

# U.S. Department of Labor

Office of Inspector General—Office of Audit

REPORT TO THE CHIEF DATA  
OFFICER



**DOL CONTINUES TO MAKE PROGRESS  
TOWARD COMPLIANCE WITH THE  
GEOSPATIAL DATA ACT OF 2018**

DATE ISSUED: OCTOBER 3, 2024  
REPORT NUMBER: 23-25-001-01-001



# BRIEFLY...

## DOL CONTINUES TO MAKE PROGRESS TOWARD COMPLIANCE WITH THE GEOSPATIAL DATA ACT OF 2018

### WHY WE DID THE AUDIT

The Geospatial Data Act of 2018 (GDA) was signed into law on 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. According to the GDA, the Inspectors General must complete an audit every 2 years regarding their agencies' progress toward implementing GDA requirements.

To address this mandatory audit requirement, we performed an audit to answer the following question:

To what extent has the Department of Labor (DOL) fulfilled the requirements of the GDA to date?

We assessed the status of DOL's implementation efforts by conducting interviews and analyzing evidence provided.

### WHAT WE FOUND

DOL made progress in addressing the 13 specific GDA requirements; however, more remains to be done. Of the 13 requirements, we determined DOL initiated action and made progress on 6 of the requirements, completed or met 5, and made no progress to date on the remaining 2.

In the following table, the red hexagon ● means no progress or requirements not met, the yellow triangle ▲ means limited progress or requirements partially met, and the green star ★ means requirements met.

**Table: OIG Assessment of DOL's Implementation of GDA Requirements**

Requirement	2020	2022	2024
1. Strategy	▲	●	▲
2. Support Data Sharing	●	●	▲
3. Promote Data Integration	●	●	★
4. Agency Record Schedules	●	●	●
5. Allocation of Resources	▲	●	●
6. Use Data Standards	●	●	▲
7. Coordination and Partnerships	★	★	★
8. Promote Application of Geospatial Data Assets	●	●	★
9. Protection of Privacy and Confidentiality	●	●	▲
10. Declassified Data	★	★	★
11. Non-Duplication of Data	▲	●	▲
12. Ensuring High-Quality Data	●	●	▲
13. Appointment of Contact	★	★	★

Source: OIG analysis from our Fiscal Year 2020, 2022, and 2024 geospatial audits

DOL's progress in addressing GDA requirements has been impaired by multiple factors. Although DOL has a geospatial data strategy, the policy was not adequately disseminated to agencies. Many agencies remained unaware there was a policy, and some did not understand their roles, responsibilities, and obligations. Furthermore, DOL had an incomplete and inaccurate geospatial data inventory. DOL also had no plans for long-term funding or allocations for geospatial projects or to purchase data quality standards. Finally, DOL continued to be hindered by lead agencies' delays in providing data standards and regulations needed by covered agencies.

### WHAT WE RECOMMENDED

We made three recommendations to improve DOL's compliance with the GDA. We recommended the Chief Data Officer (CDO) create a documented process to improve data accuracy and quality, provide training to agencies, and create a plan to acquire sufficient funding for GDA work. The CDO agreed with our recommendations.

### READ THE FULL REPORT

For more information, go to:

<https://www.oig.dol.gov/public/reports/oa/2025/23-25-001-01-001.pdf>.

**TABLE OF CONTENTS**

INSPECTOR GENERAL’S REPORT ..... 1

RESULTS ..... 2

    Progress in Implementing GDA Requirements..... 3

    DOL Progress in Implementing GDA Requirements Impaired by  
    Multiple Factors ..... 11

    DOL Addressed Prior GDA Report Recommendations ..... 13

OIG’S RECOMMENDATIONS ..... 13

    Analysis of Agency’s Comments ..... 13

EXHIBIT: STATUS OF THE 13 GDA REQUIREMENTS FOR FY 2024 ..... 15

APPENDIX A: SCOPE AND METHODOLOGY ..... 18

APPENDIX B: ACKNOWLEDGEMENTS ..... 21

APPENDIX C: AGENCY’S RESPONSE TO THE REPORT ..... 22



## INSPECTOR GENERAL'S REPORT

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This report presents the results of the U.S. 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<sup>1</sup>—i.e., information linked to specific geographic locations—to help in decision-making and to support many functions. This includes national security, law enforcement, health care, environmental protection, and natural resources conservation. The GDA was signed into law on 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 FGDC establishes each standard to complete the implementation of GDA requirements. The GDA mandates that once every 2 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. Our audit focused on the progress that DOL made in implementing GDA requirements, specifically data creation, maintenance, and usage. 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?




During our audit, we assessed the status of DOL's implementation efforts as of August 2024 by conducting interviews with DOL management officials and

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






































<sup>1</sup> Geospatial data is information that is tied to a location on the Earth, including by identifying the geographic location and characteristics of natural or constructed features and boundaries on the Earth. Examples of geospatial information include maps, satellite imagery, and census and housing data as well as information identified by a region or jurisdiction.

analyzing evidence provided. See Appendix A for additional details on scope and methodology.

**RESULTS**

DOL made progress in addressing the 13 specific requirements in Section 759(a) of the GDA; however, more remains to be done. Of the 13 requirements, we determined DOL initiated action and made progress on 6 of the requirements, completed or met 5, and made no progress to date on the remaining 2. The table provides details on the status of the progress of the 13 requirements. In this table, the red hexagon  means no progress or requirements not met, the yellow triangle  means limited progress or requirements partially met, and the green star  means requirements met.

**Table: OIG Assessment of DOL’s Implementation of GDA Requirements**

Requirement	2020	2022	2024
1. Strategy			
2. Support Data Sharing			
3. Promote Data Integration			
4. Agency Record Schedules			
5. Allocation of Resources			
6. Use Data Standards			
7. Coordination and Partnerships			
8. Promote Application of Geospatial Data Assets			
9. Protection of Privacy and Confidentiality			
10. Declassified Data			
11. Non-Duplication of Data			
12. Ensuring High-Quality Data			
13. Appointment of Contact			

Source: OIG analysis from our Fiscal Year 2020, 2022, and 2024 geospatial audits (see Appendix A)

DOL's progress to date has been hindered by several factors, including:

- lack of awareness of geospatial policy, meaning the policy was not adequately disseminated to agencies;
- lack of guidance and policy in geospatial strategy, meaning the geospatial strategy was missing some policies to address responsibilities listed in the GDA;
- lack of a completed and accurate geospatial inventory, meaning drone geospatial data were missing from the Mine Safety and Health Administration (MSHA) and the Occupational Safety and Health Administration (OSHA), and some of the geospatial data for these two agencies and the 157 geocoded datasets were not accurate; and
- lack of guidance and regulations from FGDC and the Office of Management and Budget, meaning FGDC and International Organization for Standardization (ISO) have best practice guidance for agencies to follow, but DOL did not use them.

Without additional progress in implementing the requirements of the GDA and effective controls over identifying geospatial data within agency systems, DOL cannot offer reasonable assurance that it will be able to achieve full compliance with GDA requirements.

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### **Progress in Implementing GDA Requirements**

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DOL's efforts to implement GDA included the following:

- performing geocoding on address data and converting 157 datasets to data with latitude and longitude;
- promoting the integration of geospatial data by showing that DOL, the Bureau of Labor Statistics, and the Census Bureau were using Application Programming Interface to integrate the data;
- coordinating with FGDC and other federal agencies on geospatial data processes; and
- using geospatial information to make federal geospatial information and services more useful to the public.

These actions satisfied 5 of the 13 requirements of the GDA. Though DOL made progress in implementing the remaining eight requirements, we determined the requirements were either partially met or not met.

The following sections detail our analysis of DOL’s progress in addressing each of the 13 requirements in Section 759(a) of the GDA. See Exhibit 1 for a summary-level view of our final assessment regarding DOL’s progress on these 13 requirements.

### **Requirement 1, Strategy – Partially Met**

DOL was required to prepare, maintain, publish, and implement a strategy for promoting the use of geographic information and related geospatial data and activities appropriate to its mission. DOL formalized the *U.S. Department of Labor Enterprise Data Strategy*<sup>2</sup> on April 12, 2022, and prepared and published the *Department of Labor Geospatial Data Strategy*<sup>3</sup> on June 15, 2022, on its external website. However, we found DOL’s strategy has not been maintained or fully implemented.

The Chief Data Officer (CDO) stated plans to update and revise the *Department of Labor Geospatial Data Strategy*. With the strategy in its original form and no evidence provided of DOL updating the critical elements of the strategy, we determined the strategy had not been maintained. Additionally, our program agency survey analysis determined the strategy was not fully implemented as the policy was not adequately disseminated to the program agencies.

To test the implementation of these strategies, we surveyed 21 of DOL’s program agencies. Of the 21 agencies, 15 remained unaware DOL’s geospatial data policy or strategy. Additionally, these program agencies did not know their roles, responsibilities, and obligations due to being unaware of the published strategy.

Specifically, we received the following information from the survey:

- 13 agencies responded they had not received any policies or procedures from the Chief Data Officer for geospatial data;

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<sup>2</sup> Office of Data Governance, *U.S. Department of Labor Enterprise Data Strategy* (April 12, 2022), available at: <https://www.dol.gov/sites/dolgov/files/Data-Governance/DOL-Enterprise-Data-Strategy-2022.pdf>

<sup>3</sup> Office of Data Governance, *Department of Labor Geospatial Data Strategy* (June 15, 2022), available at: <https://www.dol.gov/sites/dolgov/files/Data-Governance/Department%20of%20Labor%20Geospatial%20Data%20Strategy.pdf>

- 15 agencies responded they did not have policies or procedures for geospatial data;
- 8 agencies stated they did not attend the Office of Data Governance data board meetings; and
- 10 agencies responded that geospatial data was not applicable or nonexistent.

Furthermore, we directly interviewed four of these agencies, and, during these interviews, different agencies had individual understandings on how to define the term “geospatial data” or how geospatial processes were to be implemented at their specific agency. Generally, these agencies were unaware of how geospatial data should be integrated with their core missions or business functions.

OIG Assessment: This requirement was partially met.

### **Requirement 2, Geospatial Data – Partially Met**

DOL was required to collect, maintain, disseminate, and preserve geospatial data so it could be readily shared with other federal agencies and non-federal users. During our audit, DOL maintained a geospatial and address inventory with 458 datasets. Within the 458 datasets, DOL geocoded 157 datasets by converting the address data to latitude and longitude information.

DOL did not fully collect, maintain, disseminate, or preserve geospatial data. Our audit found the inventory was missing elements such as drone aerial photography from MSHA and OSHA datasets.<sup>4</sup> Additionally, during our interview on June 13, 2024, the CDO noted that latitude and longitude data within the MSHA mine data repository were not accurate. With this statement and due to the missing drone listing, we determined the inventory of geospatial data was incomplete, inaccurate, and may lack precision for usefulness related to DOL’s program functions.

OIG Assessment: This requirement was partially met.

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<sup>4</sup> DOL had not included the drone aerial photography in the DOL’s geospatial data inventory, which was provided to us on June 4, 2024.



### **Requirement 3, Promotion of Integration – Fully Met**

DOL was required to promote the integration of geospatial data from all sources. DOL provided evidence that on January 30, 2024, it promoted the integration of geospatial data with the program agencies by demonstrating successful geospatial data sharing. The CDO demonstrated that DOL, the Bureau of Labor Statistics, and the Census Bureau were using an Application Programming Interface to integrate the data, including geospatial data. The CDO further demonstrated a prototype in a data board meeting for using geospatial data to inform decision-making. He also demonstrated how geospatial data mapping could be helpful for people. DOL showed agencies how to optimally stage location information so they could integrate it directly into analytical software dashboards and maps.

OIG Assessment: This requirement was met.

### **Requirement 4, Inclusion of Geospatial Data in Agency Record Schedules – Not Met**

DOL was required to ensure data information products and other records created in geospatial data were included on agency record schedules that have been approved by the National Archives and Records Administration (NARA). DOL did not ensure geospatial data were included within the record schedules. We did not observe or receive any evidence of review, analyses, or meetings that would indicate an action to “ensure” geospatial data were included within the DOL existing processes. We do acknowledge that existing processes may include all geospatial data; however, there were no additional actions taken between the implementation date of GDA and June 2024. Furthermore, the Office of the Assistant Secretary for Administration and Management’s record schedule has not been updated since June 19, 2017. We have not received evidence that the CDO or program agencies have taken any specific actions to ensure the pre-existing NARA processes worked as expected or intended.

According to the Department of Labor Manual Series 1-500: Records Management Program and the DOL Records Management Handbook, agencies are required by law to develop records schedules for all their records not covered by the General Records Schedules (GRS).<sup>5</sup> The GRS and the Agency Records Schedules are the two types of records schedules and are approved by DOL and NARA. NARA defines the GRS as records that document administrative or support functions. GRS typically do not cover records documenting the mission of an agency. Geospatial data are mission records and are, therefore, not

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<sup>5</sup> 44 U.S.C. § 3303

covered in the GRS.<sup>6</sup> The records must be scheduled individually by the agency responsible for the mission. DOL does not have policies or procedures on record schedules for geospatial data, and there is not a separate record schedule for geospatial data.

DOL also does not have record schedules for legacy data maintained in enterprise databases and has started to work toward developing a method for handling the long-term storage of legacy data. The Office of Data Governance has been in discussions with DOL records management staff about this and anticipates some progress on this in the near future.

OIG Assessment: This requirement was not met.

### **Requirement 5, Allocation of Resources – Not Met**

DOL was required to allocate resources to fulfill the responsibilities of geospatial data collection, production, and stewardship, and to support committee (i.e., FGDC) activities. In our audit, there was no prospective source of funding. Planning did not include predictable or consistent funding lines for geospatial data identification, collection, or production. The only known current funding line was used from another source: the Technology Modernization Fund. This is stated as an ongoing concern for management regarding their responsibilities and for future geospatial activities.

In our Fiscal Year (FY) 2022 report, the OIG recommended that DOL develop a plan to sufficiently fund the implementation and oversight of data quality standards throughout DOL and for its contracts.<sup>7</sup> However, the CDO responded that there was no progress on this recommendation.

OIG Assessment: This requirement was not met.

### **Requirement 6, Use of Geospatial Data Standards – Partially Met**

DOL was required to use standards for documenting geospatial data with relevant metadata and making metadata available through the GeoPlatform. FGDC had not adopted or endorsed any standards since the passage of the

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<sup>6</sup> NARA, "What are the General Records Schedules (GRS)," last accessed August 29, 2024, available at: <https://www.archives.gov/records-mgmt/grs>

<sup>7</sup> DOL Made Progress in Implementing Geospatial Data Act Requirements, but More Needs to be Done, Report No. 23-22-003-01-001 (September 30, 2022), available at: <https://www.oig.dol.gov/public/reports/oa/2022/23-22-003-01-001.pdf>

GDA because it was still awaiting guidance from OMB. FGDC and ISO have best practice guidance for agencies to follow, but DOL uses the Data Documentation Initiative as the data standard.

According to the CDO, DOL has recently adopted a standardized approach to metadata (not quite a standard, but it is derived from a standard) and is describing all the location data it will feed out of the Application Programming Interface through rich metadata. In almost every case in which DOL has latitudes and longitudes, the CDO converted address data to geocoded datasets with latitude and longitude. It is even less clear which standards FGDC would like DOL to follow. In addition, due to some inaccuracy in MSHA mine geospatial data, DOL has not uploaded geospatial data to the GeoPlatform.

OIG Assessment: This requirement was partially met.

### **Requirement 7, Coordination – Fully Met**

DOL was required to 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 non-federal geospatial data to the extent possible. The CDO has participated in government-wide partnerships to develop plans for geospatial sharing and standardization. The Office of Data Governance continues to serve as the point of liaison for FGDC, other federal agencies, and the public in looking at geospatial data.

The CDO coordinated with FGDC and other federal agencies on geospatial data processes. The CDO represented DOL when voting on FGDC report matters.

OIG Assessment: This requirement was met.

### **Requirement 8, Use of Geospatial Information – Fully Met**

DOL was required to 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. DOL has invested in location data enhancement and has been making efforts to demonstrate to people how to best leverage the strategic value in that data. DOL performed geocoding on address data and converted 157 datasets to data with latitude and longitude. DOL promoted the integration of geospatial data and showed that DOL, the Bureau of Labor Statistics, and the Census Bureau were

using Application Programming Interface to integrate the data. The CDO demonstrated a prototype in a data board meeting about using spatial data to inform decision-making. The CDO demonstrated how geospatial data mapping could be helpful for different program agency business mission activities.

OIG Assessment: This requirement was met.

### **Requirement 9, Personal Privacy and Confidentiality – Partially Met**

DOL was required to protect personal privacy and maintain confidentiality in accordance with federal policy and law. DOL provided us an inventory of geospatial data and explained this data had no personal privacy or confidentiality impacts. According to the CDO, DOL does not generate, store, or manage sensitive location data. However, DOL did not have a complete inventory of geospatial data, meaning certain data might have been inadvertently at risk of being accessible. For example, drone data was missing from MSHA's and OSHA's data inventory. While this data was not sensitive, it is an example of DOL not having awareness of all the geospatial data (or datasets) available within its agencies and thus not knowing what may be sensitive geospatial data that needs to be protected.

If DOL does not have a complete inventory of geospatial data or a reliable data collection process, we are not in a position to assess risk of privacy and confidentiality. DOL cannot execute effective governance on data without knowing the volume, format, content, and characteristics of that data.

OIG Assessment: This requirement was partially met.

### **Requirement 10, Declassified Data – Fully Met**

DOL was required to participate in determining whether declassified data can contribute to and become a part of the National Spatial Data Infrastructure. The CDO stated that DOL does not have classified data with associated protections. DOL does have data with personally identifiable information that is appropriately protected by System of Record Notices, the Privacy Act, and Computer Matching Act protections. Therefore, DOL did not participate in determining whether declassified data can contribute to and become a part of the National Spatial Data Infrastructure.

OIG Assessment: This requirement was met.

## **Requirement 11, Review of Existing Geospatial Data – Partially Met**

DOL was required to search all sources, including the GeoPlatform, to determine whether existing federal, state, local, or private geospatial data meet the needs of the covered agency before expending funds for geospatial data collection. DOL did not search all sources because DOL did not have a complete inventory of geospatial data. As of June 4, 2024, the DOL's inventory list was incomplete; however, DOL needs a complete inventory in order to search all sources.

In our FY 2022 report, we identified drone data as a missing dataset, and we recommended the Chief Data Officer, "Implement processes that ensure DOL includes all types of agency geospatial data in its geospatial data management processes."<sup>8</sup> During this FY 2024 audit, we found the drone data remained missing from the inventory list. Based on our testing on the June 4, 2024, inventory, we determined this associated recommendation remains unimplemented.

The CDO reviewed the GeoPlatform for its content and claimed there was no data on that platform that would serve as a strategic asset for DOL at the current time. The CDO was not aware of any purchase of private geospatial data assets. The CDO provided the OIG with the link used to search all sources.

DOL does not have policies and processes to search all sources. Potentially, such a policy to search all sources may be able to stop the collection of, detect, and/or remove duplicative geospatial data collections. There is a need for search policy to ensure that DOL does not buy data it already has or can get for free somewhere else.

OIG Assessment: This requirement was partially met.

## **Requirement 12, Collection of High-Quality Data – Partially Met**

DOL was required to ensure, to the extent possible, that persons who receive federal funds to collect geospatial data obtain high-quality data. In a document provided to us on July 22, 2024, the CDO stated he had limited access to procurement policies and data on specific agencies. He further explained that he did not have complete knowledge of every procurement from every agency and

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<sup>8</sup> DOL Made Progress in Implementing Geospatial Data Act Requirements, but More Needs to be Done, Report No. 23-22-003-01-001 (September 30, 2022), available at: <https://www.oig.dol.gov/public/reports/oa/2022/23-22-003-01-001.pdf>

the acquisition from people receiving federal funds. The CDO asked the program agencies if they procured geospatial data, and they did not provide answers. Therefore, the CDO could not confirm the answers. In addition, DOL does not have policies or procedures on geospatial data quality control if the data was provided by persons receiving federal funds.

DOL provided data quality reviews from a few agencies. In addition, the CDO stated there are multiple quality metrics in the address standardization data that were created over a period of 15 months: mailability of addresses, ability to standardize addresses, and geocoding quality. DOL's efforts have been focused on assessing address quality and providing agencies with an empirical rationale for investing in improving the quality of the data they collect.

OIG Assessment: This requirement was partially met.

### **Requirement 13, Appointment of Contact – Fully Met**

DOL was required to appoint a contact for coordination with other lead covered agencies in the collection, acquisition, maintenance, and dissemination of the National Geospatial Data Asset data themes used by the covered agency. The CDO was appointed for this role, and these coordination activities are defined within his scope of duties. He has consistently represented DOL on FGDC since the FY 2022 audit and can serve as a liaison to any agencies that need help with DOL data.

OIG Assessment: This requirement was met.

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### **DOL Progress in Implementing GDA Requirements Impaired by Multiple Factors**

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DOL's progress to date has been impaired by multiple factors. Although DOL has a geospatial data strategy, the policy was not adequately disseminated to agencies. Many agencies remained unaware there was a geospatial data policy, and some did not fully know their roles, responsibilities, and obligations due to being unaware of the published strategy. Furthermore, DOL had an incomplete and inaccurate geospatial data inventory. DOL also had no plans for long-term funding or allocations for geospatial projects or to purchase data quality standards. Finally, FGDC and the Office of Management and Budget have not yet issued required standards and regulations pertinent to the GDA.

During our audit, we found DOL’s geospatial data policy was not adequately disseminated to agencies. We created a survey to test 21 of the DOL program agencies, asking agencies how they define geospatial data and whether they had policies or procedures for geospatial data. Different agencies had individual understandings on how to define “geospatial data” or how geospatial data processes were to be implemented at their specific agency.

For example, after an interview with one agency, officials changed their answer from “Yes” to “No” regarding having geospatial data when they understood the definition of geospatial data. Another agency stated it had geospatial data in the survey under the definition question but stated it did not have and did not receive policies or procedures for geospatial data from the CDO. During our audit, we determined the definition of geospatial data is not easy to locate in DOL’s geospatial data policy. The definition was linked to the GDA in a footnote. There were also several discrepancies between the survey results and inventory lists. In response to the survey, four agencies stated they did not have geospatial data. However, the inventory lists showed these agencies do have geospatial data.

DOL had an incomplete and inaccurate geospatial data inventory. Previously, in our FY 2022 audit, we identified geospatial data from drone aerial photography taken during MSHA mine inspections and OSHA inspections. DOL still has not included the drone aerial photography in the geospatial data inventory. Furthermore, some geolocations of MSHA mine data and OSHA severe injury data were not accurate. The latitudes and longitudes were pointing to the wrong locations.

DOL performed geocoding on address data and converted 157 datasets to data with latitude and longitude. But DOL has not uploaded the geospatial data to the GeoPlatform. In addition, some latitudes and longitudes among the 157 geocoded datasets were inaccurate.

We found DOL had not planned for funding for geospatial data. We previously identified this issue in our FY 2022 audit, but DOL did not make progress on this issue. DOL’s planning still did not include predictable nor consistent funding lines for geospatial data identification, collection, or production. The current funding was a part of another funding source: the Technology Modernization Fund. Implementing geospatial data standards, including funding to support this initiative, is an ongoing concern for management regarding their responsibilities and for future geospatial planned activities.

Also, DOL continued to be hindered by FGDC and the Office of Management and Budget’s delays in providing data standards and guidance needed by covered agencies. This led to DOL not being able to define geospatial controls consistent

with government-wide standards. Although FGDC and ISO have best practice guidance for agencies to follow, DOL did not use them. DOL was trying to use other standards to mitigate the issue. DOL has recently adopted a standardized approach (derived from a standard) to metadata and is describing all the location data it will feed out of the Application Programming Interface through rich metadata.

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## **DOL Addressed Prior GDA Report Recommendations**

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In our prior GDA report dated September 30, 2022, we made three recommendations to improve DOL’s compliance with the GDA. We recommended the CDO to create a documented process to improve data accuracy and quality, provide training to agencies, and create a plan to acquire sufficient funding for GDA work. Based on work performed for this audit, we determined more specific actions were needed by the CDO to fulfill these responsibilities and issued three new recommendations.

## **OIG’S RECOMMENDATIONS**

We recommend the Chief Data Officer:

1. Create documented processes for ensuring all DOL’s geospatial data is included within the geospatial data inventory and processes to improve data accuracy and data quality.
2. Develop a training program that ensures DOL officials with system and data responsibilities are aware of the requirements when implementing *Department of Labor Geospatial Data Strategy* and the geospatial data inventory processes.
3. Create a plan to acquire sufficient funding to properly oversee and create data quality standards of geospatial data throughout DOL and its contracts.

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## **Analysis of Agency’s Comments**

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In response to a draft of this report, the CDO agreed with our three recommendations to make progress towards compliance with the Geospatial Data Act of 2018. While the CDO did not provide the specific corrective actions



he intends to take, we look forward to working with the CDO and his personnel to ensure the intent of the recommendations is addressed.

The agency's response to the draft report is included in its entirety in Appendix C. We appreciate the cooperation and courtesies the CDO extended us during this audit.



Carolyn R. Hantz  
Assistant Inspector General for Audit

**EXHIBIT: STATUS OF THE 13 GDA REQUIREMENTS  
FOR FY 2024**

<b>Requirement</b>	<b>Description</b>	<b>Status of Implementation</b>
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.	Partial
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.	Partial
3. Promotion of Integration	Promote the integration of geospatial data from all sources	Yes
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.	Partial

Requirement	Description	Status of Implementation
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.	Yes
9. Personal Privacy and Confidentiality	Protect personal privacy and maintain confidentiality in accordance with federal policy and law.	Partial
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.	Partial

<b>Requirement</b>	<b>Description</b>	<b>Status of Implementation</b>
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.	Partial
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

Source: Geospatial Data Act Audit Report, FY 2024, 13 Responsibility Results

## APPENDIX A: SCOPE AND METHODOLOGY

### Scope

To accomplish our objectives, we audited DOL’s progress in implementing the 13 covered agency responsibilities listed in Section 759(a) of the GDA. Our work was conducted remotely with the Office of the Assistant Secretary for Policy, located in Washington, DC.

### 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 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 GDA;
- compliance of the covered agency with the agency responsibilities and requirements under Section 759(a) of the GDA; and
- compliance of the covered agency with the limitation on the use of federal funds under Section 759(a) of the GDA.

To meet these 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 audit 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.

## 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 objectives.

To accomplish our objective, we reviewed federal laws and regulations, including the GDA; interviewed DOL officials, including the CDO; and analyzed documentation provided by the CDO.

## Internal Controls

In planning and performing our audit, we considered DOL's internal controls significant to our audit objective by obtaining an understanding of those controls and assessing control risks relevant to our objective. We considered the internal control principle of assignment of responsibility and delegation 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 the 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
- Government Auditing Standards
- Standards for Internal Control in the Federal Government

## Prior Relevant Coverage

During the last 4 years, the OIG has issued two reports of significant relevance to the subject of this report, as follows:

1. DOL Made Progress in Implementing Geospatial Data Act Requirements, But More Needs To Be Done, Report No. 23-22-003-01-001 (September 30, 2022), available at: <https://www.oig.dol.gov/public/reports/oa/2022/23-22-003-01-001.pdf>

2. DOL Needs to Do More to Implement the Geospatial Data Act of 2018, Report No. 23-20-004-01-001 (September 30, 2020), available at: <https://www.oig.dol.gov/public/reports/oa/2020/23-20-004-01-001.pdf>

The GDA includes requirements for multiple reports from FGDC, GDA-covered agencies and lead covered agencies, and from Agency Inspectors General. Links to these GDA-required reports can be found on the FGDC website at: <https://www.fgdc.gov/gda/gda-reports/index.html>.

## **APPENDIX B: ACKNOWLEDGEMENTS**

Staff contributors to this report were:

Stephen Fowler, Audit Director  
Ethan Iczkovitz, Audit Manager  
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Rogelio Alejandro-Cisneros, IT Specialist  
Benjamin Brady, IT Specialist  
Nathan Pike, IT Specialist  
Dr. LaKeisha L. Jones, Statistician  
Brittany Arias, Writer-Editor



**APPENDIX C: AGENCY'S RESPONSE TO THE REPORT**

The agency's response to our draft report follows.



Thursday, September 26, 2024

MEMORANDUM FOR: CAROLYN HANTZ  
Assistant Inspector General for Audit

FROM: SCOTT GIBBONS *SG*  
Chief Data Officer

SUBJECT: Response to Recommendations in the Office of Inspector  
General's Bi-Annual Audit on Compliance with the Geospatial  
Data Act of 2018.

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 broadly agree with the findings identified during the audit, and the recommendations to help move our data governance forward.

I am appreciative for the characterization of progress at the Department in meeting the requirements of the law, and the recognition that the collaboration between DOL's Data Board and the Departmental programs to improve data governance has demonstrated progress. The audit shows that DOL made progress in 8 of the 13 categories: most notably in the areas of creating and promoting methods for using geospatial data analytically to inform program administration, and some degree of progress in using data standards, establishing geospatial strategy, protection of privacy and confidentiality, non-duplication of data and ensuring high quality data.

I believe the recommendations proposed are reasonable and would be expected to improve geospatial data management and advance the Department towards better compliance with the GDA. The Department plans to revisit our Enterprise Data Strategy, Geospatial Data Strategy, and Open Data Plan during FY 2025 and will focus on how we can address the recommendations through better defining geospatial data and establishing enterprise approaches and pathways to enhancing location data quality consistent with how it's defined.

Thank you again for your cooperative approach to conducting this audit on a short timeline and for conducting the audit in a manner that helped us identify progress as well as areas in need of more focus.

cc: Katelyn Walker Mooney, Acting Assistant Secretary for Policy  
Diana Boesch, Deputy Assistant Secretary for Policy  
Laura Dawkins, Deputy Assistant Secretary for Policy  
Louis Charlier, Acting Chief Information Officer  
DOL Chief Data Stewards

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