

U.S. Department of Labor

Office of Inspector General—Office of Audit

**REPORT TO THE OFFICE OF
SECRETARY AND CHIEF DATA
OFFICER**



**DOL NEEDS TO DO MORE TO
IMPLEMENT THE GEOSPATIAL DATA
ACT OF 2018**

**DATE ISSUED: SEPTEMBER 30, 2020
REPORT NUMBER: 23-20-004-01-001**



BRIEFLY...

DOL NEEDS TO DO MORE TO IMPLEMENT THE GEOSPATIAL DATA ACT OF 2018

September 30, 2020

WHY OIG CONDUCTED THE AUDIT

The Geospatial Data Act of 2018 (GDA) was signed into law October 5, 2018, to foster efficient management of geospatial data, technologies, and infrastructure through enhanced coordination among federal, state, local, and tribal governments, along with the private sector and academia. The GDA requires Inspectors General to complete their first audit of agencies' progress toward implementing the requirements of the Act by October 5, 2020. However, agencies have 5 years from the establishment of applicable data standards to complete implementation.

WHAT OIG DID

To address this mandatory audit requirement, we focused on the Department of Labor's (DOL) progress toward compliance with the GDA. Specifically, we performed an audit to answer the following question:

To what extent has DOL fulfilled the requirements of the GDA to date?

We assessed the status of DOL's implementation efforts as of August 2020 by conducting interviews with DOL management officials and analyzing evidence provided.

READ THE FULL REPORT

<http://www.oig.dol.gov/public/reports/oa/2020/23-20-004-01-001.pdf>

WHAT OIG FOUND

DOL has taken some steps to address the 13 specific requirements of the GDA, but more remains to be done. Of the 13 requirements, we determined DOL initiated action and made limited progress on 3 of the requirements, completed or met 3, and made no progress to date on the remaining 7.

DOL's progress to date has been impaired by several factors. For one, DOL's Chief Data Officer (CDO) had only recently assumed the role to develop DOL's policies and procedures for implementing geospatial laws and regulations. Further, required guidance and regulations from the Federal Geospatial Data Committee (FGDC) and the Office of Management and Budget (OMB) have not yet been issued, and DOL decided to wait for the required guidance before further developing and implementing policies and procedures.

DOL believes it will meet the deadlines imposed by GDA once the required guidance is provided; however, without having sufficient planning efforts underway, there is no reasonable assurance DOL will be able to achieve timely compliance with GDA.

WHAT OIG RECOMMENDED

DOL can better prepare for full implementation and readiness to use geospatial resources by developing strategies for the creation, use, and contracting of geospatial data.

To accomplish this, we recommended the Deputy Secretary of Labor formalize the assignment of responsibility and authority for developing and implementing DOL policy for geospatial laws and regulations.

We also recommended the DOL Chief Data Officer create and implement strategies and internal planning that ensure compliance with the GDA, as well as update geospatial planning strategies once data standards and guidance are issued.

In responding to our draft report, both the Deputy Secretary and CDO generally agreed with our recommendations.

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INSPECTOR GENERAL'S REPORT

Patrick Pizzella
Deputy Secretary of Labor
U.S. Department of Labor
200 Constitution Ave, NW
Washington, DC 20210

Scott M. Gibbons
Chief Data Officer
U.S. Department of Labor
200 Constitution Ave, NW
Washington, DC 20210

This report presents the results of our review of the Department of Labor's (DOL) progress in implementing the requirements of the Geospatial Data Act of 2018 (GDA). The federal government collects, maintains, and uses geospatial data – information linked to specific geographic locations – to help in decision making and to support many functions, including national security, law enforcement, health care, environmental protection, and natural resources conservation.¹ The GDA was signed into law October 5, 2018, to foster efficient management of geospatial data, technologies, and infrastructure through enhanced coordination among federal, state, local, and tribal governments, along with the private sector and academia.

The GDA established the Federal Geographic Data Committee (FGDC) as the lead federal entity for developing, implementing, and reviewing the policies, practices, and standards relating to geospatial data. Federal agencies have 5 years from the date standards are established to complete implementation of the GDA requirements. Additionally, the GDA mandates that, not less than once

¹ Examples of geospatial information include maps, satellite imagery, and census and housing data as well as information identified by a region or jurisdiction an agency may make available to other agencies, the public, or Congress.

every two years, the Inspector General must perform an audit of agency compliance with the requirements, including limitations on the use of funds should GDA requirements not be met. The GDA requires Inspectors General to complete their first audit by October 5, 2020. With implementation guidance and requirements for federal agencies overlapping with the required audit timeframes, our audit was focused on the progress that DOL made in implementing GDA requirements. As such, we performed an audit to answer the following question:

To what extent has DOL fulfilled the requirements of the Geospatial Data Act of 2018 to date?

Our audit covered DOL's progress in implementing geospatial data creation, maintenance, and usage of geospatial data by the covered federal agencies as detailed in the GDA.² We assessed the status of DOL's implementation efforts as of August 2020 by conducting interviews with DOL management officials and analyzing evidence provided.

RESULTS

DOL has taken some steps to address the 13 specific requirements of the GDA, but more remains to be done. Of the 13 requirements, we determined DOL initiated action and made limited progress on 3 of the requirements, completed or met 3, and made no progress on the remaining 7.

DOL's progress was impaired by several factors. For one, DOL's Chief Data Officer (CDO) had only recently assumed the role to develop DOL's policies and procedures for implementing geospatial laws and regulations. Further, required guidance and regulations from the FGDC and the Office of Management and Budget (OMB) have not yet been issued, and DOL decided to wait for the required guidance before further developing and implementing policies and procedures. Once the guidance is provided, DOL believes it will meet deadlines imposed by GDA. However, without sufficient planning efforts underway, DOL does not have reasonable assurance it will be able to comply with GDA in a timely way.

² See Exhibit 2 for Council of the Inspectors General on Integrity and Efficiency letter to Congress regarding the scope of audit.

LIMITED PROGRESS IN IMPLEMENTING GDA REQUIREMENTS

As of September 10, 2020, DOL efforts to implement GDA included initiating the development of a strategy for advancing DOL's geographic information and related geospatial data activities, identifying geographic information usage and sources, working with other federal agencies and groups regarding geospatial data, and appointing the CDO as the official responsible for coordinating DOL's geospatial data collection, acquisition, maintenance, and dissemination. These actions satisfied 3 of the 13 requirements of the GDA. DOL has yet to fully address the remaining 10 requirements.

The following is our analysis of DOL's progress in addressing each of the 13 requirements in Section 759a of the GDA. Exhibit 1 contains a list of the 13 requirements and our determinations for each.

Requirement 1, Strategy. DOL was required to prepare, maintain, publish, and implement a strategy for advancing geographic information and related geospatial data and activities appropriate to its mission. DOL's CDO initiated actions for developing a strategy that includes addressing data quality and standardization, but acknowledged that these efforts would likely be part of a larger mandate to publish a data strategy and governance plan. Additionally, the CDO re-initiated a former work group under DOL's Data Board to establish requirements for handling DOL's data, including geocoding requirements, through shared services.

OIG Assessment: DOL made limited progress.

Requirement 2, Geospatial Data. DOL was required to collect, maintain, disseminate, and preserve geospatial data such that the resulting data, information, or products could be readily shared with other federal agencies and non-federal users. The CDO stated that DOL has not identified any relevant geospatial data assets (GIS layers, boundary lines, etc.), but is focused on improving the address standardization for current and prospective data analysis efforts. While DOL had not identified any geospatial data that would be relevant to this GDA requirement, it has not developed strategies, plans, policies, or procedures for collecting, maintaining, disseminating, and preserving geospatial data if future information products or data are identified.

OIG Assessment: DOL made no progress.

Requirement 3, Promotion of Integration. DOL was required to promote the integration of geospatial data from all sources. DOL performed a general review

of its data and did not identify any ongoing mission-related use cases. While DOL had not identified any geospatial data or any mission-related use cases that would be relevant to this GDA requirement, it has not developed strategies, plans, policies, or procedures to integrate geospatial data into any of its future data or products.

OIG Assessment: DOL made no progress.

Requirement 4, Inclusion of Geospatial Data in Agency Record Schedules.

DOL was required to ensure that data information products and other records created from geospatial data and activities be included on agency record schedules. While DOL had not identified any geospatial data that would be relevant to this GDA requirement, it has not developed plans, policies, or procedures if future data information products and records are created.

Assessment: DOL made no progress.

Requirement 5, Allocation of Resources. DOL was required to allocate resources to fulfill the responsibilities of effective geospatial data collection, production, and stewardship with regard to related activities of the covered agency and as necessary to support the activities of the Committee. While the CDO has assumed responsibility for some GDA-related activities, DOL senior leadership had not communicated the assignment of a GDA-accountable official for the organization. Additionally, the CDO provided support that DOL provided funding to the geospatial shared services, which includes the funding of the FGDC.

Assessment: DOL made limited progress.

Requirement 6, Use of Geospatial Data Standards. DOL was required to use the geospatial data standards, including the standards for metadata for geospatial data, and other appropriate standards. This included documenting geospatial data with the relevant metadata and making metadata available through the GeoPlatform.³ DOL did not identify any geospatial data that would be relevant to GDA requirements. However, had DOL identified a relevant data set, implementation would still need to wait for the issuance of the FGDC data standards.

Assessment: DOL made no progress.

³ The GeoPlatform provides a suite of well-managed, highly available, and trusted geospatial data, services, and applications for use by federal agencies and other partners.

Requirement 7, Coordination. DOL was required to coordinate and work in partnership with other federal agencies, agencies of 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 non-federal geospatial data to the extent possible. Along with providing funding to the geospatial shared services, DOL's CDO provided time and effort to the FGDC.

Assessment: DOL met requirement.

Requirement 8, Use of Geospatial Information. DOL was required to use geospatial information to a) make federal geospatial information and services more useful to the public; b) enhance operations; c) support decision making; and d) enhance reporting to the public and to Congress. While DOL did not identify any geospatial data that would be relevant to GDA requirements, DOL did not include this requirement in its strategies or plans.

Assessment: DOL made no progress.

Requirement 9, Personal Privacy and Confidentiality. DOL was required to protect personal privacy and maintain confidentiality in accordance with federal policy and law. While DOL had not identified any geospatial data that would be relevant to GDA requirements, DOL did not identify plans to address this requirement in its strategies or plans.

Assessment: DOL made no progress.

Requirement 10, Declassified Data. DOL was required to participate in determining whether declassified data can contribute to and become a part of the National Spatial Data Infrastructure. DOL had not identified any geospatial data that would be relevant to this GDA requirement, but participates in the FGDC and coordinates and works with other agencies and organizations to the extent possible. Along with providing funding to the geospatial platform, DOL's CDO provided time and effort to the FGDC.

Assessment: DOL met requirement.

Requirement 11, Review of Existing Geospatial Data. DOL was required to search all sources, including the GeoPlatform, to determine if existing federal, state, local, or private geospatial data meets the needs of the covered agency before expending funds for geospatial data collection. At the time of our audit, DOL had not completed efforts to inventory and review agency geospatial data usage and analysis tools.

Assessment: DOL made limited progress.

Requirement 12, Collection of High Quality Data. DOL was required to ensure that a person receiving federal funds for geospatial data collection provide high quality data. While DOL had not identified any geospatial data that would be relevant to this GDA requirement, it has not developed plans, policies, or procedures to ensure any geospatial data developed, received, or shared by DOL is of high quality.

Assessment: DOL made no progress.

Requirement 13, Appointment of Contact. DOL was required to appoint a contact to coordinate with the lead covered agencies for collection, acquisition, maintenance, and dissemination of the National Geospatial Data Asset data themes used by the covered agency. DOL's CDO was identified to the FGDC Steering committee as DOL's primary point of contact.

Assessment: DOL met requirement.

DOL's limited progress in implementing GDA requirements resulted partly from DOL's delay in assigning an accountable official responsible for implementing GDA requirements. DOL issued Secretary's Order 02-2019 establishing the position of the CDO and formalized the DOL Data Board within DOL on March 12, 2019. It stated the CDO is the chair of DOL's Data Board, and the Data Board is to receive assignments from the Secretary, Deputy Secretary, and Agency Heads as appropriate. Although the GDA was signed into law on October 5, 2018, between October 2018 and December 2019, DOL senior leadership had not communicated the assignment of GDA responsibilities and authorities to an accountable DOL official. The current CDO assumed responsibility for coordinating with the FGDC and other agencies in December 2019; however, as of August 2020, the CDO or the Data Board still have not obtained formal assignment from DOL senior leadership outlining the full responsibilities and authorities in implementing GDA.

Additionally, DOL decided to wait for issuance of data standards and guidance before developing and implementing its geospatial policies and procedures. FGDC and OMB, lead agencies for implementing GDA, were delayed in providing data standards and guidance needed by covered federal agencies. Furthermore, DOL is not a significant producer of geospatial data. Given this, DOL determined its current geospatial landscape to be low risk and decided to wait until data standards and guidance are finalized before spending resources to further implement GDA requirements. While planning and implementing standards would generally improve data handling and information control, the

impact to the government-wide geospatial collection is low due to DOL not producing and sharing geospatial data.

The GDA provides 5 years after establishment of data standards for agencies to implement its requirements. However, we believe DOL can better prepare for full implementation and readiness to use geospatial resources by developing strategies for the creation, use, and contracting of geospatial data. Without the strategies and plans implemented, DOL may inadvertently spend money on redundant data or provide and use data not in conformance with data standards.

OIG'S RECOMMENDATIONS

We recommend the Deputy Secretary of Labor:

1. Provide an official assignment for the responsibility and the authority to develop and implement DOL policy for geospatial laws and regulations.

We recommend the Chief Data Officer:

2. Create and implement strategies and internal planning that ensure compliance with the GDA and update geospatial planning strategies once data standards and guidance are issued.

SUMMARY OF DEPUTY SECRETARY'S RESPONSE

The Deputy Secretary generally agreed with our first recommendation and is taking action. He highlighted Secretary's Order (SO) 02-2019 that established the position of the CDO and formalized the DOL Data Board within DOL. The Deputy Secretary also stated the implementation of the GDA requirements fall within the scope of the Data Board's responsibilities under SO 02-2019.

SO 02-2019 states the Data Board is to receive assignments from the Secretary, Deputy Secretary, and Agency Heads as appropriate. DOL officials did not provide evidence of the Secretary or Deputy Secretary providing the CDO or the Data Board the assignment for DOL's GDA responsibilities. Additionally, under SO 02-2019, the Data Board is charged with providing recommendations to the Deputy Secretary, who will implement the recommendations.

The Deputy Secretary agreed that a more clear delegation is possible and will be issuing internal guidance to clarify DOL's implementation of the GDA

requirements. We included the Deputy Secretary's response to our draft report in its entirety in Appendix B.

SUMMARY OF CHIEF DATA OFFICER'S RESPONSE

The CDO broadly agreed with our characterization of DOL's progress in meeting the requirements of the law and with our recommendations. However, the CDO provided some additional context for reviewing the findings and determining what appropriate next steps the Department should take to further implement the GDA. The CDO noted GDA's requirements apply to all agencies regardless of the extent to which the agency collects, manages, or uses geospatial data or assets and DOL's current scope and use of geospatial data is minor. The CDO also noted that implementing corrections at this time would involve extensive efforts due to DOL's numerous, inconsistent legacy systems, and it will be important for the Department to develop approaches to meet the requirements of the GDA in a manner that is consistent with the current and prospective uses of geospatial data and assets. Finally, he noted that the intent and requirements of the GDA are unfunded and the need for sufficient funding and resources to support planning, design, implementation, and training. We included the Chief Data Officer's response to our draft report in its entirety in Appendix C.

We appreciate the cooperation and courtesies extended to us by DOL personnel during this audit. OIG personnel who made major contributions to this report are listed in Appendix D.



Elliot P. Lewis
Assistant Inspector General for Audit

EXHIBIT 1: STATUS OF THE 13 GDA REQUIREMENTS

Requirement	Description	Implemented
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.	No
2. Geospatial Data	Collect, maintain, disseminate, and preserve geospatial data so that they can be readily shared with other Federal agencies and non-Federal users.	No
3. Promotion of Integration	Promote the integration of geospatial data from all sources	No
4. Inclusion of Geospatial Data in Agency Record Schedules	Ensure that data information products and other records created in geospatial data are included on agency record schedules that have been approved by the National Archives and Records Administration.	No
5. Allocation of Resources	Allocate resources to fulfill responsibilities of collection, production, and stewardship, and support of Committee activities.	No
6. Use of Geospatial Data Standards	Use the standards, including those for metadata for geospatial data, for documenting geospatial data with relevant metadata and making metadata available through the GeoPlatform.	No

Requirement	Description	Implemented
7. Coordination	Coordinate and work with other Federal agencies, State, tribal, and local Governments, institutions of higher education, and private sector to efficiently and cost-effectively collect, integrate, maintain, disseminate, and preserve geospatial data, building upon existing non-Federal geospatial data to the extent possible.	Yes
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 to Congress.	No
9. Personal Privacy and Confidentiality	Protect personal privacy and maintain confidentiality in accordance with Federal policy and law.	No
10. Declassified Data	Participate in determining whether declassified data can contribute to and become a part of the National Spatial Data Infrastructure.	Yes
11. Review of Existing Geospatial Data	Search all sources, including the GeoPlatform, to determine whether existing Federal, State, local, and private geospatial data meet the needs of the covered agency before expending funds for geospatial data collection.	No
12. Collection of High Quality Data	To the extent possible, ensure that persons that receive Federal funds to collect geospatial data obtain high-quality data.	No

Requirement	Description	Implemented
13. Appointment of Contact	Appoint a contact to coordinate with lead covered agencies for collection, acquisition, maintenance, and dissemination of the National Geospatial Data Asset data themes.	Yes

EXHIBIT 2: CIGIE CONGRESSIONAL LETTER



March 23, 2020

The Honorable Roger F. Wicker
Chairman
The Honorable Maria Cantwell
Ranking Member
Committee on Commerce, Science,
and Transportation
United States Senate
Washington, D.C.

The Honorable Eddie Bernice Johnson
Chairwoman
The Honorable Frank D. Lucas
Ranking Member
Committee on Science, Space,
and Technology
U.S. House of Representatives
Washington, D.C.

Dear Mr. Chairman, Mrs. Chairwoman, and Ranking Members:

The Council of the Inspectors General on Integrity and Efficiency (CIGIE) recognizes and appreciates your leadership on issues of geospatial data. In particular, we believe the enactment of the Geospatial Data Act of 2018 (P.L. 115-254) will improve the continuing development of geospatial data and technology. To make sure this happens, the Geospatial Data Act provides for oversight by way of the Federal Inspectors General. Specifically, the Geospatial Data Act requires the bi-annual completion of a review of Covered Agencies' compliance with standards established by the Act, Covered Agencies' responsibilities detailed in the Act, and Covered Agencies' compliance with the prohibition of Federal funding for non-compliant datasets.

We are writing this letter on behalf of CIGIE to inform you of an important distinction with the inaugural Geospatial Data Act audits by the Inspector General community. Specifically, the inaugural mandatory audit scope period overlaps with the estimated Geospatial Data Act implementation period established by the Federal Geographic Data Committee (FGDC). As part of the implementation phase, the FGDC is evaluating the existing body of standards, among other items. Due to the continuing implementation of the Geospatial Data Act, conducting the mandatory audits as prescribed by the Act would result in reports submitted by the Inspectors General in October 2020 to be inconclusive for two of the three audit requirements.

To address this challenge while continuing to meet the mandatory audit requirements, CIGIE convened a working group with representatives from the Covered Agency Inspectors General to reach a consensus on an audit approach for the inaugural audits. The Covered Agency Inspectors General determined that audits focused on the Covered Agencies' progress toward compliance with the Geospatial Data Act, including the agencies' compliance with requirements under subsection (a), would likely provide the best value to the Covered Agencies', Congress, and the Public. This is a somewhat narrower approach than what the law requires, because it is currently difficult to determine which standards the audits should use in evaluating compliance. Also, because the law establishes a five-year implementation period before limiting the use of Federal

funds for non-compliant activities, this requirement would not be evaluated in the inaugural audits.

This consensus approach will afford each Covered Agency Inspector General latitude to perform additional testing based on the Covered Agency's geospatial footprint as determined necessary by the applicable Inspector General. CIGIE has advised the affected Inspectors General that should they decide to perform either additional, or more limited procedures, the rationale for the addition, or reduction of the audit procedures should be included in the report.

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) 514-3435 or (703) 248-2296 respectively.

Sincerely,



Michael E. Horowitz
Chair, Council of the Inspectors General on
Integrity and Efficiency
Inspector General, U.S. Department of
Justice



Tammy L. Whitcomb
Chair, Council of the Inspectors General on
Integrity and Efficiency, Technology
Committee
Inspector General, U.S. Postal Service

cc: The Honorable Ron Johnson, Chairman
The Honorable Gary C. Peters, Ranking Member
Senate Committee on Homeland Security and Governmental Affairs

The Honorable Carolyn B. Maloney, Chairwoman
The Honorable Mark Meadows, Ranking Member
House Committee on Oversight and Reform

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

The Honorable Gene Dodaro, Comptroller General, GAO

APPENDIX A: SCOPE, METHODOLOGY, & CRITERIA

SCOPE

To accomplish our objectives, OIG audited DOL's progress in implementing the 13 covered agency responsibilities listed in the GDA since October 5, 2018, when Congress passed it into law. Our work was conducted remotely with Office of the Assistant Secretary for Policy headquarters personnel located in Washington, D.C.

GDA Oversight and Audit Requirements

The GDA includes several congressional oversight components related to geospatial data. These oversight components included requirements for annual performance reporting by federal agencies and the FGDC. Additionally, the GDA mandates that, not less than once every 2 years, the Inspector General of each covered agency submit to Congress an audit of the agency's collection, production, acquisition, maintenance, distribution, use, and preservation of geospatial data.

According to the mandate, this audit must include a review of the following:

- Compliance of the covered agency with standards for geospatial data, including metadata for geospatial data established under section 757 of the Act;
- Compliance of the covered agency with the agency responsibilities and requirements under subsection (a) of section 759 of the Act; and
- Compliance of the covered agency with the limitation on the use of federal funds under section 759A of the Act.

Reduced Inaugural Audit Scope

In March 2020, the Inspector General community informed congressional leadership that the inaugural mandatory audit scope period overlapped with the estimated GDA implementation period established by the FGDC (see Exhibit 2). As part of the implementation phase, the FGDC is evaluating the existing body of standards, among other items. Due to the continuing implementation of the GDA, conducting the mandatory audits as prescribed by the Act would result in reports

submitted by the Inspectors General in October 2020 to be inconclusive for 2 of the 3 audit requirements.

To address this challenge while continuing to meet the mandatory audit requirements, the Covered Agency Inspectors General determined that audits focused on the Covered Agencies' progress toward compliance with the GDA, including the agencies' compliance with requirements under subsection (a), would likely provide the best value to the Covered Agencies', Congress, and the public.

This is a somewhat narrower approach than what the law requires because it is currently difficult to determine which standards the audits should use in evaluating compliance. Also, because the law establishes a five-year implementation period before limiting the use of federal funds for non-compliant activities, this requirement would not be evaluated in the inaugural audits.

METHODOLOGY

We conducted this performance audit 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 objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

To accomplish our objective, we reviewed federal laws and regulations, including the GDA, interviewed DOL officials, including the Chief Information Officer and CDO, and analyzed documentation provided by the CDO, including a written response for the status of the implementation of each of the 13 responsibilities.

INTERNAL CONTROLS

In planning and performing our audit, we considered DOL's internal controls relevant to our audit objective by obtaining an understanding of those controls and assessing control risks relevant to our objective. We considered the internal control elements of responsibility and assignment of authority during our planning, substantive phases, and evaluated relevant controls. The objective of our audit was not to provide assurance of the internal controls; therefore, we did not express an opinion on DOL's internal controls. Our consideration of internal controls for administering the accountability of GDA would not necessarily disclose all matters that might be significant deficiencies. Because of the inherent limitations on internal controls, or misstatements, noncompliance may occur and not be detected.

CRITERIA

- Geospatial Data Act of 2018 (GDA)

PRIOR REPORTS

The U.S. Government Accountability Office has released 3 reports that directly pertain to the scope of our audit, as follows:

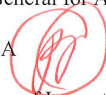
- U.S. Government Accountability Office, *Geospatial Information: Progress Needed on Identifying Expenditures, Building and Utilizing a Data Infrastructure, and Reducing Duplicative Efforts* (GAO-15-193)
- U.S. Government Accountability Office, *Geospatial Information: OMB and Agencies Need to Make Coordination a Priority to Reduce Duplication* (GAO-13-94)
- U.S. Government Accountability Office, *Geospatial Information: Better Coordination Needed to Identify and Reduce Duplicative Investments* (GAO-04-703)

APPENDIX B: DEPUTY SECRETARY'S RESPONSE TO THE REPORT

DEPUTY SECRETARY OF LABOR
WASHINGTON, D.C. 20210

SEP 25 2020

MEMORANDUM FOR: ELLIOT LEWIS
Assistant Inspector General for Audit

FROM: PATRICK PIZZELLA 

SUBJECT: Response to the Office of Inspector General's Draft Report –
*Department of Labor's Progress with Implementing Actions
Required by the Geospatial Data Act of 2018* (Draft Report No.
23-20-004-01-001)

I am responding to the draft Office of Inspector General (OIG) report titled "DOL Needs to do More to Implement the Geospatial Data Act of 2018." The report recommends that I "formalize the assignment of responsibility and authority for developing and implementing DOL policy" under the Geospatial Data Act of 2018 (GDA or Act). While I believe this delegation was sufficiently accomplished through Secretary's Order (SO) 02-2019, which is not mentioned in your report, I agree that a more clear delegation is possible. As such, I will be issuing internal guidance to clarify that implementation of the GDA requirements fall within the scope of the Data Board's responsibilities under SO 02-2019.

Although SO 02-2019 does not reference the GDA by name, it was published in the *Federal Register* on March 26, 2019, less than six months after the GDA was signed into law on October 3, 2018, and clearly encompasses agency actions required under the Act.

SO 02-2019 formalizes a Department of Labor (DOL) Data Board and establishes a Chief Data Officer (CDO) to serve as Chair of the Data Board. Under this SO, and as relevant to implementation of the GDA requirements, the Data Board is charged with creating, implementing, and overseeing a data governance model within the Department; developing a comprehensive DOL Data Strategy and updating this strategy with Subsequent Data Strategies as appropriate; serving as the principal entity acting on the Secretary's behalf with respect to data governance issues; and overseeing Department-level data-sharing agreements with external organizations and across DOL entities. Further, the CDO, as relevant to implementation of the GDA requirements, is charged with managing the data assets of DOL, including the standardization of data format, the sharing of data assets, and the publication of data assets in accordance with applicable law.

I am pleased with the CDO's and the Data Board's actions under the GDA to date, including the CDO's dutiful participation in the Federal Geospatial Data Committee's (FGDC) meetings and the re-establishment of a Data Board subgroup to address requirements under the GDA, even though DOL use of geospatial data is minimal.

I have full confidence in the CDO's and the Data Board's ability and intent to comply with the GDA, including its provision that the Act's requirements be met within five years of the FGDC issuing guidance under the Act—guidance that the Department eagerly awaits.

Thank you for the timely audit, and I appreciate the opportunity to respond to your draft report and recommendations.

cc: Scott Gibbons, Chief Data Officer
Gundeep Ahluwalia, Chief Information Officer
Jonathan Wolfson, Deputy Assistant Secretary for Policy
Alison Kilmartin, Deputy Assistant Secretary for Policy
Stephanie Swirsky, Deputy Assistant Secretary for Policy

APPENDIX C: CHIEF DATA OFFICER'S RESPONSE TO THE REPORT

U.S. Department of Labor

Office of the Assistant
Secretary for Policy
Washington, D.C. 20210



September 28, 2020

MEMORANDUM FOR: ELLIOT LEWIS
Assistant Inspector General for Audit

THROUGH: JONATHAN WOLFSON *JW*
Principal Deputy Assistant Secretary for Policy

FROM: SCOTT GIBBONS *Scott Gibbons*
Chief Data Officer

SUBJECT: Response to the Office of Inspector General's Draft Report –
*Department of Labor's Progress with Implementing Actions
Required by the Geospatial Data Act of 2018* (Draft Report No.
23-20-004-01-001)

The Chief Data Officer (CDO) and Office of the Assistant Secretary for Policy (OASP) appreciate the opportunity to respond to the draft Office of Inspector General's (OIG) report titled "DOL Needs to do More to Implement the Geospatial Data Act of 2018." The CDO and OASP broadly agree with the report's characterization of progress at the Department of Labor (Department) in meeting the requirements of the law, and with the report's recommendations presented in the report. The CDO and OASP believe that there is some important context that should be presented while reviewing the findings and determining what appropriate next steps the Department should take to further implement the Geospatial Data Act of 2018 (GDA or Act).

First, it is important to note that the GDA has a single set of requirements for all agencies, regardless of the extent to which the agency collects, manages, or uses geospatial data or assets. The Department does almost no geospatial data collection or analysis beyond capturing addresses in administrative data. While all agencies need to properly administer the data they collect and depend on to guide their work, the current scope of geospatial data collection and use for the Department is minor, and the role for this data in meeting our mission(s) is similarly minor.

Second, it is equally important context to note that the Department has experienced very little IT consolidation, and most production IT databases and data systems are exceedingly heterogeneous in terms of platforms, products, information architecture, and data quality controls. Making corrections at this time would involve extensive triage to numerous inconsistent legacy systems, and this could be prohibitively expensive, complicated, and time consuming given the scale of benefit to DOL's mission. It will be important for the Department to develop approaches to meet the requirements of the GDA in a manner that is consistent with the current and prospective uses of geospatial data and assets and the current and prospective state of its information technology architecture and systems. In addition, it will be important for the Department to balance any

prospective actions by considering the utility that could be realized by federal and public data users from more consistent and optimal geospatial data collection and management, given the very limited volume and types of such data.

Third, the first recommendation from the OIG, to “Provide an official assignment for the responsibility and the authority to develop and implement DOL policy for geospatial laws and regulations” risks becoming an unfunded mandate. Secretary’s Order 02-2019 likely provides sufficient authority for the Office of Data Governance within OASP to leverage the Data Board and to identify consensus solutions to some of the challenges identified through this audit. However, there is no current IT infrastructure or service to validate geospatial data elements that the Department does collect (e.g., postal addresses). Similarly, there is no current funding for any corrective actions or Data Board proposals, and the next opportunity to request such funding will be with the Fiscal Year 2023 budget—a time period falling after a follow-up audit is likely to occur. A mandate to identify corrective action can easily be accomplished, but ensuring that mandate is accompanied by the necessary resources to support planning, design, implementation, and training for staff in order to support the progress envisioned by the GDA is equally important.

Thank you again for your cooperative approach to conducting this audit on a short timeline and in recognizing the limited context for geospatial data at the Department. We appreciate the opportunity to comment on this and anticipate addressing the findings in early FY 2021 with both the Data Board and Departmental management.

cc: Gundeep Ahluwalia
Chief Information Officer

Stephanie Swirsky
Deputy Assistant Secretary for Policy

Allison Kilmartin
Deputy Assistant Secretary for Policy

DOL Chief Data Stewards

APPENDIX D: ACKNOWLEDGEMENTS

Key contributors to this report included:

Benjamin Brady, IT Specialist
Stephen Fowler, Audit Director
Ethan Iczkovitz, Audit Manager

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