policies in place to evaluate past investments for actual ROI versus estimates.

While the Agency makes certain capital investments and policy changes specifically because of anticipated ROI, others are made for different reasons. Examples include capital investments and policy changes concerning the health and safety of the GPO workforce and other services impacting the general public, such as “Ben’s Guide to the Government.”⁶ In these situations, the Agency utilizes other methods such as surveys and focus groups to gauge user satisfaction.

New capital investments adopted and approved due to a forecasted ROI (for example: a new piece of equipment to support a new product that will increase revenues) continues to be presented to the SIC.

New policies implemented at the GPO are the expansion of telework and Maxi-Flex options for the workforce, instituting the Quality Step Increase program, updating GPO’s Incentive Awards program, potential recruitment, and relocation expenses, updating and implementing recent graduate and apprenticeship programs, consolidating and closing Facilities and Regional Offices and establishing a four-day work week (10 hours per day) are forecasted generate an ROI of our workforce.

While ROI is a commonly used profitability ratio that measures the amount of return, or profit, an investment generates relative to cost, there are other quantitative and qualitative ways to show positive impact on an agency. Examples of ways to measure value can be in savings over time, better decision making and reporting, increased level of service, and timely regulatory compliance.

⁶ <https://bensguide.gpo.gov/>.

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The GPO Chief Financial Officer will ensure an annual evaluation of each of the forecasted ROI models for past capital project expenditures and new policies demonstrate progress toward the ROI and is conducted, documented and briefed to the GPO SIC each year as part of the existing budgetary process.

Recommendation 9: *Communicate to Congress the ways statutory authority (Title [sic] 44) constrains GPO efforts to modernize and recommend Congress change statutory authority to enable GPO to expand its lines of business and generate additional revenue.*

GPO concurs with this recommendation as it already regularly communicates with Congress regarding recommended changes in law.

As a matter of practice, the Senate Committee on Rules and Administration solicits legislative changes from the Agency at the beginning of each Congress. Typically, those legislative changes are shared with the House as well.

During my tenure as Director, the Agency has formally shared a package of proposed legislative changes on at least 2 occasions:

1. July 2020, both in response to a specific request made by Chairperson Lofgren of the Committee on House Administration and Joint Committee on Printing during a March 3, 2020 oversight hearing and the Senate Rules Committee's 116th Congress request; and
2. March 2022, in response to the Senate Rules Committee's 117th Congress request.

The Agency also regularly communicates with its oversight and appropriations staff on a bicameral, bipartisan basis about changes in law that could benefit GPO and potential vehicles for consideration.

The Agency also regularly provides comments to Congress and the Congressional Budget Office (CBO) about pending legislation, such as S. 2838, the "Access to Congressionally Mandated Reports Act" and its House companion, H.R. 2485.

The Agency is unsure of the metric that will be used by the IG to determine when this recommendation can be closed.

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Recommendation 10: *Increase net budgetary requests if additional resources are needed to keep GPO’s products and services in pace with digital transformation and to ensure GPO can maintain **govinfo**.*

GPO concurs with this recommendation as it already makes such requests where appropriate.

GPO has requested appropriations increases in both its FY 2022 and FY 2023 budget justifications to support GPO programs and digital transformation, as shown in table 1. These increases reflected increases personnel and materials costs for the Congressional Publishing and Public Information Program accounts, while appropriations to the Business Operations Revolving Fund (revolving fund) are for specific initiatives of importance to Congress, such as development of XPub and **govinfo**.

Table 1. FY 2021 through FY 2023 Appropriations.

Fiscal Year (Status)	Congressional Publishing	Public Information Programs	Business Operations Revolving Fund	Total
FY 2021 (actual)	\$ 78,000,000	\$ 32,300,000	\$ 6,700,000	\$ 117,000,000
FY 2022 (actual)	78,872,161	34,020,000	11,345,000	124,237,161
FY 2023 (requested)	82,992,000	35,257,000	12,655,000	130,904,000

Specifically, with regard to funding for **govinfo**:

- Ongoing *operation* of **govinfo**, including ingesting and cataloging data, is funded through the Public Information Programs appropriation and those figures reflect the anticipated costs of maintaining that program.
- Ongoing *development* of **govinfo**, including acquisition of hardware, other infrastructure, and software and software development, is currently funded through specific appropriations to the revolving fund made necessary by declining prior year unexpended balances in the Public Information Programs account.

For more information regarding GPO’s FY 2023 request for funding for XPub, govinfo, and cyber security projects, see the Agency’s Budget Justification Fiscal Year 2023 at <https://www.gpo.gov/docs/default-source/congressional-relations-pdf-files/budget-submission/budget-submission-fiscal-year-2023.pdf>.

The Agency is unsure of the metric that will be used by the IG to determine when this recommendation can be closed.

Recommendation 11: Update business unit-level strategic plans, where outdated, to cover current fiscal year efforts. Ensure that plans include realistic timeframes with both short- and long-term goals and corresponding metrics for success for accountability purposes. Ensure GPO leadership is aligned on and providing consistent messaging about agency wide priorities and business unit-level strategic plans.

GPO concurs with this recommendation in part.

Given that there are only six months remaining in the current fiscal year and strategic planning cycle, taking substantial time to update significantly outdated business and support unit strategic plans for the remaining time in the current fiscal year may not yield improvements measurable enough to justify the time to do so. However, the Agency's strategic plan for fiscal year 2023 should be finalized by the end of May and business and support unit managing directors will begin the process of developing new unit-level strategic plans, goals, and performance measures for the coming strategic planning cycle and fiscal year.

Each managing director will ensure that the plan included realistic timeframes with both short- and long-term goals and corresponding metrics. The managing directors, unit managers, and unit supervisors will be responsible for cascading the Agency and division/BU goals down to all levels of their organizations through the annual performance plan process. After the plans are finalized, every business and support unit strategic plan will be reviewed by PST to ensure the plan aligns with the Agency's strategic plan.

The Agency does recognize that having outdated business or support unit strategic plans is detrimental to achieving the goals of the Agency and the individual units. According, the Agency commits to keeping individual business and support unit plans current in the future.

Recommendation 12: Incorporate business unit-level progress toward execution of strategic plans in an Executive-level [sic] monitoring tool, such as the GPO Executive Dashboard.

GPO concurs with this recommendation.

By the end of CY 22, GPO will create a centralized electronic dashboard to show progress by each business unit toward executing projects related to that unit's strategic plan. This

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will provide increased transparency for GPO's executive team and senior leadership into progress toward the Agency's goals, as well as the performance of individual units.

Additionally, GPO produces an Annual Performance Plan and Annual Performance Report (APP&APR) report to capture priority projects from all business units. The annual reports are located at <https://www.gpo.gov/who-we-are/our-agency/mission-vision-and-values>. GPO's current executive dashboard highlights strategic elements in general but not specific to business units. Also, GPO provides bi-weekly reports to congress capturing unit-level projects and priorities.

Recommendation 13: *Appoint a Chief Strategy Officer to help ensure agency vision and goals are consistent across business units and leaders.*

GPO does not concur with this recommendation as written.

The Agency acknowledges the identified issues with business and support units maintaining and updating their strategic plans along with the need for improved transparency and accountability in progress toward meeting Agency goals and strategies. However, the Agency is not convinced that the creation of a new senior executive billet, along with supporting staff, will provide the required return on investment.

According to a very recent study by Deloitte⁷ of respondents to a survey who identified as having strategy functions in their jobs, only 31 percent had a "Chief Strategy Officer" (CSO) title and only 4 percent were affiliated with a Government entity, while more than half were associated with a commercial, for-profit firm. This data, combined with some very rudimentary Internet searches, indicate that CSOs are still very rare in the Federal Government space, particularly at the executive level.

Further, the Agency's very rough estimate of the cost of establishing such a position, along with an estimated 2-3 additional FTEs and other reasonably anticipated costs, is approximately \$1.2 to 1.5 million annually.

The Agency already has a directive governing its strategic planning process, Directive 1100.1C,⁸ last updated on December 6, 2021. Pursuant to that directive, PST has responsibility for ensuring executive office, business unit, and support unit strategies are

⁷ <https://www2.deloitte.com/content/dam/Deloitte/au/Documents/strategy/deloitte-au-strategy-2022-chief-strategy-officer-210322.pdf>

⁸ <https://gpointranet.gpo.gov/docs/default-source/directives/chief-of-staff/1100-1c.pdf>

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aligned with the Agency's strategy. Each managing director is responsible for preparing the strategic plan for their unit and ensuring that the plan is in alignment with the Agency's plan and that plans strategies and goals cascade up to the Agency plan and down throughout the organization's individual plans. PST reviews plans prepared by the managing directors to ensure compatibility throughout the Agency.

By the end of CY 2022, the Agency will prepare a report reexamining GPO's strategic planning process, reviewing the causes of the identified deficiencies, and evaluating the potential benefits of creating a CSO position at GPO.

Recommendation 14: *Accelerate progress toward electronic-based records management and use of automation in Human Capital and Acquisition Services to make processes more efficient, effective, and accountable. Invest in additional infrastructure and dedicated staff to implement enabling tools for digitization of paper-based processes.*

GPO concurs with this recommendation.

GPO's draft Strategic Plan identifies this effort in Goal 2: "2.4 Transition from Paper to Electronic Processes." Also, we have accelerated progress toward the following:

1. The administrative services division has accelerated progress toward electronic-based records since 2019. Permanent electronic records are currently being created. Moreover, an official project was launched to implement an effective e-records management program following Records Management Statutes and regulations, Agency directives, and guidance from the National Archives and Records Administration (NARA). The Administrative Services Division is also working on a Statement of Work (SoW) requesting to digitize hard copy and non-electronic records. The SoW is expected to be released to the public by Sep 30, 2022. This e-record effort will help Human Capital, Acquisition, and other units within GPO meet its digital modernization strategic objectives.
2. Human Capital is currently managing performance plans, position descriptions, promotions, transfers, onboarding and offboarding, and personnel records electronically.
3. Acquisitions Services is using CLM as the core tool to manage the Agency's contracts. CLM has many features and functions that GPO is evaluating and enabling soon in order to address some findings in this recommendation. Moreover, the Service Request (SR) function within CLM will help Acquisition

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Services tackle identified issues regarding the manual copying of contract clauses. CLM also serves as the centralized system to manage Acquisition-related activities, and we recently enabled the file-hold function to act as an electronic repository for record management. Furthermore, we will continue refining and enhancing the CLM system to address manual processes agency-wide.

The Agency will continuously monitor its personnel requirements. However, GPO currently does not have a need for additional dedicated personnel in response to this recommendation.

Recommendation 15: *Add a running list of pending procurement actions, by stage, to the GPO Executive Dashboard to increase accountability and awareness of processing time for various actions.*

GPO concurs with this recommendation.

GPO currently has legacy Business Objects reports to display information to GPO End-users. There are several initiatives ongoing which intend to improve the availability of information for GPO Acquisitions Services customers. These initiatives are in response to customer challenges accessing timely and accurate information.

In Q1 of FY22, GPO acquisitions implemented the GPO Business Information System (GBIS) CLM Command Center Dashboarding Tool. This tool displays status of key acquisition workflows to the end-user. GPO is also implementing a data mart for enterprise via Office 365 Power BI tools. The initial data store is GPO procurements reporting data, and use of this tool will enable improved end-user access to GPO reports covering relevant contracts within the Agency. This project is scheduled for completion at the end of FY 22.

Recommendation 16: *Develop a report that evaluates options to reorganize certain GPO functions or responsibilities, possibly in partnership, under more appropriate government [sic] entities to right-size GPO's scope of work with their budget and workforce.*

GPO does not concur with this recommendation.

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Given that GPO is an entity of the legislative branch and directly managed by the Joint Committee on Printing, the Agency does not believe that it is appropriate to undertake such an endeavor absent clear direction from Congress. However, should Congress direct the Agency to complete such a review, we will do so.

As noted at the beginning of this memorandum, GPO's functions and responsibilities are dictated by its statutory authorities and obligations enacted by Congress, not its self-created motto. While we recognize the hurdles facing the printing and publishing industry, and GPO in particular, we are not convinced by the contents of the draft report that shedding GPO functions is necessary, would benefit GPO's customers, the taxpayer, or the public.

Recommendation 17: *Conduct a strategic, enterprise-wide, and forward-looking forecasting initiative to discern where GPO needs to be in the next decade and beyond.*

GPO concurs with this recommendation.

In determining how best to proceed, GPO would have to start with defining what the measurement of success would be. GPO would anticipate requiring at least nine months to adequately assess how best to proceed with such an initiative and approval from the JCP to expend the additional agency resources to complete this initiative. Thus, the Agency cannot adequately forecast a completion date at this time.

GPO fundamentally agrees with the importance of strategic planning in identifying opportunities and in charting the Agency's course in a time of significant technological change and evolving customer needs. Some recent examples of GPO's commitments to strategic planning include the March 2022 issuance of our draft FY 2023-FY 2027 GPO Strategic Plan; the December 2021 revision of GPO's Strategic Planning and Performance Reporting Directive; and the January 2022 establishment of the Director's Task Force on an All-Digital Federal Depository Library Program.⁹

Inaccuracies and Disputed Findings

The following statements in the report are inaccurate or require further clarification:

⁹ <https://www.gpo.gov/who-we-are/news-media/news-and-press-releases/gpo-director-appoints-task-force-to-study-making-gpo-library-program-all-digital>.

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Page 14: The draft report states that “Title 44 calls for Publication and Information Sales to maintain a bookstore * * *.” Chapter 17 of title 44 *authorizes* the Superintendent of Documents to offer certain categories of documents for sale to the public, but there is no statutory *requirement* to sell publications either online or through physical locations.

Page 20: The 4-day/40-hour workweek is only in effect in SID facilities. Plant Operations still operates on a 5-day/40-hour workweek on three shifts to meet customer requirements.

Page 20: The Agency believes that the draft report’s Sub-Finding 2.C may underestimate the prevalence of the use of revolving funds in the Federal Government. For instance, as of November 2021, there were 28 revolving funds used in the legislative branch alone.¹⁰

The Agency also does not believe that the Postal Service is an appropriate comparator. As the IG’s recent report entitled “Evaluation of Product Billing Rates for the U.S. Government Publishing Office”¹¹ showed, the costs of the USPS are either attributable to a product or service or institutional. GPO has no such distinction. Lastly, the Agency notes the recent enactment of the Postal Service Reform Act of 2022 (P.L. 117-108) which is reported to significantly improve the Postal Service’s financial position.

Page 20: The report appears to ignore GPO’s single most important cost-saving measure: increasing the productivity of its workforce. GPO currently produces more material for customers with fewer teammates. For instance, in FY 2013, there were 1,879 FTEs employed by GPO; in April 2022, there were 18 percent fewer teammates, only 1,545.

Page 22: The Agency does not currently have a contract with the FBI to produce smart cards. We believe that the authors confused the Agency’s contract with the FBI to produce fingerprint cards in Plant Operations with SID’s production of smart cards.

Page 22: The report alleges that “Title 44 restricts state [sic] and local governments from purchasing smart cards from GPO.” Section 501 of title 44, United States Code, provides that “Printing and binding may be done at the Government Publishing Office only when authorized by law,” and there is no provision in law authorizing work for States. However, it is important to note that there is not a provision that functions as a restriction on the States, which would likely be unconstitutional.

¹⁰ <https://crsreports.congress.gov/product/pdf/R/R40939>.

¹¹ <https://www.gpo.gov/docs/default-source/inspector-general/audits/2021/21-08-evaluation-of-product-billing-rates.pdf>

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Pages 22-23: The report states that GPO is operating in “a legislative ‘gray area’ * * * outside of Title [sic] 44 unless or until congressional oversight expressly prohibits specific efforts * * *.” The Agency believes the assertion that GPO is operating outside its statutory authority to be inaccurate. To be clear, everything that GPO produces falls within its authority pursuant to section 501 of title 44, United States Code.

With regard to the example of smart credentialing services used in the draft report, the JCP has repeatedly approved capital expenditures for these activities and endorsed the establishment and expansion of these services. For instance, the JCP has endorsed these activities in multiple correspondence:

- Letter dated 9 June 2009 signed by Senator Charles Schumer (Chairman of the JCP);
- Letter dated 25 February 2010 signed by Senator Charles Schumer (Chairman of the JCP);
- Letter dated 26 March 2012 signed by Representative Greg Harper (Chairman of the JCP);
- Letter dated 27 November 2012 signed by Representative Greg Harper (Chairman of the JCP);
- Letter dated 16 May 2013 signed by Senator Charles Schumer (Chairman of the JCP);
- Letter dated 22 August 2013 signed by Senator Charles Schumer (Chairman of the JCP); and
- GAO letter dated 25 March 2015 to the JCP reporting on GPO’s Secure Credential Production capabilities in response to a request by Senator Charles Schumer (Chairman of the JCP).

Page 23: The draft report states that “At the center of GPO-Congressional relations is the JCP, a combined House and Senate committee responsible for GPO appropriations * * *.” The JCP is the Agency’s oversight, not appropriations, committee. GPO’s appropriations are handled by the House and Senate Committee on Appropriations Subcommittees on the Legislative Branch. The JCP’s membership is comprised of Members from GPO’s authorizing committees, the Committee on House Administration and the Senate Committee on Rules and Administration.

Page 24: The draft report states that the Agency was “unable to specify the actual, realized cost savings with purchasing new printers and publishing equipment.” Since this information was not collected during the authors’ field work, the Agency is taking the opportunity to provide this information at this time.

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The Agency invested in digital press technology for multiple reasons: (1) it was needed to replace three-decade old equipment which was obsolete, and (2) digital inkjet press technology is highly efficient and flexible, allowing significant labor savings. The change in headcount is shown in table 2 below. This reduction in staffing saved the Agency approximately \$1,078,100 in labor and benefits costs.

Table 2. Net Change in Press Staffing 2019-2022.

	2019 (Oct.)	2020 (Oct.)	2021 (Oct.)	2022 (Apr)	Difference
Head Presspersons	10	10	10	12	2
2nd Web Pressperson:	10	9	6	3	-7
RollTender (PPW5)*	8	5	5	4	-4
Packers (PPW4)**	9	7	7	6	-3
Net Change in Press Staffing					-12

Page 28: The draft report states that “At the extreme, Plant Operations was approximately 40% [sic] understaffed.” While that figure certainly has shock value, the Agency does not believe it is an accurate picture of GPO’s staffing in Plant Operations. Table 3, from data used in the preparation of the Agency’s FY 2022 budget submission, shows that Plant Operations is only approximately 10 percent understaffed at that point.

Table 3. FY 2022 Understaffing in Plant Operations.

Organization	On-board	Vacancies	Total	Understaffed by...
Plant	510	57	567	10%
Facilities	125	44	169	26%
Total	635	101	736	14%

Page 30: The text implies that the Agency had an acting Director during all or part of CY 2020. This is not correct. I assumed office in December of 2019 after being unanimously confirmed by the Senate, so Mr. Crawford’s tenure as acting Director ended when I took the oath of office in 2019.

Page 30: The Agency believes that Sub-Finding 3.C minimizes the progress made by Human Capital in automating paper-based processes. The Agency recognizes the hurdles faced by its Human Capital operations, but also notes the substantial progress in automating previously paper-based processes.

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In 2021, Human Capital released:

- Digital Signatures for Employee Performance Plans;
- Digital, Fillable SF 52 Module with Digital Signatures for Hiring and Non Hiring actions; and
- An Electronic Medical Records

In 2022, Human Capital is planning for the following electronic Human Capital systems:

- Electronic Signatures for Emergency/Excepted Designations (Complete)
- Employee Offboarding Module (Complete)
- Government Retirement Benefits, Phase 2 (Spring/Summer 2022)
- Equifax Employment Verification (Spring/Summer 2022)
- Monster Classification (Spring 2022)

Page 34: The Agency does not believe that Australia is comparable to the United States in terms of passport production. Australia produces approximately 2.5 million passports per year, while GPO produces nearly 20 million passports per year.

Page 35: The Agency has identified three errors in Figure 11:

1. Australian passports are produced by Note Printing Australia (NPA), a wholly-owned subsidiary of the Reserve Bank of Australia, a Australian Government entity similar to the United States' Federal Reserve Bank and 100 percent government-owned, not the Royal Bank of Australia as identified in the table.
2. United Kingdom passports are not produced by Gemalto as the firm no longer exists. The passports are produced by a French company, Thales¹² which purchased Gemalto and its assets.
3. The Agency believes the first column header ("Country") is mislabeled as the European Union is not a country, but rather a political and economic union comprised of individual countries.

Page 39: The Agency disputes the characterization in figure 12 that the activities of SID are neither within the Agency's core mission nor its authority under title 44. As previously stated, the Agency's core mission is set by statute, not its motto, and section 501 of title 44, United States Code, specifically authorizes the production of blank books, such as

¹² <https://www.thalesgroup.com/en/markets/digital-identity-and-security/government/customer-cases/uk-passport>.

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passports, and the JCP’s continued support for the production of secure credentials demonstrates their confidence that those activities fall within the Agency’s statutory authority and mission.

Page 56: The draft report states that “Because GPO is an independent agency, it cannot offer incentives that other agencies offer, such as student loan reimbursement.” That statement is inaccurate. GPO has authority to offer a student loan repayment program and other incentives, such as a relocation allowance, and has done so in the past. The Agency has not always offered certain incentives as the cost and administrative burden were not always a net benefit to the Agency. However, the Agency is constantly evaluating the range of available incentives and the potential benefit to the Agency in terms of recruitment and retention.

Thank you for the opportunity to provide the Agency’s input on this product from your office. The Agency spent approximately 135 hours preparing this response. If you have any questions, please contact me.



HUGH NATHANIAL HALPERN

Digitally signed by Hugh N Halpern
Date: 2022.05.06 14:45:42 -04'00'

CC: Deputy Director