Comments on the GPO National Plan  
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These are not my exact remarks from the REGP panel. Think of them like an “Extensions of Remarks” section in the Congressional Record.

General Thoughts about GPO’s National Plan

The Plan document felt more like an outline than a plan. I really liked the formal adoption of the Principles of Government Information, but much of the rest of the document read like a wish list to me. A set of desirable outcomes without specific activities behind them. That’s the jist of what I said at the REGP panel. Since then I’ve learned that the National Plan document was actually conceived of as an outline and that specifics on each area will be forthcoming. I think the community should be alert for these new documents and initiatives and should carefully weigh every piece as they come out.

Responses to Planned Questions

Q1. How can depositories ensure preservation of their tangible collections while still providing access for users?

This was the hardest question for me as I’ve never been directly involved in the preservation of physical materials. Four things that come to mind are:

1. Decide which titles/series are vital to your community. No one institution can hope to save everything, so focus on your priorities.
2. Keep track of the number of copies of your priority titles in OCLC or CGP (When available). Consider moving them from circulation to closed stacks when the number of copies drops below your level of comfort.
3. Think about going to Interlibrary Loan for priority materials in your collection that appear in bad condition but other libraries have circulating copies.
4. Consider NON-destructive digitalization of your priority titles/series most at risk and refer people to the digital copies while holding the original in closed stacks. Prior to digitization, search for previously digitized copies on the internet. This is especially useful for USGS, NASA and historical military publications. Also ensure that someone actually looks at the digital copy prior to offering it as the main access to patrons.

Q2. What do you see as one pro and one con of GPO’s new Regional Discard Policy?

I offer two pros:

1. Should keep more Regionals in the FDLP
2. Has sparked a discussion and some action towards an actual inventory of Regionals, at least as far as discard eligible titles are concerned.

One con - As of this writing, GPO has not offered clear guidance on what constitutes a preservation copy and how and where such copies should be housed.

Q3. In your opinion, is digital deposit by depository libraries a viable option for preserving born-digital government information?

It is, for SOME depository libraries. There is already an informal locally-held digital documents depository program going on with the LOCKSS-USDOCS project (https://www.lockss.org/locksswp/wp-content/uploads/2012/03/Digital-Federal-Depository-FAQ.pdf). So it seems like technical issues are doable. It would just be an act of will for GPO to offer such digital deposit on a larger scale.

Not all Federal Depository Libraries have the expertise and staffing to accept local digital documents and should not be pushed to do so. But the ones who have the resources and are willing to accept custody of electronic copies should be given the means to do so.

Q4. Is it feasible to assume that the Government can guarantee the preservation of all government information "in perpetuity to ensure the continued accountability of the Government to its present and future citizens"?

Absolutely not. Aside from being chronically underresourced for preserving and dissemination, the strong natural incentives for government are to hide or destroy information, not to preserve it. There are least four circumstances when the government has a strong incentive to destroy information:

1. When information becomes outdated. This is particularly true with web sites. The majority of users benefit from only having the most current information. Having to sift through older reports - unless you are a historical researcher is wading through clutter. So a gov’t web designer looking for the most benefit for the highest number, will ensure that only a short crisp menu of the latest information is available.
2. When information was generated by a previous Administration. It’s a known fact that after the end of term of a federal or state executive, all reports and other information productions belonging to the predecessor’s office are wiped clean off the government website and not normally preserved by the incoming administration.
3. When information is perceived as embarrassing. A few Administrations bravely admit their mistakes and learn from them. Most try to sweep them under the rug.
4. When information is perceived as a threat to national security. It only takes one terror attack to get the government going “OMG! OMG! Mosaic Theory!” to get them going about the perceived dangers of having some material in the public record - even it had been in the public record for years. Witness the withdrawal of some USGS Water Supply
CDs and the attempted removal of long public Treasury money laundering reports after 9/11. The second withdrawal would have happened if not for the loud outcry of librarians and financial researchers. In an all digital, government centric server world, the reports would have been deleted from access as a fait accompli.

These incentives were present in the print era, but much harder to act upon. Once physical items were in the hands of federal depositories, a public recall order had to be issued. If the order seemed to be made for reasons 2-4 above, such orders were often publicly disputed. But when all government information resides on federal servers, “recalls” can happen at the push of a button without debate. We cannot risk that happening to the public record.