



## Office of Inspector General United States Department of State

AUD-MERO-20-41

Office of Audits

September 2020

# **(U) Audit of Department of State Compliance With the Geospatial Data Act of 2018**

MIDDLE EAST REGION OPERATIONS



# HIGHLIGHTS

Office of Inspector General  
United States Department of State

AUD-MERO-20-41

## **(U) What OIG Audited**

(U) The Geospatial Data Act of 2018 (GDA or the Act) requires Federal agencies that collect, produce, acquire, maintain, distribute, use, or preserve geospatial data to comply with certain requirements. The Act is designed to promote geospatial data sharing among government agencies, academia, and private industry, and to encourage the use of existing geospatial data when possible. Among other things, the Act requires covered agencies, including the Department of State (Department), to (1) comply with geospatial data standards developed by the Federal Geographic Data Committee (FGDC), (2) comply with 13 covered agency responsibilities, and (3) limit use of Federal funds associated with geospatial data that does not comply with applicable standards. The Act also requires covered agency inspectors general to submit an audit to Congress every 2 years, which includes reviewing agencies' compliance with Sections 757, 759(a), and 759A, described above.

(U) The Office of Inspector General (OIG) conducted this audit to determine whether the Department has complied with the 13 covered agency responsibilities in accordance with Section 759(a) of the Act. OIG, in collaboration with the Council of the Inspectors General on Integrity and Efficiency, determined that sections 757 and 759A were not relevant to this inaugural audit.

## **(U) What OIG Recommends**

(U) OIG made three recommendations to Department management intended to assist the Department in implementing GDA requirements. Management's response to the recommendations offered follow each recommendation in the Results section of this report. Management comments to a draft of this report are reprinted in their entirety in Appendices D and E. OIG considers all three recommendations resolved, pending further action.

September 2020  
OFFICE OF AUDITS

MIDDLE EAST REGION OPERATIONS

## **(U) Audit of Department of State Compliance With the Geospatial Data Act of 2018**

### **(U) What OIG Found**

(U) The Department is not presently in compliance with the 13 covered agency responsibilities required by section 759(a). Although the Department plans to incorporate geospatial data considerations into its Enterprise Data Strategy—a Department strategy for data governance—to comply with 1 of the 13 responsibilities, the strategy is not expected to be completed until Summer 2021. With respect to the remaining 12 responsibilities, OIG found that some Department bureaus and offices have established practices that address some GDA requirements. For example, the Bureau of Intelligence and Research combined information from Federal agencies, academia, and the private sector to develop and make available maps of key facilities for disaster relief in non-capital cities, an important example of compliance with the GDA requirement to promote geospatial data integration from all sources. However, a significant amount of work remains for the Department to achieve full compliance with the Act.

(U) The Department has not complied with the Act, in part, because Department officials stated that they were unaware of the GDA's enactment because it was enacted under an unrelated reauthorization act, and neither the Office of Management and Budget (OMB) nor FGDC formally notified the Department of GDA requirements. However, OIG found that prior to enactment, the Bureau of Legislative Affairs circulated a draft of the law but did not send it to the bureaus with geospatial data expertise that would likely lead implementation efforts. In addition, official Department representatives did not attend FGDC meetings, including one in October 2018 discussing GDA enactment. Moreover, although the Bureau of Information Resource Management learned of the GDA in August 2019, when OMB requested information on the Department's GDA implementation progress, it did not promptly take action to implement GDA requirements at that time. By not fully implementing the GDA, the Department is not meeting the intent of the Act, which is to promote open geospatial data sharing, avoid duplication of effort, and effectuate the use of existing data when possible.

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## (U) OBJECTIVE

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(U) The Office of Inspector General (OIG) conducted this audit to determine whether the Department of State (Department), defined as a covered agency in the Geospatial Data Act of 2018 (GDA or the Act), complied with the 13 covered agency responsibilities in accordance with Section 759(a) of the Act.

## (U) BACKGROUND

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(U) On October 5, 2018, Congress enacted the GDA<sup>1</sup> to promote geospatial data<sup>2</sup> sharing among government agencies, academia, and private industry and the use of existing geospatial data when possible. The Act states that “not less than once every 2 years, the inspector general of a covered agency... shall submit to Congress an audit of the collection, production, acquisition, maintenance, distribution, use and preservation of geospatial data, which shall include a review of compliance with GDA Sections 757, 759(a), and 759A,” codified at 43 U.S.C. §§ 2806, 2808(a), and 2809, respectively.<sup>3</sup>

(U) Section 757 of the Act requires the Federal Geographic Data Committee (FGDC)<sup>4</sup> to establish standards for each National Geospatial Data Asset data theme.<sup>5</sup> The Act states that the standards “shall include rules, conditions, guidelines, characteristics, and content standards for the geospatial data and metadata within the National Geospatial Data Asset data theme and related processes, technology, and organization and shall be consistent with international standards and protocols to the maximum extent practicable.”<sup>6</sup>

(U) Section 759(a) of the Act identifies 13 requirements each covered agency must implement to comply with the Act. These requirements include:

1. (U) Prepare, maintain, publish, and implement a strategy for advancing geographic information and related geospatial data.

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<sup>1</sup> (U) Geospatial Data Act of 2018, Pub. L. 115-254, Subtitle F – Geospatial Data, §§ 751-759C, codified at 43 U.S.C. §§ 2801–2811.

<sup>2</sup> (U) According to the Act, 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, and that is generally represented in vector datasets by points, lines, polygons, or other complex geographic features or phenomena.” Pub. L. No. 115-254, Subtitle F – Geospatial Data, § 752(5)(A), codified at 43 U.S.C. § 2801(5)(A).

<sup>3</sup> (U) Pub. L. No. 115-254, Subtitle F – Geospatial Data, § 759(c), codified at 43 U.S.C. § 2808(c).

<sup>4</sup> (U) The FGDC is an interagency committee chaired by the Department of Interior that serves as the lead entity in the executive branch for the development, implementation, and review of policies, practices, and standards relating to geospatial data. Pub. L. No. 115-254, § 753(a), 231–232.

<sup>5</sup> (U) The GDA states that National Geospatial Data Asset data themes are the primary topics and subjects for which the coordinated development, maintenance, and dissemination of geospatial data will benefit the Federal Government and the interests of the people of the United States. Pub. L. No. 115-254, § 756(a), 237.

<sup>6</sup> (U) Pub. L. No. 115-254, § 757, 239–240.

2. (U) Collect, maintain, disseminate, and preserve geospatial data such that the resulting data, information, or products can be readily shared.
3. (U) Promote the integration of geospatial data from all sources.
4. (U) Ensure that data information products and other records created in geospatial data and activities are included on agency record schedules.
5. (U) Allocate resources to fulfill the responsibilities of effective geospatial data collection, production, and stewardship.
6. (U) Use geospatial data standards, documenting geospatial data with relevant metadata<sup>7</sup> and making metadata available through GeoPlatform.<sup>8</sup>
7. (U) Coordinate to collect, integrate, maintain, disseminate, and preserve geospatial data efficiently and cost-effectively.
8. (U) Make Federal geospatial information and services more useful to the public, enhance operations, support decision making, and enhance reporting to the public and Congress.
9. (U) Protect personal privacy and maintain confidentiality in accordance with Federal policy and law.
10. (U) Participate in determining whether declassified data can contribute to and become part of the National Spatial Data Infrastructure.<sup>9</sup>
11. (U) Search all sources to determine if existing geospatial data meets the needs of the agency before expending funds for geospatial data collection.
12. (U) Ensure that a person receiving Federal funds for geospatial data collection provides high-quality data.
13. (U) Appoint a contact to coordinate with the lead covered agencies for collection, acquisition, maintenance, and dissemination of National Geospatial Data Asset data themes used by the agency.<sup>10</sup>

(U) Although the Act requires covered agencies to comply with these 13 responsibilities, it does not identify a specific timeframe for implementation and compliance.

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<sup>7</sup> (U) The Act defines “metadata for geospatial data” as “information about geospatial data, including the content, source, vintage, accuracy, condition, projection, method of collection, and other characteristics or descriptions of the geospatial data.” Pub. L. No. 115-254, § 752(11), 231.

<sup>8</sup> (U) The GDA states that the GeoPlatform is “an electronic service that provides access to geospatial data and metadata for geospatial data to the general public.” Pub. L. No. 115-254 § 758(a), 240. The GeoPlatform is located at <https://www.geoplatform.gov/>.

<sup>9</sup> (U) According to the Act, the National Spatial Data Infrastructure is “the technology, policies, criteria, standards, and employees necessary to promote geospatial data sharing throughout the Federal Government, State, tribal, and local governments, and the private sector.” Pub. L. No. 115-254 § 752(13), 231.

<sup>10</sup> (U) Pub. L. No. 115-254, § 759(a)(1)-(13), 241–242.

## **(U) Geospatial Data Act Terminology**

### **(U) Covered Agencies**

(U) Executive branch departments that collect, produce, acquire, maintain, distribute, use, or preserve geospatial data to fulfill their missions.

### **(U) Geospatial Data**

(U) Information that is tied to a location on the Earth.

### **(U) Lead Covered Agencies**

(U) Ensure coordinated geospatial data management, supporting resources, and related services and products for a National Geospatial Data Asset data theme.

### **(U) Metadata for Geospatial Data**

(U) Information about geospatial data, including content, source, vintage, accuracy, condition, projection, method of collection, and other characteristics or descriptions.

### **(U) National Geospatial Data Asset Data Themes**

(U) Primary topics and subjects for which the coordinated development, maintenance, and dissemination of geospatial data will benefit the Federal Government.

### **(U) National Spatial Data Infrastructure**

(U) Technology, policies, criteria, standards, and employees necessary to promote geospatial data sharing throughout the government and the private sector.

(U) Finally, Section 759A of the Act limits the use of funds expended for geospatial data. The Act states that “5 years after the date on which standards for each National Geospatial Data Asset data theme are established, a covered agency may not use Federal funds for the collection, production, acquisition, maintenance, or dissemination of geospatial data that does not comply with the applicable standards.”

However, “a covered agency may use Federal funds to maintain and disseminate geospatial data that does not comply with the applicable standards . . . if the data was collected, produced, or acquired by the covered agency before the implementation date.”<sup>11</sup>

## **(U) Office of Management and Budget Circular A-016**

(U) The Office of Management and Budget (OMB), formerly the Bureau of Budget, issued Circular A-016, *Coordination of Geographic Information and Related Spatial Activities*, in 1953 to encourage surveying and mapping activities across all levels of government and avoid duplicative efforts.<sup>12</sup> Since then, OMB Circular A-016 has been updated seven times. In 1990, the Circular was revised to establish the FGDC to promote the coordinated use, sharing, and dissemination of geospatial data nationwide.<sup>13</sup> Although not an update to the Circular per se, in 1994, the President issued Executive Order 12906, *Coordinating Geographic Data Acquisition and Access: The National Spatial Data*

<sup>11</sup> (U) Pub. L. No. 115-254, § 759A(a), § 759A(b), and § 759A(c), 243.

<sup>12</sup> (U) Government Accountability Office, “OMB and Agencies Can Reduce Duplication by Making Coordination a Priority (GAO-14-26T),” December 5, 2013.

<sup>13</sup> (U) Ibid.

*Infrastructure*,<sup>14</sup> which established the National Spatial Data Infrastructure and delegated the FGDC responsibility to develop it. In 2002, the Circular was revised to establish 34 National Spatial Data Infrastructure data themes;<sup>15</sup> the Circular also identified the Department as the lead covered agency for the “International Boundaries” National Spatial Data Infrastructure data theme. In 2011, the Circular condensed the list of data themes from 34 to 16 and rebranded them as National Geospatial Data Asset data themes. In this revision, OMB removed “International Boundaries” as a data theme (and subsequently, the Department’s responsibilities as the lead covered agency). In 2016, the Circular was revised again to add a new data theme—Address—which raised the total number of data themes to 17. The Department is not currently identified as a lead covered agency for any of the 17 National Geospatial Data Asset data themes. Appendix B provides a complete list of current data themes, descriptions, and lead covered agencies.

## **(U) What OIG Audited**

(U) The Council of the Inspectors General on Integrity and Efficiency<sup>16</sup> convened representatives of covered agency Inspectors General to discuss audit requirements outlined in the Act. Representatives determined that covered agency Inspectors General could not determine whether agencies were compliant with standards established in accordance with GDA Section 757 due to the uncertainty as to which standards should be tested for compliance. Covered agency Inspectors General representatives also determined that GDA Section 759A compliance would not be required until October 5, 2023. Given that the Act requires covered agency Inspectors General to submit audits by October 2020, along with the uncertainty as to which standards to apply to determine compliance, representatives concluded that covered agency Inspectors General could not fully address the audit requirement. After considering these challenges, covered agency Inspectors General representatives determined that it would be in the covered agencies’ best interest for respective Inspectors General to focus inaugural audits on compliance with Section 759(a) of the Act. A full discussion of the audit scope is provided in Appendix A. The Council of the Inspectors General on Integrity and Efficiency Executive Committee issued a letter to Congress on March 23, 2020, to explain this audit approach, which is included in Appendix C of this report.

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<sup>14</sup> (U) Executive Order 12906, Coordinating Geographic Data Acquisition and Access: The National Spatial Data Infrastructure, April 11, 1994.

<sup>15</sup> (U) National Spatial Data Infrastructure data themes are electronic records and coordinates for a topic or subject, such as elevation or vegetation.

<sup>16</sup> (U) The Council of Inspectors General on Integrity and Efficiency is an independent entity established within the executive branch to address integrity, economy, and effectiveness issues that transcend individual Government agencies and aid in the establishment of a professional, well-trained, and highly-skilled workforce in the Offices of Inspectors General.



## (U) AUDIT RESULTS

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### **(U) Finding: The Department Has Not Complied with Geospatial Data Act of 2018 Section 759(a)**

(U) The Department is not presently in compliance with the 13 covered agency responsibilities required by section 759(a). Although the Department plans to incorporate geospatial data considerations into its data governance strategy to comply with 1 of the 13 responsibilities, the strategy is not expected to be completed until Summer 2021. The Department has not reached full compliance with the Act, in part, because Department officials stated that they were unaware of the GDA's enactment because the Department's Bureau of Legislative Affairs did not inform them and neither OMB nor FGDC formally notified them of GDA requirements. However, OIG found that prior to enactment, the Bureau of Legislative Affairs circulated a draft of the Act to several bureaus but did not send it to bureaus with geospatial data expertise that would likely lead implementation efforts. With respect to the remaining 12 responsibilities, some Department bureaus and offices have practices that address them, but significant work remains for the Department to comply with the Act. By not fully implementing the GDA, the Department is not meeting the Act's intent to promote open geospatial data sharing, avoid duplication of effort, and effectuate the use of existing data when possible.

#### ***(U) The Department Has Taken Limited Action To Implement 1 of 13 Covered Agency Responsibilities***

(U) Since OIG announced its audit in April 2020, the Department has begun to implement 1 of the 13 covered agency responsibilities prescribed in Section 759(a) of the Act. Specifically, it has taken steps to "prepare, maintain, publish, and implement a strategy for advancing geographic information and related geospatial data and activities appropriate to the mission of the covered agency" (Responsibility 1). According to Department officials, the Enterprise Data Council is developing an Enterprise Data Strategy, which when completed "will improve management and use of data for the Department's most pressing data challenges and lay the foundation to build a more data-driven culture." According to Office of Management Strategy and Solutions (M/SS) officials, the Department's Enterprise Data Strategy will address GDA requirements and, thus, meet the intent of the Act. M/SS officials stated that the Enterprise Data Strategy will emphasize the importance of data sharing and interoperability. It will create a governing structure for geospatial data. M/SS manages and oversees the work of the Enterprise Data Council.<sup>17</sup> The Council is chaired by the Department's Chief Data Officer and is comprised of Deputy Assistant Secretary-level members from each of the Department's Under Secretaries. M/SS officials stated that prior to OIG's audit announcement, the Enterprise Data Council had not considered including geospatial data in the Department's data governance strategy but added that the Council is now working to include geospatial data; however, the strategy will not be completed until at least Summer 2021.

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<sup>17</sup> (U) According to the Foreign Affairs Manual (1 FAM 044.4-3, "Office of Management Strategy and Solutions (M/SS)"), M/SS has the authority to coordinate bureaus toward Department-wide policies such as the Data Enterprise Strategy.



(U) Based on M/SS statements and the Council's efforts to incorporate geospatial data considerations into the Enterprise Data Strategy, OIG determined that the Department could potentially comply with Responsibility 1, as outlined in the Act, when the strategy is complete in Summer 2021.

***(U) The Department Was Not Officially Notified of the GDA's Enactment, but Was Aware of Its Requirements***

(U) The Department began efforts to implement requirements under section 759(a) in late February 2020, about 17 months after the GDA was enacted. However, the Department was aware of proposed GDA requirements in April 2018, 6 months prior to its enactment. Specifically, in April 2018, OMB provided the Bureau of Legislative Affairs<sup>18</sup> a draft of the GDA and requested comments on the proposed legislation. The Bureau of Legislative Affairs then circulated the proposed legislation to several Department bureaus and offices, including:

- (U) Under Secretary for Economic Growth, Energy, and the Environment
  - (U) Bureau of Economic and Business Affairs
  - (U) Bureau of Energy Resources
  - (U) Bureau of Oceans and International Environmental and Scientific Affairs
  - (U) Office of Global Partnerships
  - (U) Office of the Chief Economist
  - (U) Office of the Science and Technology Adviser
- (U) Under Secretary for Arms Control and International Security
  - (U) Bureau of Arms Control, Verification and Compliance
  - (U) Bureau of International Security and Nonproliferation
  - (U) Bureau of Political-Military Affairs
- (U) Bureau of Legal Affairs
- (U) Office of the U.S. Global AIDS Coordinator and Health Diplomacy

(U) According to Legislative Affairs officials, no Department entities provided comments on the proposed legislation and Legislative Affairs did not track the Act through enactment. The GDA was ultimately included in the Federal Aviation Administration Reauthorization Act of 2018, a law that Bureau of Legislative Affairs officials stated they would not typically track. Bureau of Legislative Affairs officials also stated that OMB generally notifies agencies of legislative and reporting requirements but did not do so for GDA.

(U) Bureau of Legislative Affairs officials also stated that FGDC did not notify the Department that it was required to implement covered agency responsibilities prescribed by Section 759(a) of the Act. Although the Department, as a covered agency, can designate an official representative to the FGDC, records indicate that the Department's representative frequently did not attend meetings at which information about the Act and implementation requirements

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<sup>18</sup> (U) The Bureau of Legislative Affairs is responsible for coordinating legislative activity for the Department and reviewing proposed legislation related to the Department.

were discussed. For instance, FGDC officials stated that they addressed the Act at their quarterly meeting in October 2018, approximately 1 week after the GDA was enacted. OIG obtained copies of the meeting minutes and determined that the Department's official representative, who at the time was the Principal Deputy Chief Information Officer, was not in attendance. Moreover, FGDC addressed the Act at several subsequent meetings, but the Department's official representative was not in attendance at those meetings either. The Department's previous FGDC representative left the Department in April 2019 and since that time, the Department has not designated an official representative to the FGDC, limiting its access to information related to the Act and implementation requirements. M/SS and Bureau of Information Resource Management officials stated that the Chief Data Officer will serve as the Department's official FGDC representative moving forward.

(U) According to M/SS and Bureau of Information Resource Management officials, their offices did not initiate implementation of the GDA because neither was aware of the Act. OIG found that their offices, as well as INR/GGI, were not included in the email that Legislative Affairs officials sent in April 2018 soliciting input on the proposed GDA legislation, despite having the geospatial data expertise necessary to implement the Act. However, OIG also found that the Bureau of Information Resource Management and INR/GGI officials responded to an OMB data call in August 2019 that asked, "How is your agency preparing for implementing the [GDA]?" The Bureau of Information Resource Management and INR/GGI, on behalf of the Department, stated that the Department "continues to work on several open data holdings that house geospatial data and related information or products" but did not provide any information specific to GDA implementation efforts. The Bureau of Information Resource Management did not survey any geospatial data users in the Department other than INR/GGI to request an update on GDA implementation efforts.

***(U) Existing Practices May Inform and Improve Department GDA Implementation Efforts***

(U) Although the Department is developing its Enterprise Data Strategy to address Responsibility 1 as outlined in the GDA, it has not formally begun to implement the remaining 12 responsibilities. Nevertheless, some bureaus and offices that regularly collect, use, maintain, and disseminate geospatial data have existing practices that could inform the Department's full implementation of GDA requirements. While these practices address GDA covered agency responsibilities, the Department is not compliant with the Act because a covered agency, such as the Department, must implement policies, procedures, and practices to address these responsibilities Department-wide, rather than at the component level.

(U) For example, several bureaus told OIG that they integrate geospatial data from multiple sources to conduct their work. This practice would appear to address the GDA's requirement that covered agencies "promote the integration of geospatial data from all sources" (Responsibility 3). Bureau of Intelligence and Research Office of the Geographer and Global Issues (INR/GGI) officials integrate data collected from local governments, universities, non-governmental organizations, the American Association of Geographers, and Colorado State University to create a dataset called the "Secondary Cities." This dataset maps key facilities (such as hospitals and pharmacies) in urban areas in developing countries to assist responders

in delivering disaster relief. Bureau of Overseas Buildings Operations officials stated that they integrate geospatial data from the United States Geological Survey, the National Aeronautics and Space Administration, the World Resources Institute, and other public and contracted sources to identify sites susceptible to hazardous conditions such as flooding, draught, and extreme heat. The Bureau is working to make use of such data to inform its planning processes and decisions for new construction projects, as well as acquisition and disposal of real property assets. Bureau of Conflict and Stabilization Operations officials stated that they use data from the United States Agency for International Development, the National Geospatial Intelligence Agency, and the Department of Defense to inform policy decisions and responses to global conflict.

(U) In addition, procurement of licenses for IT applications, information systems, training and development by various bureaus and offices could also be considered as addressing the GDA's requirement 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 [FGDC]" (Responsibility 5). For example, Bureau of Consular Affairs officials stated that they acquired approximately 55 licenses and user accounts allocated across multiple directorates to use a geographic information system from Esri, a software developer. The licenses provide the Bureau's Passport Services Directorate the ability to analyze the adequacy of its operations by examining data on location, volume, and operating hours. Similarly, Bureau of Overseas Buildings Operations officials stated that they have allocated over \$1 million for development, training, and licenses for geospatial technology, use, and collection. Bureau of Diplomatic Security officials stated that they are seeking funding to implement two geographic information system pilot programs:

- **(U) SigActs:** a mapping system that consolidates and analyzes data already tracked by Regional Security Officers at high threat posts. The bureau will use SigActs to track trip location, threats identified by local law enforcement, and residential property information to make data-informed decisions on policies and resource requests.
- **(U) DS Infinity:** an information system that collects information, including geospatial data, to create a unified view to analyze, and share security data that the bureau tracks. This will enhance personnel's ability to analyze trends and complete forecasting models more efficiently for resource allocation, personnel placement, and better overall preparation for responding to global risk and threats.

(U) Furthermore, officials from the Bureaus of Oceans and International Environmental and Scientific Affairs and Conflict and Stabilization Operations stated that they coordinate with other Department entities; Federal interagency partners such as the National Oceanic and Atmospheric Administration and the National Geospatial Intelligence Agency; non-governmental organizations; and academia to collect, integrate, maintain, disseminate, and preserve geospatial data prior to expending funds to collect or create new data. These practices can be viewed as addressing the GDA's requirement that covered agencies "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” (Responsibility 7), and “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” (Responsibility 11).

(U) Finally, officials from the Bureaus of Consular Affairs and the Operations Center Office of Crisis Management and Strategy stated that they use geospatial data to inform the public and senior officials, that can be viewed as addressing the GDA’s requirement to “use geospatial information to make Federal geospatial information and services more useful to the public; enhance operations; support decision making; and enhance reporting to the public and to Congress” (Responsibility 8). For example, the Bureau of Consular Affairs officials stated that they use geospatial data to inform the public about travel advisories. The Operations Center Office of Crisis Management and Strategy uses geospatial data to map conflict and weather conditions around the world to inform the Secretary and other Department leaders.

(U) As described above, some individual bureaus and offices have developed practices that address GDA covered agency responsibilities, although they were not developed with the express intent to comply with the Act, and, in some cases, are not subject to GDA requirements.<sup>19</sup> In fact, the Department does not have a complete inventory of its geospatial data assets, to include individual expertise within Department bureaus and offices, along with geospatial datasets and resulting products. Department officials identified the bureaus and offices referenced in this report as known collectors and users of geospatial data, but there may be others with which OIG did not speak or from which OIG did not obtain information. Moreover, the individual bureaus’ and offices’ actions appear ad hoc because the Department has not provided guidance for implementing GDA requirements. To fully comply with GDA covered agency responsibilities, a significant amount of work remains. Namely, the Department would need to develop and implement policies, procedures, and practices that address GDA covered agency responsibilities that are applicable to the entire Department and put in place appropriate internal controls to ensure compliance.

(U) By not fully implementing the GDA, the Department is not meeting the Act’s intent to promote open geospatial data sharing, avoid duplication of effort, and effectuate the use of existing data when possible. Therefore, OIG offers the following recommendations.

**Recommendation 1:** (U) The Office of Inspector General recommends that the Bureau of Intelligence and Research, in coordination with and support from the Office of Management Strategy and Solutions and the Bureau of Information Resource Management, establish and implement an action plan and timeline for implementing each of the 13 covered agency responsibilities prescribed by the Geospatial Data Act of 2018, Section 759(a).

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<sup>19</sup> (U) Geospatial data several of the bureaus developed, used, and maintain include sensitive or classified information that are governed under Chapter 32 of the Code of Federal Regulations, Section 2001 (32 C.F.R. 2001); therefore, they are not subject to the GDA. Pub. L. No. 115-254, § 759B.

**Management Response:** (U) In response to a draft of this report, M/SS requested a change in the action office for Recommendation 1 from M/SS to INR, based on INR/GGI's designation as the Department's Senior Advisor for Geospatial Information on August 18, 2020. Specifically, M/SS requested the recommendation be revised as follows:

(U) The Office of Inspector General recommends that the Bureau of Intelligence and Research, with coordination and support from the Office of Management Strategy and Solutions and the Bureau of Information Resource Management, establish and implement an action plan and timeline for implementing each of the 13 covered agency responsibilities prescribed by the Geospatial Data Act of 2018, Section 759(a).

(U) M/SS's official response to a draft of this report is reprinted in full in Appendix D.

**OIG Reply:** (U) As requested, OIG changed the action office for Recommendation 1 from M/SS to INR and considers the recommendation resolved, pending further action. OIG confirmed that INR/GGI was designated as the Senior Advisor for Geospatial Information, including responsibility for implementing the GDA. In addition, OIG confirmed that INR/GGI contributed to the development of and supported M/SS's proposed recommendation revision, and that INR leadership reviewed and cleared the M/SS official response. OIG will close the recommendation once it has received and accepted documentation demonstrating that INR has established and implemented an action plan and timeline for implementing each of the 13 covered agency responsibilities prescribed by the Geospatial Data Act of 2018, Section 759(a).

**Recommendation 2:** (U) The Office of Inspector General recommends that the Bureau of Intelligence and Research, in coordination with and support from the Office of Management Strategy and Solutions and the Bureau of Information Resource Management, identify and survey geospatial data users throughout the Department of State to identify existing practices and expertise to assist in implementing each of the 13 covered agency responsibilities prescribed by the Geospatial Data Act of 2018, Section 759(a).

**Management Response:** (U) In response to a draft of this report, M/SS requested a change in the action office for Recommendation 2 from M/SS to INR, based on INR/GGI's designation as the Department's Senior Advisor for Geospatial Information on August 18, 2020. Specifically, M/SS requested the recommendation be revised as follows:

(U) The Office of Inspector General recommends that the Bureau of Intelligence and Research, with coordination and support from the Office of Management Strategy and Solutions and the Bureau of Information Resource Management, identify and survey geospatial data users throughout the Department of State to identify existing practices and expertise to assist in implementing each of the 13 covered agency responsibilities prescribed by the Geospatial Data Act of 2018, Section 759(a).

**OIG Reply:** (U) As requested, OIG changed the action office for Recommendation 2 from M/SS to INR and considers the recommendation resolved, pending further action. OIG

confirmed that INR/GGI was designated as the Senior Advisor for Geospatial Information, including responsibility for implementing the GDA. In addition, OIG confirmed that INR/GGI contributed to the development of and supported M/SS's proposed recommendation revision, and that INR leadership reviewed and cleared the M/SS official response. OIG will close the recommendation once it has received and accepted documentation demonstrating that INR has identified and surveyed geospatial data users throughout the Department to identify existing practices and expertise to assist in implementing each of the 13 covered agency responsibilities prescribed in the Geospatial Data Act of 2018, Section 759(a).

**Recommendation 3:** (U) The Office of Inspector General recommends that the Bureau of Intelligence and Research, in coordination with and support from the Office of Management Strategy and Solutions and the Bureau of Information Resource Management, develop policies, procedures, and practices to implement each of the 13 covered agency responsibilities prescribed by the Geospatial Data Act of 2018, Section 759(a).

**Management Response:** (U) In response to a draft of this report, M/SS requested a change in the action office for Recommendation 3 from M/SS to INR, based on INR/GGI's designation as the Department's Senior Advisor for Geospatial Information on August 18, 2020. Specifically, M/SS requested the recommendation be revised as follows:

(U) The Office of Inspector General recommends that the Bureau of Intelligence and Research, with coordination and support from the Office of Management Strategy and Solutions and the Bureau of Information Resource Management, develop policies, procedures, and practices to implement each of the 13 covered agency responsibilities prescribed by the Geospatial Data Act of 2018, Section 759(a).

**OIG Reply:** (U) As requested, OIG changed the action office for Recommendation 3 from M/SS to INR and considers the recommendation resolved, pending further action. OIG confirmed that INR/GGI was designated as the Senior Advisor for Geospatial Information, including responsibility for implementing the GDA. In addition, OIG confirmed that INR/GGI contributed to the development of and supported M/SS's proposed recommendation revision, and that INR leadership reviewed and cleared the M/SS official response. OIG will close the recommendation once it has received and accepted documentation demonstrating that INR has developed policies, procedures, and practices to implement each of the 13 covered agency responsibilities prescribed in the Geospatial Data Act of 2018, Section 759(a).

(U) In addition to M/SS's official response to OIG's recommendations, INR/GGI provided technical comments stating that it operates two additional programs—the Large Scale International Boundaries dataset and the MapGive initiative—that could be viewed as addressing GDA Requirements 2, 6, 7, and 8. OIG confirmed the validity of the technical comments offered and modified the report accordingly. INR/GGI's response to a draft of this report is reprinted in full in Appendix E.

(U) Finally, OIG received informal technical comments from the Bureaus of Consular Affairs, Conflict and Stabilization Operations, and Diplomatic Security via email correspondence. Specifically, the Bureau of Consular Affairs Deputy Executive Director requested edits regarding the bureau's geographic information systems licenses and user accounts, as well as its geospatial data use. Citing a recent reorganization, the Bureau of Conflict and Stabilization Operations requested the Office of the Analysis, Planning, Programs, and Learning referenced in OIG's draft of this report be changed to the Office of Advanced Analytics in OIG's final report. Finally, the Bureau of Diplomatic Security, High Threat Programs Directorate, Office of Special Programs requested edits regarding the directorate's geospatial data pilot programs. OIG confirmed the validity of the comments offered and modified the Results and Appendix A sections of this report accordingly.



## (U) RECOMMENDATIONS

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**Recommendation 1:** (U) The Office of Inspector General recommends that the Bureau of Intelligence and Research, in coordination with and support from the Office of Management Strategy and Solutions and the Bureau of Information Resource Management, establish and implement an action plan and timeline for implementing each of the 13 covered agency responsibilities prescribed by the Geospatial Data Act of 2018, Section 759(a).

**Recommendation 2:** (U) The Office of Inspector General recommends that the Bureau of Intelligence and Research, in coordination with and support from the Office of Management Strategy and Solutions and the Bureau of Information Resource Management, identify and survey geospatial data users throughout the Department of State to identify existing practices and expertise to assist in implementing each of the 13 covered agency responsibilities prescribed by the Geospatial Data Act of 2018, Section 759(a).

**Recommendation 3:** (U) The Office of Inspector General recommends that the Bureau of Intelligence and Research, in coordination with and support from the Office of Management Strategy and Solutions and the Bureau of Information Resource Management, develop policies, procedures, and practices to implement each of the 13 covered agency responsibilities prescribed by the Geospatial Data Act of 2018, Section 759(a).

## **(U) APPENDIX A: PURPOSE, SCOPE, AND METHODOLOGY**

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(U) The Office of Inspector General (OIG) conducted this audit to determine whether the Department of State (Department), defined as a covered agency in the Geospatial Data Act of 2018 (GDA or the Act), has complied with the 13 covered agency responsibilities in accordance with Section 759(a) of the Act.

(U) OIG conducted this audit from April 2020 to August 2020 in the Washington, DC, metropolitan area. OIG conducted this compliance audit in accordance with generally accepted government auditing standards. Those standards require that OIG plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for the findings and conclusions based on the audit objective. OIG faced challenges in completing this work because of the COVID-19 pandemic. These challenges included limitations on in-person meetings, difficulty accessing information, and related difficulties within the Department, which affected its ability to respond to OIG requests for information in a timely manner. Despite the challenges, OIG believes that the evidence obtained provides a reasonable basis for the findings and conclusions presented in this report.

### **(U) Audit Scope**

(U) The Geospatial Data Act of 2018 requires the Inspector General of each covered agency to conduct an audit every 2 years that includes a review of the covered agency's compliance with Sections 757, 759(a), and 759A of the Act.<sup>1</sup> Section 757 requires that the Federal Geographic Data Committee (FGDC) establish "rules, conditions, guidelines and characteristics for geospatial data and content standards" for geospatial data and related metadata. Section 759(a) lists 13 covered agency responsibilities regarding geospatial data collection, production, use, and maintenance. Section 759A limits the use of Federal funds for the collection, production, acquisition, maintenance, or dissemination of geospatial data that does not comply with the applicable standards established in Section 757.<sup>2</sup>

(U) The Council of the Inspectors General on Integrity and Efficiency convened a working group comprised of covered agency Inspectors General representatives to discuss audit requirements outlined in the Act. The working group reviewed the Act's language, Office of Management and Budget (OMB) Circulars and Executive Orders, the OMB Federal Data Strategy 2020 Action Plan, and FGDC documentation. The working group identified challenges associated with auditing covered agencies' compliance with GDA Sections 757 and 759A.

(U) Regarding Section 757, FGDC has not established standards required by the Act. Moreover, the Act does not explicitly state whether FGDC standards in place prior to GDA's enactment meet the intent of the Act. In addition, neither FGDC nor OMB has provided clarification to covered agencies explaining which, if any, standards to follow. The Council of the Inspectors

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<sup>1</sup> (U) Pub. L. No. 115-254, § 759(c), 242.

<sup>2</sup> (U) Pub. L. No. 115-254, § 757, Geospatial Data Standards; § 759(a), Covered Agency Responsibilities; and § 759(A), Limitation on Use of Federal Funds.

General on Integrity and Efficiency working group concluded that because FGDC is not certain which geospatial datasets the Act governs, the covered agency Inspectors General cannot determine if agencies are compliant with standards established in accordance with GDA Section 757.

(U) Regarding Section 759A, the Act provides a 5-year period from the date standards are established for covered agencies to comply. After the 5-year period, the Act prohibits the use of Federal funds for non-compliant datasets. The Council of the Inspectors General on Integrity and Efficiency working group determined that it was unclear which, if any, standards adopted prior to the GDA's passage remained in effect. However, even if previous standards remained in effect, compliance with Section 759A would not be required until October 5, 2023. Given that the Act requires covered agency Inspectors General to submit audits by October 2020, along with the uncertainty as to which standards to apply to determine compliance, the working group concluded that covered agency Inspectors General could not fully address this requirement.

(U) After considering these challenges, the Council of the Inspectors General on Integrity and Efficiency working group determined that it would be in covered agencies' best interest for respective Inspectors General to focus inaugural audits on compliance with Section 759(a) of the Act—to assess covered agencies' progress toward compliance with the 13 responsibilities the Act outlines. The working group presented its proposal to the Council of the Inspectors General on Integrity and Efficiency Executive Committee, which approved the approach. The Executive Committee issued a letter to Congress on March 23, 2020, to explain this audit approach, which is reprinted in Appendix C of this report.

## **(U) Audit Methodology**

(U) To obtain background information for the audit, OIG reviewed the Geospatial Data Act of 2018, the OMB Circulars A-016 ("Coordination of Geographic Information and Related Spatial Data Activities") and its A-119 and A-130 supplemental guidance.<sup>3</sup> OIG also reviewed a draft of a proposed update to OMB Circular A-016. In addition, OIG reviewed data management requirements contained in the *Foreign Affairs Manual*.<sup>4</sup> OIG met regularly with the Council of the Inspectors General on Integrity and Efficiency Geospatial Data Act working group and attended an FGDC meeting.

(U) To determine whether the Department complied with the 13 covered agency responsibilities prescribed by GDA Section 759(a), OIG met with Department geospatial data users including the Bureau of Intelligence and Research, Office of the Geographer and Global Issues; the Bureau of Conflict and Stabilization Operations Office of Advanced Analytics; the Bureau of Diplomatic Security High Threat Programs Directorate; the Bureau of Consular

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<sup>3</sup> (U) OMB Circular A-119, "Federal Participation in the Development and Use of Voluntary Consensus Standards and in Conformity Assessment Activities" and OMB Circular A-130, "Managing Information as a Strategic Resource."

<sup>4</sup> (U) 5 Foreign Affairs Manual 630, "Data Management Policy."

Affairs; the Operations Center's Office of Crisis (U) Management and Strategy; the Bureau of Overseas Buildings Operations; and the Bureau of Oceans and International Environmental and Scientific Affairs. Table A.1 describes how these offices use geospatial data.

**(U) Table A.1: Department Primary Geospatial Data Users**

<b>(U) Bureau</b>	<b>(U) Geospatial Data Use</b>
Bureau of Intelligence and Research, Office of the Geographer and Global Issues	The office is the primary collector and user of geospatial data in the Department; it conducts research, analysis, and briefs the Department on a range of issues such as transboundary issues, environment, and humanitarian crises. The office also creates maps for the Department, oversees the MapGive initiative, and is the dataset manager for Large-Scale International Boundaries, a National Geospatial Data Asset.
Bureau of Conflict and Stabilization Operations	The bureau's Office of Advanced Analytics conducts research and analysis to understand conflict, types of violence, and how to respond to conflict. The office uses geospatial data to inform the Department on conflicts and to make policy recommendations.
Bureau of Diplomatic Security	The bureau's High Threat Programs Directorate manages and directs formulation, planning, coordination, policy development, and implementation of security programs in high threat, high risk U.S. diplomatic missions. The Directorate is piloting two programs that collect and analyze geospatial security data from diplomatic facilities around the world.
Bureau of Consular Affairs	The bureau has eight offices that use geospatial data to assess operations. For example, Fraud Prevention Programs analyzes, detects, prevents, and mitigates vulnerabilities in the consular process. In addition, Passport Services administers laws and formulates and recommends legislation, regulations, and policies relating to documentation of U.S. nationals/citizens abroad and uses geospatial data to enhance domestic passport center operations. Three offices (Overseas Citizen Services, Public and Congressional Affairs, and Visa Services) work together to advise U.S. citizens on safety precautions when traveling to certain countries.
Operations Center, Office of Crisis Management and Strategy	The Office of Crisis Management and Strategy coordinates the Department's crisis preparation and response activities and conducts lessons learned reviews following critical operational events. The Office uses geospatial data to produce reports that inform the Secretary and other Department principals on global events and risks to diplomatic missions.
Bureau of Oceans and International Environmental and Scientific Affairs	The bureau's Office of Oceans and Polar Affairs formulates and implements U.S. policy on international issues concerning the ocean, the Arctic, and the Antarctic. It uses geospatial data to support maritime boundary negotiation and determine the extended continental shelf.
Bureau of Overseas Buildings Operations	The bureau has two directorates (Planning and Real Estate Directorate and Program Development, Coordination, and Support Directorate) that use geospatial data. The bureau uses geospatial data, such as environmental data and real property data, for site selection.

**(U) Source:** OIG generated based on analysis of the *Foreign Affairs Manual*, public websites, and interviews conducted with bureau personnel regarding geospatial data use.

(U) OIG also met with the Office of Management Strategy and Solutions, the Bureau of Information Resource Management, the Geographic Information Systems at State working group, and the Bureau of Legislative Affairs.

## **(U) Data Reliability**

(U) OIG did not identify geospatial data users within the Department using electronic or computer processed data, nor did OIG review any of the geospatial data that the Department collects, uses, maintains, or disseminates. Therefore, it was not necessary to evaluate data reliability to fulfill the audit objective and for the purpose of this inaugural audit.

## **(U) Work Related to Internal Control**

(U) During the audit, OIG considered several factors, including the project's subject matter, and determined that internal control was significant to the audit objective. OIG also considered the components of internal control and the underlying principles included in the *Standards for Internal Control in the Federal Government*<sup>5</sup> to identify internal controls that were significant to the audit objective. Considering internal control in the context of a comprehensive internal control framework can help auditors determine whether underlying internal control deficiencies exist.

(U) For this audit, OIG concluded that two of five internal control components from the *Standards for Internal Control in the Federal Government*—Control Environment and Control Activities—were significant to the audit objective. The Control Environment component is the foundation for an internal control system; it provides the discipline and structure to help an entity achieve its objectives. The Control Activities component includes the actions management establishes through policies and procedures to achieve objectives and respond to risks in the internal control system. OIG also concluded that three principles related to the selected components were significant to the audit objective as described in Table A.2.

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<sup>5</sup> (U) Government Accountability Office, *Standards for Internal Control in the Federal Government* (GAO-14-704G, September 2014).

**(U) Table A.1: Internal Control Components and Principles Identified as Significant**

<b>(U) Components</b>	<b>(U) Principles</b>
Control Environment	Management should assign an organizational structure, assign responsibilities, and delegate authority to achieve the entity's objectives.
Control Activities	Management should design control activities to achieve objectives and respond to risks.
Control Activities	Management should implement control activities through policies.

**(U) Source:** OIG generated based on analysis of internal control components and principles in the *Standards for Internal Control in the Federal Government*.

(U) OIG interviewed Department officials and reviewed documentation to understand the internal controls related to the components and principles identified as significant to this audit. OIG performed procedures to assess the design and implementation of key internal controls. OIG also reviewed documentation related to the Department's policies, procedures, and processes regarding geospatial data collection, use, maintenance, dissemination, and preservation. Internal control deficiencies identified during the audit that are significant within the context of the audit objective are presented in the Audit Results section of this report.

**(U) Sampling Methodology**

(U) Sampling was not applicable to the audit methodology. The audit universe was 47 Department bureaus and offices that existed as of February 2020. OIG, with assistance from Department officials, identified seven bureaus that regularly collect and use geospatial data. OIG identified and interviewed geospatial data users in all seven bureaus.

**(U) Prior Office of Inspector General Reports**

(U) OIG has not completed any prior work related to the Geospatial Data Act. This report represents the first mandated audit of the Department's compliance with the Act.

**(U) APPENDIX B: NATIONAL GEOSPATIAL DATA ASSET DATA THEMES**

(U) Table B.1 identifies National Geospatial Data Asset data themes, descriptions, and lead covered agencies, as of July 2020.

**(U) Table B.1: National Geospatial Data Asset Data Themes as of March 2017**

<b>(U) Data Theme</b>	<b>(U) Description</b>	<b>(U) Lead Covered Agencies</b>
Address	Data elements, attributes, and metadata that specify a fixed geographic location by reference to a thoroughfare or landmark, or specify a point of postal deliver, or both. Does not include information about occupants or addressees nor does it include the attribute information about any features that may be specified by an address point.	Department of Commerce, U.S. Census Bureau and Department of Transportation
Biodiversity and Ecosystems	Pertain to, or describes, the dynamic processes, interactions, distributions, and relationships between and among organisms and their environments.	Department of the Interior, U.S. Geological Survey
Cadastre	Past, current, and future rights and interests in real property including the spatial information necessary to describe geographic extents. Does not include Federal government or military facilities.	Department of the Interior, Bureau of Land Management
Climate and Weather	Climate is the meteorological conditions that characteristically prevail in a region over a long period of time. Weather is the state of the atmosphere at a given time and place.	Department of Commerce, National Oceanic and Atmospheric Administration
Cultural Resources	Features and characteristics of a collection of places of significance in history, architecture, engineering, or society. Includes National Monuments and Icons.	Department of the Interior, National Park Service
Elevation	The measured vertical position of the earth surface and other landscape or bathymetric features relative to a reference datum typically related to sea level.	Department of the Interior, U.S. Geological Survey and Department of Commerce, National Oceanic and Atmospheric Administration
Geodetic Control	Survey control points or other related datasets which are accurately tied to the National Spatial Reference System.	Department of Commerce, National Oceanic and Atmospheric Administration
Geology	Geographically-referenced data pertaining to the origin, history, composition, structure, features, and processes of the solid Earth, both onshore and offshore. Does not include soils.	Department of the Interior, U.S. Geological Survey and Bureau of Ocean Energy Management



<b>(U) Data Theme</b>	<b>(U) Description</b>	<b>(U) Lead Covered Agencies</b>
Governmental Units, and Administrative and Statistical Boundaries	Boundaries that delineate geographic areas for uses such as governance and the general provision of services, administration and/or for a specific purpose, and/or provision of statistical data.	Department of Commerce, U.S. Census Bureau
Imagery	Georeferenced images of the Earth's surface, which have been collected via aerial photography or satellite data.	Department of Agriculture, Farm Service Agency and Department of the Interior, U.S. Geological Survey
Land Use-Land Cover	Refers collectively to natural and man-made surface features that cover the land and to the primary ways in which land cover is used by humans.	Department of Agriculture, U.S. Forest Service and Department of the Interior, U.S. Geological Survey
Real Property	Spatial representation of real property entities, typically consisting of one or more of the following: unimproved land, a building, a structure, site improvements, and the underlying land.	General Services Administration
Soils	Depicts the geography and attributes of the many kinds of soils found in the landscape at both large and small map scales.	Department of Agriculture, Natural Resources Conservation Service
Transportation	Means and aids for conveying persons and/or goods.	Department of Transportation
Utilities	Means, aids, and usage of facilities for producing, conveying, distributing, processing, or disposing of public and private commodities including power, energy, communications, natural gas, and water.	Offshore Utilities: Department of the Interior, Bureau of Safety and Environmental Enforcement Terrestrial Utilities: To Be Determined
Water – Inland	Interior hydrologic features and characteristics including classification, measurements, location, and extent.	Department of the Interior, U.S. Geological Survey and U.S. Fish and Wildlife Service
Water – Oceans and Coasts	Features and characteristics of salt water bodies and features and characteristics that represent the intersection of the land with the water surface, the lines from which the territorial sea and other maritime zones are measures and lands covered by water at any stage of the tide, as distinguished from tidelands, which are attached to the mainland or an island and cover and uncover with the tide.	Department of Commerce, National Oceanic and Atmospheric Administration

**(U) Source:** OMB Circular A-016, Appendix E, “National Geospatial Data Asset Data Themes, Definitions, and Lead Agencies,” (March 24, 2017).

## (U) APPENDIX C: COUNCIL OF INSPECTORS GENERAL ON INTEGRITY AND EFFICIENCY CONGRESSIONAL NOTIFICATION

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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. Whitecomb  
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

## (U) APPENDIX D: OFFICE OF MANAGEMENT STRATEGY AND SOLUTIONS RESPONSE

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United States Department of State

Washington, D.C. 20520

August 24, 2020

~~SENSITIVE BUT UNCLASSIFIED~~

TO: OIG/AUD – Norman Brown

FROM: Office of Management Strategy & Solutions (M/SS) – Director Jim Schwab 

SUBJECT: (U) Response to draft report – Audit of Department of State Compliance with Geospatial Data Act of 2018

(U) Thank you for the opportunity to review the draft report of the Audit of Department of State Compliance with Geospatial Data Act (GDA) of 2018.

(b) (3) (A)



**Recommendation 1:** (U) The Office of Inspector General recommends that the Office of Management Strategy and Solutions, in coordination with the Bureau of Information Resource Management, establish and implement an action plan and timeline for implementing each of the 13 covered agency responsibilities prescribed by the Geospatial Data Act of 2018, Section 759(a).

**M/SS Response:** (U) M/SS recommends that the action office for this recommendation be adjusted to reflect INR's newly-established role as Senior Agency Official for Geospatial Information. Upon transfer of the action office responsibility, INR will respond to the recommendation.

- (U) The Office of Inspector General recommends that the Bureau of Intelligence and Research, with coordination and support from the Office of Management Strategy and Solutions and Bureau of Information Resource Management, establish and implement an action plan and timeline for implementing each of the 13 covered agency responsibilities prescribed by the Geospatial Data Act of 2018, Section 759(a).

**Recommendation 2:** (U) The Office of Inspector General recommends that the Office of Management Strategy and Solutions, in coordination with the Bureau of Information Resource

~~SENSITIVE BUT UNCLASSIFIED~~



~~SENSITIVE BUT UNCLASSIFIED~~

2

Management, identify and survey geospatial data users throughout the Department of State to identify existing practices and expertise to assist in implementing each of the 13 covered agency responsibilities prescribed by the Geospatial Data Act of 2018, Section 759(a).

**M/SS Response:** (U) M/SS recommends that the action office for this recommendation be adjusted to reflect INR's newly-established role as Senior Agency Official for Geospatial Information. Upon transfer of the action office responsibility, INR will respond to the recommendation.

- (U) The Office of Inspector General recommends that the Bureau of Intelligence and Research, with coordination and support from the Office of Management Strategy and Solutions and Bureau of Information Resource Management, identify and survey geospatial data users throughout the Department of State to identify existing practices and expertise to assist in implementing each of the 13 covered agency responsibilities prescribed by the Geospatial Data Act of 2018, Section 759(a).

**Recommendation 3:** (U) The Office of Inspector General recommends that the Office of Management Strategy and Solutions, in coordination with the Bureau of Information Resource Management, develop policies, procedures, and practices to implement each of the 13 covered agency responsibilities prescribed by the Geospatial Data Act of 2018, Section 759(a).

**M/SS Response:** (U) M/SS recommends that the action office for this recommendation be adjusted to reflect INR's newly-established role as Senior Agency Official for Geospatial Information. Upon transfer of the action office responsibility, INR will respond to the recommendation.

- (U) The Office of Inspector General recommends that the Bureau of Intelligence and Research, with coordination and support from the Office of Management Strategy and Solutions and Bureau of Information Resource Management, develop policies, procedures, and practices to implement each of the 13 covered agency responsibilities prescribed by the Geospatial Data Act of 2018, Section 759(a).

Attachment:

- Tab 1 – (b) (3) (A)  
(b) (3) (A)

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3

Approved: M/SS: JSchwab

Drafted: M/SS – Camille Pellegrino 202-485-2622

Cleared:

M/SS/CFA: JdeGarmo (OK)  
M/SS/PGP: BPomainville (OK)  
M: PdeSouza (OK)  
IRM: CHootselle (OK)  
INR: VRaphael (OK)

~~SENSITIVE BUT UNCLASSIFIED~~

## (U) APPENDIX E: BUREAU OF INTELLIGENCE AND RESEARCH RESPONSE



United States Department of State  
Bureau of Intelligence and Research  
Washington, D.C. 20520

August 19, 2020

~~SENSITIVE BUT UNCLASSIFIED~~

TO:           OIG, Director of Middle East Regional Operations – David Bernet

FROM:       Bureau of Intelligence and Research, Office of the Geographer and Global Issues  
              (INR/GGI) – Director Lee Schwartz *LS*

SUBJECT:    (U) Response to draft report – Audit of Department of State Compliance with the  
              Geospatial Data Act of 2018

(U) Thank you for the opportunity to review the draft report of the Audit of Department of State Compliance with the Geospatial Data Act (GDA) of 2018. While no recommendations were directed towards INR, we offer the following as a response to your draft report.

(U) In addition to its Secondary Cities initiative the draft report identifies, two additional initiatives led by The Office of the Geographer and Global Issues might merit consideration for inclusion as examples of where the Department is already in compliance with several of the requirements listed in 759(a) of the GDA.

- *Requirements #2 and #6: Collect, maintain, disseminate, and preserve geospatial data such that the resulting data, information, or products can be readily shared. Use geospatial data standards, documenting geospatial data with relevant metadata and making metadata available through the GeoPlatform.*

INR/GGI developed, maintains, and disseminates the Large-Scale International Boundaries (LSIB) dataset, the official digitized international boundary lines approved for use on all U.S. Government maps, databases, and other geographic products such as annotated imagery. The alignments and representations of the lines accurately reflect U.S. Government foreign policy concerns and positions. The LSIB are an established data layer in the National Spatial Data Infrastructure and a recognized National Geospatial Data Asset. Regularly updated versions of the LSIB are disseminated to the Federal Government and made available to the public on the GeoPlatform and Data.gov with ISO 19115 compliant metadata.

- *Requirements #7 and #8: Coordinate to collect, integrate, maintain, disseminate, and preserve geospatial data efficiently and cost-effectively. Make Federal geospatial information and services more useful to the public, enhance operations, support decision making, and enhance reporting to the public and Congress.*



INR/GGI conceived, developed, and launched MapGive, which the State Department made one of its flagship initiatives in 2014. MapGive was born out of the recognition that significant geospatial data gaps exist in areas of the world most affected by humanitarian disasters. MapGive built upon INR's existing role as a conduit for sharing USG-purchased commercial satellite imagery and extended the sharing of satellite imagery web services with the volunteer mapping community. To date, MapGive-published imagery services have been the foundation of millions of edits to the OpenStreetMap database, resulting in over 50,000 miles of roads and over 3.5 million mapped buildings.<sup>1</sup> These data are used across the humanitarian, international development, diplomatic, and national security elements of the USG, as well as in a number of commercial mapping applications.

(U) Further, we offer some factual corrections to Table A1 on page 14:

(U) Bureau of Intelligence and Research, Office of the Geographer and Global Issues  
The **office** is the primary collector and user of geospatial data in the Department; it conducts research, analysis, and briefs the Department on a range of issues such as transboundary issues, environment, and humanitarian crises. The **office also creates maps for the Department, oversees the MapGive initiative, and is the dataset manager for Large Scale International Boundaries (LSIB) -- a National Geospatial Data Asset.**

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<sup>1</sup> <https://www.missingmaps.org/leaderboards/##mapgive>

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INR/GGI – Harry Petrey (ok)

## (U) ABBREVIATIONS

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Department	Department of State
FGDC	Federal Geographic Data Committee
GDA	Geospatial Data Act of 2018
GGI	Office of the Geographer and Global Issues
INR	Bureau of Intelligence and Research
M/SS	Office of Management Strategy and Solutions
OIG	Office of Inspector General
OMB	Office of Management and Budget

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