



Office of the Superintendent of Documents

**SUPERINTENDENT OF DOCUMENTS
PUBLIC POLICY STATEMENT
2019-2**

EFFECTIVE: 09/24/2019

SUBJECT: Redaction of Personally Identifiable Information from GPO’s System of Online Access by the Superintendent of Documents

PURPOSE

To establish Superintendent of Documents action to proactively redact personally identifiable information (PII) from content discovered in, or being readied for ingest into, the Government Publishing Office’s (GPO) system of online access.¹

BACKGROUND

As Federal agencies, including GPO, create born-digital content, and as they embark on digitization projects, and subsequently make the reformatted publications accessible via the internet, instances of PII appearing in online publications are increasing.

For more than 150 years, GPO has distributed publications through the Federal Depository Library Program (FDLP). Publications deposited in these libraries over the years may contain PII. Many, but not all, of those publications were originally released and distributed prior to the categorization of PII. Federal depository libraries (FDLs) undertake digitization projects and become digital content contributors to GPO’s system of online access. Further, FDLs become digital access partners by making their digitized depository resources accessible locally. As a result, depository publications no longer sit on library shelves in “practical obscurity”.

In 2008 the Joint Committee on Printing authorized GPO to remove full Social Security numbers wherever they appeared in any congressional publication accessible from GPO’s system of online access. PII, however, includes more than Social Security numbers, and GPO’s system of online access contains not just congressional publications, but resources from all three branches of the U.S. Government. When digitized content is provided to GPO for ingest into its system of online access, whether from Federal agencies as the content originators, or from FDLs as digital content providers, GPO must take proactive measures to ensure PII is not publicly accessible.

¹ At present **govinfo** is GPO’s online system of record. This policy will be valid with **govinfo**, or any successor online system of record.

GPO is a National Archives and Records Administration (NARA) Affiliate for the content in its system of online access. As such, the content is legally part of the National Archives collection. In accordance with this agreement, GPO retains custody of the system content for public access and preservation purposes, and to ensure its long-term preservation, GPO must manage the content under preservation conditions that are at least equal to those that would be provided by NARA. The majority of the Privacy Act provisions do not apply to the holdings of NARA. While the Privacy Act prohibits disclosure of records contained in a system of record, an exception in [5 USC §552a\(b\)\(6\)](#) allows disclosure “to the National Archives and Records Administration as a record which has sufficient historical or other value to warrant its continued preservation by the United States Government, or for evaluation by the Archivist of the United States or the designee of the Archivist to determine whether the record has such value.” This is the essence of GPO’s NARA Affiliate agreement.

The Superintendent of Documents’ interest is in addressing PII that has been disclosed in the official publications of the U.S. Government that are within scope of GPO’s Federal Depository Library Program, Cataloging and Indexing Program, and GPO’s System of Online Access. Most laws, guidance, and directives pertain to protecting the confidentiality of PII in the context of information systems, systems security, and the prevention of PII disclosure by executive branch agencies. Official guidance is lacking for action to be taken once PII is publicly disseminated in official publications of the U.S. Government. The existing laws, guidance, and directives are, however, extremely helpful in identification of PII and determination of its impact, which is essential to the decision-making process—in establishing when action should be taken to “de-identify” or remove the PII.

The Superintendent of Documents, following the National Institute of Standards and Technology (NIST) [Guide to Protecting the Confidentiality of Personally Identifiable Information](#) (Special Publication 800-22), considered the potential harm of disclosure to determine which PII confidentiality impact level corresponds to a specific set of PII, and made the following determination of PII that may be found in Government publications:

High-Impact:

Personal identification numbers issued by government or financial institutions printed in conjunction with an individual’s name, such as full or partial Social Security numbers, passport numbers, driver’s license numbers, taxpayer identification numbers, patient identification numbers, financial account numbers, or credit card numbers

Low-Impact:

Personal name, street address, phone number, names of family members, photographic image

Some identifying information, i.e., low-impact PII, will routinely exist in Government publications of record. This is particularly true for individuals who serve as members of Congress, testify before Congress, are a party in a Federal court case, are nominated for a Federal Government position, are employed by the Federal Government and/or author a Government publication.

POLICY

It is Superintendent of Documents policy that when high-impact PII is discovered within publicly accessible files in GPO's system of online access or within content being prepared for digitization and/or ingest into GPO's system of online access, the access copies will be redacted and the preservation copies will remain unredacted.

Further, the Superintendent of Documents will notify its digital content contributors and digital access partners, as appropriate, when PII is discovered, in order for them to take action to remove the PII from public access.

APPLICATION

This policy applies to all GPO employees who have touch points to the acquisition, digitization, ingest, and curation of content in GPO's system of online access. The Superintendent of Documents must authorize any exceptions to this policy.

DEFINITIONS

Digital Access Partner	Through a signed agreement with GPO these partners make digital resources within scope of the FDLR publicly accessible at no fee. GPO directs users to these resources via bibliographic records in the Catalog of U.S. Government Publications (CGP) and PURLs.
Digital Content Contributor	Through a signed agreement these contributors provide digital content to GPO for ingest into govinfo . Their content meets GPO's specifications for ingest into the preservation repository. GPO provides ongoing access to and preservation of the digital content.
High Impact PII	Information for which the loss of confidentiality, integrity, or availability of PII could be expected to have a major, severe, or catastrophic adverse effect on organizational operations, organizational assets, or individuals. Examples include Social Security Numbers, financial account numbers, and driver's license numbers (NIST Special Publication 800-22).
Personally Identifiable Information (PII)	Information which can be used to distinguish or trace an individual's identity, such as their name, social security number, biometric records, etc., alone, or when combined with other personal or identifying information which is linked or linkable to a specific individual, such as date and place of birth, mother's maiden name, etc. (OMB Memorandum M-07-16) ²

² GPO adopted the use of the OMB definition for GPO Directive 825.41a, *Privacy Program: Protection of Personally Identifiable Information (PII)*.

RELATED SUPERINTENDENT OF DOCUMENTS POLICY STATEMENTS:

- Scope of Government Information Products Included in the Cataloging and Indexing Program and Disseminated Through the Federal Depository Library Program ([SOD-PPS-2019-1](#)).
- Content Scope for GPO's System of Online Access ([SOD-PPS-2016-2](#)).
- Withdrawal of Federal Information Products from GPO's Superintendent of Documents Programs (SOD 110)

APPROVED:



Superintendent of Documents


Date