

U.S. Department of Labor

Office of Inspector General—Office of Audit

**REPORT TO THE OFFICE OF
THE SECRETARY AND THE
OFFICE OF DATA
GOVERNANCE**



**DOL MADE LIMITED PROGRESS
TOWARD COMPLIANCE WITH THE
GEOSPATIAL DATA ACT OF 2018**

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BRIEFLY...

DOL CONTINUES TO MAKE LIMITED 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 covered agency Inspectors General, which includes DOL, 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 DOL fulfilled the requirements of the GDA of 2018 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 7, completed or met 5, and made no progress to date on the remaining 1 (see Table).

In the following table:

- Red hexagon = No progress or Requirement not met
- Yellow triangle = Limited progress or Requirement partially met
- Green star = Requirement met

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

GDA Requirement	2022	2024	2026
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. Search all sources of Data Before Acquisition			
12. Ensuring High-Quality Data			
13. Appointment of Contact			

Source: OIG analysis from our Fiscal Year (FY) 2022, 2024, and 2026 GDA audits

DOL's progress toward GDA compliance has been hindered by several factors. During this audit cycle (2024–2026), there were three different Chief Data Officers. While DOL has published a Geospatial Data Strategy, the policy has not been updated since FY 2022. Previous audits have also highlighted the lack of sufficient funding, which continues to result in insufficient resources for completing the inventory, improving data quality processes, and adopting standards.

What We Recommended

We made four recommendations to improve DOL's GDA compliance. We recommended that the Chief Data and Analytics Officer (CDAO) update the strategy, establish a process to improve data accuracy and quality, and provide training for agencies. We also recommended that the Secretary of Labor develop a plan to secure sufficient funding for GDA work. The CDAO agreed with our recommendations and provided corrective action plans for three of the four. The fourth recommendation was sent to the Secretary.

Read the Full Report

For more information, go to:

<https://www.oig.dol.gov/public/reports/oa/2027/23-26-002-01-001.pdf>

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INSPECTOR GENERAL'S REPORT

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This report presents the results of the U.S. Department of Labor's (Department or DOL) progress in implementing the requirements of the Geospatial Data Act of 2018 (GDA). The federal government collects, maintains, and uses geospatial data¹—i.e., information linked to specific geographic locations—to support decision-making and 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 the efficient management of geospatial data, technologies, and infrastructure through enhanced coordination among federal, state, local, and tribal governments, as well as the private sector and academia.

The GDA established the Federal Geographic Data Committee (FGDC) as the lead federal entity for developing, implementing, and reviewing policies, practices, and standards for geospatial data. Federal agencies have 5 years from the date the FGDC establishes each standard to implement the GDA requirements. According to the GDA, the covered agency Inspectors General, which includes DOL, are mandated to conduct an audit of the agency's compliance with the requirements every 2 years, including limitations on the use of funds if GDA requirements are not met. Our audit focused on DOL's progress

¹ 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.

in implementing GDA requirements, specifically data creation, maintenance, and use. As such, we conducted an audit to answer the following question:

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

To answer our objective, we assessed the status of DOL’s implementation efforts as of July and August 2026 by conducting interviews with DOL management officials and analyzing evidence provided. Note that the Chief Data and Analytics Officer (CDAO) is the DOL official that has the key role in implementing DOL’s GDA compliance. See Appendix A for additional details on scope and methodology.

RESULTS

DOL has made progress in addressing the 13 specific Requirements in Section 2808(a) of the GDA; however, more remains to be done. Of the 13 Requirements, we determined that DOL initiated action and made progress on 7, completed or met 5, and made no progress to date on the remaining 1. The table below provides details on the status of the 13 Requirements as follows:

-  Red hexagon = No progress or Requirement not met
-  Yellow triangle = Limited progress or Requirement partially met
-  Green star = Requirement met

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

GDA Requirement	2022	2024	2026
1. Strategy			
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6. Use Data Standards			
7. Coordination and Partnerships			
8. Promote Application of Geospatial Data Assets			
9. Protection of Privacy and Confidentiality			

GDA Requirement	2022	2024	2026
10. Declassified Data	★	★	★
11. Search all sources of Data Before Acquisition	⬛	▲	▲
12. Ensuring High-Quality Data	⬛	▲	▲
13. Appointment of Contact	★	★	★

Source: OIG analysis from our Fiscal Year 2022, 2024, and 2026 GDA audits (see Exhibit)

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

- continuous data office leadership;
- a current Geospatial Data Strategy, as the strategy has not been revised since Fiscal Year (FY) 2022;
- time to update new metadata guidance from the FGDC issued in March 2026 and guidance from the Federal Chief Data Officer's Council issued in August 2026;
- dedicated geospatial resources and funding, as there is no specific budget for geospatial governance and inventory development, improvement of data quality processes, or adoption of International Organization for Standardization (ISO)-based FGDC metadata standards; and
- a complete and accurate geospatial inventory, as drone geospatial data were missing for the Mine Safety and Health Administration (MSHA) and the Occupational Safety and Health Administration (OSHA), and some of the geospatial metadata for these two agencies were not accurate;

Without additional progress implementing GDA requirements 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.

Because of these factors, DOL's overall progress in implementing GDA requirements remains limited, and FY 2026 ratings remain largely unchanged from FY 2024.

DOL Made Minimal Progress Implementing GDA Requirements

Since our FY 2024 GDA audit, we found that, except for Requirement 4, the status of DOL’s implementation of the 13 GDA Requirements remained unchanged. As in our previous GDA audits, we classified DOL’s status for each of the 13 GDA Requirements into one of three determinations: (1) no progress or requirement not met, (2) limited progress or requirement partially met, and (3) requirement met. In this audit, we identified that, of the 13 Requirements, Requirement 4: Inclusion of Geospatial Data in Agency Record Schedules, changed from the status of requirement not met to requirement partially met. The status of the remaining 12 Requirements remained the same as we found in our FY 2024 GDA audit.

The following sections detail our analysis of DOL’s progress in addressing each of the 13 Requirements in Section 2808(a) of the GDA². Specifically, of the 13 Requirements, we determined DOL initiated action and made progress on 7, completed or met 5, and made no progress to date on the remaining 1. See the Exhibit for a summary-level view of our final assessment regarding DOL’s progress on these 13 Requirements for covered agencies.

Requirement 1, Geospatial Data Strategy – Partially Met

The GDA requires DOL to prepare, maintain, publish, and implement a strategy to promote the use of geographic information and related geospatial data and activities appropriate to its mission, in support of the strategic plan for the National Spatial Data Infrastructure. While the Department published a Geospatial Data Strategy in 2022, the strategy has not been maintained, updated, or implemented as required. During this audit, the OIG conducted a review of the strategy and found that it explicitly covers FY 2021–FY 2024, meaning it expired 2 years before the FY 2026 audit period. Until the strategy is properly updated and implemented in support of DOL and the National Spatial Data Infrastructure, this requirement remains partially met.

OIG Assessment: This requirement is partially met.

Requirement 2, Geospatial Data Sharing – Partially Met

The GDA requires DOL to collect, maintain, disseminate, and preserve geospatial data so it can be readily shared with other federal agencies and

² In this report, we use the word “requirement” to cover all mandated standards for covered agencies to comply with the GDA. Section 2808(a) of the GDA uses the term “responsibilities” to more specifically refer to the requirements.

non-federal users. A review of the enterprise data inventory and an interview with the CDAO confirmed that, although OSHA and MSHA collect geospatial data through drone imagery used in enforcement investigations, these datasets are still not listed in the inventory, are not classified, and are not governed by geospatial-specific policies. In our FY 2024 audit, the OIG found the inventory was missing elements such as drone aerial photography from MSHA and OSHA datasets. In this audit, we found that DOL continues collecting and maintaining certain geospatial imagery datasets, but they are not yet inventoried, resulting in an incomplete and inaccurate geospatial data inventory. As a result, this requirement remains partially met for this audit cycle.

OIG Assessment: This requirement is partially met.

Requirement 3, Promotion of Integration – Met

The GDA requires DOL to promote the integration of geospatial data from all sources. In our FY 2024 GDA audit, we found DOL promoted the integration of geospatial data with the program agencies by demonstrating successful geospatial data sharing. In this audit, our analysis indicated that DOL continues to promote integration of geospatial data from federal sources and uses geospatial information from the Bureau of Labor Statistics, Census Bureau, and other federal repositories to support operational and analytical needs.

OIG Assessment: This requirement is met.

Requirement 4, Inclusion of Geospatial Data in Agency Record Schedules – Partially Met

The GDA requires DOL to ensure that geospatial data, information products, and other records are included in agency record schedules approved by the National Archives and Records Administration (NARA). During our FY 2024 GDA audit, we found that DOL had not ensured geospatial data were incorporated into record schedules. Consistent with the previous audit, there was no evidence, such as reviews, analyses, or meetings, that indicated any actions had been taken to address the inclusion of geospatial data in existing DOL processes.

In a meeting with the CDAO on August 20, 2026, Department management acknowledged that a comprehensive enterprise-wide geospatial data mapping is not feasible to meet the requirements at this time. However, the CDAO stated that geospatial datasets, such as OSHA and MSHA drone imagery, are preserved within enforcement case management systems (e.g., OSHA's Occupational Safety and Health Information System); therefore, they fall under those systems' existing NARA retention schedules. To show the link between OSHA and MSHA drone imagery and the enforcement case management

systems, the CDAO provided screenshots showing drone data stored within the systems. The CDAO also supplied the corresponding NARA retention schedule information. DOL needs to provide a comprehensive enterprise-wide geospatial data mapping to record schedules for this requirement to be fully met.

OIG Assessment: This requirement is partially met.

Requirement 5, Allocation of Resources – Not Met

The GDA requires DOL to allocate resources to fulfill geospatial data collection, production, and stewardship responsibilities and to support FGDC activities. As in our FY 2022 and FY 2024 GDA audits, DOL has not yet allocated financial resources to support geospatial governance, metadata compliance, quality assurance, and inventory development, as required by the GDA.

In July 2026, the CDAO confirmed that geospatial responsibilities are handled by existing personnel without a dedicated budget and that the CDAO lacks authority to allocate Department-wide funding. The lack of dedicated geospatial specific funding prevents DOL from adopting FGDC metadata standards, validating geospatial datasets, and maintaining a geospatially accurate inventory.

Management concurred with the OIG's assessment and acknowledged that only senior Department leadership can allocate the resources necessary to meet statutory requirements. Given the significance of the resource allocation gap, the OIG is elevating this matter to the Secretary of Labor for resolution.

OIG Assessment: This requirement is not met.

Requirement 6, Use of Geospatial Data Standards – Partially Met

The GDA requires DOL to use geospatial-specific standards for documenting geospatial data with relevant metadata and making metadata available through the GeoPlatform. We determined DOL has partially implemented Requirement 6. To achieve full implementation, the Department must adopt ISO-based FGDC metadata standards, issue geospatial-specific metadata guidance, and publish metadata to the GeoPlatform. During this audit, the OIG confirmed that metadata alignment is part of the upcoming DOL Geospatial Data Strategy revision. Management acknowledged that FGDC's March 2026 metadata guidance created new requirements that DOL has not yet incorporated into its strategy or processes. Management also noted additional guidance from the Federal Chief Data Officer's Council was issued in August 2026. Although DOL has begun internal coordination and has committed to adopting FGDC's 2026 minimum

standards, these actions remain planned rather than implemented. As a result, Requirement 6 remains partially met for this audit cycle.

OIG Assessment: This requirement is partially met.

Requirement 7, Coordination with Others – Met

The GDA requires DOL 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. Our FY 2024 GDA audit reported that this requirement was met because the CDAO had participated in government-wide partnerships to develop plans for geospatial sharing and standardization. The OIG confirmed that the CDAO participates in FGDC activities and requirements by preparing the annual Covered Agency Self-Assessment Report and participating in the GeoPlatform Oversight Body and interagency geospatial working groups. As a result, DOL continues to meet Requirement 7 because the Department actively coordinates with the FGDC and other federal agencies on geospatial data activities.

OIG Assessment: This requirement is met.

Requirement 8, Use of Geospatial Information – Met

The GDA requires DOL 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. Our FY 2024 GDA audit reported that DOL has invested in location data enhancement and has been working to demonstrate how to best leverage the strategic value of that data. DOL performed geocoding³ on address data and converted the datasets to include latitude and longitude. Further, DOL promoted the integration of geospatial data and showed that DOL, Bureau of Labor Statistics, and Census Bureau were using an application programming interface to integrate the data.

In this audit, the OIG found that DOL continues to meet Requirement 8. The Department uses geospatial information for: (1) operational purposes, (2) decision-making, (3) enforcement activities, and (4) public-facing data products including geocoding, integration with Census Bureau and Bureau of

³ The DOL Geospatial Data Strategy defines geocoding as the process of transforming a description of a location or address into a pair of geographic coordinates that describe a location on the earth's surface and can be placed on a map.

Labor Statistics datasets, and spatial analysis to support enforcement and program oversight. Requirement 8 remains met for FY 2026 provided that, as stated by the CDAO, DOL will implement geospatial-specific quality assurance processes to ensure geospatial data are accurate, complete, and fit for operational use.

OIG Assessment: This requirement is met.

Requirement 9, Personal Privacy and Confidentiality – Partially Met

The GDA requires DOL to protect personal privacy and maintain confidentiality in accordance with federal policy and law. DOL has privacy protections in place including Department of Labor Manual Series 1-1000: The Privacy Act of 1974 and Invasion of Privacy; however, DOL does not fully meet Requirement 9 because the DOL Geospatial Data Strategy does not define policies and procedures for geospatial-specific privacy risk assessments. DOL has not: (1) issued geospatial-specific privacy or confidentiality guidance, (2) conducted privacy risk assessments for geospatial datasets, nor (3) established procedures to safeguard sensitive geospatial information. DOL's departmental privacy policies are not tailored to geospatial data and do not address geospatial-specific risks, such as the inadvertent disclosure of enforcement locations, investigatory attributes, or sensitive operational coordinates. In addition, the absence of a complete geospatial inventory prevents DOL from identifying sensitive geospatial attributes or applying appropriate safeguards. While DOL has departmental privacy protections, Requirement 9 remains partially met for FY 2026 because DOL does not define how restricted geospatial datasets should be categorized, protected, or excluded from public dissemination.

OIG Assessment: This requirement is partially met.

Requirement 10, Declassification of Geospatial Data – Met

The GDA requires covered agencies, when applicable, to participate in determining whether declassified data can contribute to and be incorporated into the National Spatial Data Infrastructure; however, this requirement does not apply to DOL's mission. As in previous GDA audits, we found that the Department neither possesses nor handles classified geospatial data. However, the OIG noted that DOL lacks a plan to handle classified geospatial data if such data is acquired in the future. Requirement 10 remains met provided that DOL develops a basic plan to: (1) ensure compliance if classified geospatial data is ever received or generated, and (2) establish declassification procedures before

releasing previously classified geospatial data to the public. Since this requirement does not apply to DOL, we consider the requirement met.

OIG Assessment: This requirement is met.

Requirement 11, Search All Sources Before Expending Funds for Geospatial Data Collection – Partially Met

The GDA requires DOL 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.

In the FY 2024 GDA audit, the OIG reported that DOL lacks policies and procedures for searching all sources. A policy requiring searches across all sources could help prevent the collection of duplicative geospatial data. It could also help detect duplicative collections and remove them. A search policy is needed to ensure that DOL does not buy data it already has or can obtain for free elsewhere.

In this audit, DOL continues to partially meet Requirement 11 because the Department has not yet established policies or procedures requiring program agencies to search federal, state, local, tribal, private sector, or academic geospatial sources before acquiring new geospatial data. The OIG confirmed that DOL has not issued geospatial-specific guidance directing agencies to consult the GeoPlatform, Data.gov, or other repositories prior to procurement of geospatial data. Our FY 2026 fieldwork attempted to demonstrate the CDAO's internal datasets or operational collection methods, such as how OSHA drone imagery is added to the inventory. We were not provided documentation showing DOL was actively searching all sources. When the OIG asked for DOL's policy on searching all sources, DOL provided references to Federal Acquisition Requirement policies, but not DOL policies. Because DOL is following government-wide policies, but does not have its own policies, Requirement 11 remains partially met for FY 2026.

OIG Assessment: This requirement is partially met.

Requirement 12, Ensure High-Quality Geospatial Data – Partially Met

The GDA requires DOL, to the maximum extent practicable, to ensure that a person receiving federal funds for geospatial data collection provides high-quality data. Our FY 2026 GDA audit fieldwork walkthroughs confirmed that DOL has not yet addressed known data quality issues identified in our prior GDA audits,

including MSHA's inaccurate mine coordinates and missing OSHA drone datasets.

In August 2026, the CDAO clarified that, while DOL applies general data quality requirements to contractors and grantees through procurement and grant processes, these requirements do not address geospatial-specific quality needs or statutory expectations under the GDA.

Overall, the OIG assessed that Requirement 12 remains partially met. This determination is due to: (1) DOL's application of general data quality requirements to contractors and grantees through procurement and grant processes, and (2) Department management's concurrence with the OIG and willingness to incorporate the FGDC and ISO 19157 standards into future contracts and grants.

OIG Assessment: This requirement is partially met.

Requirement 13, Appointment of a National Geospatial Data Asset Coordination Contact – Met

The GDA requires DOL to appoint a contact to coordinate with the lead covered agencies for the collection, acquisition, maintenance, and dissemination of the National Geospatial Data Asset data themes used by the Department. DOL designated the CDAO to coordinate with lead covered agencies and the FGDC on National Geospatial Data Asset themes used by DOL. Because the CDAO fulfills this role and participates in FGDC governance activities, Requirement 13 remains met.

OIG Assessment: This requirement is met.

DOL's Progress Implementing GDA Requirements Impaired by Multiple Factors

DOL's progress implementing GDA requirements remains impaired by several factors. First, the leadership of the Chief Data Office was interrupted when the Chief Data Officer, appointed in 2020, left in December 2024. While there were Acting Chief Data Officers in the interim, another Chief Data Officer was not appointed until September 2025 when the title changed to CDAO.

Although the Department has a Geospatial Data Strategy, the policy remains outdated and has not been revised since FY 2022. The absence of an up-to-date, well-maintained strategy increases the risk of inconsistent geospatial

practices across agencies, missed opportunities for geospatial analytics, noncompliance with FGDC metadata standards, and a lack of enterprise governance for geospatial data.

DOL was hindered by delays in the issuance of government-wide guidance. The FGDC released new metadata guidance in March 2026 and the Federal Chief Data Officer's Council issued guidance in August 2026; however, DOL management stated the Department did not have sufficient time during our FY 2026 GDA audit period to incorporate the guidance into its strategy or processes. Therefore, as we found in our FY 2024 GDA audit, without implementation of an ISO metadata standard, DOL is limited in its ability to define geospatial controls consistent with government-wide standards.

Resource limitations further constrained DOL's progress. As noted in previous GDA audits, the Department still does not have sufficient funding to properly oversee and create data quality standards of geospatial data, relying instead on indirect funding sources. Without predictable resources, DOL is not able to complete an accurate geospatial inventory, strengthen data quality processes, and adopt ISO-based FGDC metadata standards required by the GDA.

DOL continues to maintain an incomplete and inaccurate geospatial data inventory. Aerial drone photography collected by MSHA and OSHA remains absent from the inventory, despite our prior GDA audits identifying it as geospatial data.

Collectively, these conditions depict why DOL made limited progress toward meeting GDA requirements during the audit period.

DOL's Implementation Status of Prior GDA Audit Recommendations

In our FY 2024 GDA audit report dated October 3, 2024, we made three recommendations to improve DOL's compliance with the GDA. We recommended that the CDAO establish a documented process to improve data accuracy and quality (Recommendation 1) and to provide training to agencies (Recommendation 2). We also recommended the Department create a plan to acquire sufficient funding for GDA work (Recommendation 3). Based on the work performed for this FY 2026 GDA audit, the OIG determined that these three recommendations will be closed, reworded, and reissued. In addition, the OIG created a new Recommendation 1 for this report. Lastly, the OIG elevated the previous Recommendation 3—which is being reissued as Recommendation 4 in this report—to the Secretary of Labor to develop a plan to secure sufficient funding for GDA work.

OIG'S RECOMMENDATIONS

We recommend the Chief Data and Analytics Officer:

1. Revise the DOL Geospatial Data Strategy, ensuring that geospatial-specific policies, procedures, and implementation guidance are clearly documented.
2. Create a documented process that is aligned with the updated Geospatial Data Strategy to ensure: (1) all of DOL's geospatial data is included in its geospatial data inventory, and (2) improved data accuracy and quality.
3. When implementing DOL's updated Geospatial Data Strategy and the geospatial data inventory process, develop a training program to ensure DOL officials with system and geospatial data responsibilities are aware of the requirements.

We recommend the Secretary of Labor:

4. Create a plan to acquire sufficient funding to properly oversee and create data quality standards for geospatial data throughout DOL and its contracts.

Analysis of Agency's Comments

In response to a draft of this report, the CDAO agreed with our four recommendations to make progress towards compliance with the Geospatial Data Act of 2018. Synopses of the CDAO's corrective action plans, as well as our corresponding responses, are detailed as follows:

- For Recommendation 1, the CDAO agreed and stated he will revise the Department's Geospatial Data Strategy to update the standards and guidance published in the current strategy that dates from 2022.
 - We determined the CDAO's proposed corrective action meets the intent of the recommendation.

- For Recommendation 2, the CDAO agreed and stated he will document the process of including all of DOL's geospatial data in its Enterprise Data Inventory to ensure improved data accuracy and quality.
 - We determined the CDAO's proposed corrective action meets the intent of the recommendation.
- For Recommendation 3, the CDAO agreed and stated he will provide training to agency Data Stewards via the Data Governance Board on the updated Geospatial Data Strategy and the geospatial data inventory process.
 - We determined the CDAO's proposed corrective action meets the intent of the recommendation.
- For Recommendation 4, the OIG is elevating this recommendation to the Secretary of Labor to develop a plan to secure sufficient funding for GDA work. As a result, the CDAO did not provide corrective actions for this recommendation.

The agency's response to the draft report is included in its entirety in Appendix B. We appreciate the cooperation and courtesies extended to us by the CDAO and his personnel during this audit.



Sean Gilkerson
Acting Assistant Inspector General for Audit

EXHIBIT: STATUS OF THE 13 GDA REQUIREMENTS FOR FY 2026

Requirement	Description	Status of Implementation
1. Geospatial Data Strategy	DOL is 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.	Partially Met
2. Geospatial Data Inventory	DOL is required to collect, maintain, disseminate, and preserve geospatial data so it could be readily shared with other federal agencies and non-federal users.	Partially Met
3. Promotion of Integration	DOL is required to promote the integration of geospatial data from all sources.	Met
4. Inclusion of Geospatial Data in Agency Record Schedules	DOL is 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).	Partially Met
5. Allocation of Resources	DOL is required to allocate resources to fulfill the responsibilities of geospatial data collection, production, and stewardship, and to support Federal Geographic Data Committee activities.	Not Met

Requirement	Description	Status of Implementation
6. Use of Geospatial Data Standards	DOL is required to use standards for documenting geospatial data with relevant metadata and making metadata available through the GeoPlatform.	Partially Met
7. Coordination with Other Federal and Non-Federal Agencies	DOL is 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.	Met
8. Use of Geospatial Information	DOL is 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.	Met
9. Personal Privacy and Confidentiality	DOL is required to protect personal privacy and maintain confidentiality in accordance with federal policy and law.	Partially Met
10. Declassified Data	DOL is required to participate in determining whether declassified data can contribute to and become a part of the National Spatial Data Infrastructure	Met

Requirement	Description	Status of Implementation
11. Search all Sources and Review Existing Geospatial Data Before Acquisition	DOL is required to 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.	Partially Met
12. Collection of High-quality Data	DOL is required to ensure, to the extent possible, that persons who receive federal funds to collect geospatial data obtain high-quality data.	Partially Met
13. Appointment of Contact	DOL is 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 DOL.	Met

Source: Geospatial Data Act Audit Report, FY 2026, 13 Requirement Results

APPENDIX A: SCOPE AND METHODOLOGY

Scope

To accomplish our objectives, we audited DOL’s progress in implementing the 13 covered agency Requirements listed in Section 2808(a) of the GDA. Our work was conducted remotely within 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 include 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 2806 of the GDA;
- compliance of the covered agency with the agency responsibilities and requirements under Section 2808(a) of the GDA; and
- compliance of the covered agency with the limitation on the use of federal funds under Section 2809 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.

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 the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

To answer our audit objective, we:

- reviewed federal laws and regulations, including the GDA
- interviewed DOL officials, including the CDAO; and
- analyzed documentation provided by the CDAO.

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 the assignment of responsibility and the delegation of authority during our planning and substantive phases and evaluated relevant controls. The objective of our audit was not to provide assurance of internal controls; therefore, we did not express an opinion on DOL's internal controls. Our consideration of internal controls over the administration of the GDA's accountability would not necessarily disclose all matters that might constitute significant deficiencies. Because of the inherent limitations of internal controls, misstatements or noncompliance may occur without being detected.

Criteria

- Geospatial Data Act of 2018
- Government Auditing Standards
- Standards for Internal Control in the Federal Government

Prior Relevant Coverage

During the last 6 years, the OIG has issued three reports of significant relevance to the subject of this report, as follows:

1. DOL Continues to Make Progress Toward Compliance with the Geospatial Data Act of 2018, Report No. 23-25-001-01-001 (October 3, 2024), available at: <https://www.oig.dol.gov/public/reports/oa/2025/23-25-001-01-001.pdf>

2. 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>
3. 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 the FGDC, GDA covered agencies, lead covered agencies, and agency Inspectors General. Links to these GDA-required reports can be found on the FGDC's website at: <https://www.fgdc.gov/gda/gda-reports/index.html>

APPENDIX B: AGENCY'S RESPONSE TO THE REPORT

The agency's response to our draft report follows.



September 25, 2026

MEMORANDUM FOR: Laura B. Nicolosi
Assistant Inspector General for Audit

FROM: Brandon Brown
Chief Data and Analytics Officer 

SUBJECT: Response to Recommendations in the Office of Inspector General's Biennial Audit on Compliance with the Geospatial Data Act of 2018 (#23-26-01-001)

We 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). We agree with the findings identified during the audit and the recommendations to further our data governance efforts.

We note that the Data Governance Board's collaboration and efforts, along with Departmental program to improve data governance, are critical to our demonstrated progress. The audit shows that DOL initiated action and made progress on seven responsibilities, completed or met five, and made no progress to date on one. Overall, DOL maintained its status for 12 of the 13 responsibilities, and improved the status for one responsibility, Agency Record Schedules. We continue our commitment to use geospatial data to inform program administration, update and maintain DOL's Geospatial Data Strategy, protect privacy and confidentiality and ensure high-quality, non-duplicative data.

The Department plans to update and publish its Geospatial Data Strategy and Open Data Plan in FY 2027. We will focus on continued progress with the recommendations and supporting information provided by OIG. Specifically, we will address the following recommendations:

Recommendation	Responsible Party	Corrective Action Plan	Estimated Completion Date
1. Revise the DOL Geospatial Data Strategy, ensuring that geospatial-specific policies, procedures, and implementation	Brandon Brown, CDAO	The CDAO will update the Department's Geospatial Data Strategy to update the standards and guidance	January 29, 2027

guidance are clearly documented.		published in the current plan from 2022.	
2. Create a documented process that is aligned with the updated Geospatial Data Strategy to ensure: 1) all of DOL's geospatial data is included in its geospatial data inventory, and 2) improved data accuracy and quality.	Brandon Brown, CDAO	The CDAO will document the process of including all DOL's geospatial data in its Enterprise Data Inventory to ensure improved data accuracy and quality.	February 26, 2027
3. When implementing DOL's updated Geospatial Data Strategy and the geospatial data inventory process, develop a training program to ensure DOL officials with system and geospatial data responsibilities are aware of the requirements.	Brandon Brown, CDAO	The CDAO will provide training to agency Data Stewards via the Data Governance Board on the updated Geospatial Data Strategy and the geospatial data inventory process.	March 31, 2027
4. Create a plan to acquire sufficient funding to properly oversee and create data quality standards for geospatial data throughout DOL and its contracts.	DOL-OIG	OIG will elevate this recommendation to the Secretary of Labor to develop a plan to secure sufficient funding for GDA work.	Undetermined

cc: Rosario Palmieri, Assistant Secretary for Policy
Sheng Li, Principal Deputy Assistant Secretary for Policy
Laura Dawkins, Deputy Assistant Secretary for Policy
Mangala Kuppa, Chief Information Officer
DOL Chief Data Stewards

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