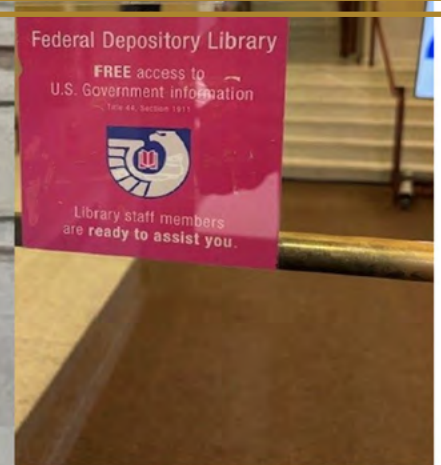




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AUGUST 2025



U.S. Government Publishing Office

Federal Depository Library Program
Assessments Inspection

OIG Report Number 25-10



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Date: August 21, 2025

To: Director, U.S. Government Publishing Office

From: Inspector General, U.S. Government Publishing Office

Subject: Final Report—Federal Depository Library Program Assessments Inspection,
Report Number 25-10

The Office of the Inspector General (OIG) conducted an inspection of GPO's Federal Depository Library Program (FDLP) Assessments. We reported one finding with four recommendations intended to improve GPO's operation of the FDLP by updating current guidance and ensuring stakeholders approve changes considered necessary for the economical and practical implementation of the FDLP.

GPO reviewed the draft report and provided comments through the Director. In accordance with the Council of the Inspectors General on Integrity and Efficiency standards for inspections, we reviewed GPO's comments for relevance and completeness and included them in their entirety in Appendix D. Our office is always open to alternatives to meet the intent of the recommendations as the Agency is the best arbiter of how recommendations should be implemented.

GPO concurred with all four recommendations, and its proposed actions were responsive to them. We summarize management's comments and provide a detailed response throughout the body of the report. All recommendations remain open.

We appreciate the courtesies extended to our staff throughout this review. If you have any questions or comments about this report, please contact Connie Greene, Assistant Inspector General for Inspections, at cgreene@gpo.gov or (202) 512-1597.



NATHAN J. DEAHL
Inspector General

Attachment

RESULTS IN BRIEF

What We Did

The OIG inspection team assessed whether the Superintendent of Documents (SuDoc) is meeting the intent of 44 United States Code (U.S.C.) Section 1909 to “make firsthand investigation of conditions for which need is indicated” with the Public Access Assessments (PAA) of the Federal Depository Libraries (FDL).

What We Recommend

Our report contains four recommendations intended to improve GPO’s operation of the Federal Depository Library Program (FDLP) by updating current guidance and ensuring stakeholders approve changes considered necessary for the economical and practical implementation of the FDLP. GPO concurred with all four recommendations, and its proposed actions were responsive to them.

What We Found

Finding 1. SuDoc is not meeting the intent of 44 U.S.C. Section 1909 to “make firsthand investigation of conditions for which need is indicated” with the Public Access Assessments of the Federal Depository Libraries. SuDoc has not conducted a PAA since 2017 and has not conducted a firsthand investigation since 2004. Due to a lack of evidence, we were not able to determine why the decision to stop conducting PAAs was made. However, we did discover multiple contributing factors to the current state. First, the current SOD 312 is too restrictive. It equates the statutorily required firsthand investigation to the conduct of PAAs. In reality, firsthand investigations could be accomplished in a variety of ways and don't need to be done as PAAs. Second, PAAs and previous iterations were complex and burdensome. Finally, we could not find that SuDoc ever communicated the cessation of PAAs, and the risks involved with that decision, to the GPO Director or Joint Committee on Printing (JCP). By not conducting firsthand investigations, as PAAs or something different, SuDoc is not able to identify and assess deficiencies in depository libraries as required by law.

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INTRODUCTION

The Federal Depository Library Program (FDLP) was established by Congress in 1895 to ensure that Government information is freely accessible to and preserved for the American public. Government information, or publications, is informational matter published at Government expense, for the free use of the general public. GPO, Superintendent of Documents (SuDoc), and Library Services and Content Management (LSCM) work in close collaboration with Federal Depository Libraries (FDL) to achieve the goal of freely accessible and preserved Government information.¹

As of January 2025, there were 1,097 FDLs across all 50 states, the District of Columbia, the Federated States of Micronesia, Guam, the U.S. Virgin Islands, and Puerto Rico. From Fiscal Year (FY) 2015 through FY 2024, SuDoc and LSCM conducted 734 visits to FDLs. This count of visits does not indicate whether the same FDLs were visited multiple times.

As a significant mission area of the GPO, our office initiated this inspection to assess and understand the FDL's mandates and functions with the specific objective below. The report contains one finding and four recommendations, which are listed in Appendix A. The inspection scope and methodology are presented in Appendix B.

Background

Context of the Inspection

We initiated this review from our FY 2025 Annual Work Plan.

The Issue

The authority for the FDLP is codified in Title 44, Chapter 19 of the U.S. Code. In accordance with section 1909, FDLs are required to report their conditions to the SuDoc at least every two years. Additionally, the SuDoc is to make a firsthand investigation of conditions when need is indicated, and to include the results in their annual report. Finally, libraries that 1) hold less than 10,000 publications other than Government publications, 2) are no longer accessible to the public, or 3) have not properly maintained the furnished Government publications, are to be removed from the list of depository libraries if the unsatisfactory conditions are not corrected within six months.

SuDoc conducts a Biennial Survey of Depository Libraries in which the libraries report their conditions. After conducting the survey, the LSCM staff analyzes the Biennial Survey data and publishes a State of the Federal Depository Library Program Report.

¹ LSCM is a division within the SuDoc Business Unit.

Objective

Determine whether the Superintendent of Documents is meeting the intent of 44 United States Code (U.S.C.) Section 1909 to “make firsthand investigation of conditions for which need is indicated” with the Public Access Assessments of the Federal Depository Libraries.

Prior Evaluation Coverage

- None

Criteria

Laws and Regulations

- 44 U.S.C. Chapter 19, *Depository Library Program*

GPO Standards

- No GPO-wide standards

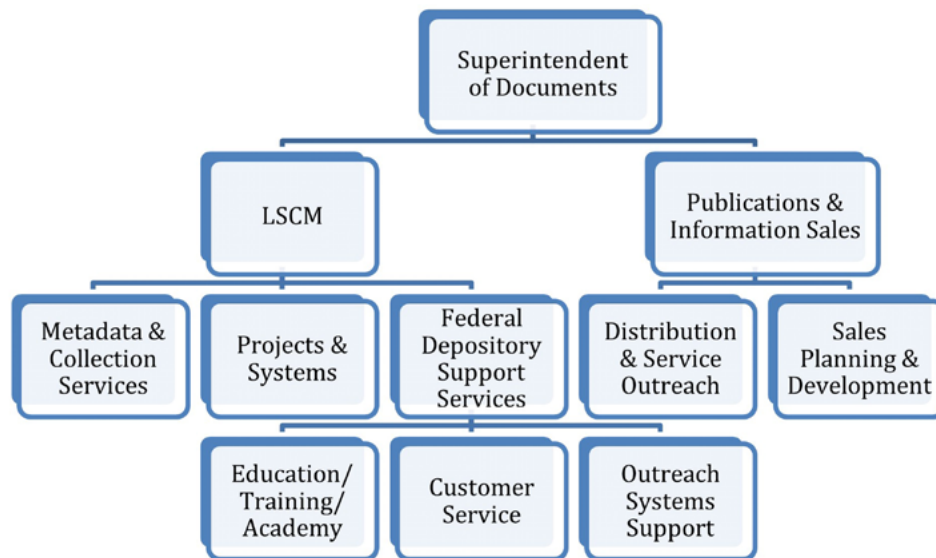
Other

- Superintendent of Documents Policy Statement, SOD 312, *Firsthand Investigation of Individual Federal Depository Library Conditions*, January 28, 2008
- *Legal Requirements & Program Regulations of the FDLP*, February 2018

Superintendent of Documents

GPO’s Business Unit, SuDoc, provides public access to Government information published by the U.S. Congress, Federal agencies, and the Federal courts. The SuDoc also serves as the Agency’s public face for: FDLP, Cataloging & Indexing, and Publication & Information Sales. Within SuDoc, LSCM administers and supports four statutorily-mandated programs, the FDLP, Cataloging & Indexing Program, International Exchange Service, and By-Law Program, to ensure Federal Government information lifecycle management in multiple publishing formats. Within LSCM, the Federal Depository Support Services division is responsible for firsthand consultation and coordination with FDLs through education, training, and outreach. These responsibilities include administering and managing FDL consultations through remote and onsite visits, maintaining official FDL files, administering the Biennial Survey of FDLs, developing and updating formal guidance for FDLs, and the *Legal Requirements & Program Regulations of the FDLP*. See Figure 1 for the SuDoc organizational chart.

Figure 1: SuDoc Organizational Chart dated August 21, 2024

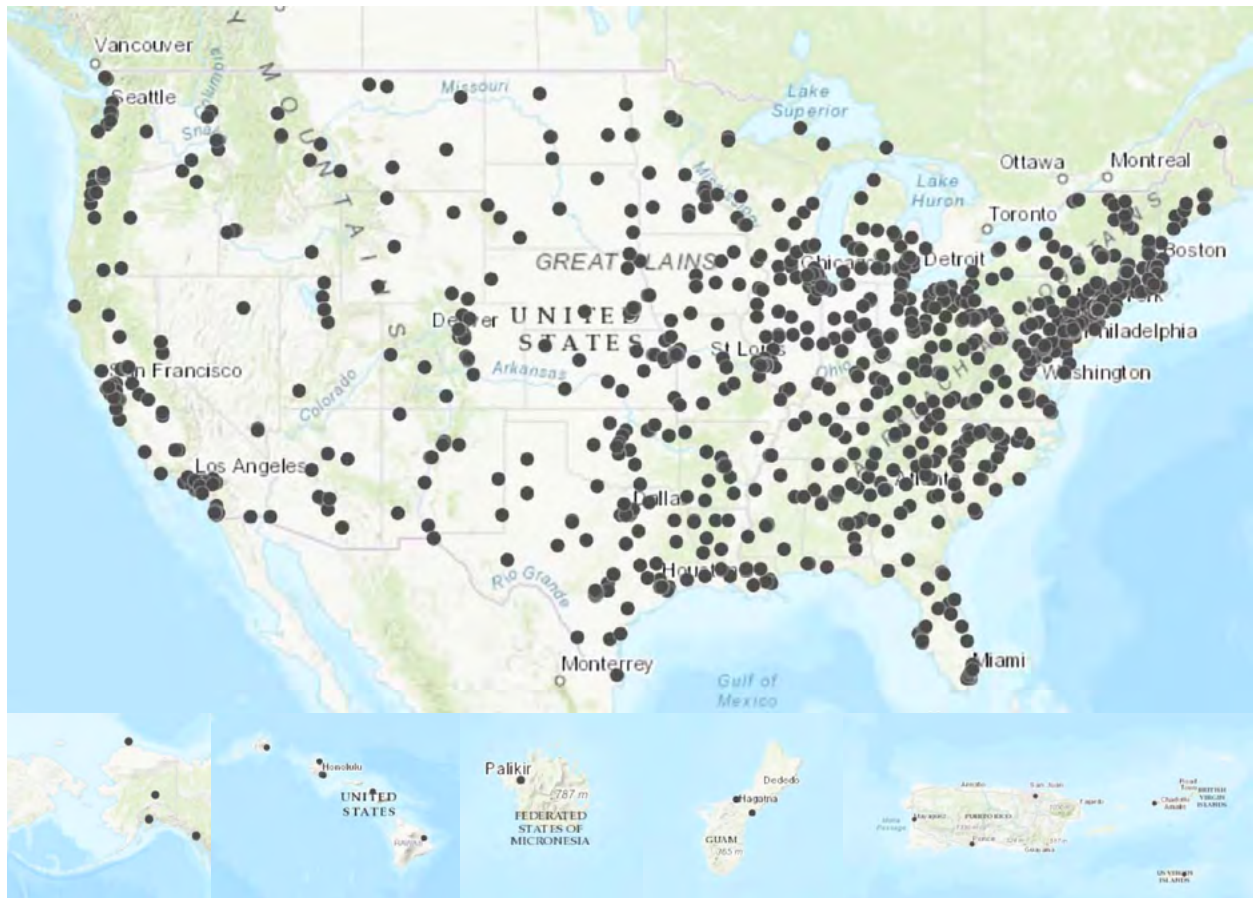


Source: OIG.

Federal Depository Library Program

The roots of the FDLP trace back to 1813 when Congress began sending House and Senate Journals and other Congressional documents to certain universities, historical societies, and state libraries to inform those far away from Washington, DC, about the work of the Government. In 1895, Congress overhauled existing printing laws and created new authorities for GPO, including directing that Government publications would be distributed through deposit in designated libraries. That direction led to the FDLP of today, which spans across the United States and its territories. See Figure 2 for a map of locations.

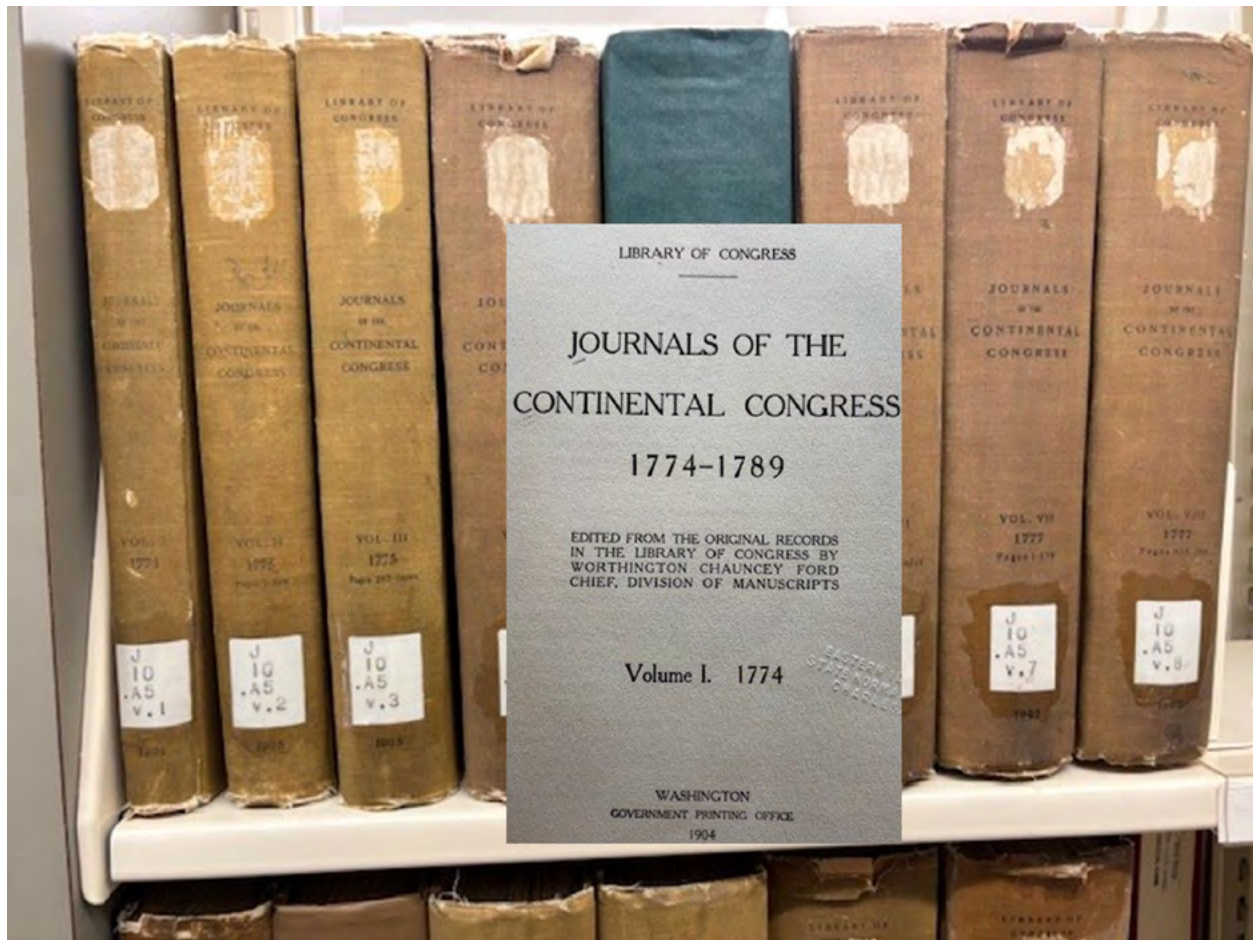
Figure 2. Map of locations of FDLs



Source: 2024 LSCM Year In Review.

FDLs offer access to information from all three branches of government on various topics, including health, the military, science, and early U.S. history; see Figure 3 for an example. The information might be available through books, maps, journals, and periodicals, or it could be accessible digitally. FDLs can be designated by law or by U.S. Senators, Representatives, agency heads, and other officials. An online searchable directory of FDLs exists, allowing the public to find details about each FDL, such as their address, phone number, website, catalog, and other relevant information like temporary closures or appointment requirements.

Figure 3. Journals of the Continental Congress, 1774-1777, with the title page from Volume I. 1774



Source: OIG.

Federal Depository Library Program Benefits

There are many benefits for libraries to be part of the FDLP. Some of those reasons include:

- Free publications in exchange for providing public access to those publications
- Savings on the cost to acquire Government publications
- Meeting their own mission, such as performing outreach in their communities
- Enhances political goodwill with the Congressional delegation
- Perceived prestige for the library and parent institution
- Collections that provide a documentary history of the United States
- Printed materials for inner-city communities and for small libraries
- Tangible materials allow rural communities with very little contact with federal agencies to gain insight into the important Federal Government work done on their behalf

For the librarians working in the FDLs, the reasons to be part of the FDLP are more direct:

- The ability to shape how Government information services are provided
- Participation in a professional group to help guide the evolution of FDLP services
- Free training to enhance reference librarians' skills and their ability to support students and faculty with research and teaching
- Access to many electronic publications at no cost
- Access to a community of expert FDLP practitioners
- Tools provided save time and effort in disseminating information

Figure 4 is an example of an FDLP display at one FDL.

Recent Legislative History of the FDLP

Title 44, Chapter 19, Depository Library Program, largely dates back to the 1960s, with some updates in the 1970s and in 2014, when GPO was renamed to Government Publishing Office and the Public Printer was retitled Director.² Those changes aside, the laws governing the FDLP remain mostly unchanged, even as public access and technology needs have evolved. Several attempts to update Chapter 19 were ultimately unsuccessful.³

Figure 4. FDLP display at an FDL



Source: OIG.

² In 1972, [Public Law 92-368](#) allowed a State's highest appellate court's library to be designated as an FDL. In 1978, [Public Law 95-261](#) allowed accredited law school libraries to be designated as FDLs.

³ Two bills, the Public Printing Reorganization Act of 1979 and the Wendell H. Ford Government Publications Reform Act of 1998 did not become law.

INSPECTION RESULTS

Finding 1. SuDoc is not meeting the intent of 44 U.S.C. Section 1909 to “make firsthand investigation of conditions for which need is indicated” with the Public Access Assessments of the Federal Depository Libraries.

SuDoc has not conducted a PAA since 2017 and has not conducted a firsthand investigation since 2004. Due to a lack of evidence, we were not able to determine why the decision to stop conducting PAAs was made. However, we did discover multiple contributing factors to the current state. First, the current SOD 312 is too restrictive. It equates the statutorily required firsthand investigation to the conduct of PAAs. In reality, firsthand investigations could be accomplished in a variety of ways and don't need to be done as PAAs. Second, PAAs and previous iterations were complex and burdensome. Finally, we could not find that SuDoc ever communicated the cessation of PAAs, and the risks involved with that decision, to the GPO Director or Joint Committee on Printing (JCP). By not conducting firsthand investigations, as PAAs or something different, SuDoc is not able to identify and assess deficiencies in depository libraries as required by law.

Criteria:

- 44 U.S. Code Chapter 19, *Depository Library Program*
 - Section 1909, Requirements of depository libraries; reports on conditions; investigations; termination; replacement
 - Section 1914, Implementation of depository library program by Director of the GPO
- Superintendent of Documents Policy Statement, SOD 312, *Firsthand Investigation of Individual Federal Depository Library Conditions*, January 28, 2008
- *Legal Requirements & Program Regulations of the FDLP*, February 2018

The FDLP is governed by 44 U.S.C. chapter 19. Under section 1909, SuDoc must conduct firsthand investigations of FDL conditions when necessary and include the findings in their annual report. Libraries that hold fewer than 10,000 publications, excluding government publications, are inaccessible to the public or fail to maintain government publications properly, must be removed from the depository list if they do not fix these issues within six months. Further, depository libraries are required by law to report their conditions to the SuDoc at least every two years. Libraries report their conditions by responding to the Biennial Survey of Depository Libraries, and the information received is analyzed and published in the State of the FDLP Report. We interpret “firsthand” as direct personal observation.

U.S.C. 44 section 1914, states, “[t]he Director of the [GPO], with the approval of the [JCP], as provided by section 103 of this title, may use any measures he considers necessary for the economical and practical implementation of this chapter.”⁴ We assess that Section 1914 could be used to grant GPO the authority, subject to JCP approval, to implement necessary measures for the economical and practical implementation of the depository library program; those “necessary measures” just need to be documented.

The Superintendent of Documents Policy Statement, *Firsthand Investigation of Individual Federal Depository Library Conditions*, SOD 312, effective January 28, 2008, states “[t]he [PAAs] Program fulfills the GPO's responsibility to conduct firsthand investigations of conditions at individual depository libraries.”

⁴ U.S.C. 44 Section 103, states, “The [JCP] may use any measures it considers necessary to remedy neglect, delay, duplication, or waste in the public printing and binding and the distribution of Government publications.”

The *Legal Requirements & Program Regulations of the FDLP*, February 2018, were initially developed in the mid-1970s, after the Depository Library Council (DLC) and a library association round table concluded that FDLs needed systematic and formal inspection to ensure the FDLP's effectiveness.⁵ The DLC developed guidelines, which eventually became the *Legal Requirements & Program Regulations of the FDLP*.

Figure 5 shows the FDLP area in one FDL.

Figure 5. FDLP signage in the Government Publications area of the library



Source: OIG.

SuDoc has not Conducted PAAs since 2017

Instead of physically visiting the FDLs to assess their conditions, PAAs were carried out through document reviews and phone calls. We could not determine when or why that decision was made. A GPO official told us the decision to stop PAAs was due to a personnel and budget shortage, but we could not verify that claim. We assess that there are several reasons contributing to the cessation of PAAs. First, the current SOD 312 limits firsthand investigations to PAAs, and SuDoc has not established a clear policy defining PAAs and their components. Second, PAAs and earlier versions were complex and burdensome. Finally, there is no evidence that SuDoc informed the GPO Director and Congressional stakeholders, particularly the JCP, about the decision to stop conducting PAAs or the risks involved.

History of Firsthand Investigations

In 1962, Public Law 87-579 required the Superintendent of Documents to conduct firsthand investigations of conditions at FDLs for which need is indicated and to include the results of those investigations in an annual report. Since then, the firsthand investigations have taken several forms as follows:

- In the mid-1970s, using DLC-developed guidelines, GPO had a formal inspection program in which librarians visited and assessed individual libraries. In 1975, they provided the FDLs with a two- to three-page inspection report checklist. By 1979, the inspection reports were more than 20 pages long and included scores in various categories, ranging from organization and maintenance of the collection to cooperation with GPO.
- In 1996, reviewed libraries had to complete a self-study of their FDL to determine if an onsite inspection was needed. These reports, over 30 pages, included an inspection summary detailing compliance in areas like collection development, bibliographic control, human resources, and public service. They also outlined corrective actions and non-mandatory recommendations.
- In 2008, SuDoc implemented its Policy Statement, SOD 312, *Firsthand Investigation of Individual Federal Depository Library Conditions*, January 28, 2008. It designated PAAs as the mechanism to conduct firsthand investigations of individual FDLs. PAAs focus on whether FDLs provide free public access to Federal Government information products distributed and disseminated by GPO. The PAAs were conducted through phone calls and written correspondence. PAA reports were approximately 10 pages long, and covered categories like collection development, bibliographic control, physical facilities and collection maintenance,

⁵ The DLC advises the GPO Director on policy matters relating to the FDLP and access to U.S. Government information. The library association round table group is a forum for professional librarians working with government documents to learn about, discuss, and advocate for government information.

staffing, public service, and cooperative efforts. Additionally, the reports contained recommendations, although the recommendations were not required to be addressed.

Figure 6 shows unopened material at two FDLs.

Current SuDoc Policy is too Restrictive

SOD 312 does not allow firsthand investigations to be anything other than a PAA, e.g., “[t]he [PAAs] Program fulfills the GPO’s responsibility to conduct firsthand investigations of conditions at individual depository libraries.” However, it lacks additional guidance that establishes requirements for firsthand investigation; specific conditions that would be investigated, or what indicates the need for investigation; and details of other types of visits that SuDoc may conduct.

Figure 7 shows a worn decal displayed at an FDL.

Other Visits Conducted

SuDoc staff have visited FDLs for commemorative events, training, or consultations such as the FDL’s 135th anniversary in the FDLP. From FY 2018 to FY 2024, SuDoc staff made 281 visits to FDLs across 38 states. They stated these visits were not considered PAAs. However, by establishing minimal requirements, these visits could be classified as PAAs or even meet the firsthand investigation requirement in other ways.

In addition to the examples above, SuDoc staff consulted with FDLs who were considering leaving the FDLP, accused of improperly discarding Government documents, or needed help with “weeding,” which involves removing resources to ensure the FDL maintains a collection aligned with user needs and its mission.⁶ These visits exemplify the statute’s “needs indicate” stipulation and could have been identified as a firsthand investigation with JCP approval.

Figure 6. Shrink wrapped materials at two FDLs



Source: OIG.

Figure 7. Worn FDLP decal



Source: OIG.

⁶ The FDL was provided guidance on properly weeding the Government publications, and other requirements and regulations of the FDLP. The library has since transitioned to being a digital FDL.

Guidance Needed to Focus FDL Visits

Without clear guidance regarding the “firsthand investigation” and “need is indicated” requirements, SuDoc lacks a comprehensive way to determine which FDLs it should prioritize to visit. For example, a SuDoc FY 2023 and FY 2024 travel budget document identified several potential visit locations where an FDL had not previously been visited. Fourteen FDLs in those geographic areas were visited, including seven that were visited when SuDoc staff was in the area for a statewide meeting. However, those FDLs, and visits, did not coincide with the FDLs we identified as having a high need for a firsthand investigation due to their lack of response to the biennial survey for multiple cycles. Additionally, Federal Depository Support Services pointed out one area FDL as needing a visit because of serious issues across the depositories that required on-site support. However, that FDL was not visited.

PAA’s Extensive Requirements are Burdensome

PAAs and previous versions of PAAs were burdensome due to extensive requirements, such as self-studies that exceeded 30 pages, inclusion of categories related to staffing and space, and now dated requirements like making sure microfiche was not stored wrapped in rubber bands; see Figure 8.⁷

PAAs were conducted by phone calls and written correspondence, and resulted in a written report shared with the FDL and the regional FDL, and kept in GPO’s files. GPO was evaluating:

1. if the library was meeting the minimum requirements laid out in the *Legal Requirements & Program Regulations of the FDLP*;
2. how the library selected, tailored, processed, organized, cataloged, provided public access to, and promoted its depository collection;
3. if the Federal property sent to the library was being taken care of; and
4. if the library knew the location of all of that Federal property.

To conduct a PAA, first, outreach librarians review short questionnaires, the FDL’s official GPO file, responses to past Biennial Surveys of Depository Libraries, webpages, policies, and promotional highlights provided by the FDLs. Second, during a phone call that could last up to 90 minutes, outreach librarians asked clarifying questions and identified compliance issues. The FDLs also had an opportunity to ask questions. Third, outreach librarians followed the template to fill in the necessary information. After the call with the FDL, they wrote a detailed report of their findings. Finally, the reports were sent to the library and stored in GPO’s records.

Figure 8. Microfiche in a cabinet, with no rubber bands



Source: OIG.

⁷ Rubber bands are made of elements that can damage the microfiche film.

Together with extensive requirements and work to review an FDL's history and policies, PAAs were cumbersome for both SuDoc and the FDLs. By clearly identifying the highest priority elements of PAAs, such as public access, the ability to timely locate materials, and physical conditions of the materials, SuDoc would be able to more easily review FDLs and spend the saved time providing training or addressing other FDL concerns.

Figure 9 shows one library's entire physical collection.

PAA Cessation Not Communicated with Stakeholders

As a reminder, GPO's last PAA was August 2017. However, SuDoc was unable to provide evidence that they were stopping PAAs. Ceasing firsthand investigations is a change to the implementation of the FDLP that should have received clear, documented approval from the JCP.

Obtaining JCP Approval

The JCP is one of the oldest joint committees in Congress. It was established in 1846 and consists of five members from the Senate's Committee on Rules and Administration and five members from the House's Committee on House Administration, with the chair and vice-chair alternating between the two chambers every two years.⁸ The JCP exercises oversight of government printing and is authorized to "use any measure it considers necessary to remedy neglect, delay, duplication, or waste in the public printing and binding and the distribution of Government publications."⁹

GPO already works with the JCP to receive approval for changes to physical structures, changes to the workforce, and interagency agreements and spending over certain dollar amounts. One GPO official referenced the JCP's spending authorizations as the most tangible and relevant forms of approval for GPO activities.

As discussed in the Background section, there have been unsuccessful attempts to update FDLP legislation. While updating 44 U.S.C. Chapter 19 to modernize the FDLP and SuDoc operations is warranted, several elements could be addressed absent legislation. By obtaining JCP approval of measures considered necessary for the economical and practical implementation of the FDLP, GPO would be able to update the FDLP and how SuDoc operates it until Congress takes up legislation to modernize the FDLP.

Figure 9. One FDL's entire physical collection of Government information



Source: OIG.

⁸ 44 U.S.C. Section 101.

⁹ 44 U.S.C. Section 103.

Impact of not Conducting Firsthand Investigations

Without conducting firsthand investigations, or PAAs, SuDoc cannot verify whether FDLs meet the requirements of the FDLP. Our visits to FDLs revealed several deficiencies and room for improvement in the FDLs.

GPO OIG Visits to FDLs

We visited 46 libraries in 43 FDL organizations to examine their condition firsthand.¹⁰ We selected the FDLs based on the requirement to respond to the Biennial Survey of Depository Libraries questionnaire. While all FDLs are required by law to report their conditions to SuDoc at least every 2 years, nine had not responded in the last 6 years and 30 had not responded in the last 4 years. We visited ten of the non-responding FDLs, and several FDLs in the geographic areas of those FDLs.

Figure 10 is an example of an exterior FDLP decal.

During our visits we focused on assessing the three elements that would lead an FDL to be removed from the FDLP:

1. whether the FDL held less than 10,000 publications other than Government publications,
2. whether the FDL was no longer accessible to the public, and
3. whether the FDL properly maintained the furnished Government publications.

Figure 10. FDLP decal on the exterior of an FDL



Source: OIG.

¹⁰ At one FDL organization, a county library, we visited three library branches. The library listed in the FDL Directory was an administrative building that did not hold any materials available for public access. Our results reflect the information for the library branch the other library branches directed us to.

In addition to the above three elements, we assessed selected elements from previous PAAs and the *Legal Requirements & Program Regulations of the Federal Depository Library Program*:

1. Bibliographic control so Federal depository resources could be located, retrieved, and accessed in a timely manner.
2. Publicly accessible computer equipment so users could view, download, photocopy, and print depository content available in online and electronic resources.
3. Post FDLP decal on or near the library entrance. See Figure 11 for an example of an FDLP decal.
4. Depository libraries that have a library Web page or site identify themselves as an FDL on their Web page or site.

We also asked the staff at the information or circulation desks about their awareness of the library's participation in the FDLP.

Figures 12-14 are examples of signage observed during our site visits.

Figure 11. 2023 FDLP decal



Source: GPO.

Figure 12. Interior FDLP signage on microfiche cabinets



Source: OIG.

Figure 13. Interior FDLP sign directing patrons



Source: OIG.

Figure 14. Interior FDLP signage on moveable stacks



Source: OIG.

What We Saw at FDLs

FDLs need to better adhere to the *Legal Requirements & Program Regulations of the FDLP*. As shown in Table 1, of the 43 FDLs we visited, only 65 percent had a decal identifying them as FDLs near their entrance, and just over half identified themselves as FDLs on their website. Despite a reminder from the Superintendent of Documents in January 2023, many FDLs did not have clear exterior signage. Some decals were placed on interior doors, in vestibules, or on the backside of buildings, making them hard to see from the outside. See Figures 15 and 16 for examples.

Table 1. Results of review of selected elements

Element	No	Unknown	Yes	Percent
Bibliographic control so Federal depository resources could be located, retrieved, and accessed in a timely manner	126	9 ¹¹	123	48%
Publicly accessible computer equipment	1	14 ¹²	28	65%
FDLP decal on or near the library entrance	10	5 ¹³	28	65%
Depository libraries website identifies as an FDL	19	2 ¹⁴	22	51%
Information or circulation staff aware participation in the FDLP	7	6 ¹⁵	30	70%
Scale: Red = <60%; Yellow = 60 % - 69%; Green = >= 70%				

Figure 15. Exterior wooden doors



Source: OIG.

Figure 16. Entrance on backside of building



Source: OIG.

¹¹ We were unable to access the catalog at some FDLs and were unable to find our selection of materials through the catalog of some FDLs.

¹² We did not assess at all locations if there were publicly available computers at all of the visited FDLs.

¹³ One FDL was undergoing construction and inaccessible. Four FDLs required appointments, which was not clearly stated on the FDL Directory.

¹⁴ The websites for two of the libraries had security concerns, so we were not able to review those websites.

¹⁵ We did not ask staff at all visited FDLs if their library participated in the FDLP.

Further, we were able to identify publicly accessible computer equipment to access Government information in only 65 percent of the FDLs visited. And while nearly three-quarters of the staff were aware that their library participated in the FDLP, this is largely due to being directed to another member of the staff to answer the question. Multiple times, we were sent to another librarian to ask about FDLP membership, and then sent to at least a third librarian before the staff could definitively say they were part of the FDLP. Examples like this happened even in libraries that had the FDLP decal displayed.

Even with the deficiencies described, we identified examples of FDLs embracing their depository status with clear interior signage and FDLP displays. The various FDLs, including public, academic, and State libraries, created various FDLP displays, as seen in Figures 17 and 18.

Figure 17. FDLP display at an FDL



Source: OIG.

Figure 18. FDLP display at an FDL



Source: OIG.

Recommendations

For the Director, GPO:

Recommendation 1. Resume conducting firsthand investigations, in accordance with Title 44 section 1909, paragraph 2.

Management Comments

Management concurred with the recommendation and plans to prioritize in-person visits after updating their "definitions of 'firsthand investigation of conditions for which need is indicated.'"

OIG Response

GPO's concurrence and planned actions are responsive to this recommendation.

Recommendation 2. Update SOD 312 to include rubrics and definitions, along with a simple checklist, as a minimal firsthand investigation that executives can use during commemorative event trips.

Management Comments

Management concurred with the recommendation and plans to update SOD 312, using experiences from the spring and summer of 2025 activities.

OIG Response

GPO's concurrence and planned actions are responsive to this recommendation.

Recommendation 3. Request JCP approval for measures that are considered necessary for the economical and practical implementation of the FDLP, such as including commemorative events, training, or consultations as firsthand investigations.

Management Comments

Management concurred with the recommendation and plans to engage with the JCP and will send future measures taken under Title 44 section 1914 for the economical and practical implementation of the FDLP to the JCP for its approval.

OIG Response

GPO's concurrence and planned actions are responsive to this recommendation.

Recommendation 4. Develop and use a system of recordkeeping to track notifications to the JCP and JCP approval of SuDoc activities for the economical and practical implementation of the FDLP.

Management Comments

Management concurred with the recommendation and plans to develop a recordkeeping system to track notifications of FDLP changes submitted to the JCP, including when staff are briefed and approval or disapprovals are received.

OIG Response

GPO's concurrence and planned actions are responsive to this recommendation.

APPENDICES

Appendix A. Table of Recommendations

Recommendation	Management Response	Status	Return on Investment
Director, GPO			
1. Resume conducting firsthand investigations, in accordance with Title 44 section 1909, paragraph 2.	Concur. LSCM staff will update the definitions of "firsthand investigation of conditions for which need is indicated" and develop a plan to prioritize in-person visits based on the criteria in those definitions.	Open	Enhance compliance with laws, regulations, and standards <i>Firsthand investigations are required in Title 44 section 1909.</i>
2. Update SOD 312 to include rubrics and definitions, along with a simple checklist as a minimal firsthand investigation that can be used by executives during commemorative event trips.	Concur. LSCM staff will update SOD 312 so that minimal firsthand investigations can be made with less effort than was required by the former Public Access Assessments. LSCM and SuDoc staff have piloted simpler evaluations and visits during the spring and summer of 2025. LSCM staff will use that experience to make appropriate updates and develop checklists.	Open	Enhance management controls <i>Including rubrics and definitions in policy allow management to clarify how they will conduct firsthand investigations.</i>
3. Request JCP approval for measures that are considered necessary for the economical and practical implementation of the FDLP, such as including commemorative events, training, or consultations as firsthand investigations.	Concur. SuDoc and LSCM staff will develop a recordkeeping system to track when notifications of FDLP changes are submitted to JCP, including when staff are briefed and when approval or disapproval is received, ensuring the preservation of those records. LSCM staff have begun this work, including documenting policies and procedures tied to JCP approvals along with the records of those approvals.	Open	Enhance management controls <i>Using a system of recordkeeping to track requests for and JCP approvals will allow management to ensure the implementation of the FDLP is supported by the JCP.</i>
4. Develop and use a system of recordkeeping to track notifications to the JCP and JCP approval of SuDoc activities for the economical and practical implementation of the FDLP.	Concur. SuDoc and LSCM staff will develop a recordkeeping system to track when notifications of FDLP changes are submitted to JCP, including when staff are briefed and when approval or disapproval is received, ensuring the preservation of those records. LSCM staff have begun this work, including documenting policies and procedures tied to JCP approvals along with the records of those approvals.	Open	Enhance management controls <i>Using a system of recordkeeping to track requests for and JCP approvals will allow management to ensure the implementation of the FDLP is supported by the JCP.</i>

Appendix B. Scope and Methodology

Scope

Our team of inspectors performed this inspection of FDLP Assessments. Our inspection focused on the SuDoc Business Unit. The timeframe of the inspection was FYs 2020 - 2024.

Methodology

The inspection team:

- Interviewed:
 - Managers, Supervisors, and other personnel within:
 - SuDoc
 - Governmental Affairs
- Reviewed laws and regulations, GPO Directives, policies, and procedures; legal opinions; PAAs and other records.
- Reviewed FDL websites, physically visited FDLs, and took pictures of various conditions at the FDLs.

This inspection was conducted in accordance with the *Quality Standards for Inspections and Evaluations of the Council of the Inspectors General on Integrity and Efficiency*, December 2020 (Blue Book).

Appendix C. Abbreviations

DLC	Depository Library Council
FDL	Federal Depository Library
FDLP	Federal Depository Library Program
FY	Fiscal Year
GPO	Government Publishing Office
JCP	Joint Committee on Printing
LSCM	Library Services and Content Management
OIG	Office of the Inspector General
PAA	Public Access Assessment
SOD	Superintendent of Documents (Policy)
SuDoc	Superintendent of Documents
U.S.C.	United States Code

Appendix D. Management Comments

HUGH NATHANIAL HALPERN
Director

MEMORANDUM

Date: August 18, 2025

To: Inspector General

Subject: Agency Response to the OIG Draft Report on the Federal Depository Library Program Assessments Inspection 25-01-II

Thank you for the opportunity to offer the Agency's response to the OIG Draft Report on the Federal Depository Library Program Assessments Inspection 25-01-II.

In General

The Federal Depository Library Program is experiencing major changes as it transitions to a more digital format and the thoughtful recommendations in this Inspection will strengthen its management and delivery. The Library Services and Content Management (LSCM) staff look forward to acting on these recommendations and updating definitions, processes, and policies to improve our oversight of and support for the Depository Libraries.

Agency Response to Recommendations in the Draft Report

Recommendation 1

Resume conducting firsthand investigations, in accordance with Title 44 section 1909, paragraph 2.

GPO concurs with this recommendation.

The Agency concurs that LSCM staff need to update the definitions of "firsthand investigation of conditions for which need is indicated" and develop a plan to prioritize in-person visits based on the criteria in those definitions. The Agency expects to complete the review and implement any necessary managerial and supervisory changes by September 30, 2026.

Recommendation 2

Update SOD 312 to include rubrics and definitions, along with a simple checklist, as a minimal firsthand investigation that executives can use during commemorative event trips.

GPO concurs with this recommendation.

The LSCM staff will update SOD 312 so that minimal firsthand investigations can be made with less effort than was required by the former Public Access Assessments. LSCM and Superintendent of Documents (SuDoc) staff have piloted simpler evaluations and visits during the spring and summer of 2025. LSCM staff will use that experience to make appropriate updates and develop checklists. The Agency expects to complete the review and implement the necessary policy updates and managerial changes by June 30, 2026.

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Recommendation 3

Request JCP approval for measures that are considered necessary for the economical and practical implementation of the FDLP, such as including commemorative events, training, or consultations as firsthand investigations.

GPO concurs with this recommendation.

SuDoc and LSCM staff will engage JCP as they develop the updates needed to implement Recommendation 2. Future measures taken under title 44 U.S.C. § 1914 for the economical and practical implementation of the FDLP will also be sent to JCP for its approval. The Agency expects to complete the review and implement any necessary managerial and supervisory changes by September 30, 2026.

Recommendation 4

Develop and use a system of recordkeeping to track notifications to the JCP and JCP approval of SuDoc activities for the economical and practical implementation of the FDLP.

GPO concurs with this recommendation.

SuDoc and LSCM staff will develop a recordkeeping system to track when notifications of FDLP changes are submitted to JCP, including when staff are briefed and when approval (or disapproval) is received, ensuring the preservation of those records. LSCM staff have begun this work, including documenting policies and procedures tied to JCP approvals along with the records of those approvals. The Agency expects to complete the review and implement any necessary managerial and supervisory changes by June 30, 2026.

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



HUGH NATHANIAL HALPERN

**cc: Deputy Director
Chief of Staff
General Counsel**



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