

Report on Public Responses to the Proposed Revisions of the Superintendent of Documents Preservation Policy

June 24, 2026

Introduction

On February 9, 2026, the Superintendent of Documents released a call for public comments on a [draft revision](#) of SOD Public Policy Statement *Permanent Public Access to U.S. Government Public Information through Preservation* (SOD-PPS-2016-4).

Major additions to the policy include the Government Publishing Office's (GPO) status as an Affiliate Archive of the National Archives and Records Administration; Trustworthy Digital Repository certifications for GovInfo; and recognition of the National Collection of U.S. Government Public Information and a Preservation Program to preserve it.

By March 29, 2026, the deadline for comments, there were 15 submissions. Additionally, on March 26, the Depository Library Council transmitted [comments in a letter](#) to the Superintendent of Documents, which was supportive of the proposed revision. The Association of Southeastern Research Libraries also [sent the Superintendent a letter](#); content of this letter also was submitted through the comment form. The Office of the Superintendent of Documents thanks those who took the time to provide comments about the draft revision of the preservation policy.

Proposed Policy

- A Preservation Program will address the preservation needs of the digital and tangible content of the National Collection of U.S. Government Public Information. The Preservation Librarian will lead the Preservation Program.
- Through preservation services for Federal depository libraries, GPO will ensure future generations have free permanent public access to tangible Government information that is within the scope of the Federal Depository Library Program and the Cataloging & Indexing Program.
- GPO is committed to the digital stewardship vision of GovInfo. To support this vision, GovInfo is CoreTrustSeal and ISO 16363 certified Trustworthy Digital Repository.
- The Affiliate Archive Memorandum of Understanding with NARA serves as a contingency and succession plan per the ISO 16363 Trustworthy Digital Repository standard. GPO partners may host and preserve digital content in accordance with agreed upon terms.

- Content hosted by partners is considered “official” but will not be digitally signed or authenticated by GPO. An inventory of preservation copies of record will be maintained.
- The inventory will include condition statements and where the holdings are located. Those publications that cannot be made permanently accessible through the application of this policy will be handled on a case-by-case basis.

Summary of Responses

There were 15 respondents to the call for comments on the draft preservation policy revision. Eight represented an academic setting; 4 were not from a library; and there was 1 respondent from a Federal agency library, a special library, and a state library. While 6 respondents liked the draft policy revision, there were 6 who expressed reservations about it. Of the remaining 3, 1 wants to know more, 1 is neutral, and 1 does not like the policy. All the responses received from the call for comments are included below, as they were submitted.

Thirteen respondents provided text comments. Several were pleased to learn that GPO is an Affiliate Archive of the National Archives and Records Administration for the content in GovInfo. There also were positive comments about the certification of GovInfo as a trusted digital repository under ISO 16363 and the CoreTrustSeal and ISO 16363. One commenter suggested that the preservation commitment should include information posted to X, Bluesky, Truth Social, and other such platforms and be made publicly available through searches of them. Others suggested the GPO explore the possibility of networked preservation efforts for digital content. Also included in the comments were some technical recommendations for clarity and word choice

While respondents strongly support the policy’s overall purposes of preserving Government information and ensuring permanent public access to it, many comments expressed concern about its vagueness and potential impact on depository libraries, especially regional depositories. Some commentors think the policy is burdensome to depository libraries and is open to inconsistent interpretations. The lack of details about preservation activities and procedures was disconcerting to many respondents.

Many who provided comments were interested in seeing the operational procedures for implementing the policy. Some organizations include policies and procedures in the same document. Superintendent of Documents policies provide what will be done and the purpose, but not the how. Procedures are not included because they often change for any number of reasons including new technologies, new ideas, and funding. Their importance

is not diminished by being omitted from the policy document. They are important and they will be shared with the depository community. A preservation plan for implementing this policy is currently being reviewed. When finalized, it will be posted to FDLP.gov.

Responses to the Call for Comments

I am ... (select the most fitting description)
<input type="checkbox"/> General public user of Federal Government information
(3) A depository library coordinator
(2) A regional depository library coordinator
(3) A government information librarian
(1) A librarian, other than a government information librarian
(1) An administrator at a library with a designated Federal depository library
(3) From a Federal agency or a Federal agency library
(1) From a library association/organization/consortium
<input type="checkbox"/> From a non-profit organization
<input type="checkbox"/> From the public sector
<input type="checkbox"/> From the private sector
(1) Other, please specify __depository library staff member, specializing in gov docs__

I am from ...
(2) Academic, Community College
(6) Academic, General
<input type="checkbox"/> Academic, Law Library
(1) Federal Agency Library
<input type="checkbox"/> Highest State Court Library
<input type="checkbox"/> Public Library
<input type="checkbox"/> Service Academy
(1) Special Library
(1) State Library
<input type="checkbox"/> From the public sector
(4) Not from a library

Choose the response below that best describes your opinion of the proposed policy.
<input checked="" type="radio"/> (6) Like
<input type="radio"/> (1) Need to more about
<input type="radio"/> (1) Neutral about
<input type="checkbox"/> Unsure about
<input checked="" type="radio"/> (6) Have some reservations about
<input type="radio"/> (1) Do not like

Comments as they were submitted

I appreciate being able to review this policy and the related processes. It seems thorough and well thought out in its attempt to establish practices that help to preserve government information.
Preservation of US Government Public Information should also include a commitment to make information posted to X, Bluesky, "Truth" Social, etc. publicly available through searches of those platforms, and not removed and hidden behind cumbersome and time-consuming Freedom of Information requests.
I appreciated learning that GPO is now an affiliate archive of NARA. That's an honor, (in my opinion)! I appreciated the reiteration that there is a plan in place to permanently "house" digital content with GPO and that it meets the highest standards of security, as a repository that is.
I approve of including the Government Publishing Office as an Affiliate Archive of NARA and generally support government offices with archival management skills and capabilities continuing to be able to garner this status.
N/A
I would like to see NARA and the GPO explore networked preservation. The current assault on public data could not have happened in print -- not because print is any less vulnerable, but because the network of Federal Depository Libraries was too big and dispersed to destroy completely. What would a digital FDLP program look like? (Probably a LOCKSS network.) Could NARA and GPO build one, with partners?
<p>'- GPO has previously limited Program (capital 'P') for those established by legislation, not activities that support statutory programs. Language from SOD-PPS 2016-4 characterized how preservation activities support statutory programs, and that approach should continue to be used until/unless a Preservation Program is established by legislation.</p> <p>- It is inconsistent with other Superintendent of Documents Public Policy Statements to identify staff below the level of the LSCM Managing Director, and identification of a single position discounts the number of LSCM staff who support preservation, and preservation-adjacent, activities.</p> <p>- This policy is not about how public access is ensured, rather that preservation activities are undertaken to ensure public access. Recommend reverting to word order from Policy section of SOD-PPS 2016-4, and being consistent throughout document: "This policy statement asserts the U.S. Government Publishing Office's (GPO) responsibility to preserve the National Collection of U.S. Government Public Information to</p>

ensure public access for future generations."

- In policy section, reference to scope of FDLP and C&I Program should be moved to affirm scope applies to both tangible and digital content, not just tangible materials held by Federal depository libraries.

- Future-proof by referring to 'GPO's system of online access' instead of specifying GovInfo, wherever possible.

- The statement "Those publications that cannot be made permanently accessible through the application of this policy will be handled on a case-by-case basis" is problematic because GPO isn't notified by Federal agencies of all content within scope of the FDLP and C&I Program, and thus cannot know in which cases this standard cannot be upheld.

N/A

I understand and appreciate GPO's needs to update its Preservation Policy in the digital environment. However, the vagueness of the policy is of great concern to any regional federal depository library; for whom, and many years the burden of such policies usually fall. Since the establishment of the original policy regional federal depository libraries have experienced significant reduction of resources. The consequences of the new policy need to be more clearly articulated to library administrators and also how the new policy will ensure the goals of the National Collection policy. I believe there needs to be more discussion before any revised preservation policy is finalized.

Just to be clear, these comments are in regards to SOD-PPS-4-2026 Permanent Public Access to U.S. Government Public Information through Preservation.

I would like to see some reference to the 2015 JCP letter to the GPO Director included in this SOD-PPS on permanent public access through preservation. That 2015 JCP letter is referenced in the Background section of SOD-PPS-7-2025, which is the policy framework for the PDT. I feel that this SOD-PPS that speaks to permanent preservation of the tangible National Collection should point to that 2015 JCP letter as well. Perhaps it could be included in the second paragraph on pg. 2, which starts with "As GPO does not have a tangible collection to preserve..."? While that 2015 JCP letter was addressing requirements for discard from regional FDLP collections, I believe the requirement that the JCP put on GPO with that 2015 letter establishes the four comprehensive, geographically distributed collections "floor" for preservation of the tangible National Collection as a whole.

Also, I am concerned about the statement about the role of the Preservation Librarian in the Application section of this SOD-PPS. The lifecycle for managing National Collection content is currently understood to include all phases from acquisition, through cataloging and classification and metadata creation and distribution, content distribution and access, and finally collection management and preservation. I do not agree that the Preservation Librarian is the subject matter expert for all those phases of the National Collection content lifecycle. I also do not think that it is necessary for a single position beneath the Superintendent of Documents to be referenced in the Application section of this SOD-PPS. I do not see that in other SOD-PPS language.

Thank you for your consideration of these comments.

The Association of Southeastern Research Libraries (ASERL) has long held an active interest in the workings of the Federal Depository Library Program (FDLP). Our Collaborative Federal Depository Program (CFDP) has been awarded for its innovative approach to coordinating activities among FDLP libraries in our region and has supported significant growth in the size, scope, and strength of tangible FDLP collections in our member libraries and elsewhere. ASERL believes that ensuring stable, permanent public access to our government's information is critical for a healthy democracy, and these collections and services represent massive long-term investments by our members in furtherance of that belief. We appreciate the opportunity to comment on the draft public policy statement regarding Permanent Public Access to U.S. Government Public Information through Preservation.

On the surface, the new draft policy seems flexible and simple enough, but the lack of specificity raises red flags for some of our documents librarians. It has been many of our members' experience that a lack of specificity in policies like this can lead to inconsistent, widely varying interpretations by GPO officials over time as to how the policies are to be implemented, frequently at the expense of the depository library.

Moreover, the draft policy states both that the responsibility for preserving public access is the responsibility of the GPO, and that "GPO does not have a collection and relies on partners" and "libraries will preserve tangible content." Aside from the lack of specificity mentioned above, we find these statements read like top-down commands rather than a mutually beneficial and shared responsibility among so-called partners. FDLP libraries undertake the responsibility and costs for maintaining these collections on their own, with no remuneration from the federal government. Open-ended, unfunded mandates such as this are not sustainable and risk driving FDLP libraries from the program due to very real concerns about unknown costs and requirements.

We would prefer to see clearly delineated expectations for both the GPO and the FDLP libraries, and engagement with the depository libraries—particularly the regional depositories—as partners in this preservation endeavor who need support to execute the GPO's goals. We value the work of the GPO and hope that a more clearly defined document will ensure success for both the office and the libraries who partner with it.

The policy contains two positive improvements over the last version of this policy (SOD PPS 2016-4) which bring the policy up to date with existing GPO actions: certification of GovInfo under the ISO 16363 TDR and CoreTrustSeal standards and designates NARA to serve as a contingency and successor.

The second improvement of the scope of preservation to include all "Federal Government public information." This is significant because it removes the past restrictions that have limited the scope of what GPO could target for preservation.

The policy deletes those actions which GPO deems no longer important to its preservation activities and asserts in their place the general statement that GPO has the responsibility to "preserve and ensure public access to the National Collection of U.S. Government Public Information for future generations." It expands the scope of the FDLP by defining the "National Collection" as a "geographically dispersed collection of the corpus of Federal Government public information." It further promises to make this complete corpus freely accessible.

The policy lists two specific actions that GPO will undertake: 1) it will continue to maintain GovInfo; and 2)

it will hire a preservation librarian who will lead a preservation program that will “address the preservation needs of the digital and tangible content of the National Collection.” But the policy fails to acknowledge that only about 2 percent of the packages in GovInfo are from the executive branch, which produces about 93 percent of all federal government Public Information. How will GPO address that gap?

The policy does not specify any strategy for recruiting or managing other partners. Neither does it mention any preservation or access standards for these partners. It fails to provide a strategy for how content spread over many partners will be integrated into the “National Collection.” There’s no mention of succession planning for any “official” digital content hosted by GPO partners.

The policy fails to provide a strategy for collecting, acquiring, storing, describing, and preserving the “National Collection” or for making that Collection accessible and useable by the public.

The policy does not explicitly mention the relatively new concept of the four National Collection Service Areas (NCSA’s) or the preservation stewards program meant to bring current and historic physical depository publications within GPO’s preservation program. There’s also no mention of the “Print Distribution Titles List” (which lists the small number of titles that will continue to be printed and distributed by GPO) or how any of these new concepts feed GPO’s preservation program.

The new draft deletes the stated requirement of regional depository libraries to provide permanent public access to their depository materials. So, the regional concept that came into being with the Depository Library Act of 1962, which assures geographically distributed access and preservation, is for all intents and purposes no longer required of the program although the law still mandates it. Although the wording is not explicit, it seems to imply that “tangible” collections will be “maintained” and digital collections will be “preserved.”

There is no mention of or responsibility for the content that falls within GPO’s defined scope of the “National collection” (which includes everything published by the US government) but that falls outside of the control of GPO and/or its official partners.

Unfortunately, this proposed policy update of the 2016 SOD on preservation does not adequately describe the particular problems or issues or how the policy will alleviate them.

It is clear from this updated policy that GPO is committed to the digital stewardship vision of GovInfo but does not comment on any of the devilish details. There is a lot that is left out which leaves us wondering how GPO's preservation program will be applied to both print and digital content.

I'm not convinced the wording of "free permanent public access to tangible Government information" is strong enough. Too often tangible is used as in print and some may argue that it would not include all born-digital government information.

The proposed policy is concerning because the language is vague and ambiguous. It is difficult to understand the exact meaning of the policy, especially regarding the commitments that FDLP libraries are being asked to make. Overall, it appears that FDLP libraries are being asked to do more without any allocation of funds or contribution of expertise from GPO.

Our library (regional depository) can commit to modest preventive measures for taking care of the material and replacing lost/damaged material through needs lists in the ASERL Disposition Database and the eXchange but are unable to commit to more involved tasks in the realm of conservation, treatment, preservation, or reformatting. We have neither the means, know-how, nor personnel to perform these tasks. We can host digital content only in the most limited of ways.

I support the ASERL response to the proposed policy.

Withdrawal needs to be handled very delicately, in light of how information products have been treated by the current administration.

Closed Request for Comment Record

<https://www.fdlp.gov/about/closed-request-for-comments>

TOPIC: Preservation of the National Collection of U.S. Government Public Information

PROPOSAL: [Permanent Public Access to U.S. Government Public Information through Preservation](#) (SOD-PPS-4-2026)

SUPERSEDES: [SOD-PPS-2016-4](#) (effective July 5, 2016)

COMMENTS: Comment Period Closed

DEADLINE: March 29, 2026

NOTICE: [News Alert: Request for Comments: Draft Preservation Policy](#) (February 9, 2026)

REPORT OF COMMENTS:

- Report on Public Responses to the Proposed Revisions of the Superintendent of Documents Preservation Policy (June 24, 2026)
- [Letter from the Depository Library Council](#) (March 26, 2026)
- [Letter from the Association of Southeastern Research Libraries](#) (March 27, 2026)