



July 2013

FEDERAL PRINTING

Fewer Plants Are in Operation Than in 1990, and Selected Agencies Reported Declining Volumes

Why GAO Did This Study

Federal law requires that, with limited exceptions, all federal printing be performed by or through GPO. The JCP authorizes exemptions to specific agencies to operate in-house printing plants. In its 1990 JCP Regulations, the JCP included a list of authorized federal in-house printing plants. Some agency documents, once published, are required to be submitted to the FDLP, a GPO program designed to preserve government documents and make them available to the public.

GAO was asked to examine how federal printing practices had changed since the JCP Regulations were updated in 1990. This report describes (1) agencies' current printing practices—including the number of in-house printing plant and selected agencies' volumes and spending—and (2) how agencies' current printing practices are reflected in federal printing regulations and statutes.

GAO surveyed agencies that might be operating in-house printing plants, interviewed GPO and agency officials, analyzed agency data on printing volumes and spending, and reviewed printing regulations and statutes. GAO also selected six agencies from those surveyed to interview, based on their printing and reproduction obligations. Findings from these interviews cannot be generalized to other federal agencies.

GAO is not making recommendations in this report. GAO provided copies of the draft report to GPO and DOD for review and comment. GPO generally agreed with the findings and provided a letter and technical comments which were incorporated as appropriate. DOD did not provide comments.

View [GAO-13-636](#). For more information, contact Lorelei St. James at (202) 512-2834 or stjamesl@gao.gov

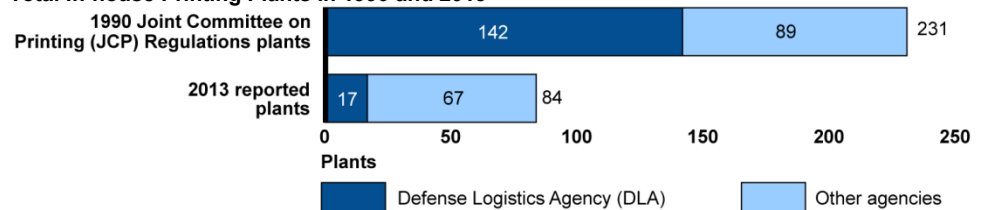
FEDERAL PRINTING

Fewer Plants Are in Operation Than in 1990, and Selected Agencies Reported Declining Volumes

What GAO Found

Agencies GAO surveyed reported operating fewer in-house printing plants than in 1990. Specifically, surveyed agencies reported operating 64 percent fewer plants than the number listed in the Congress's Joint Committee on Printing's (JCP) Government Printing and Binding Regulations, updated in 1990 (1990 JCP Regulations). The Department of Defense (DOD) accounted for the greatest decline in in-house printing plants. The 1990 JCP Regulations listed 142 DOD printing plants; however, the Defense Logistics Agency, which currently manages the majority of DOD's printing infrastructure, reported 17 in-house printing plants in GAO's survey. In addition, most agencies reported operating toner-based high-speed duplication machines, and fewer reported operating ink-based conventional printing presses. Of the 32 agencies operating in-house printing plants, 17 reported that all of their in-house printing was conducted on high-speed duplication machines; another 14 agencies reported operating some duplication equipment in addition to conventional printing presses (the remaining agency did not report its type of equipment). No agency reported having only ink-based conventional printing presses at its in-house plants. In addition, interviews with selected agencies showed declines in printing volumes and total spending, and suggested that agencies spent more on printing sent to the Government Printing Office (GPO) and its contracted private printers than on printing done at in-house printing plants.

Total In-house Printing Plants in 1990 and 2013



Source: GAO analysis of 1990 JCP Regulations and agency data.

Agencies' printing practices have changed, but existing authorities have not been updated. For example, in 1994, Title 44 of the U.S Code was updated to include "duplicating" in the definition of "printing," but the 1990 JCP Regulations do not include this definition. According to JCP staff, the Committee is aware that the 1990 JCP Regulations do not include duplicating in the definition of printing, and the Committee is working to revise the guidance. Also, the majority of government documents are now published digitally, but provisions in Title 44 that require agencies to submit documents to the Federal Depository Library Program (FDLP) do not reference digital publishing. Selected agencies GAO interviewed reported that they do not submit digital documents to FDLP. FDLP staff have taken a number of steps to address this, including educating agencies about FDLP requirements. In addition, the National Academy of Public Administration recently recommended that GPO develop a plan to preserve and collect government documents, and include a process for ingesting digitized copies into GPO's online government publications system, and GPO reported that it would incorporate this recommendation into its national plan for the future of the FDLP.

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Abbreviations

Commerce	Department of Commerce
DOD	Department of Defense
FDLP	Federal Depository Library Program
FDsys	GPO's Federal Digital System
GPO	Government Printing Office
HHS	Health and Human Services
JCP	The Congress's Joint Committee on Printing
OMB	Office of Management and Budget
State	Department of State
VA	Veterans Affairs
USPS	U.S. Postal Service
1990 JCP Regulations	Government Printing and Binding Regulations

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July 17, 2013

The Honorable Charles E. Schumer
Chairman
The Honorable Gregg Harper
Vice Chairman
Joint Committee on Printing
United States Congress

Federal agencies publish thousands of items such as reports, regulatory decisions, consumer information, and other types of documents that are of interest to the public. Federal law requires that, with limited exceptions, all federal printing be performed by or through the Government Printing Office (GPO). The Congress's Joint Committee on Printing (JCP) issues exemptions to some agencies to operate in-house printing plants, and in 1990, the JCP included within its Government Printing and Binding Regulations (1990 JCP Regulations) a list of authorized federal in-house printing plants. At the time, this included 231 in-house printing plants across 36 agencies. Once published, some agency documents, including some printed at in-house plants, are required to be submitted to the Federal Depository Library Program (FDLP), a program within GPO designed to preserve government documents and make them available to the public. However, since 1990, federal printing operations have changed, as industry and government data suggest that digital publication (producing and disseminating documents electronically) has increased and the traditional production of printed documents has decreased.

In this context, you asked us to examine the current state of federal printing. In this report, we describe: (1) agencies' current printing practices, including the number of in-house printing plants and selected agencies' volumes and spending, and (2) how agencies' current printing practices are reflected in federal printing regulations and statutes.

To carry out this review, we developed working definitions of key printing terms — "printing," "duplication," and "printing plant"—intended to capture agencies' current printing practices. To develop these definitions, we used existing statutory language, and consulted with GPO and the

Interagency Council on Printing and Publication Services.¹ We distinguished “duplication” from “copying” by the number of pages printed, which allowed us to identify and include larger duplication operations that qualified as agency in-house printing plants and exclude smaller copying operations, sometimes referred to as “copy centers.” We considered volumes above 500 copies of a single page and 2,500 copies in the aggregate of multiple pages to be “duplication,” and we considered volumes below that to be “copying.” For further information on the definitions used and challenges they presented, see appendix I.

To develop a list of agencies that might be currently operating in-house printing plants, we identified 31 agencies² with printing plants listed in the 1990 JCP Regulations and an additional 16 agencies identified by reviewing agency obligations of funds identified in the Office of Management and Budget’s (OMB) “printing and reproduction” object class data³ for fiscal years 2009 through 2011. We included only those agencies that had obligated funds in at least 2 years from fiscal years 2009 to 2011. This resulted in a total universe of 47 agencies. To describe agencies’ current printing practices, such as the operation of in-house printing plants, we administered a survey from January 2013 through March 2013. We received a 100 percent response rate on our survey and analyzed the information obtained.

To obtain information about selected agencies’ current printing operations, including their volumes and spending, we interviewed officials from the six agencies from our survey universe whose printing and reproduction obligations in fiscal years 2009, 2010, and 2011 together constituted the majority—roughly 80 percent—of total federal obligations to printing and reproduction. Those agencies were the Departments of Commerce (Commerce), Defense (DOD), Health and Human Services (HHS), State (State), and Veterans Affairs (VA), and the U.S. Postal

¹ The Interagency Council on Printing and Publication Services consists of printing officers representing federal organizations from the executive, judicial, and legislative branches.

² There were 36 agencies included in the 1990 JCP Regulations list of authorized printing plants, but for the purposes of our review, we made a number of adjustments. As a result, we excluded 5 of these agencies and retained 31 in our survey universe. For additional detail on the adjustments, see appendix I.

³ *Object classes* are categories used in budget preparation to classify obligations by the items or services purchased by the federal government. In this instance, the object class identifies printing and reproduction-related items and services.

Service (USPS). We interviewed printing and budget officials from these agencies, and obtained information on their printing operations, including data on volumes and spending. Findings from these interviews cannot be generalized to other federal agencies.

Although we used OMB obligations data to identify agencies to be included in our review, we could not use the same obligations data to describe agencies' in-house printing activities because obligations data includes other agency printing activities, such as printing sent to GPO and private printers.⁴ As such, we relied on interviews with agency officials to describe their in-house printing. The spending data agencies provided fell into two categories: (1) printing and reproduction expenses and (2) printing and reproduction obligations. For the purposes of this report, we refer to both as "spending." "Obligations" and "expenditures" capture different aspects of the budgeting process—obligations are the legal commitment to pay for a good or service while expenditures are the actual disbursement of money. For the purposes of this report we assume that there is a relatively short time lag between obligation and expenditure for printing and reproduction activities, and therefore that the difference is not material. Therefore, we refer to both obligations and expenditures as a single "spending" category.

To understand and describe federal printing authorities, we reviewed Title 44 of the U.S. Code and the 1990 JCP Regulations, and interviewed officials from GPO and other agencies.

We conducted this performance audit from August 2012 to July 2013, in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives. See appendix I for more detailed information on our scope and methodology.

⁴ Private printers are printing companies with which GPO or other agencies contract to print.

Background

JCP and GPO

The JCP and the GPO have prominent roles in federal government printing. The oldest joint committee in Congress, the JCP was established in 1846 and is comprised of five Representatives and five Senators.⁵ It oversees the operation of GPO, which by law is the principal printing organization for federal agencies. The JCP exercises oversight over 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.”⁶ To assist in carrying out its responsibilities, in 1990 the JCP updated the Government Printing and Binding Regulations,⁷ which require agencies to report semi-annually to the JCP any in-house printing and any printing that exceeds 5,000 production units of a single page or 25,000 production units in the aggregate of multiple pages.

GPO was established in 1861 to print government documents and disseminate them to the public. Title 44 of the U.S Code, Public Printing and Documents, provides that all printing for Congress, the executive branch, and the judiciary (except the Supreme Court) is to be done by or contracted by GPO, unless otherwise exempted.⁸ GPO prints at its in-house plant in Washington, D.C., and one other secure facility for passports and smart cards only, but it contracts with private printers to produce the majority of printing for the federal government. At its in-house plant, GPO prints primarily congressional documents, such as the Congressional Record. GPO offers different programs and services such as GPO Express, which allows agencies to print directly to FedEx Office and other private sector vendors, and the GPO Simplified Purchase Agreement Program, which provides a list of pre-approved private printers and stated prices for federal agencies to use when selecting a

⁵ 44 U.S.C. § 101.

⁶ 44 U.S.C. § 103.

⁷ “Government Printing and Binding Regulations”, JCP, S. Pub. 101-9, Feb. 1990, No. 26.

⁸ 44 U.S.C. § 501.

printer. GPO receives funding through direct appropriations⁹ (\$126 million in fiscal year 2012), collection of an approved fee-for-service from other federal agencies for print procurement, and the sale of publications to the public.

GPO's activities also include providing public access to official government documents through the FDLP¹⁰ and GPO's Federal Digital System (FDsys) website.¹¹ The Superintendent of Documents, who heads GPO's Information Dissemination division, is responsible for collecting government products and disseminating them to the public through a network of approximately 1200 depository libraries and online catalogues. GPO evaluates documents to identify those that contain information on U.S. government activities or are important reference publications, and should therefore be disseminated to a depository library. Title 44 requires that federal agencies make their publications available to the Superintendent of Documents for cataloging and distribution through the FDLP.¹² With the onset of digital publishing, the FDLP has been transformed into a primarily electronic program, obtaining and distributing federal documents digitally. GPO's FDsys website, which offers an online catalogue of official government digital documents, also aids in the collection and preservation of government publications and provides access to the public.

Printing Definitions

Federal government printing definitions are outlined in statute and regulation. Title 44 at Section 501 Note defines printing as the processes of composition, platemaking, presswork, duplicating, silkscreen processes, and binding. The 1990 JCP Regulations include the definitions of key printing terms applicable at that time. Prior to 1994, Title 44 did not include duplicating in the definition of printing, but in 1994, the Title 44

⁹ GPO officials noted that GPO's appropriations are for congressional printing and binding, the salaries and expenses of the Superintendent of Documents, and additions to working capital in the revolving fund. GPO officials also reported that the congressional printing and binding account is the largest appropriation, the Congress reimburses GPO for work performed for Congress, and GPO also is reimbursed by agencies for work performed inplant (e.g., *Federal Register*).

¹⁰ 44 U.S.C. §§ 1901-1916.

¹¹ <http://www.gpo.gov/fdsys/>.

¹² 44 U.S.C. § 1902.

definition was updated to include duplicating (i.e., printing done on high-speed duplication machines) as a printing process.¹³ However, the 1990 JCP Regulations were not updated to include duplicating.

In our review, we identified two main categories of agency printing used today— ink-based, and toner-based or ink-jet-based:

- Ink-Based Printing (also referred to as conventional printing) is a water and ink-based process that uses machines called printing presses to produce material such as publications and other documents. Presses use plates to transfer images onto a final paper document. Conventional presses are relatively costly to set up, making the first impression of a document expensive, but costs decline as the volume of copies increases, which makes it cost-effective for high volume print jobs. Ink-based printing uses offset or digital printing presses. Offset printing presses typically have many open areas where the machinery can be manually adjusted, and can take up a large amount of space (see fig. 1).

Figure 1: Offset Printing Press



Source: GPO.

¹³ 44 U.S.C. § 501 Note.

A digital printing press¹⁴ also uses plates to transfer images and ink, but the process is computerized and the press is mostly closed because it does not need the same level of manual adjustments (see fig. 2).

Figure 2: Digital Printing Press



Source: GPO.

- Toner-Based Printing (also referred to as duplication) is a process on machines that use either heat to transfer an image on paper or toner or ink-jet to transfer an image to paper. Toner-based printing is typically done on one type of equipment, a high-speed duplication machine, also referred to as a high-speed copier. This refers to a high capacity toner-based machine, typically capable of 100 or more black and white images per minute with some finishing capabilities (e.g., staples, collating, limited binding, etc.) (see fig. 3). These machines typically have a higher printing speed and capacity than typical “walk-up” office copiers.

¹⁴The term digital printing refers to printing done on a digital printing press, but can be applied more broadly to categorize all printing using digital processes, which can include both ink and toner-based machinery. For the purposes of this report, we limited our digital printing definition to that conducted on ink-based digital presses.

Figure 3: High-speed Duplication Machine



Source: GPO.

Current Printing Practices Show Changes since 1990

Since the JCP Regulations were updated in 1990, agencies' printing operations have changed in scale and type. Printing industry and government data suggest that the total volume of printed material has been declining for at least the past 10 years.¹⁵ A major factor in this decline is the use of electronic media options, such as digital publishing. As such, federal agencies publish more documents directly to the Internet where the public can access them, bypassing the need for the agency to print hard copies. At the same time that digital publishing was increasing, digital printer/copier technology was developing. In circumstances where agencies still needed hard copies to be printed, digital printers and copiers allowed federal agencies to produce documents themselves that formerly would have required professional printing expertise from outside vendors such as GPO or private printers.

¹⁵ For example, see GAO, *Government Printing Office: Actions to Strengthen and Sustain GPO's Transformation*, [GAO-04-830](#) (Washington, D.C.: June 30, 2004) and Joss, Molly. "PMIR." *The Seybold Report* (Jan. 21, 2013).

Fewer In-house Printing Plants Are in Operation Than in 1990

Based on definitions we developed in conjunction with GPO and the Interagency Council on Printing and Publication Services,¹⁶ among the agencies in our survey universe, we measured 64 percent fewer in-house printing plants than the number included in the 1990 JCP Regulations.¹⁷ The 1990 JCP Regulations listed 231 authorized¹⁸ in-house printing plants; agencies we surveyed reported operating 84 in-house plants. Although there was an overall decline in the number of printing plants, there was not a decline across all agencies—9 of the surveyed agencies reported a decrease in the number of plants, 14 agencies reported no change in the number of in-house plants, and 8 agencies reported an increase in the number of in-house plants.¹⁹

DOD accounted for the greatest decline in in-house printing plants. For example, the 1990 JCP Regulations listed 142 in-house printing plants for the armed services and the Defense Logistics Agency (DLA), which currently manages the majority of DOD's printing infrastructure. DLA officials reported managing 17 in-house plants in our survey (see fig. 4).²⁰

¹⁶ In order to collect current information on agencies' printing, we developed working definitions for key printing terms. Our definition of printing plant was the same as that used in 1990, with the addition of the following note: "A duplication plant is a printing plant." See appendix I for more information on how we developed definitions for "printing," "duplicating" and "printing plant."

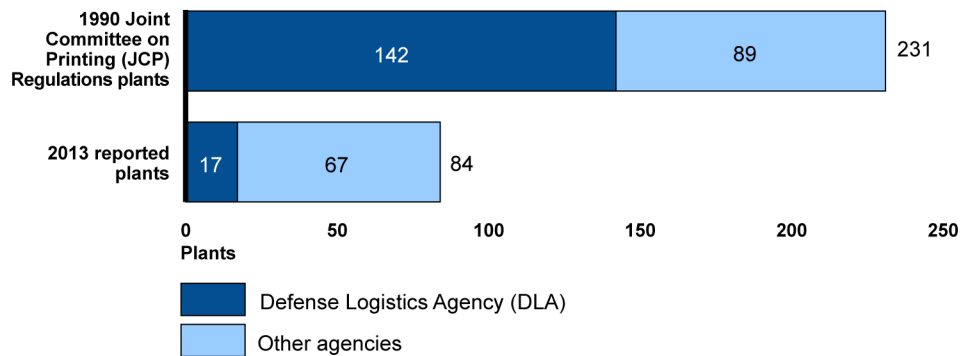
¹⁷ The universe of agencies included in the 1990 JCP Regulations and in our 2013 survey differed. See appendix I and II for further details.

¹⁸ The total number of printing plants listed in the 1990 JCP Regulations includes one authorized printing plant each for the Panama Canal Commission and the Administrative Offices of U.S. Courts and 6 authorized plants for GPO. The Panama Canal Commission no longer exists, and we excluded the U.S. Administrative Offices of U.S. Courts and GPO from our survey population. GPO officials noted, however, that the agency's regional plants listed in the 1990 JCP Regulations have since closed.

¹⁹ Some agencies reported difficulty identifying their in-house printing plants based on printing definitions provided. See appendix I for further information on challenges associated with the definitions and how we addressed them.

²⁰ According to DLA officials, DOD's intelligence agencies' tactical activities and National Guard and Reserve organizations are excluded from DLA's mission.

Figure 4: Total In-house Printing Plants Counted in 1990 and 2013



Source: GAO analysis of 1990 JCP Regulations and agency data.

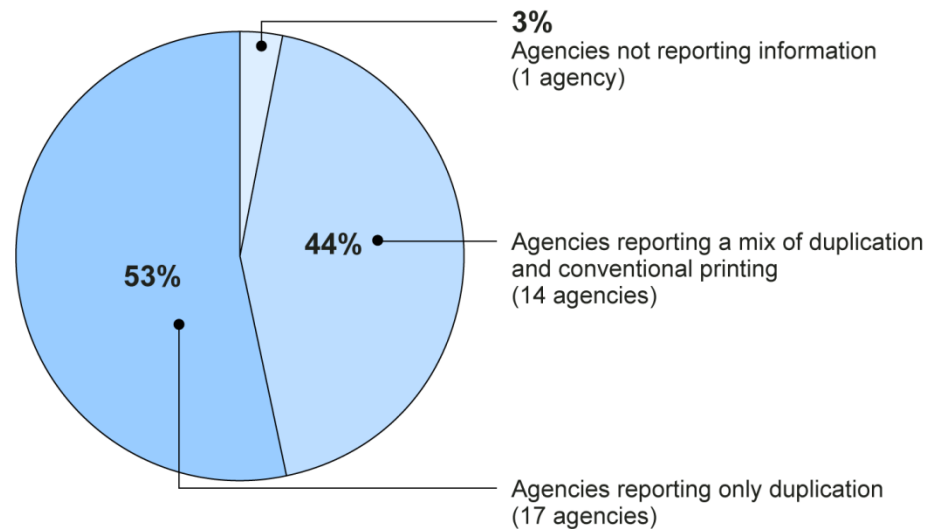
Other agencies that reported declines showed less dramatic reductions, such as the Department of Energy, which had 18 plants on the 1990 list, and reported 5 plants in our 2013 survey. A decline in the number of in-house plants could be due to some agencies reducing their printing and focusing more on digital publications. One factor that could have influenced the increased emphasis on digital publications is a November 9, 2011, executive order promoting efficient spending. This executive order included a provision encouraging agencies “to limit the publication and printing of hard copy documents and to presume that information should be provided in an electronic form, whenever practicable, permitted by law, and consistent with applicable records retention requirements.”²¹

²¹ Section 5 of Exec. Order No. 13589, Promoting Efficient Spending, 76 Fed. Reg., 70863 (Nov. 15, 2011).

Agencies Reported Operating Primarily Duplication Equipment at In-house Printing Plants

The vast majority of agencies that currently operate in-house printing plants reported operating duplication equipment.²² That is, most agencies reported operating high-speed duplication machines, and fewer reported operating conventional printing presses. Of the 32 agencies operating in-house printing plants, 17 reported that all of their in-house printing was duplication, and another 14 agencies reported operating some duplication equipment in addition to ink-based conventional printing presses. The remaining agency did not report its type of equipment (see fig. 5). No agency reported having only ink-based conventional printing presses at its in-house plants.

Figure 5: Types of Printing Equipment Reported by Agencies Surveyed



Source: GAO analysis of agency data.

²² Twenty-seven of the 32 agencies operating in-house printing plants are included in the 1990 JCP Regulations list of agencies with authorized printing plants. The remaining five agencies were identified through our review of OMB obligations data. When asked under what authority these agencies were operating print plants, one of the 5 agencies cited the 1990 JCP Regulations; three cited other specific statutory authority applying to their agency, and one did not respond to the question.

Most Selected Agencies Estimated Their Printing Volumes Declined, and Agencies' Spending Suggests Greater Use of Private Printers

In addition to agencies operating fewer printing plants and conducting more duplication, interviews with selected agencies showed declines in printing volumes in recent years. We interviewed six agencies that, according to OMB budget data, accounted for about 80 percent of total federal printing and reproduction obligations. Of those six agencies, five reported declines in total printing volumes between fiscal year 2009 and fiscal year 2011²³, ranging from 6 percent to 59 percent. One agency reported an 11 percent increase in printing volumes and told us it was due in part to opening an additional in-house plant in 2009. All six agencies estimated a decrease in total spending²⁴ on printing and reproduction between fiscal year 2009 and fiscal year 2011. Decreases ranged from as little as 0.1 percent to over 90 percent. All six agencies also reported greater spending on printing sent to GPO and private printers than on in-house printing or duplication.²⁵ For example, in fiscal year 2011, USPS reported spending \$5.8 million on in-house printing and spending \$108.3 million²⁶ on printing sent to private printers. Similarly, HHS reported spending \$0.4 million on in-house printing, and \$50.2 million on printing sent to GPO or private printers in fiscal year 2011.²⁷

Agencies told us that they use a number of factors such as sensitivity, cost, volume, turnaround time, and in-house capabilities to determine if they will print in-house or externally through GPO or private printers. For example, DLA officials told us DLA produces some documents, such as those printed for the President, at in-house facilities to accommodate the short turnaround time and possible sensitive nature of the documents. VA officials said they send large volume print orders or documents requiring

²³ We considered total printing volumes to be volumes reported as printed at agencies' in-house printing plants plus volumes reported as printed through GPO or private printers, unless agencies provided separate "total" figures. One division within HHS, the Centers for Medicare and Medicaid Services, did not provide volumes printed through GPO or private printers, so HHS totals do not include that division.

²⁴ OMB requires agencies to submit obligations on object class 24—"printing and reproduction"—but these obligations may not reliably capture spending at in-house printing plants. For more information, see appendix I.

²⁵ As noted previously, agency obligations data may not be reliable. See appendix I for more information.

²⁶ This was the largest amount reported by the 6 selected agencies.

²⁷ We did not determine if increased spending by agencies on printing sent to private printers was due to greater print volumes or greater prices.

special finishing to private printers. For example, VA officials told us they used GPO and its approved private printers to print 2.9 million copies of its 2011 federal benefits booklet for veterans, survivors, and dependents because private printers could better handle this quantity than VA could in-house.

Current Printing Practices Are Not Fully Reflected in Existing Printing Authorities

1990 JCP Regulations

Even with these changes in agencies' printing, the definition of "printing" has not been updated in the 1990 JCP Regulations, which outline printing-related definitions and list authorized agency in-house printing plants. In 1994, Title 44 was updated to include "duplicating" in the definition of "printing," so that it read "... 'printing' includes the processes of composition, platemaking, presswork, duplicating, silk screen processes, binding, microform, and the end items of such processes."²⁸ However, the 1990 JCP Regulations have not been updated to include duplicating in the definition of printing, and duplicating is not separately defined in either authority. For example, Title 44 does not separately define duplicating, and the 1990 JCP Regulations include a definition for "duplicating/copying," such that it is not distinguished from "copying."²⁹

Some agencies had difficulty using the definitions we created or identifying the number of their in-house facilities that performed duplication and qualified as printing plants. As mentioned above, to facilitate consistent data gathering from federal agencies on their printing activities, we worked with GPO and the Interagency Council on Printing

²⁸ 44 U.S.C. § 501 Note.

²⁹ 1990 Government Printing and Binding Regulations, Section 2-1. See appendix I for a detailed description of the definitions in the 1990 JCP Regulations, Title 44, and those developed with GPO and the Interagency Council on Printing and Publication Services for this review.

and Publication Services to establish working definitions that included the Title 44 definition of printing and an updated definition of duplicating. In our survey, three agencies told us their definition of printing differed from ours. Two of those reported using the 1990 JCP Regulations printing definition, which does not include “duplicating”. Similarly, VA officials believed their agency operated one in-house printing plant, but in our discussion officials noted that the facility does not typically produce work that exceeds the volume limits of “duplication”³⁰ and as such would not qualify as a printing plant. Postal Service officials reported that its 67 district offices do not track printing volumes, and thus could not determine if those offices’ printing operations would qualify as printing plants. We excluded these VA and Postal Service plants in our tally.

Some agencies also had difficulty providing volumes and spending data under these definitions. For instance, printing officials from Commerce’s bureaus told us that they each tracked printing differently—some tracked pages while others tracked the number of jobs. Regarding spending, some printing officials told us they combined in-house printing and printing through GPO and its contractors in their spending estimates while others were able to report these amounts separately. For example, DLA officials said that they do not typically track volumes by our duplication volume limits, and as such would not track spending at facilities (i.e., printing plants) that may exceed those volumes. However, at our request, DLA officials reviewed production at the agency’s in-house facilities and identified plants that met our definitions, and then estimated spending at these plants.³¹ Other agencies we interviewed, such as the Postal Service and the State Department, provided total spending for all jobs printed at their in-house printing plants. As such, this data could include jobs printed at volumes below those in the provided duplication definition.

³⁰ DLA officials told us that they provided us with spending data only for jobs done at in-house printing plants that exceeded 500 copies of a single page or 2,500 copies of multiple pages, per job. As noted above, we considered volumes above 500 copies of a single page and 2500 copies in the aggregate of multiple pages to be “duplication,” and we considered volumes below that to be “copying.”

³¹ To describe how differently agencies track printing-related volumes and spending compared to the way we requested this information, we asked DLA officials to estimate how long it took them to compile our data request. DLA officials reported spending more than 50 hours assembling data on their in-house printing operations.

Agencies may also have had difficulty providing volumes and spending data because of decentralized printing practices. For instance, five agencies reported that their printing operations were dispersed across the agency, which meant that officials responsible for printing operations did not have readily available information on agency-wide printing operations. One was the Department of Commerce, which houses 12 bureaus and agencies that operate independently and differently. Commerce officials told us that because printing is dispersed, there was not a single official who could report on printing across the agency. Health and Human Services' four divisions³² with printing operations also reported operating with their own distinct printing officials and practices. In these cases, each division provided its own volume and spending information, which could lead to inconsistencies in data across bureaus or sub-agencies.

In addition, the 1990 JCP Regulations provide that federal agencies report on their print operations to the JCP, but the requirements do not address duplication. The 1990 JCP Regulations state that agencies shall report printing operations semi-annually to the JCP, on information such as the total cost of printing and an inventory of plant equipment at in-house printing plants. Officials from four of the six agencies we interviewed reported that they did not recently send reports on their printing operations to the JCP, and JCP staff told us they received only a few reports in the last 5 years. Discussions with officials from one agency suggested a reason for this may be that some agency officials believed they are only required to report on printing plants with offset or conventional printing equipment, not those with duplication equipment. Since the reporting requirements date back to 1990, before Title 44 was updated to include duplicating in the definition of printing, neither the 1990 JCP Regulations nor the JCP report forms specify that agencies are required to submit reports for printing plants that agencies may consider duplication plants. Officials from one agency told us they did not report to JCP because they did not have any in-house facilities, and officials from another agency noted that they were exempt from the reporting

³² One of HHS's divisions, the Program Support Center, manages the federal printing program for eight divisions – the Office of the Secretary, Food and Drug Administration, Substance Abuse and Mental Health Services Administration, Indian Health Service, Health Resources and Services Administration, Administration for Children and Families, Office of the Inspector General, and Agency for Healthcare Research and Quality.

requirements.³³ Additionally, officials from a bureau at one agency told us they send JCP reports to an in-house printing officer, suggesting some confusion regarding reporting requirements.

JCP staff told us they recognize the 1990 JCP Regulations do not include duplication in the definition of printing, and are working to revise this guidance. Specifically, JCP staff are in the process of developing printing definitions that more closely reflect current printing practices, particularly for “duplication” activities. JCP staff also told us that they are working to streamline reporting requirements for agency printing officials.

FDLP Requirements

The majority of government documents are published digitally (electronically produced and then disseminated over the Internet); however, the provisions in the law that require agencies to submit documents to the Federal Depository Library Program (FDLP) do not reference digital publishing. GPO estimates that more than 90 percent of all government information is published digitally. Title 44 outlines the types of documents that are required to be submitted to the FDLP, upon request, but does not reference digital documents explicitly. Currently, Title 44 defines a “government publication” as “[an] informational matter which is published as an individual document at Government expense, or as required by law.”³⁴ Title 44 does not specify if “published” includes digitally published documents. Officials from selected agencies told us they do not submit digital documents to FDLP,³⁵ and two reported that they do not have any policies or procedures for submitting documents to the FDLP regardless of whether the documents were printed at their in-house printing plants or published electronically. For documents printed through GPO, agencies are not required to make a determination about whether a document should be submitted to FDLP, as GPO typically identifies documents that could be of interest to the FDLP and then, if

³³ Postal Service officials told us that the general requirements of 44 U.S.C. §§ 501 and 502 with regard to “every executive department, independent office and establishment of the Government” should not be construed to apply to the Postal Service, in view of the provisions of 39 U.S.C. § 410(a) which excludes the Postal Service, with exceptions, from federal laws “dealing with public or Federal contracts, property, works, offices, employees, budgets or funds...” Instead, 39 U.S.C. § 411 provides specific authority for cooperative endeavors between the Postal Service and the Government Printing Office.

³⁴ 44 U.S.C. §1901.

³⁵ Commerce officials reported that the National Institute of Standards and Technology coordinates its digital publication with the FDLP.

FDLP request them, sends them directly to the FDLP. Some agencies' officials told us they rely on GPO for this service, and do not submit digital documents to the FDLP.

FDLP staff have taken a number of steps to address this challenge, and to obtain digital documents from agencies. FDLP staff told us they focus on educating agencies about document submission requirements, and searching for and locating possible "fugitive documents"—documents that agencies published and FDLP staff believe should have been submitted to the FDLP. In a January 2013 report, the National Academy of Public Administration (NAPA) recommended that GPO work with depository libraries and other library groups to develop a comprehensive plan for preserving the print collection of government documents, including a process for ingesting digitized copies into FDSys, GPO's online system that provides free access to government publications.³⁶ In response to NAPA's recommendation, GPO noted that GPO and the depository library community have long recognized the need to catalog and preserve the tangible collections that GPO has distributed to federal depository libraries since 1861, and that implementing this recommendation will be incorporated into GPO's national plan for the future of the FDLP.³⁷ Because NAPA's review was ongoing and GPO was outside the scope of our review, we do not make recommendations regarding FDLP submissions to GPO in this report (see app. I for more information on our scope and methodology).

Agency Comments

We provided copies of our draft report to GPO and DOD for their review and comment. GPO generally agreed with our findings and provided a letter and technical comments, which we incorporated as appropriate. DOD did not provide comments.

We are sending copies of this report to the appropriate congressional committees. The report will also be available at no charge on the GAO Website at <https://www.gao.gov>

³⁶ For more information on FDLP and digital publishing, see National Academy of Public Administration, *Rebooting the Government Printing Office: Keeping America Informed in the Digital Age* (January 2013).

³⁷ GPO also stated that developing a print preservation strategy includes identifying historic resources, many of which are not cataloged, located in 1200 libraries nationwide.

If you or your staff have any questions about this report, please contact me at 202-512-2834 or stjamesl@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made key contributions to this report are listed in appendix V.

A handwritten signature in black ink that reads "Lorelei St. James". The signature is written in a cursive, flowing style.

Lorelei St. James
Director, Physical Infrastructure Issues

Appendix I: Objectives, Scope and Methodology

To address our objectives, we developed working definitions of key printing terms—*“printing”*, *“duplication”*, and *“printing plant”*—to use when surveying and interviewing agencies on their current printing practices. To do this we used existing statutory language for “printing” and “printing plant” from Title 44 of U.S. Code, Public Printing and Documents, and the Joint Committee on Printing’s 1990 Printing and Binding Regulations (1990 JCP Regulations). To define “duplication” we worked with GPO and the Interagency Council on Printing and Publication Services to update the definition of duplication in the 1990 JCP Regulations.

We considered volumes above 500 copies of a single page and 2,500 copies in the aggregate of multiple pages “duplication,” and volumes below that “copying”. This allowed us to identify agencies’ printing operations that qualified as printing plants rather than lower volume copying operations, sometimes referred to as “copy centers”. In interviews with selected agencies, printing officials expressed confusion over this definition of “duplication”, in part due to the volume limits distinguishing duplication from copying. The volume limits we used were similar but not the same as limits outlined in the 1990 JCP Regulations on the number of pages agencies are permitted to produce in-house without prior authority of the JCP (5,000 copies of a single page or 25,000 in the aggregate of multiple pages). We clarified our definitions when possible, but it is possible that agency officials’ confusion could have affected the number of printing plants reported in our survey. See table below for a list of how each printing term was defined in the 1990 JCP Regulations, Title 44, and by GAO with assistance from GPO and the Interagency Council on Printing and Publication Services.

Table 1: Definitions of Key Printing Terms in 1990 JCP Regulations and Title 44, and those GAO developed with GPO and the Interagency Council on Printing and Publication Services

Term	Title 44	1990 JCP Regulations	Definitions Used by GAO
Printing	Printing includes the processes of composition, platemaking, presswork, duplicating, silkscreen processes, binding, microform, and the end items of such processes.	Printing includes the processes of composition, platemaking, presswork, binding and microform, the equipment as classified in the tables [listed in these regulations]; or the end items produced by such processes and equipment.	Printing includes the processes of composition, platemaking, presswork, duplicating, silk screen processes, binding, microform, and the end items of such processes. Duplicating includes high-speed duplicating.
Duplication	N/A	Duplicating/Copying is material produced by duplicating or copying processes or machines that used lithographic, electrostatic, thermal, or other copying process. Duplication/copying work exceeding 5,000 production units of any one page and work exceeding 25,000 production units in the aggregate of multiple pages cannot be produced in-house without prior authority.	Duplication is (a) by automatic copy-processing or copier-duplicating machines, producing copies by electrostatic, thermal, or other copying processes, and using exclusively toner or ink-jet type inks instead of ink; and (b) in volumes that exceed either 500 copies of a single page or 2,500 production units in the aggregate of multiple pages, per job.
Printing Plant	N/A	Any plant which produces “printing” as defined by the regulations that is owned or operated wholly or in part by the Government or at Government expense, and shall include all such plants located on property owned or controlled by the Government.	Printing plant is any plant which produces “printing” as defined above, owned or operated wholly or in part by the Government or at Government expense, and shall include all such plants located on property owned or controlled by the Government. Note: A duplication plant is a printing plant.

Source: GAO analysis of Title 44, the 1990 JCP Regulations, and assistance from GPO and the Interagency Council on Printing and Publication Services.

To identify agencies that could be operating in-house printing plants, we developed a universe consisting of agencies authorized in the 1990 JCP Regulations and agencies that had obligated funds to the “printing and reproduction” object class in at least 2 years between fiscal years 2009 and 2011. Agencies report printing and related obligations in this object class. Data in the various volumes of the President’s budget request, including object class data, undergo rigorous review by the OMB, and accordingly, are generally considered sufficiently reliable for most of GAO’s purposes. This includes using this data to select agencies to survey.

For the purposes of our review we made a number of adjustments to the 1990 JCP Regulations list of 36 agencies. First, we combined the armed forces and their plants, which were listed separately in the 1990 JCP Regulations, under the Defense Logistics Agency (DLA) since DLA took

over all printing plants for the armed forces. Second, we excluded the Administrative Office of U.S. Courts, due to its being outside the executive branch; GPO, as it was outside the scope of our review, and the National Academy of Public Administration since it had ongoing related work on GPO; and the Panama Canal Commission, as it was decommissioned in 1999. Finally we separated the Social Security Administration from Health and Human Services. In 1990 the Social Security Administration was a sub-agency with an in-house printing plant within Health and Human Services, but it became an independent agency in 1994. With these exceptions, 31 of the agencies from the 1990 list remained in our universe.

Through budget obligations data we identified 16 additional agencies with at least 2 years of printing and reproduction obligations for fiscal years 2009 through 2011. This resulted in a total universe of 47 agencies with possible in-house printing plants.¹

To describe how federal printing regulations and statutes reflect current printing practices, we reviewed legal documents such as Title 44 of the U.S. Code and the 1990 JCP Regulations, administered a survey to the universe of agencies described above, and interviewed officials from the printing industry, GPO, and other federal agencies.

To describe agencies' printing volumes and spending, we interviewed the six agencies from our survey universe whose printing and reproduction obligations in fiscal years 2009, 2010, and 2011 together constituted the majority—roughly 80 percent—of total federal obligations to printing and reproduction. Those agencies were the Department of Commerce, the Department of Defense, Health and Human Services, Department of State, U.S. Postal Service, and Veterans Affairs. We interviewed printing and budget officials from these agencies, and obtained information on their printing operations, including data on printing volumes and spending. Findings from our interviews with selected agencies cannot be used to generalize results to the entire population.

To describe agencies' in-house printing spending, we relied on data provided by selected agencies since federal printing and reproduction

¹ See appendix II for more detail on 1990 JCP Regulations' plants and 2013 reported plants.

obligations may not reliably describe agencies' in-house printing spending. This is partially due to challenges with obligations data we have previously reported, such as that obligations categories are not mutually exclusive (e.g., it is possible for some printing and duplication obligations to be categorized under a different object class, and vice versa).² We also found that the printing and reproduction object class includes printing done through GPO or external private printers as well as that done at agencies' in-house printing plants. As such, we relied on interviews with agencies to describe their in-house printing operations and collected spending information from agencies for analysis. We also asked agencies to provide spending information on the printing that they sent out to GPO and private printers.³ Some agencies provided printing expenses and others provided obligations, but for the purposes of this report, we refer to both as "spending." Obligations and expenditures capture different aspects of the budgeting process – obligations are the legal commitment to pay for a good or service while expenditures are the actual disbursement of money. For the purposes of this report we assume that there is a relatively short time lag between obligation and expenditure for printing and reproduction activities, and therefore that the difference is not material. As such, we refer to both obligations and expenditures as a single "spending" category.

Government Printing Survey

To describe agencies' current printing practices, such as operation of in-house printing plants, we administered the survey described above to the 47 agencies in our universe from January through March 2013. Results from that survey are presented in this report, and the questions asked in our survey instrument can be found in appendix III. We received a 100 percent response rate on the survey and analyzed the information obtained.

Administration of Survey and Quality Assurance

We developed a questionnaire using Microsoft Excel to obtain information about federal agencies in-house printing operations. We identified

² GAO, *Budget Object Classification: Origins and Recent Trends*, [GAO/AIMD-94-147](#) (Washington, D.C.: Sept. 13, 1994).

³ Two agencies reported using some printers that were not arranged by GPO, but we determined that this was outside of the scope of this report, and thus did not pursue it with agencies.

potential survey recipients from a list of agency print contacts provided by GPO and the Interagency Council on Printing and Publication Services. We tested the questionnaire with print officials from five agencies included on our list of potential respondents. We selected these agencies to represent different printing and reproduction obligations and to provide a mix of agencies we identified through obligations data and those listed in the 1990 JCP Regulations. We conducted these survey pretests to determine if the questions were understandable and measured what we intended, and to ensure that the survey was not overly burdensome. On the basis of feedback from the pretests we modified the questionnaire as appropriate. In late January 2013, we sent an email alerting agency contacts to the upcoming survey; the survey was delivered to recipients via email message a few days later. Using the questionnaire, we requested contact information for print officials; feedback on the definitions used in the survey, each agency's cited authority to operate in-house printing plants, and information on in-house printing plants such as location and equipment used. We did not independently verify if the information in the surveys was accurate. For agencies in the JCP 1990 Regulations, we provided a list of plants that were authorized in 1990 and asked them to verify if a listed plant was operational or not operational. We also asked that the agencies identify any additional plants that were not included in the 1990 list. For agencies that were not included in the 1990 list but were added to our survey population using obligations data, we asked that they provide plant information. To help increase our response rate, we sent two follow-up emails and called agency officials from January through March 2013.

Nonsampling Error

The practical difficulties of conducting any survey may introduce some types of errors, commonly referred to as nonsampling errors. For example, differences in how a particular question is interpreted or the sources of information available to respondents can introduce unwanted variability into the survey results. As we discussed previously, some of our survey respondents reported having difficulty with the definitions of printing, duplication, and printing plant that we included in our survey. We included steps in the design of the questionnaire, such as testing the instrument, and followed-up with agencies to clarify responses during the data collection for the purpose of minimizing such nonsampling errors.

We took the following steps to increase the response rate: pretesting the questionnaires with agency officials with print operation knowledge, conducting multiple follow-up calls and emails to encourage responses to the survey, and contacting respondents to clarify unclear responses.

We conducted this performance audit from August 2012 through July 2013, in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Appendix II: 47 Surveyed Agencies' In-house Printing Plants

GAO surveyed 47 agencies to determine if they operated in-house printing plants. To identify agencies that could be operating in-house printing plants, we developed a universe consisting of agencies authorized in the 1990 Government Printing and Binding Regulations and agencies that had obligated funds to the "printing and reproduction" object class in at least 2 years between fiscal years 2009 and 2011. The tables below contain the agencies in this universe and the number of plants authorized in the 1990 Printing and Binding Regulations and/or plants reported in 2013 in the GAO Government Printing Survey.

Table 2: 31 Agencies Listed in the JCP 1990 Regulations and Surveyed by GAO in 2013

Agency name	Plants listed in the JCP 1990 Regulations	Plants reported in 2013 GAO Survey
Broadcasting Board of Governors (U.S. Information Agency) ^a	1	1
Defense Intelligence Agency	1	1
Defense Logistics Agency ^b	142	17
Defense Threat Reduction Agency	1	2
Department of Agriculture	2	1
Department of Commerce	3	5
Department of Energy	18	5
Department of Housing and Urban Development	1	1
Department of Interior	7	1
Department of Justice	9	13
Department of Labor	1	2
Department of State	1	3
Department of Transportation	1	3
Department of Treasury	2	4
Environmental Protection Agency	1	1
Federal Communications Commission	1	1
Federal Energy Regulatory Commission	1	1
Federal Trade Commission	1	0
General Services Administration	11	0

Appendix II: 47 Surveyed Agencies' In-house Printing Plants

Agency name	Plants listed in the JCP 1990 Regulations	Plants reported in 2013 GAO Survey
Government Accountability Office	1	0
Health and Human Services ^c	0	2
Library of Congress	1	1
National Aeronautics and Space Administration	6	0
National Geospatial Intelligence Agency	3	2
National Security Agency	1	1
Nuclear Regulatory Commission	1	1
Office of Personnel Management	1	1
Railroad Retirement Board	1	1
Securities and Exchange Commission	1	1
Social Security Administration	1	1
U.S. International Trade Commission	1	1
Plant Total	223^d	74

Source: GAO analysis of JCP 1990 Printing and Binding Regulations and survey responses.

^aThe U.S. Information Agency, except for the Broadcasting Board of Governors, was absorbed by the State Department in 1999. We surveyed the Broadcasting Board of Governors.

^bWe combined the armed forces and their plants, which were listed separately in the 1990 JCP Regulations, under the Defense Logistics Agency (DLA) since DLA took over all printing plants for the armed forces.

^cIn 1990 the Social Security Administration was a sub-agency of Health and Human Services and was the entity listed with a plant in 1990. The Social Security Administration became an independent agency in 1995. We surveyed both agencies and counted the 1990 plant under the Social Security Administration

^dThe total number of printing plants listed in the 1990 JCP Regulations was 231. This total includes one authorized print plant each for the Panama Canal Commission and the Administrative Offices of U.S. Courts single authorized plant and 6 authorized plants for GPO. The Panama Canal Commission no longer exists, and we excluded the U.S. Administrative Offices of U.S. Courts and GPO from our survey population.

Table 3: 16 Additional Agencies Identified through Obligations Data and Surveyed by GAO in 2013

Agency name	Plants reported in 2013 GAO survey
Commodity Futures Trading Commission	0
Corporation for National and Community Service	0
Department of Education	0
Department of Homeland Security	3
Executive Office of The President	0
Federal Deposit Insurance Corporation	2
Federal Retirement Thrift Investment Board	0
National Archives and Records Administration	0
Peace Corps	0
Presidio Trust	0
Small Business Administration	0
Smithsonian Institution	0
Tennessee Valley Authority	3
U.S. Agency for International Development	1
U.S. Postal Service	1
Veterans Affairs	0
Plant Total	10

Source: GAO analysis of OMB printing and reproduction obligations data and survey responses.

Appendix III: Questions from GAO's Survey of Federal Printing Activities and Plants

We administered a survey focused on government printing operations to print officials at 47 agencies we determined could be operating in-house printing plants. We provided questions to identified agency print officials using Microsoft Excel to obtain information about federal agencies' in-house printing operations.¹ This appendix contains the questions from the survey questionnaire.

We provided the following definitions for agencies to use when answering our questions:

Printing includes the processes of composition, platemaking, presswork, duplicating, silkscreen processes, binding, microform, and the end items of such processes. Duplicating includes high-speed duplicating. (Title 44 Sec. 503 Note)

Duplication (a) by automatic copy-processing or copier-duplicating machines, producing copies by electrostatic, thermal, or other copying processes, and using exclusively toner or ink-jet type inks instead of ink; and (b) in volumes that exceed either 500 copies of a single page or 2,500 production units in the aggregate of multiple pages, per job.

Printing Plant means any plant which produces "printing" as defined above, owned or operated wholly or in part by the Government or at Government expense, and shall include all such plants located on property owned or controlled by the Government. Note: A duplication plant is a printing plant.

We asked officials from all surveyed agencies the following questions regarding the definitions of key print terms:

1. Does your agency have official definitions of "printing", "duplication," or "printing plant" that differ from any of the three definitions above?
2. If yes, please provide your agency's definitions below:
3. What authority are the definition(s) from? (Please include statute or other citation(s).)

¹ See appendix I for more information on the survey development process.

We asked agency officials the following questions, with specific instruction, to determine how many in-house printing plants each agency operates:

4. What is the total number of in-house printing plants (including duplication plants) operated by your agency, across all departments and bureaus within the agency?

When completing your answer, please include the following types of facilities:

- Any plant that produces printing (including duplicating), owned or operated by your agency
- Duplication plants and high speed duplication plants that use toner or ink-jet machines and typically produce more than 500 copies of a single page or 2500 production units in the aggregate, per job.

When completing your answer, please exclude the following types of facilities:

- Any small plants or "copy centers" that do NOT produce more than 500 single/2500 in aggregate production units, per job.

5. Which of the following is the source of your statutory authority to operate in-house printing plants (including duplication plants)?

- 1990 Government Printing and Binding Regulations
- Some other statutory authority
- Don't know

a. If you selected "Some other statutory authority" in Q5, please specify that authority in the space provided here.

We asked only print officials from agencies authorized to operate in-house plants listed in the JCP 1990 Government Printing and Binding Regulations the following questions to determine the operating status and additional information on those listed in-house plants:

6. The table provided contains information on printing plants operated by your agency, as indicated in the 1990 Government Printing and Binding Regulations. Please indicate the current status of each plant (Q6a), and complete the requested information for all operational plants (Q6b - Q6f).

a. What is the current status of this plant?

- Operational
- Not Operational

b. Does this plant produce the following types of products? (*Yes, No, Don't Know*)

- Toner or Ink Jet on Paper:
- Ink on Paper:
- Other products (i.e. other substrates):

If you answered "yes" to other products, please provide two examples of other products below:

c. Does this plant contain any of the following types of equipment? (*Yes, No, Don't Know*) If yes, how many?

- Offset printing press (ink):
- Digital printing press (ink):
- High speed duplication machine (ink-jet or toner):

d. Approximately how much of this plant's printing volume is offset printing? (*All, More than half, About half, Less than half, None*)

e. Approximately how much of this plant's printing volume is digital printing? (*All, More than half, About half, Less than half, None*)

f. Approximately how much of this plant's printing volume is duplication? (*All, More than half, About half, Less than half, None*)

We asked all survey participants the following questions about any in-house printing plants not listed in the JCP 1990 Printing and Binding Regulations:

7. If your agency operates any in-house printing plants (including duplication plants) that were NOT included in the previous question (Q6), please list the name and location of the plant and complete the requested information using the table below.

If you do not have any in-house printing plants (including duplication plants) to enter on this tab, please check this box and proceed to the next tab:

a. Name of Plant:

b. Location of Plant (City and State):

c. Does this plant produce the following types of products? (Yes, No, Don't Know)

- Toner or Ink Jet on Paper:
- Ink on Paper:
- Other products (i.e. other substrates):

If you answered "yes" to other products, please provide two examples of other products below:

d. Does this plant contain any of the following types of equipment? (Yes, No, Don't Know)

- Offset printing press (ink):
- Digital printing press (ink):
- High speed duplication machine (ink-jet or toner):

e. Approximately how much of this plant's printing volume is offset printing? (All, More than half, About half, Less than half, None)

f. Approximately how much of this plant's printing volume is digital printing? (All, More than half, About half, Less than half, None)

g. Approximately how much of this plant's printing volume is duplication? (All, More than half, About half, Less than half, None)

Appendix IV: Comments from the Government Printing Office



JIM BRADLEY
Assistant Public Printer

July 12, 2013

Ms. Lorelei St James
Director, Physical Infrastructure
Dallas Field Office
U.S. Government Accountability Office
1999 Bryan Street, Suite 2200
Dallas, TX 75201

Dear Ms. St James:

Thank you for your offer to comment on the Government Accountability Office (GAO) draft report, *Federal Printing: Fewer Plants are in Operation than in 1990, and Selected Agencies Reported Declining Volumes*, dated June 25, 2013. We have just a few brief points to make.

The Government Printing Office (GPO) for many years has relied on our partnership with the private sector printing industry to fulfill the vast majority of orders for printing and binding services requisitioned from us by Federal agencies. This partnership is a model of service provision. The competition for Government printing contracts by thousands of printers nationwide ensures taxpayer savings while generating job opportunities, especially in the small business sector. Several previous studies conducted by the GAO, the former Office of Technology Assessment, and GPO's Inspector General have validated the cost-savings made available for procurable agency printing and binding work through this partnership. Our longstanding view is that, in this era of spending constraints and sequestration, GPO's print procurement partnership with the private sector offers the opportunity for significant savings, provided it is utilized.

We have had a longstanding concern that a significant portion of Federal agency printing and binding work appears to be performed outside of GPO and our print procurement program. Data recently published by the Office of Management and Budget as part of the FY 2014 budget shows an estimated \$1.8 billion in obligations for printing and reproduction for FY 2013. This amount exceeds the total amount of printing and binding that will be produced through GPO this fiscal year by a factor of approximately 2.5. To the extent that any of this printing is procurable,

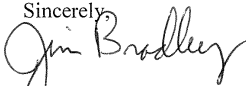
732 North Capitol Street, NW, Washington, DC 20401-0001 | jbradley@gpo.gov

our position is that it would be more cost-effective to utilize GPO's print procurement program than to produce it in Federal agency plants. As previous studies have indicated, Federal agency inplant printing costs tend to be significantly higher than the costs of printing procured competitively through the private sector, and there tends to be a sizeable amount of printing that could be procured through GPO, which as your draft report notes has a number of procurement vehicles to meet agency needs.

As we understand the request of the Chairman of the Joint Committee on Printing (JCP) for this study, it was to highlight significant savings that could be achieved by identifying the number of internal printing plants that are operating today. The draft study has found there are fewer agency printing plants today than in 1990, when the roster of JCP-authorized printing plants was last published, a development that is consistent with the ongoing transition from print to digital technologies for information production and dissemination. The finding that printing is declining (although the costs as reported by OMB are still high) is also consistent with our experience: this year, we are seeing a continued reduction in printing requirements sent to us by agencies for procurement from the private sector. Still, the report identifies some 84 facilities engaged in the production of print products, utilizing a variety of conventional and digital production technologies. Presumably further studies of these and potentially other facilities that may be in operation in the Government will shed additional light on where the funds are being expended on printing and reproduction work that is not being produced or processed through GPO.

While GPO is not just for printing any more, as Acting Public Printer Davita Vance-Cooks has made clear, and as the recent report of the National Academy of Public Administration, "Rebooting the Government Printing Office: Keeping America Informed in the Digital Age," has shown, to the extent that procurable Federal printing and binding continues to be required by Federal agencies, we firmly believe that our print procurement program is the most economical way to produce it, and the most effective use of the taxpayers' Federal printing dollars.

We have a few technical comments on the text of the draft report which I am enclosing. It was a pleasure working with you and your team, and we look forward to the opportunity to work with you again in the future.

Sincerely,

JIM BRADLEY
Assistant Public Printer (Operations)

Enclosure

Appendix V: GAO Contact and Staff Acknowledgments

GAO Contact

Lorelei St. James, 202-512-2834 or stjamesl@gao.gov

Staff Acknowledgments

In addition to the contact named above, Sharon Silas (Assistant Director), Melissa Bodeau, Leia Dickerson, Sarah Farkas, Kathleen Gilhooly, Leigh Ann Haydon, Carol Henn, Hannah Laufé, John Mingus, Jr., Betsey Ward-Jenks, Elizabeth Wood, and William T. Woods made significant contributions to this report.

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