

APPENDIX B: CDO'S RESPONSE TO THE REPORT

U.S. Department of Labor

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



Thursday, September 19, 2022

MEMORANDUM FOR: CAROLYN HANTZ
Assistant Inspector General for Audit

FROM: SCOTT GIBBONS
Chief Data Officer *SG*

SUBJECT: Response to Recommendations in the Office of Inspector
General's Bi-Annual Audit on Compliance with the Geospatial
Data Act of 2019.

I appreciate the opportunity to respond to the Office of Inspector General's (OIG) findings and recommendations regarding Department of Labor (Department) compliance with the requirements of the Geospatial Data Act of 2018 (GDA or Act). I appreciate OIG's characterization of progress at the Department in addressing prior audit recommendations and meeting the requirements of the law, and I broadly agree with the findings identified during the audit, and the recommendations to help move our data governance forward. However, I also 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 continue implementation of the GDA.

First, it continues to be 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 to meet their mission. 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 scope of location data in meeting the missions of the agencies within the Department is minor.

Second, most production IT databases and data systems are exceedingly heterogeneous in terms of platforms, products, information architecture, and data quality controls. Making large scale changes at this time would involve extensive triage to numerous, inconsistent, legacy systems, and this would be prohibitively expensive, complicated, and time consuming given the potential benefit to DOL's mission. The Department must continue to balance approaches to meet the requirements of the GDA in a manner that is consistent with our use of location and geospatial data, the current and prospective state of our information technology architecture and systems, and the utility that would be realized by the Department in more consistent and optimal geospatial data collection, management, and use.

Third, I appreciate the acknowledgement by the auditing team that the absence of clear guidance in how to implement the requirements of the GDA creates practical challenges for the

Department in assessing compliance and organizational risk in rushing towards implementing systemic governance without clarity in government-wide standards.

The Department has a number of activities underway that will help to address the recommendations including expanded use of existing address standardization, validation and geocoding services. Consistent with the audit findings, the Department will update our Geospatial Data Strategy and data standards for location data, and create a plan for data governance to cover the emerging types of geospatial data identified in the audit such as data from drones.

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 during FY 2023 by coordinating new policy and guidance through the Data Board and Departmental management.

cc: Raj Nayak
Assistant Secretary for Policy

Laura Dawkins
Deputy Assistant Secretary for Policy

Gundeep Ahluwalia
Chief Information Officer

DOL Chief Data Stewards