

# Biennial Audit of the Department's Compliance with Geospatial Data Act Requirements

FINAL REPORT NO. OIG-24-035-A

SEPTEMBER 19, 2024



U.S. Department of Commerce  
Office of Inspector General  
Office of Audit and Evaluation



September 19, 2024

**MEMORANDUM FOR:** Don Graves  
Deputy Secretary of Commerce

**FROM:** Frederick J. Meny, Jr.  
Assistant Inspector General for Audit and Evaluation

**SUBJECT:** *Biennial Audit of the Department's Compliance with Geospatial Data Act Requirements*  
Final Report No. OIG-24-035-A

Attached is the final report on our audit of the Department's collection, production, acquisition, maintenance, distribution, use, and preservation of geospatial data. Our audit objective was to assess the Department's compliance with the 13 Geospatial Data Act (GDA) responsibilities in 43 U.S.C. § 2808(a).

We found that the Department was complying with 12 of the 13 GDA requirements. However, our testing revealed that the Department's geospatial metadata is sometimes incomplete. Specifically, we found that:

- I. The Department made progress in fulfilling Geospatial Data Act responsibilities.
- II. The Department's geospatial metadata could be further improved.

In response to our draft report, the Department concurred with our findings and recommendation. The Department's response is included within the final report as appendix D.

Pursuant to Department Administrative Order 213-5, please submit to us an action plan that addresses the recommendation in this report within 60 calendar days. This final report will be posted on the Office of Inspector General's website pursuant to the Inspector General Act of 1978, as amended (5 U.S.C. §§ 404 & 420).

We appreciate the cooperation and courtesies extended to us by your staff during this audit. If you have any questions or concerns about this report, please contact me at (202) 793-2938 or Kevin Ryan, Director for Audit and Evaluation, Systems Analysis and NOAA Programs, at (202) 750-5190.

Attachment

cc: Jeremy Pelter, Deputy Assistant Secretary for Administration, performing the non-exclusive functions and duties of the Chief Financial Officer and Assistant Secretary for Administration

Oliver Wise, Chief Data Officer, OUS/EA

Richard W. Spinrad, Ph.D., Under Secretary of Commerce for Oceans and Atmosphere and NOAA Administrator

Jainey K. Bavishi, Assistant Secretary of Commerce for Oceans and Atmosphere and Deputy NOAA Administrator, NOAA

Karen Hyun, Ph.D., Chief of Staff, NOAA

Tony La Voi, Commerce Senior Agency Official for Geospatial Information and NOAA Chief Data Officer, NOAA

Robert Santos, Director, Census Bureau

Ron S. Jarmin, Ph.D., Deputy Director and Chief Operating Officer, Census Bureau

Deirdre Dalpiaz-Bishop, Chief of the Geography Division, Census Bureau



# Report in Brief

September 19, 2024

## Background

Geospatial data affects the daily lives of the American public and supports federal government policy decisions. The Department's geospatial data takes many forms such as census data; weather, climate, and environmental data; satellite imagery; and maps. The Department provides almost 75 percent of the geospatial data listed on the Data.gov website, the government's open data site.

The Geospatial Data Act of 2018 (GDA), 43 U.S.C. §§ 2801-2811, mandates how the federal government manages geospatial data through 13 responsibilities. These responsibilities include geospatial strategy, data sharing, integration, records retention, management, standards, partnerships, application, and privacy.

The GDA requires inspectors general of the covered agencies to audit the agencies' collection, production, acquisition, maintenance, distribution, use, and preservation of geospatial data not less than once every 2 years.

This is our third audit in fulfillment of this requirement. In accordance with an approach developed through the Council of the Inspectors General on Integrity and Efficiency, we again limited our audit to focus on the 13 covered agency responsibilities.

## Why We Did This Review

Our objective was to assess the Department's compliance with the 13 covered agency responsibilities in 43 U.S.C. § 2808(a).

## OFFICE OF THE SECRETARY

### Biennial Audit of the Department's Compliance with Geospatial Data Act Requirements

OIG-24-035-A

#### WHAT WE FOUND

To meet our objective, we reviewed our audit results from 2020 and 2022 and obtained updated information from the Department for each of the 13 requirements. In addition, we independently tested the Department's geospatial metadata published on Data.gov.

We found that the Department was complying with 12 of the 13 GDA requirements. In response to our 2022 report, the Department implemented corrective actions for all five of our recommendations. Only one recommendation from our 2020 report remains open, but it cannot be fully addressed until the Office of Management and Budget issues guidance. In addition, since 2022, the National Oceanic and Atmospheric Administration (NOAA) and the Census Bureau (Census) initiated new partnerships and enhanced existing ones in fulfilling GDA-mandated responsibilities.

However, our testing revealed that the Department's geospatial metadata is not always complete. We found that the Department completed 15 of 19 fields consistently but did not complete 4 fields at least half the time. The four fields commonly missing were the reference system identifier, data set download link, web service, and data set last update (revision) date. A subset of records we tested were National Geospatial Data Asset metadata records. For this subset, we found the Department had improved completion of the metadata fields that our 2022 testing had determined were missing, which indicates the Department's actions in response to our recommendations were effective. The single metadata field for which there was no improvement was the data set download link content field.

Without ensuring a consistent approach to completing geospatial metadata, the Department's geospatial data stakeholders could face challenges in making the most efficient and effective use of the Department's geospatial data portfolio.

#### WHAT WE RECOMMEND

We recommend that the Department's Senior Agency Official for Geospatial Information coordinate with NOAA and Census to:

1. Review our test results, determine which missing metadata content is most significant for current users of geospatial data, and develop a plan (with goals and timeframes) to ensure more consistent completion of those fields.

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*Cover: Herbert C. Hoover Building main entrance at 14th Street Northwest in Washington, DC. Completed in 1932, the building is named after the former Secretary of Commerce and 31st President of the United States.*

# Introduction

Geospatial data affects the daily lives of the American public and supports federal government policy decisions. The U.S. Department of Commerce's (the Department's) geospatial data takes many forms such as census data; weather, climate, and environmental data; satellite imagery; and maps. The Department provides almost 75 percent of the geospatial data listed on the Data.gov website.<sup>1</sup>

The Geospatial Data Act of 2018 (GDA)<sup>2</sup> mandates how the federal government manages geospatial data through 13 responsibilities (see appendix B for a full list of the 13 responsibilities) for covered agencies.<sup>3</sup> The GDA also unifies geospatial data strategy, policy, and decision making through the Federal Geospatial Data Committee (FGDC).<sup>4</sup>

The GDA aims to reduce duplication of and centralize access to geospatial data, ensure the adoption of geospatial data standards, and enhance coordination between federal agencies and non-federal users. FGDC labels geospatial data that are of national importance as National Geospatial Data Assets (NGDAs). The Department is responsible for 56 of the 171 NGDAs.

The GDA requires inspectors general to audit their department's collection, production, acquisition, maintenance, distribution, use, and preservation of geospatial data not less than once every 2 years. This is our third audit in fulfillment of this requirement.<sup>5</sup> In accordance with an approach developed through the Council of the Inspectors General on Integrity and Efficiency (CIGIE), we again limited our audit to focus on the 13 covered agency responsibilities (see appendix C).

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<sup>1</sup> Data.gov is the United States Government's open data site "designed to unleash the power of government open data to inform decisions by the public and policymakers, drive innovation and economic activity, achieve agency missions, and strengthen the foundation of an open and transparent government." ([Data.gov](#), Mission, accessed August 27, 2024.)

<sup>2</sup> Pub. L. No. 115-254, Subtitle F (2018), codified at 43 U.S.C. §§ 2801-2811.

<sup>3</sup> As defined under the GDA, 43 U.S.C. § 2801(3), the Department is a covered agency subject to these requirements.

<sup>4</sup> 43 U.S.C. § 2808(a).

<sup>5</sup> U.S. Department of Commerce (DOC), Office of Inspector General (OIG), October 1, 2020. *The Department Has Made Progress Meeting Its Responsibilities Under the Geospatial Data Act But Must Improve Controls to Ensure Full Compliance*, OIG-21-001-A. Washington, DC: DOC OIG. DOC OIG, September 22, 2022. *The Department Needs to Improve Its Metadata Processes Under the Geospatial Data Act*, OIG-22-032-A. Washington, DC: DOC OIG.

# Objective, Findings, and Recommendation

Our objective was to assess the Department's compliance with the 13 covered agency responsibilities in 43 U.S.C. § 2808(a). To meet this objective, we reviewed our audit results from 2020 and 2022 and obtained updated information from the Department for each of the 13 requirements. In addition, we independently tested the Department's geospatial metadata published on Data.gov. See appendix A for a full description of our scope and methodology.

We found that the Department was complying with 12 of the 13 GDA requirements. However, our testing revealed that the Department's geospatial metadata is not always complete. Without ensuring a consistent approach to completing geospatial metadata, the Department's geospatial data stakeholders could face challenges in making the most efficient and effective use of the Department's geospatial data portfolio. We summarize our findings for the 13 requirements in appendix B.

## I. The Department Made Progress in Fulfilling Geospatial Data Act Responsibilities

In response to our 2022 report, the Department implemented corrective actions for all five of our recommendations.<sup>6</sup> Those recommendations related to metadata quality control processes and technical challenges with data harvesting from Department servers to Data.gov and the GeoPlatform.gov.<sup>7</sup> Only one recommendation from our 2020 report remains open, but it cannot be fully addressed until the Office of Management and Budget issues guidance on this topic.<sup>8</sup>

In addition, since 2022, the National Oceanic and Atmospheric Administration (NOAA) and the Census Bureau (Census) initiated new partnerships and enhanced existing ones in fulfilling GDA-mandated responsibilities. Those responsibilities are to promote the integration of geospatial data from all sources and to coordinate with external entities to collect, integrate, maintain, disseminate, and preserve geospatial data.<sup>9</sup> Specifically, the bureaus informed us that:

- NOAA initiated the new Ocean-Based Climate Resilience Accelerators public-private partnership program<sup>10</sup> and awarded funds to 16 entities in 11 states to

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<sup>6</sup> OIG-22-032-A.

<sup>7</sup> The GDA requires covered agencies to make their geospatial metadata available through the GeoPlatform, an electronic service managed by the U.S. Department of the Interior that provides the public access to geospatial data and metadata. See 43 U.S.C. § 2808(a)(6). The GeoPlatform is available online at [geoplatform.gov](https://geoplatform.gov).

<sup>8</sup> See OIG-21-001-A, recommendation 3.

<sup>9</sup> Responsibilities 3 and 7, respectively. See appendix B.

<sup>10</sup> According to NOAA, "the program will foster public-private partnerships to develop and support sustainable business models around ocean, coastal, and Great Lakes observation technologies, products, and services that address climate resilience needs." See: <https://ioos.noaa.gov/about/governance-and-management/inflation-reduction-act/accelerators/> (accessed August 28, 2024).

develop and advance new technologies for gathering coastal, ocean, and Great Lakes data and observations.

- Census initiated a new partnership with the Navajo Nation Tribe to improve the quality and completeness of each party's geospatial data.
- Census also continued enhancing its partnerships with state and local governments while conducting the Boundary Annexation Survey and School District Review Program.

## II. The Department's Geospatial Metadata Could Be Further Improved

FGDC guidance explains that:

Metadata records document the who, what, why, where, when, and how of the resource (dataset or service) and provide context for data consumers as to the content, extent, quality, purpose, intended use, and limitations of the resource.<sup>11</sup>

FGDC establishes recommendations for documenting geospatial data with relevant metadata on the Data.gov and GeoPlatform websites.<sup>12</sup> Although FGDC states that this guidance "provides best practices only and is not intended as policy that agencies must comply with, or for audit purposes,"<sup>13</sup> it serves as the most universal guide for federal agencies when creating and managing geospatial metadata.

In our 2022 audit, we tested the Department's 56 NGDA geospatial metadata records. For this audit, we expanded our testing to include all of the Department's metadata available on Data.gov, which consisted of 179,723 records. We tested each record for the existence of 19 metadata content fields (see appendix A for a full list). We found that the Department completed 15 of 19 fields consistently but did not complete 4 fields at least half the time. The four fields commonly missing were the reference system identifier, data set download link, web service, and data set last update (revision) date. Due to time constraints based on the statutory deadline for this work, we did not perform additional fieldwork to assess the relative importance or value of these fields.

A subset of records we tested were NGDA metadata records. For this subset, we found the Department had improved completion of the metadata fields that our 2022 testing had determined were missing, which indicates the Department's actions in response to our recommendations were effective. The single metadata field for which there was no improvement was the data set download link content field.

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<sup>11</sup> FGDC, December 13, 2022. *FGDC Technical Guidance: Data.gov and The GeoPlatform Metadata Recommendations Including Guidelines for National Geospatial Data Assets (NGDA)*, 1. Reston, VA: FGDC. Available online at <https://www.fgdc.gov/technical-guidance/metadata/fgdc-technical-guidance-datagov-geoplatform-ngda.pdf> (accessed August 28, 2024).

<sup>12</sup> *Ibid.*

<sup>13</sup> *Ibid.*, 1.



We shared our complete testing results with relevant Census and NOAA officials. They noted various reasons for the missing metadata, such as the fact that a reference system identifier may not exist for every data set (for example, databases of geocoded information). They also stated that in some cases, a data set is part of a collection and thus, lacks a specific data set download link; web services may not exist for each data set; and older data sets that are completed may never be updated or revised.

Additionally, the bureaus have logistical and resource challenges in managing the significant number of geospatial data records beyond their NGDA data records. For example, NOAA's geospatial metadata is created and maintained by data set managers who are distributed across the agency. In addition, Census maintains an office dedicated to geospatial data and metadata, but it does not update historical records due to a lack of staff resources.

Metadata content fields are relevant to users' ability to find, understand, and use geospatial data resources. To maximize discovery and use of geospatial data consistent with the GDA, the Department should strive to populate geospatial metadata content fields with adequate, relevant information.

### Recommendation

We recommend that the Department's Senior Agency Official for Geospatial Information coordinate with NOAA and Census to:

- I. Review our test results, determine which missing metadata content is most significant for current users of geospatial data, and develop a plan (with goals and timeframes) to ensure more consistent completion of those fields.

# Summary of Agency Response and OIG Comments

On September 12, 2024, we received the Department's response to our draft report. In the response, the Department concurred with our findings and recommendation. We are pleased with Department's response and look forward to reviewing its action plan. The Department's complete response is included in this report as appendix D.

## Appendix A: Objective, Scope, and Methodology

Our objective was to assess the Department's compliance with the 13 covered agency responsibilities in 43 U.S.C. § 2808(a). To meet this objective, we reviewed our audit results from 2020 and 2022 and developed a questionnaire to obtain updated information for each of the 13 responsibilities from NOAA and Census officials responsible for implementing GDA requirements. We reviewed the responses to the questionnaire and compared them with prior audit results to assess the sufficiency and appropriateness of the information. Based on further assessment of risk, we chose to conduct independent testing of the Department's geospatial metadata.

To test metadata, we developed an automated script that queried the Data.gov application programming interface. The script examined 179,723 Department metadata records on Data.gov for the existence of selected, key content fields recommended in *FGDC Technical Guidance: Data.gov and The GeoPlatform Metadata Recommendations Including Guidelines for National Geospatial Data Assets (NGDA)*, December 13, 2022. The selected content fields were: title, abstract, responsible party (role code), progress code, maintenance frequency code, citation identifier, metadata identifier, reference system identifier, metadata download link, data set download link, temporal extent begin, temporal extent end, data set publication date, data set creation date, data set last update (revision) date, metadata publication date, metadata last update (revision) date, geographic extent (bounding boxes), web service, and keywords. However, our script did not complete tests for geographic extent (bounding boxes), and we therefore excluded those from our summary results.

We shared and discussed the full results of the testing, along with summaries of the results for each of the tested content fields, with NOAA and Census staff responsible for overseeing and implementing geospatial metadata requirements. Due to time constraints based on the relevant statutory deadline, we were not able to complete additional fieldwork to assess the relative importance and effects of missing metadata content.

Our work incorporated prior assessments of both the design and implementation of internal controls significant within the context of our objective—specifically, the policies and procedures required by 43 U.S.C. § 2808(a). Our findings are inclusive of these assessments.

In satisfying our objective, we relied on computer-processed data: metadata records queried through the Data.gov application programming interface. We tested the data primarily for reliability (e.g., completeness) and validity, where relevant. We determined that these data were sufficiently reliable to support our findings. Although we could not independently verify the reliability of all the information we collected, we compared it with other available supporting documents and information sources to determine data consistency and reasonableness. Based on these efforts, we believe the information we obtained is sufficiently reliable for this report.

We conducted our audit from April 2024 through August 2024 under the authority of the Inspector General Act of 1978, as amended (5 U.S.C. §§ 401-424), and Department

Organization Order 10-13, as amended October 21, 2020. We performed our fieldwork remotely.

We conducted this performance audit in accordance with generally accepted government auditing standards. These 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 objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

# Appendix B: Summary of the Department's Progress Implementing GDA Responsibilities

**Table B-1. Summary of Department Progress Implementing Covered Agency Responsibilities Under 43 U.S.C. § 2808(a)**

Responsibility	Description	Status of Implementation
1. Strategy	Prepare, maintain, publish, and implement a strategy for promoting the use of geographic information and related geospatial data and activities appropriate to the agency's mission, in support of the strategic plan for the National Spatial Data Infrastructure (NSDI).	The Department continues to follow the <i>Department of Commerce Geospatial Strategy Fiscal Years 2021–2024</i> (developed in July 2021 by the Commerce Geospatial Working Group (CGWG); published November 2021). The Department's Chief Data Officer is developing a new <i>Commerce Data Strategy</i> . Once the Department publishes its newest <i>Commerce Data Strategy</i> , the CGWG will develop the next Department geospatial strategy for fiscal years 2025 through 2028.
2. Management of geospatial data	Collect, maintain, disseminate, and preserve geospatial data so that it can be readily shared with other federal agencies and nonfederal users.	<p>In response to our 2022 recommendations, the Department implemented metadata quality control processes and addressed technical challenges with data harvesting from Department servers to Data.gov and the GeoPlatform.</p> <p>NOAA stated that the issues identified in our prior audit related to data harvesting increased awareness of those issues across agencies, resulting in additional efforts to address these errors with the GeoPlatform.</p> <p>Census is also encountering issues with the GeoPlatform that it is attempting to resolve. Census developed an automated tool to check files on Data.gov and the GeoPlatform to confirm the presence of Department geospatial data and detect duplication.</p>
3. Promotion of integration	Promote the integration of geospatial data from all sources.	<p>No change from 2022.</p> <p>Summary from OIG-22-032-A: The Department promotes the integration of geospatial data from all sources through its partnerships to collect geospatial data, shares with users how they can discover data, and has data integration processes to integrate nonagency data.</p>
4. Inclusion of geospatial data in agency record schedules	Ensure that data information products and other records created in geospatial data are included on National Archives and Records Administration (NARA)-approved agency records schedules.	<p>No change from 2022.</p> <p>Summary from OIG-22-032-A: NOAA and the Census Bureau have policies and procedures that include geospatial data on agency record schedules. NOAA has two NARA-approved records schedules for geospatial data that are included in the Department's records schedules. The Census Bureau did not have any records schedules for geospatial data that were within the scope of this audit.</p>

Responsibility	Description	Status of Implementation
5. Allocation of resources	Allocate resources to fulfill responsibilities of collection, production, and stewardship, with regard to related activities of the covered agency, and support Committee activities.	<p>Per the Department, there have been no changes in allocation of resources; however, the Department’s level of responsibility and leadership roles have increased for several new FGDC task teams responsible for developing geospatial standards and related practices government-wide.</p> <p>Summary from OIG-22-032-A: Both the Census Bureau and NOAA identified resource challenges in the metadata area and planned to address them in a combination of ways: increasing budget and resources, acquiring a metadata contractor, using technology, or acquiring new equipment.</p>
6. Use of geospatial metadata standards	Use the appropriate standards for documenting geospatial data with relevant metadata and making metadata available through the GeoPlatform.	<p>In response to our 2022 audit recommendations, the Department (and NOAA and Census) implemented metadata quality control processes.</p> <p>For this audit, we expanded our testing to include all of the Department’s metadata available on Data.gov, which consisted of 179,723 records. See finding II of this report for more details on our testing results.</p>
7. Coordination	Coordinate and work with other federal agencies; state, tribal, and local governments; institutions of higher education; and the private sector to efficiently and cost-effectively collect, integrate, maintain, disseminate, and preserve geospatial data, building upon existing nonfederal geospatial data to the extent possible.	<p>Both Census and NOAA added new partnerships since our 2022 audit. See finding I for a description of each.</p> <p>Summary from OIG-22-032-A: The Census Bureau integrates addresses, feature, and boundary data provided by tribal, federal, state, and local government partners through partnership programs, such as the Boundary and Annexation Survey.</p> <p>NOAA has established partnership programs and agreements with government, private, and academic partners across its mission areas. Many of NOAA’s geospatial datasets integrate geospatial data from various government and nongovernment sources.</p>
8. Use of geospatial information	Use geospatial information to (a) make federal geospatial information and services useful to the public, (b) enhance operations, (c) support decision making, and (d) enhance reporting to the public and Congress.	<p>No change from 2022.</p> <p>Summary from OIG-22-032-A: The Department’s geospatial strategy enhances operations and supports decision making since it aligns with the Department of Commerce Data Strategy (2021-2024). NOAA and the Census Bureau participate in many different geospatial-related working groups, councils, special listening sessions, and summits that ensure continued outreach and communications with the public. NIST uses geospatial data for the tracking and source prediction of greenhouse gases. NTIA uses geospatial data as input for its National Broadband Availability Map, used by broadband policymakers. The public and other agencies can find information about the Department’s geospatial data on agency websites, Data.gov and the GeoPlatform.</p>
9. Personal privacy and confidentiality	Protect personal privacy and maintain confidentiality in accordance with federal policy and law.	<p>No change from 2022.</p> <p>Summary from OIG-22-032-A: NOAA and the Census Bureau’s geospatial systems that include personally identifiable information implement all applicable privacy controls from Appendix J of NIST’s SP 800-53 Rev. 4, Security and Privacy Controls for Federal Information Systems and Organizations, as required by the Department Privacy Program Plan.</p>

Responsibility	Description	Status of Implementation
10. Declassified data	Participate in determining whether declassified data can contribute to and become part of the NSDI.	No change from 2022. Summary from OIG-22-032-A: According to Department officials, the Department does not have declassified geospatial data that could become part of the NSDI. Through the Department's representation on the U.S. Civil Applications Committee, FGDC Steering Committee, and National Geospatial Advisory Committee, it works across the government to determine which data is most appropriate and useful for inclusion in the NSDI.
11. Review of existing geospatial data	Search all sources, including the GeoPlatform, to determine whether existing federal, state, local, and private geospatial data meets the needs of the covered agency before users expend funds for geospatial data collection.	No change from 2022. The Department has an outstanding recommendation from our first GDA report (OIG-21-001-A, recommendation 3). The Department is waiting on Office of Management and Budget (OMB) to issue the revised OMB Circular A-16 (and A-16 supplemental guidance) to update its procedures and policies accordingly. Summary from OIG-22-032-A: Although NOAA conducts searches before issuing a contract for geospatial data collection, there are no procedures or policies in place to ensure searches are conducted. According to NOAA's Acquisition and Grants Office, the program office is responsible for ensuring searches are conducted before procuring and obligating funds.
12. Collection of high-quality data	To the extent possible, ensure that persons that receive federal funds to collect geospatial data provide high-quality data.	Census Bureau made purchases to support its ongoing update and maintenance of the MAF/TIGER System. NOAA indicated its implementation was adequately explained in our 2022 report. Summary from OIG-22-032-A: NOAA has quality control procedures and processes in place to ensure it receives high quality geospatial data from its contractors. Census does not generally expend funds to collect geospatial data but did become a cost-share partner for the U.S. Department of Agriculture (USDA) Farm Service Agency's National Agricultural Imagery Program (NAIP). According to Census Bureau officials, the NAIP imagery includes sufficient accuracy specifications, compliance guidelines, and is subjected to automated and visual product inspections.
13. Appointment of contact	Appoint a contact to coordinate with lead covered agencies for collection, acquisition, maintenance, and dissemination of the NGDA data themes.	NOAA added an additional theme lead to its Water-Oceans and Coast NGDA Theme. Summary from OIG-22-032-A remains accurate: The Department has appointed multiple points of contact who coordinate with lead covered agencies for NGDA themes that it does not lead or co-lead.

Source: Office of Inspector General analysis of the Department's questionnaire responses and of report OIG-22-032-A

# Appendix C: CIGIE Letter to Congress

The CIGIE letter to Congress follows on p. 12.





## COUNCIL OF THE INSPECTORS GENERAL ON INTEGRITY AND EFFICIENCY

November 30, 2023

The Honorable Maria Cantwell  
Chairwoman  
The Honorable Ted Cruz  
Ranking Member  
Committee on Commerce, Science,  
and Transportation  
United States Senate  
Washington, D.C.

The Honorable Frank Lucas  
Chairman  
The Honorable Zoe Lofgren  
Ranking Member  
Committee on Science, Space,  
and Technology  
U.S. House of Representatives  
Washington, D.C.

Dear Chairpersons and Ranking Members:

The Council of the Inspectors General on Integrity and Efficiency (CIGIE) appreciates your leadership on geospatial data issues. The Geospatial Data Act of 2018<sup>1</sup> (the Act) mandates oversight through Federal Inspectors General (IG) to ensure effective implementation of the related requirements. Specifically, the Act requires biennial IG audits to evaluate the following:

1. Covered Agencies' compliance with geospatial data and metadata standards established under the Act.
2. Covered Agencies' compliance with responsibilities outlined in the Act.
3. Covered Agencies' compliance with the limitation of Federal funding for noncompliant datasets.<sup>2</sup>

We are writing this letter on behalf of CIGIE to inform you about an important timing concern related to the biennial audits conducted by the IG community. The standards required for implementation of the Act by Covered Agencies have not yet been issued by the Federal Geographic Data Committee (FGDC). As of now, there is no projected release date available. Consequently, the full implementation of the Act is delayed, which in turn limits the IG community's ability to conduct a comprehensive biennial audit in Fiscal Year 2024. We cannot assess compliance with two of the three audit requirements (specifically, audit evaluation tasks 1 and 3 listed above). To address this challenge, CIGIE has taken proactive measures to establish a consensus within the IG community on an audit approach for the Fiscal Year 2024 audits.

After careful deliberation and similar to our prior audits, the Covered Agency IG representatives have concluded that audits focused on assessing the progress of Covered Agencies toward compliance with the Act, including their adherence to the Act's requirements outlined in section 759(a), 43 U.S.C. § 2808(a), would offer the most value to the covered agencies, Congress, and the Public.

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<sup>1</sup> Pub. L. No. 115-254, Subtitle F (2018), codified at 43 U.S.C. §§ 2801-2811.

<sup>2</sup> 43 U.S.C. § 2808(c).

In our view, this approach is appropriate due to the inherent challenges in determining the precise standards that audits should utilize to assess compliance at this time. Moreover, it is important to note that the limitation on the use of Federal funds for noncompliant geospatial data will not apply until 5 years after FGDC's establishment of standards. As such, compliance with the limitation is not yet auditable.

This approach would provide each Covered Agency IG with the flexibility to conduct additional testing as needed, depending on the geospatial footprint of the respective covered agency. The relevant IG would make this determination as they see fit.

Furthermore, among the 16 federal agencies specified under the Act, more than half of them do not accumulate or publish substantial or significant volumes of new geospatial assets on a biennial basis. Consequently, many IG audit teams are contemplating the adoption of weighted or risk-based approaches. Additionally, the CIGIE Legislation Committee has encouraged Congress to repeal the requirement that IGs conduct a biennial audit to allow IGs the flexibility to assess the risks of geospatial data at the agencies they oversee and provide a cost-effective, risk-based review if appropriate.

Should you or your staffs have any questions about our approach or other aspects of our collective Geospatial Data Act oversight activities, please do not hesitate to contact us at 202-208-5475. In the alternative, please feel free to have your staff contact Andrew Cannarsa, CIGIE's Executive Director, at 202-292-2603.

Sincerely,



Mark L. Greenblatt  
Chair, Council of the Inspectors General  
on Integrity and Efficiency  
Inspector General  
U.S. Department of the Interior



Robert P. Storch  
Chair, Council of the Inspectors General on  
Integrity and Efficiency, Technology  
Committee  
Inspector General, U.S. Department of Defense

cc: The Honorable Gary C. Peters, Chairman  
The Honorable Rand Paul, Ranking Member  
Committee on Homeland Security and Government Affairs

The Honorable James Comer, Chairman  
The Honorable Jamie Raskin, Ranking Member  
House Committee on Oversight and Accountability

The Honorable Jason Miller, Deputy Director OMB and Executive Chair, Council of the  
Inspectors General on Integrity and Efficiency

The Honorable Gene Dodaro, Comptroller General GAO

## Appendix D: Agency Response

The Department's response to our draft report follows on p.15.



**UNITED STATES DEPARTMENT OF COMMERCE**  
**Office of the Under Secretary for Economic Affairs**

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**TO:** Frederick J. Meny, Jr.  
Assistant Inspector General for Audit and Evaluation

**FROM:** Oliver Wise  
Chief Data Officer, Office of the Under Secretary for Economic Affairs

Anthony LaVoi 862580  
Commerce Senior Agency Official for Geospatial Information and  
National Oceanic and Atmospheric Administration Chief Data Officer

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**SUBJECT:** Department of Commerce Response to *Biennial Audit of the Department's Compliance with Geospatial Data Act Requirements* Draft Report

This memorandum contains the Department's response to the Office of the Inspector General (OIG) draft report entitled *Biennial Audit of the Department's Compliance with Geospatial Data Act Requirements*. The Deputy Secretary's Office has authorized us to provide this response and serve as Agency Action Officials for recommendations made in the final report.

The Department concurs with the recommendation and findings in the draft report. We will prepare a formal action plan upon issuance of OIG's final report within the 60 day timeframe required.

- OIG recommends that the Department's Senior Agency Official for Geospatial Information coordinate with NOAA and Census to:
  - Review OIG test results, determine which missing metadata content is most significant for current users of geospatial data, and develop a plan (with goals and timeframes) to ensure more consistent completion of those fields.

The Department will review the metadata test results, determine which of the missing fields are most significant to geospatial users, and develop a plan that will include goals and timelines to ensure more consistent completion of these fields in the future for Department metadata.

Additionally, the Department does not believe the report contains any information that cannot be shared publicly with the issuance of the report.

The Department appreciates your team's work on this audit. We look forward to working with you as we continue to address the recommendation in this report.

Should you have questions, please contact MaryAnn Mausser, Commerce GAO/OIG Audit Liaison at [mmausser@doc.gov](mailto:mmausser@doc.gov).

# REPORT

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Department of Commerce

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