



DEPARTMENT OF VETERANS AFFAIRS
OFFICE OF INSPECTOR GENERAL

Office of Audits and Evaluations

DEPARTMENT OF VETERANS AFFAIRS

VA Needs to Comply Fully
with the Geospatial Data Act
of 2018

AUDIT

REPORT #20-02339-35

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Executive Summary

The VA Office of Inspector General (OIG) conducted this audit to determine whether VA complied with the requirements of the Geospatial Data Act of 2018.¹ VA uses geospatial data to support budget, strategic planning, and policy decisions. Geospatial data is information that is tied to a location on the Earth. It is identified by geographic location and characteristics of natural or constructed features and boundaries. The Veterans Health Administration (VHA) offers care to over nine million enrolled veterans and uses geospatial information to calculate drive time and distance between residences and the closest VHA healthcare facilities. Geospatial data also strengthens and improves the National Cemetery Administration's (NCA) ability to permanently account for remains, mark gravesites, track gravesite usage, and digitally map gravesites. NCA maintains 3.83 million graves and, as of the end of fiscal year 2019, manages approximately 22,368 acres within its cemeteries.

According to the Geospatial Data Act of 2018, the inspector general of each covered agency is required to submit an audit to Congress at least once every two years on the collection, production, acquisition, maintenance, distribution, use, and preservation of geospatial data. As this is an inaugural audit, the Council of the Inspectors General on Integrity and Efficiency convened a working group with representatives from the covered agencies' inspectors general to reach a consensus on an audit approach. Due to the implementation period, the working group determined that the audits should focus on progress toward compliance with only one section of the act, "Covered Agency Responsibilities." A copy of the council's letter to Congress detailing the scope limitations is in appendix B.

Table 1 illustrates VA's compliance with the 13 requirements within the scope of this audit.

Table 1. VA's Compliance with Covered Agency Responsibilities

Requirement	Description	Is VA compliant?
1	Prepare and implement a strategy for advancing geospatial data activities appropriate to the agency's mission. <i>(In the absence of an approved strategic plan from the Federal Geographic Data Committee, VA was unable to comply with this requirement.)</i>	No
2	Collect, maintain, disseminate, and preserve geospatial data such that resulting data, information, or products can be shared.	Yes
3	Promote geospatial data integration.	No

¹ Geospatial Data Act of 2018, Pub. L. No. 115-254, § 751–759 (2018).

Requirement	Description	Is VA compliant?
4	Ensure that geospatial information is included on agency record schedules that have been approved by the National Archives and Records Administration.	No
5	Allocate resources to fulfill geospatial data responsibilities.	Yes
6	Use geospatial data standards.	Yes
7	Coordinate with other federal agencies; state, local, and tribal governments; institutions of higher education; and the private sector.	Yes
8	Make federal geospatial information more useful to the public, enhance operations, support decision-making, and enhance reporting to the public and to Congress.	Yes
9	Protect personal privacy and maintain confidentiality in accordance with federal policy and law.	Yes
10	Participate in determining whether declassified data can become part of the National Spatial Data Infrastructure.	Not applicable
11	Search all sources to determine if existing data meet the needs of the covered agency before expending funds to acquire geospatial data.	Yes
12	Ensure that those receiving federal funds for geospatial data collection provide high-quality data.	Yes
13	Appoint a contact to coordinate with other lead covered agencies.	Yes

Source: OIG team analysis.

What the Audit Found

VA did not meet three of the 13 covered agency responsibilities. First, VA did not promote geospatial data integration because VA does not have an approved data and analytics strategy, an implementation roadmap, or an enterprise data management policy. Until there is an approved data and analytics strategy and policy, VA's Data Governance Council cannot effectively promote the integration of geospatial data from all sources as required by the Geospatial Data Act.² Second, VA also did not ensure that geospatial information is included on agency record schedules that have been approved by the National Archives and Records Administration (NARA). As a result, VA did not identify geospatial data and activities correctly for their preservation on NARA-approved record schedules as required by the act. Without an established NARA-approved records schedule for the retention of geospatial data used by offices, their geospatial activities and veterans' cemetery boundary geographic information is at risk of loss or

² The Data Governance Council oversees VA's establishment of data standards and is the final authority on all VA directives, policies, and standards concerning the creation, collection, and dissemination of authoritative data.

deletion. Finally, although VA also did not implement a strategy for advancing geographic information, the OIG team found the Federal Geographic Data Committee does not have an approved National Spatial Data Infrastructure strategic plan in place for covered agencies such as VA. Without the approved strategic plan, VA did not have the necessary criteria to develop and implement a strategy to comply with this requirement.

VA met the other applicable requirements by sharing geospatial data, allocating geospatial resources, using geospatial data standards, coordinating with other federal and nonfederal entities, and making geospatial information more useful to the public. VA also protected personal privacy, maintained confidentiality, searched required sources before expending funds to acquire geospatial data, provided high-quality data to those receiving federal funds for geospatial data collection, and designated representatives to coordinate with other lead covered agencies. According to VA officials, VA does not collect, hold, manage, or consume declassified geospatial data, and the OIG team did not find evidence to the contrary, making the related requirement not applicable.

What the OIG Recommended

The OIG recommended that the acting assistant secretary for enterprise integration establish mandatory VA-wide policies and responsibilities to promote the integration of geospatial data, and the assistant secretary for information and technology establish a process that ensures geospatial data and activities are included on VA record schedules that have been approved by NARA.

Management Comments

The principal executive director for the Office of Acquisition, Logistics, and Construction and chief acquisition officer, who is performing the delegable duties of the assistant secretary for enterprise integration, and the principal deputy assistant secretary for information and technology and deputy chief information officer concurred with both recommendations and provided corrective action plans that are responsive to the intent of the recommendations. Appendixes D and E include the full text of their comments. The OIG will monitor the implementation of planned actions and will close the recommendations when the Office of Enterprise Integration and the Office of Information and Technology provide sufficient evidence demonstrating progress in addressing the intent of the recommendations and the issues identified.

A handwritten signature in black ink, reading "Larry M. Reinkemeyer". The signature is written in a cursive style with a large initial "L" and "M".

LARRY M. REINKEMEYER
Assistant Inspector General
for Audits and Evaluations

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Abbreviations

ESRI	Environmental Systems Research Institute
NARA	National Archives and Records Administration
NCA	National Cemetery Administration
OEI	Office of Enterprise Integration
OIG	Office of Inspector General
OIT	Office of Information and Technology
VHA	Veterans Health Administration



Introduction

The VA Office of Inspector General (OIG) conducted this inaugural audit to determine whether VA complied with the requirements of section 759(a), “Covered Agency Responsibilities,” of the Geospatial Data Act of 2018.³ Geospatial data is information that is tied to a location on the Earth. It is identified by geographic location and characteristics of natural or constructed features and boundaries. The Veterans Health Administration (VHA) offers care to over nine million veterans and uses geospatial information to calculate drive time and distance between enrollees’ residences and their closest VHA healthcare facilities. Since these measures are used to determine eligibility for care within the community, it is critical that calculations are consistently accurate. Geospatial data also strengthens and improves the National Cemetery Administration’s (NCA) ability to permanently account for remains, mark gravesites, track gravesite usage, and digitally map gravesites.

Aspects of Geospatial Data

Geospatial data is made up of either vector or raster data. Vector data has specific coordinates that are represented by points, lines, or polygon features.⁴ Common examples of vector data are the maps and driving directions viewed in applications such as Google Maps. Geospatial data can also be derived from remote sensing, mapping, and surveying technologies including images, raster data sets, and aerial photographs. The satellite view in Google Maps is an example of raster data.

According to the Government Accountability Office, geographic information systems are “...systems of computer software, hardware, and data used to capture, store, manipulate, analyze, and graphically present a potentially wide array of geospatial data.” The primary function of a geographic information system is to link multiple sets of geospatial data and display the combined information as maps with different layers of information, as seen in figure 1.

³ The Geospatial Data Act of 2018, Pub. L. No. 115-254, § 759 (2018).

⁴ Polygon features are used to represent regions such as parcels, cities, forests, states, or countries.

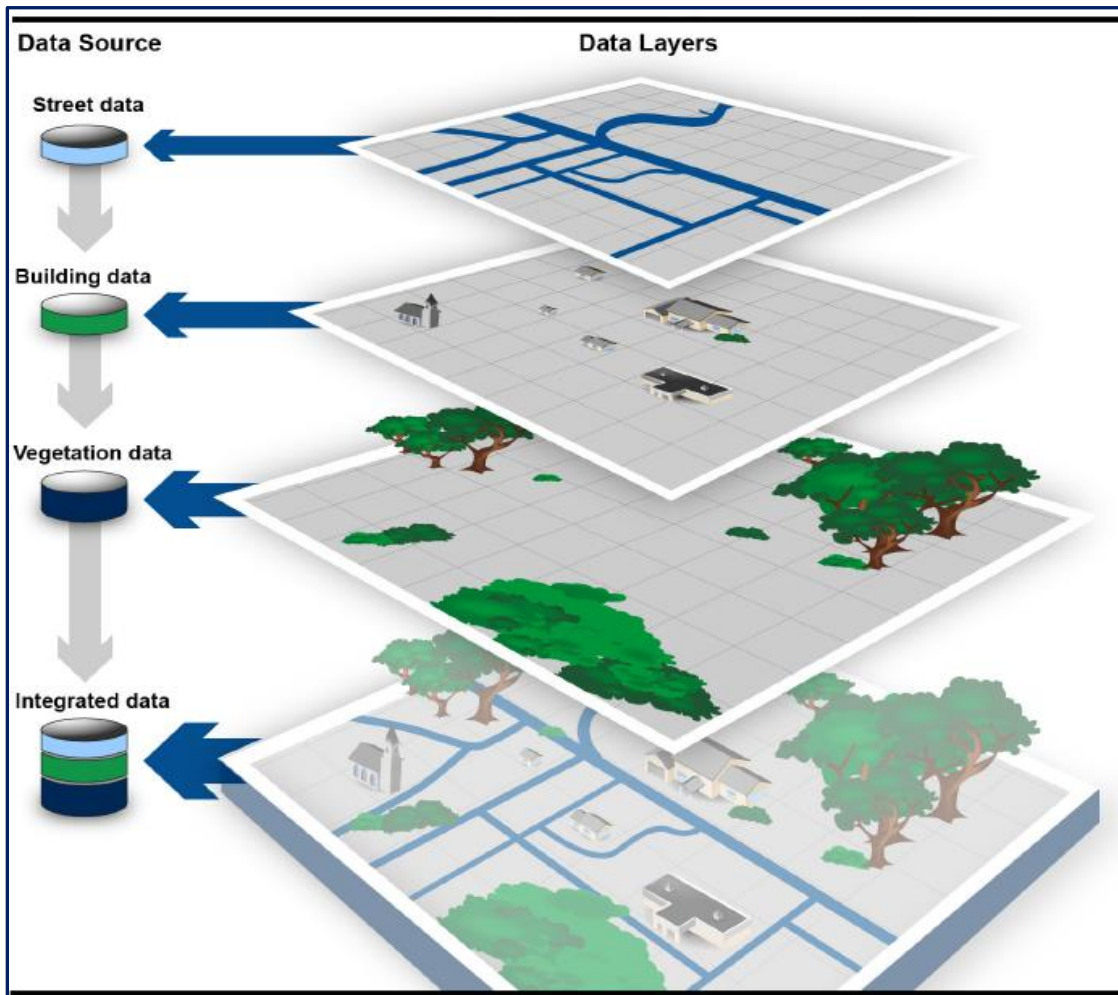


Figure 1. Representation of data in a geographic information system.

Source: Government Accountability Office, GAO-15-193, February 2015.

The Geospatial Data Act

According to the Geospatial Data Act of 2018, the inspector general of each covered agency is required to submit an audit to Congress at least once every two years on the collection, production, acquisition, maintenance, distribution, use, and preservation of geospatial data. The act reflects the growing recognition of the essential roles of geospatial data and technology and highlights the need to support their continuing development as critical investments for the nation. The act codifies the committees, processes, and tools used to develop, drive, and manage the National Spatial Data Infrastructure.⁵ It also formalizes governance processes related to geospatial data, provides policy and guidance to empower the use of geospatial data and

⁵ The National Spatial Data Infrastructure is the technology, policies, standards, and human resources necessary to acquire, process, store, distribute, and improve utilization of geospatial data.

technology, and facilitates broad cooperation between the public and private sector. This legislation fosters efficient management of geospatial data, technologies, and infrastructure by enabling better coordination among federal, state, local, and tribal governments; the private sector; and institutions of higher education. It also reduces duplicative efforts and makes it easier to obtain geospatial expertise, technology, services, and data from the rapidly growing geographic community in the United States.

Approach for Inaugural Audits

The Council of the Inspectors General on Integrity and Efficiency convened a working group with representatives from the covered agencies' inspectors general to reach a consensus on an audit approach for the inaugural audits. The working group determined that these audits should focus on progress toward compliance with covered agency responsibilities. Appendix B contains a copy of the council's full letter to Congress defining the scope, which focuses on geospatial data standards and limitation on use of federal funds.

Geospatial Data Standards

Section 757 of the Geospatial Data Act, "Geospatial Data Standards," requires the Federal Geographic Data Committee to establish standards for each National Geospatial Data Asset data theme, including rules, conditions, guidelines, and characteristics. The committee must also establish content standards for metadata.⁶ Data themes are electronic records and coordinates for a topic or subject such as elevation or vegetation. The standards must be consistent with international standards to the maximum extent practicable, and the Federal Geographic Data Committee must periodically review and update them to remain current, relevant, and effective. However, as the standards have not been implemented, they will not be evaluated in inaugural audits.

Limitation on Use of Federal Funds

Section 759A of the Geospatial Data Act, "Limitation on Use of Federal Funds," prohibits the use of federal funds by a covered agency for the collection, production, acquisition, maintenance, or dissemination of geospatial data that does not comply with the standards determined by the Federal Geographic Data Committee. The prohibition under this section will be effective five years from the date on which standards for each National Geospatial Data Asset data theme are established by the committee. Therefore, this requirement will not be evaluated in this inaugural audit.

⁶ Metadata is information about the geospatial data, including the content, source, vintage, accuracy, condition, projection, method of collection, and other characteristics or descriptions.

Program Office Responsibility

The Office of Enterprise Integration's (OEI) mission is to

orchestrate and lead the continuous improvement of veterans and employee experience through effective enterprise integration of people, processes, technology; innovations; and maturing organizational management capabilities.

OEI is composed of five offices, including the Office of Data Governance and Analytics.⁷ This office is responsible for providing data management, data analysis, and business intelligence capabilities to inform VA-wide decision-making. It acts as an authoritative clearinghouse for the collection, analysis, and dissemination of statistics about veterans and VA programs.

The Office of Data Governance and Analytics also provides predictive analysis, actuarial services, and data-driven forecasting capabilities to inform decision-making and supports policy development and resource allocation decisions. The chief data officer and executive director of data governance and analytics (chief data officer) serves as cochair of the Data Governance Council with the principal deputy assistant secretary for the Office of Information and Technology (OIT). The council oversees VA's establishment of data standards and is the final authority on all VA directives, policies, and standards concerning the creation, collection, and dissemination of authoritative data.

Office of Management and Budget Circular A-16

The Office of Management and Budget Circular A-16 Revised, "Coordination of Geographic Information and Related Spatial Data Activities," provides for improvements in coordination and use of spatial data and describes the effective and economical use and management of spatial data for the benefit of the government and the nation.⁸ The circular describes federal agency management and reporting requirements for the direct or indirect acquisition, maintenance, distribution, use, and preservation of spatial data in fulfilling agencies' missions. The circular also established the Federal Geographic Data Committee and promotes the coordinated use, sharing, and dissemination of geospatial data nationwide.

Federal Geographic Data Committee

The Federal Geographic Data Committee helps with the use of geographic information systems and the national implementation of the National Spatial Data Infrastructure. In addition, the committee implements the National Spatial Data Infrastructure Clearinghouse and advises

⁷ "Office of Enterprise Integration," accessed April 14, 2020, <https://www.va.gov/oei/about/index.asp>. The OEI's five offices are the Office of Planning and Performance Management, Office of Data Governance and Analytics, Office of Policy and Interagency Collaborations, VA Center for Innovation, and Office of Modernization.

⁸ Both spatial and geospatial data are defined as information that identifies the geographic location and characteristics of natural or constructed features and boundaries on Earth.

federal and other spatial data users on their clearinghouse implementation responsibilities.⁹ Lead covered federal agencies are required to be members of the committee. They are responsible for providing leadership and facilitating development and implementation of geospatial data standards, including data content standards. VA is not a lead covered federal agency. However, VA has designated representatives to coordinate with the committee.

The Federal Geographic Data Committee is also responsible for developing a National Spatial Data Infrastructure strategic plan that will ensure geospatial data from multiple federal and nonfederal sources is available and easily integrated to enhance decision-making. Based on the *Federal Data Strategy 2020 Action Plan*, the National Spatial Data Infrastructure strategic plan was targeted for completion on December 31, 2020. Although the inaugural OIG Geospatial Data Act audits were originally due in October 2020, appendix C contains a copy of the Council of the Inspectors General on Integrity and Efficiency's letter detailing the plan to provide Congress with the first required audit reports no later than January 2021.

⁹ A clearinghouse is a network of data producers, managers, and users linked electronically, such as over the internet. Through the clearinghouse, users can employ a single interface to search and access metadata and data for themes.

Results and Recommendations

Finding: VA Needs to Take Additional Steps to Comply with Two of Thirteen Requirements in the Geospatial Data Act of 2018

Although VA has taken steps to comply with most requirements of the Geospatial Data Act of 2018, it has additional work to do for two areas of responsibility that are within its control. As detailed below, there is a third area that is dependent on prior action being taken by the Federal Geographic Data Committee before VA can act. The table below shows VA's compliance with each requirement in section 759(a) of the act, "Covered Agency Responsibilities."

Table 1. VA's Compliance with Covered Agency Responsibilities

Requirement	Description	Is VA compliant?
1	Prepare and implement a strategy for advancing geospatial data activities appropriate to the agency's mission. <i>(In the absence of an approved strategic plan from the Federal Geographic Data Committee, VA was unable to comply with this requirement.)</i>	No
2	Collect, maintain, disseminate, and preserve geospatial data such that resulting data, information, or products can be shared.	Yes
3	Promote geospatial data integration.	No
4	Ensure that geospatial information is included on agency record schedules that have been approved by the National Archives and Records Administration.	No
5	Allocate resources to fulfill geospatial data responsibilities.	Yes
6	Use geospatial data standards.	Yes
7	Coordinate with other federal agencies; state, local, and tribal governments; institutions of higher education; and the private sector.	Yes
8	Make federal geospatial information more useful to the public, enhance operations, support decision-making, and enhance reporting to the public and to Congress.	Yes
9	Protect personal privacy and maintain confidentiality in accordance with federal policy and law.	Yes
10	Participate in determining whether declassified data can become part of the National Spatial Data Infrastructure.	Not applicable

Requirement	Description	Is VA compliant?
11	Search all sources to determine if existing data meet the needs of the covered agency before expending funds to acquire geospatial data.	Yes
12	Ensure that those receiving federal funds for geospatial data collection provide high-quality data.	Yes
13	Appoint a contact to coordinate with other lead covered agencies.	Yes

Source: OIG team analysis.

What the OIG Did

The OIG team examined federal laws, regulations, and publications. The team interviewed officials and personnel within VA's OEI, VHA, NCA, and OIT's Geospatial Business Intelligence Service Line and Office of Information Security. In addition, the team reviewed Environmental Systems Research Institute (ESRI) contracts. For more information on the audit scope and methodology, see appendix A.

VA Did Not Meet Three Geospatial Data Act Requirements

The sections that follow detail the unfulfilled requirements and why VA did not meet three of the 13 requirements for compliance with section 759(a) of the Geospatial Data Act.

VA Did Not Have the Necessary Criteria to Prepare and Implement a Strategy for Advancing Geospatial Data Activities (Requirement 1)

Requirement 1 is to prepare, maintain, publish, and implement a strategy for advancing geographic information and related geospatial data and activities in support of the strategic plan for the National Spatial Data Infrastructure. The Council of the Inspectors General on Integrity and Efficiency's working group determined that requirement 1 is related to developing a National Spatial Data Infrastructure strategic plan. The working group also determined the pending deadline for finalizing the National Spatial Data Infrastructure strategic plan could affect the scope specific to this requirement. Therefore, in the absence of an approved strategic plan from the Federal Geographic Data Committee, VA was unable to comply with this requirement. See appendix B for a copy of the working group's letter detailing this scope limitation.

VA Is Making Progress Toward Promoting Geospatial Data Integration (Requirement 3)

Requirement 3 is to comply with promoting the integration of geospatial data from all sources. VA is working toward meeting this requirement. However, according to the system administrator

for the Planning System Support Group, the siloed nature of VA programs and funding has slowed the development of the geospatial program across VA. As a result, there is no true VA-wide enterprise geographic information system. A former director of the Statistics and Analytics Service for OEI informed the OIG team that some users do not have consistent access to ESRI software and the different tools available on the platform. She said that there is no central repository for geospatial data, which is “scattered across” VA. The former director also indicated that there were multiple contracts for the same ESRI software used across several program offices. NCA’s geographic information system program manager informed the team that offices want to maintain control of their own programs.

While VA’s chief data officer provided a partial list of VA offices that use or manage geospatial data, the former director of the Statistics and Analytics Service for OEI indicated that the Statistics and Analytics Service had not reached out to all the stakeholders across VA that would be generating, using, or storing geospatial data. The OIG team found that OIT’s Geospatial Business Intelligence Service Line and VHA’s Planning System Support Group did not fully integrate their geospatial data, even though the geographic information system program manager for NCA stated they have similar missions.¹⁰ According to the program manager, while both are using the same ArcGIS software, ESRI servers, and portals, they do not have a shared enterprise contract with ESRI.¹¹ The program manager also stated the Geospatial Business Intelligence Service Line team lead previously looked into setting up a VA-wide enterprise license agreement with ESRI, but the Planning System Support Group did not participate because it had its own enterprise license agreement.

Although the Office of Data Governance and Analytics and the Data Governance Council have encouraged geospatial data users to participate in meetings and working groups, VA does not have an approved data and analytics strategy, an implementation roadmap, or an enterprise data management policy. OEI and OIT are developing a comprehensive data and analytics strategy that was expected to be approved by December 31, 2020, and an implementation roadmap that is expected to be approved by February 28, 2021. However, until there is an approved data and analytics strategy and policy, the Data Governance Council cannot effectively promote the integration of geospatial data from all sources as required by the Geospatial Data Act.

¹⁰ OIT’s Office of Business Intelligence Service Line maintains a set of servers and other IT resources that provide clinical and other data to VA for analytical purposes. VHA’s Planning System Support Group assists healthcare planners with improving veterans’ access to healthcare locations by using advanced geographic information systems and geospatial analysis.

¹¹ ESRI supports organizations with mapping and spatial analytics technology. ArcGIS software and applications combine mapping and data analytics to deliver location intelligence. For example, ESRI may add layers of data such as demographics or traffic to a map to aid organizations in understanding what is happening at a particular physical location at a certain time.

VA Is Making Progress toward Ensuring Geospatial Information Is Included on Approved Record Schedules (Requirement 4)

Requirement 4 is to ensure data information products and other records created in geospatial data and activities are included on agency record schedules that are approved by the National Archives and Records Administration (NARA).¹² VA did not identify geospatial data and activities correctly for their preservation on NARA-approved record schedules as required by the Geospatial Data Act. All VA records must be covered by either the NARA General Records Schedule or a NARA-approved records control schedule.¹³ The chief data officer stated OIT's Enterprise Records Service administers VA's records management program and provides policy guidance. The director for the Enterprise Records Service informed the OIG team that geospatial data are intermediary records and are scheduled through the General Records Schedule. The director also stated that VHA's geographic information system relies on current data for analysis and retains only the information necessary for running analyses. Data from previous years are deleted from the system database when a business use no longer exists, in accordance with the VHA Records Control Schedule.¹⁴

As mentioned earlier, NCA has been using geospatial data to strengthen and improve its capability to permanently account for remains, mark gravesites, track gravesite usage, and digitally map gravesites. NCA is also working toward integrating its geospatial gravesite marker data into the public-facing Veterans Legacy Memorial website. The NCA maintains 3.83 million graves and, as of the end of fiscal year 2019, manages approximately 22,368 acres within its cemeteries. NCA uses VHA's corporate data warehouse to retain its geospatial data, but this data is not on an approved NARA schedule.¹⁵ Therefore, VA is not scheduling geospatial data for retention consistent with the preservation of geospatial records.

Under a memorandum of agreement, OIT's Business Intelligence Service Line provides NCA with an enterprise geographic information system architecture and administrative support.¹⁶ The agreement provides NCA with data support to load, store, and view data including photos, gravesites, and plots. The agreement also provides data storage for NCA common and operational data in VHA's corporate data warehouse storage area network. According to its

¹² NARA is the nation's record keeper of all documents and materials created in the course of business conducted by the federal government. A records schedule provides mandatory instructions regarding how to maintain records and what to do with them when they are no longer needed for current business.

¹³ VA Directive 6300, *Records and Information Management*, September 21, 2018.

¹⁴ VHA, *Records Control Schedule 10-1*, January 2020. This provides records retention and disposition requirements for VHA Central Office, program offices, and field facilities.

¹⁵ The corporate data warehouse is an enterprise asset encompassing multiple subject areas and potentially enabling multiple departments/lines of business within VHA to access and analyze their relevant data.

¹⁶ The memorandum of agreement is to continue to provide and maintain for NCA an enterprise geographic information system architecture and administrative support on an annual basis.

privacy impact assessment, the data is on a NARA-approved record schedule published on August 1, 2019.¹⁷ However, this records schedule only addresses non-geospatial data related to administering research programs and conducting research.

NCA also has a memorandum of understanding with the US Geological Survey to maintain critical data.¹⁸ This includes preserving geospatial information, such as VA cemetery site boundaries, used by the US Geological Survey to produce the National Map.¹⁹ The memorandum requires NCA to share and retain geospatial data the US Geological Survey used in its operations, such as cemetery boundary geographic information system files for all VA national cemetery locations. NCA provides information to the US Geological Survey when it opens a new cemetery or existing cemetery boundaries are updated.

A program analyst for NCA's Office of Improvement and Compliance Service said NCA is integrating geospatial technology when accounting for remains to increase the accuracy of marking gravesites and improve the level of trust with veterans and their family members. This includes NCA's commitment to finding new ways to encourage memorialization, storytelling, and facilitating access to the rich histories of veterans in national cemeteries. The analyst also indicated that, through this program, NCA is establishing a verified record of interments. The spatial gravesite records provide additional details to enable NCA leaders to provide more timely and accurate answers regarding gravesite inquiries. However, without an established NARA-approved records schedule for the retention of geospatial data used by offices, their geospatial activities and veterans' cemetery boundary geographic information are at risk of loss or deletion.

Geospatial Data Act Requirements Met by VA

VA met the remaining applicable requirements for compliance with section 759(a) of the Geospatial Data Act.

VA Collected, Maintained, Disseminated, and Preserved Geospatial Data (Requirement 2)

VA follows Federal Information Processing Standards publications for geocoding so the resulting data, information, or products can be readily shared with other federal agencies and

¹⁷ A privacy impact assessment determines the risks and effects of collecting, maintaining, and disseminating information in identifiable form in an electronic information system. It also examines and evaluates protections and alternative processes for handling information to mitigate potential privacy risks.

¹⁸ The memorandum of understanding establishes a framework for coordination and cooperation between the US Geological Survey and VA, effective for five years as of July 18, 2018.

¹⁹ The US Geological Survey's National Map provides access to geospatial information to describe the landscape of the United States and its territories. National cemeteries have been identified as a necessary layer within the data life cycle plans for the National Map.

nonfederal users. Geocoding converts addresses into geographic coordinates so that the addresses can be placed on a map. The publications facilitate data sharing across VA offices and with other federal agencies and nonfederal users. Neither the Office of Management and Budget nor the Federal Geographic Data Committee has issued revised guidance, standards, or timelines for geospatial data management. According to VA's chief data officer, geospatial data is collected, managed, stored, and published on the ArcGIS platform at the Austin Information Technology Center in Austin, Texas.²⁰ Geospatial data is stored locally in secure databases throughout VA's enterprise so that the data can be used by analysts. These data can be shared externally with other government agencies after being posted on Data.gov and shared publicly using ArcGIS online. All data shared publicly or with external agencies must be approved and cleared in accordance with VA's Privacy Service guidelines and policy to ensure confidentiality.

VA Allocated Resources to Fulfill Geospatial Data Responsibilities (Requirement 5)

VA allocated resources to fulfill geospatial data responsibilities and supported the activities of the Federal Geographic Data Committee. VA's chief data officer stated that the Data Governance and Analytics working group helps VA employees understand the importance of geospatial analytics and their use throughout VA and at other federal agencies and is establishing a geospatial infrastructure subgroup to partner with OIT and improve infrastructure resources. In addition, the chief data officer stated the Planning System Support Group manages and maintains a bank of servers that can handle large-batch and complex geoprocessing and provide storage and archival services. He also stated VA provides resources for geospatial data by enabling web publishing and promoting enterprise geographic information system operations through multiple ESRI contracts.

In 2015, the Planning System Support Group secured an agreement for ESRI geospatial software and services for VHA. The contract provides unlimited server and desktop licenses, technical support, online services, StreetMap Premium data, and other ArcGIS tools. The system administrator for the Planning System Support Group collaborates with OIT staff and other specialists to manage and maintain the servers, software, and geospatial products and services. The Planning System Support Group and other program offices employ analysts and subject matter experts to support geospatial analysis and VHA healthcare initiatives. According to NCA's geographic information system program manager, NCA also uses ArcGIS tools that create district mapping for cemeteries and determine veterans' plots based on shape, size, and location.

²⁰ ArcGIS is an ESRI mapping and analytics platform that enables spatial analysis and data science, field operations, mapping, three-dimensional geographic information system, imagery and remote sensing, and data collection and management.

VA Used Geospatial Data Standards (Requirement 6)

VA used geospatial data standards when documenting relevant metadata and making it available through the GeoPlatform. OEI also follows standards established by VA's Data Governance Council that align with the Federal Geographic Data Committee and federal standards. Throughout geocoding and spatial data processing, the Planning System Support Group does not alter the standardized addresses it receives. This ensures when VA disseminates the data for wider distribution, it still follows the committee's standards. When VA shares group data sets, they are published as feature layers or services and include metadata that follows the committee's standards.²¹

VA Coordinated with Federal, State, and Local Stakeholders (Requirement 7)

VA works in partnership with federal, state, and local stakeholders to efficiently and cost-effectively collect, integrate, maintain, disseminate, and preserve geospatial data. When possible, VA builds on existing geospatial data. The Planning System Support Group works directly with designated points of contact in the Department of Health and Human Services, the Department of Defense, and the Bureau of Indian Affairs/Indian Health Services. The group also collaborates with other offices to acquire geographic data from academic affiliates, researchers external to VA, special interest groups such as veterans service organizations, and businesses that are working with VA on projects that advance healthcare initiatives. In addition, NCA and the US Geological Survey are actively engaged in an established partnership to develop and maintain critical data for use in the US Geological Survey's National Map.

VA Made Federal Geospatial Information More Useful to the Public, Enhanced Operations, Supported Decision-Making, and Enhanced Reporting to the Public and to Congress (Requirement 8)

According to VA's chief data officer, OEI publishes data by different geographic units (primarily state, county, and congressional district), maps, and shape files for the public.²² Products are published and made available at <https://va.gov/vetdata> and <https://data.va.gov>. The Office of Data Governance and Analytics is responsible for providing mapping and geospatial analytic services and products to support VA planning and decision-making activities, and manages and updates the United States Veterans Eligibility Trends and Statistics database. VA analysts use the

²¹ A feature layer is a grouping of similar geographic features, for example, buildings, parcels, cities, roads, and earthquake epicenters.

²² Shape files show the location and geographical features and may include points, lines, and polygons that represent elements such as cities, roads, and waterways.

database for business intelligence, modeling, and reporting activities, and the database maintains the data from VA's statistics website.

This database also produces the veteran population projection model used by NCA, the Veterans Benefits Administration, and VHA to support decision-making and operations.²³ The model includes demographics and socioeconomic status to support VA's budget, strategic planning, and policy making. OEI responds to about 700 inquiries annually from the public, Congress, and state and local governments regarding statistical products. OEI improves its geospatial products based on feedback and plans to conduct a stakeholder analysis in the future.

The OIG found that VA is using geospatial data to improve its service to veterans and provide information to the public. In response to the COVID-19 pandemic, VA has a report summarizing what it knows about the status of affected patients who have been tested or treated at VA facilities. The VA COVID-19 National Summary website provides information about the number of positive tests, active cases, convalescent cases, and known deaths. The report also displays non-VA data provided by Johns Hopkins University to provide a general picture of the extent of COVID-19 illness in the community where a VA facility is located. Figure 2 shows a snapshot of one way the data is presented for the Washington DC VA Medical Center.

²³ The Veteran Population Projection Model provides VA's latest official projection of the total number of veterans from fiscal years 2018 to 2048. The model also projects living and deceased veteran counts by key demographic characteristics such as age, gender, period of service, and race/ethnicity at various geographic levels.

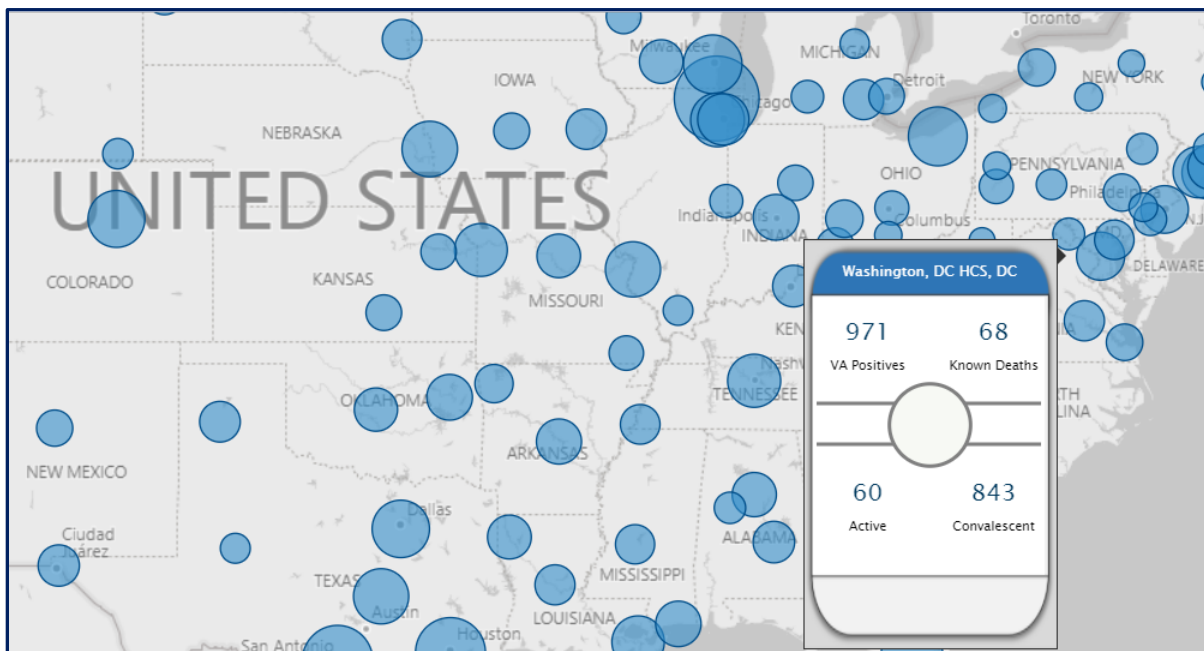


Figure 2. Screenshot from VA COVID-19 National Summary.

Source: VA website at <https://www.accesstocare.va.gov/Healthcare/COVID19NationalSummary>, accessed November 20, 2020.

VA Protected Personal Privacy and Maintained Confidentiality (Requirement 9)

All Planning System Support Group and OEI staff, including contractors, are required to complete training to protect the personal privacy and confidentiality of veterans. In addition, the Office of Data Governance and Analytics and OEI follow recommended procedures and practices for securing their systems and data and comply with VA rules and regulations regarding identification and authentication when accessing systems. All VA staff and contractors who require access to servers are required to follow VA procedures for requesting and maintaining elevated privileges as needed. Quarterly reviews of elevated privileges are completed and follow-up actions are taken, if necessary.

All data is secured in databases with limited and controlled access. In accordance with VA privacy guidelines, VA removes personally identifiable information before sharing data with individuals without access. OEI also has standard operating procedures regarding geographic information and cell suppression.²⁴ For example, the Geospatial Business Intelligence Service

²⁴ Cell suppression is a redaction process, applied prior to publishing data to the public, that protects individual identities from being disclosed. OEI's cell suppression guidelines are based on the best practices of federal principal statistical agencies. A federal statistical agency's activities are predominantly the collection, compilation, processing, or analysis of information for statistical purposes.

Line must approve the release of any geospatial data. According to the team lead for this service line, some of the standard operating procedures were being revised.

VA Assessed Its Obligation to Participate in Determining Whether Declassified Data Can Become Part of the National Spatial Data Infrastructure (Requirement 10)

According to the information and analysis chief, based on an analysis for VA's Integrated Operations Center Office of Operations, he is unaware of any routine consumption or delivery of classified geospatial data to VA. He is also unaware of any documentation that specifically discusses VA's consumption of classified geospatial data. The chief's response was shared with the directors of VA's Data Governance and Dissemination and Privacy Service, who agreed that VA does not collect, hold, manage, or consume declassified geospatial data. The OIG team found no evidence to the contrary, making the related requirement not applicable.

VA Searched All Sources to Determine if Existing Data Met Its Needs Before Expending Funds to Acquire Additional Geospatial Data (Requirement 11)

According to VA's chief data officer, VA conducted a search of existing geospatial data before developing the United States Veterans Eligibility Trends and Statistics database. VA evaluates the internal database each year before acquiring geospatial data for the next iteration. The original decision to purchase geospatial location data for the database was made around 2007, after OEI performed environmental scans to determine if internal sources met VA's needs. Additional purchases of geospatial location data were made in 2012 and 2017.

VHA's Planning System Support Group evaluated zip code data from [Data.gov](https://data.gov), the Census Bureau, and ESRI. None of these sources provide the frequency of updates available through external zip code data vendors. For example, according to the zip code metadata that is included with the ESRI data, files were updated in 2010, 2011, 2017, and 2018. VA is unable to conduct searches in the GeoPlatform because the United States Veterans Eligibility Trends and Statistics database requires a current address to be associated with a name, and no data set on the GeoPlatform meets this requirement. In addition, the data presented on the GeoPlatform is not in real time. Therefore, both OEI and the Planning System Support Group determined GeoPlatform's data sets did not meet specific program requirements. VA uses other resources to conduct searches for geospatial data.

VHA's Planning System Support Group purchased two geospatial data sets: quarterly zip code files and the StreetMap Premium data set. The group purchased the zip code data because all other sources the group evaluated were not current or complete. The group purchased the StreetMap Premium data to have a consistent and reliable resource for geocoding millions of facility records and enrollees in VA's healthcare system. According to the Planning System

Support Group director, of the 21 million US veterans, 40 to 45 percent are enrolled in VHA health care, and about 60 percent of the enrollees use VHA care in any given year. Because drive time and distance measures are used to determine eligibility for care within the community, it is critical that calculations are consistent. VHA uses the zip code and StreetMap information to calculate drive time and distance between enrollees' residences and their closest VHA healthcare facilities. All remaining geospatial data used as part of routine operations is downloaded from the US Census Bureau, acquired through open data and online resources, or obtained directly from other agencies including the Department of Defense, the Department of Health and Human Services, and the Bureau of Indian Affairs.

VA Ensured That Those Receiving Federal Funds for Geospatial Data Collection Provided High-Quality Data (Requirement 12)

Neither the Geospatial Data Act nor the Office of Management and Budget Circular A-16 defines what constitutes high-quality geospatial data. Also, the Federal Geographic Data Committee has not defined this term for covered agencies. However, in December 2016, the Federal Geographic Data Committee endorsed the International Organization for Standardization's metadata and data quality standards.²⁵ The audit team determined that VA follows these standards. Additionally, VA's Enterprise Data Management draft policy states that its Data Governance Council "shall create and maintain policy, processes, guidance, and standards to ensure that VA data are managed to provide the most integrated, efficient, and effective service possible to VA customers and internal business operations."²⁶

VA Appointed a Contact to Coordinate with Lead Covered Agencies (Requirement 13)

VA satisfied the requirement for collection, acquisition, maintenance, and dissemination of the National Geospatial Data Asset data themes used by VA. Specifically, VA designated representatives to work with the Federal Geographic Data Committee's steering committee and the coordination group.

Conclusion

The OIG found VA met most requirements of section 759(a) of the Geospatial Data Act. However, the OIG found that, in the absence of an approved National Spatial Data Infrastructure strategic plan from the Federal Geographic Data Committee, VA was unable to comply with

²⁵ International Organization for Standardization, ISO 19115-1:2014, *Geographic Information—Metadata—Part 1: Fundamentals* (2014); and International Organization for Standardization, ISO 19157:2013, *Geographic Information—Data Quality* (2013). The International Organization for Standardization is an independent, nongovernmental entity that develops international standards.

²⁶ VA Directive 0900, *VA Enterprise Data Management*, provided to the OIG team on June 11, 2020.

requirement 1 to prepare and implement a strategy for advancing geospatial data activities. VA was noncompliant with two other requirements: promote geospatial integration and ensure geospatial information is included in NARA-approved VA record schedules.

While VA does not have an approved data and analytics strategy, implementation roadmap, or VA Enterprise Data Management policy, it is in the process of developing a comprehensive VA strategy that was expected to be approved by December 31, 2020, and an implementation roadmap that is expected to be approved by February 28, 2021. Until then, VA cannot effectively promote the integration of geospatial data from all sources in accordance with requirement 3. VA is also not scheduling geospatial data for retention in accordance with requirement 4. Without an established NARA-approved records schedule for the retention of geospatial data, information could be lost or deleted.

Recommendations 1–2

1. The acting assistant secretary for Enterprise Integration, in conjunction with the assistant secretary for Information and Technology, complies with requirement 3 in section 759(a) of the Geospatial Data Act to establish mandatory VA-wide policies and responsibilities to promote the integration of geospatial data.
2. The assistant secretary for Information and Technology, in conjunction with the director of Enterprise Records Service, establishes a process to ensure geospatial data and activities are included on VA record schedules that have been approved by the National Archives and Records Administration in accordance with requirement 4 of the law.

Management Comments

The principal executive director for the Office of Acquisition, Logistics, and Construction and chief acquisition officer, who is performing the delegable duties of the assistant secretary for enterprise integration concurred with recommendation 1. The principal deputy assistant secretary for information and technology and deputy chief information officer concurred with recommendation 2. To address recommendation 1, the principal executive director reported OEI's Office of Data Governance and Analytics, in partnership with OIT, will lead the development and implementation of a VA-wide data strategy "to include policies and responsibilities to integrate, leverage, and promote geospatial and other data."

To address recommendation 2, the principal deputy assistant secretary reported that "VA has started the process of ensuring that geospatial data and activities are included in VA records schedules by completing the Standard Form (SF) 115, [']Request for Records Disposition Authority,['] which is currently staffed for Office of General Counsel concurrence." According to the principal deputy assistant secretary, VA will submit the form to NARA. Once NARA completes its review and returns the approved form to the VA records officer, the approved disposition will be published in the records control schedule. VA will provide additional

information on the timeline for publication of the approved disposition to the records control schedule in the 90-day update to this report.

OIG Response

The responsible officials submitted acceptable corrective action plans for the recommendations. The OIG will monitor implementation of planned actions and will close the recommendations when VA provides sufficient evidence demonstrating progress in addressing the intent of the recommendations and the issues identified. Appendixes D and E include the full text of their comments.

Appendix A: Scope and Methodology

Scope

The OIG team conducted its work from April 2020 through November 2020. The team evaluated VA's efforts to comply with the requirements of section 759(a) of the Geospatial Data Act, "Covered Agency Responsibilities."

Methodology

To assess compliance with the Geospatial Data Act, the OIG audit team examined Office of Management and Budget Circulars A-16 Revised, "Coordination of Geographic Information and Related Spatial Data Activities," and A-119, "Federal Participation in the Development and Use of Voluntary Consensus Standards and in Conformity Assessment Activities." The team considered Title 5 of the United States Code and the National Institute of Standards and Technology Special Publication 800-53, "Security and Privacy Controls for Information Systems and Organizations" as well. The team also reviewed VA's draft enterprise data management policy, VHA Records Control Schedule 10-1, and VA Functional Organization Manual Version 5.0.

The audit team conducted interviews with one of OEI's former directors of the Statistics and Analytics Service, the Geospatial Business Intelligence Service Line team lead, the Data Governance and Analytics privacy officer, and an Office of Information Security Privacy Service information technology specialist. The team also interviewed VHA's deputy chief strategy officer, Planning System Support Group director, and system administrator. The team interviewed the director of operations for the Office of Emergency Management and Resilience and NCA's Geographic Information System program manager. In addition, the team examined ESRI contracts.

Scope Limitations

The inaugural mandatory audit scope period overlaps the estimated Geospatial Data Act implementation period established by the Federal Geographic Data Committee. Based on the recommendation of the Council of the Inspectors General on Integrity and Efficiency's working group, inaugural act audit reports do not address sections 757, "Geospatial Data Standards," and 759A, "Limitation on Use of Federal Funds."

Internal Controls

The OIG determined that internal controls were significant to the audit objectives. The team assessed the internal controls applicable to the audit objectives for OEI's Office of Data Governance and Analytics, OIT's Geospatial Business Intelligence Service Line and Enterprise

Records Service, and VHA's Planning Systems Support Group and Office of Emergency Management and Preparedness. This included an assessment of the five internal control components for each of the six entities, including control environment, risk assessment, control activities, information and communication, and monitoring. The team identified the following two principles of component three, control activities, as significant to the audit objectives:

- Principle 10—Management should design control activities to achieve objectives and respond to risks.
- Principle 12—Management should implement control activities through policies.

The team identified internal control weaknesses during the audit and proposed recommendations to address these control deficiencies.

Fraud Assessment

The OIG team assessed the risk that fraud, violations of legal and regulatory requirements, and abuse could occur during this audit. The team exercised due diligence in staying alert to any fraud indicators and did not identify any instances of fraud or potential fraud during this audit.

Data Reliability

The OIG did not obtain electronic data that required a data reliability assessment.

Government Standards

The OIG conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that the OIG plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for the findings and conclusions based on audit objectives. The OIG believes the evidence obtained provides a reasonable basis for the findings and conclusions based on the audit objectives.

Appendix B: Council of the Inspectors General on Integrity and Efficiency's Letter to Congress (March 23, 2020)

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,

(Original signed by)

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

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

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

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

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

The Honorable Gene Dodaro, Comptroller General, GAO

<p><i>For accessibility, the original format of this appendix has been modified to comply with Section 508 of the Rehabilitation Act of 1973, as amended.</i></p>

Appendix C: Council of the Inspectors General on Integrity and Efficiency's Letter to Congress (September 30, 2020)

September 30, 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, Ms. Chairwoman, and Ranking Members:

The Council of the Inspectors General on Integrity and Efficiency (CIGIE) recognizes and appreciates your leadership on federal government oversight. The Geospatial Data Act of 2018 (P.L. 115-254) promotes access, use, and the continued development of geospatial data and technology. For covered agencies, the Act requires Inspectors General to conduct a review of agency compliance with the standards established by the Act every two years.

In March 2020, we wrote to the committee to inform you of an important distinction with the inaugural Geospatial Data Act audits. That letter discussed our plans to focus the first set of audits on progress the agencies have made in complying with the requirements under subsection (a) of the Act, due to an overlap in the implementation period and the mandatory audit scope period.

We are writing to you now on behalf of CIGIE to inform you that Covered Agency Inspectors General have been diligently working on the required audits, seeking to minimize schedule disruptions from the increased pandemic-related audit work and general changes to the work environment. Despite best efforts, this work has taken longer than anticipated, especially coupled with the unique work environment created by the current coronavirus pandemic.

As a result of these challenges, the Covered Agency Inspectors General plan to provide Congress with their first required audit reports no later than January 2021. This constitutes a 90-day delay from the due date, with subsequent reports following on a two-year cycle, starting in October 2022. We informed your staff of this delay and our continued commitment to meet the intent of the oversight requirements in the Geospatial Data Act. Our ultimate goal is to provide the highest quality reports to the agencies, Congress, and the public.

Should you or your staffs have any questions or concerns, please do not hesitate to contact us at (202) 514-3435 or (703) 248-2296 respectively.

Sincerely,

(Original signed by)

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

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

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

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

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

The Honorable Gene Dodaro, Comptroller General, GAO

<p><i>For accessibility, the original format of this appendix has been modified to comply with Section 508 of the Rehabilitation Act of 1973, as amended.</i></p>

**Appendix D: Management Comments,
Principal Executive Director,
Office of Acquisition, Logistics and Construction
and Chief Acquisition Officer**

Department of Veterans Affairs Memorandum

Date: December 28, 2020

From: Principal Executive Director, Office of Acquisition, Logistics and Construction and Chief Acquisition Officer, Performing the Delegable Duties of the Assistant Secretary for Enterprise Integration (008)

Subj: OIG Draft Report, VA Needs to Comply Fully with the Geospatial Data Act of 2018 — Project Number 2020-02339-DV-0002

To: Assistant Inspector General for Audits and Evaluations (52)

1. Thank you for the opportunity to review the Office of Inspector General (OIG) draft report, VA Needs to Comply Fully with the Geospatial Data Act of 2018 (Project Number 2020-02339-DV-0002). The Office of Enterprise Integration (OEI) concurs with OIG's findings and recommendations and submits the attached written comments.

<i>The OIG removed point of contact information prior to publication.</i>

(Original signed by)

Karen L. Brazell

Attachment

008 Attachment

Office of Enterprise Integration
Comments on OIG Draft Report,
VA Needs to Comply Fully with the Geospatial Data Act of 2018

OIG Recommendation 1: **The assistant secretary for Information and Technology, in conjunction with the acting assistant secretary for Enterprise Integration, complies with requirement 3 in section 759(a) of the Geospatial Data Act to establish mandatory VA-wide policies and responsibilities to promote the integration of geospatial data.**

Comments: The Office of Enterprise Integration (OEI) concurs. OEI's Office of Data Governance and Analytics, in partnership with the Office of Information and Technology, will lead the development and implementation of a Department of Veterans Affairs (VA)-wide data strategy to include policies and responsibilities to integrate, leverage, and promote geospatial and other data.

Target Completion Date: June 30, 2022

OIG Recommendation 2: The assistant secretary for Information and Technology, in conjunction with the director of Enterprise Records Service, establishes a process to ensure geospatial data and activities are included on VA record schedules that have been approved by the National Archives and Records Administration in accordance with requirement 4 of the law.

Comments: The Office of Enterprise Integration defers to the Office of Information and Technology.

<p style="text-align: center;"><i>For accessibility, the original format of this appendix has been modified to comply with Section 508 of the Rehabilitation Act of 1973, as amended.</i></p>

Appendix E: Management Comments, Principal Deputy Assistant Secretary for Information and Technology and Deputy Chief Information Officer

Department of Veterans Affairs Memorandum

Date: December 14, 2020

From: Principal Deputy Assistant Secretary for Information and Technology and Deputy Chief Information Officer (005A)

Subj: OIG Draft Report, VA Needs to Comply Fully with the Geospatial Data Act of 2018 — Project Number 2020-02339-DV-0002

To: Assistant Inspector General for Audits and Evaluations (52)

Thank you for the opportunity to review the Office of Inspector General (OIG) draft report, VA Needs to Comply Fully with the Geospatial Data Act of 2018 (Project Number 2020-02339-DV-0002). The Office of Information and Technology (OIT) concurs with OIG's findings and recommendations and submits the attached written comments.

<i>The OIG removed point of contact information prior to publication.</i>

(Original signed by)

Dominic Cussatt

Attachment

Office of Information and Technology
Comments on OIG Draft Report,
VA Needs to Comply Fully with the Geospatial Data Act of 2018

OIG Recommendation 1: The acting assistant secretary for Enterprise Integration, in conjunction with the assistant secretary for Information and Technology, complies with requirement 3 in section 759(a) of the Geospatial Data Act to establish mandatory VA-wide policies and responsibilities to promote the integration of geospatial data.

Comments: The Office of Information and Technology (OIT) defers to the Office of Enterprise Integration.

OIG Recommendation 2: The assistant secretary for Information and Technology, in conjunction with the director of Enterprise Records Service, establishes a process to ensure geospatial data and activities are included on VA record schedules that have been approved by the National Archives and Records Administration in accordance with requirement 4 of the law.

Comments: Concur. The OIT Director for Enterprise Records Service provides policy and guidance to the Department of Veterans Affairs (VA) community on records management practices, including record scheduling. The policy and guidance comply with National Archives and Records Administration (NARA) requirements and the Federal Records Act. Applicable policy and guidance are outlined in VA Directive 6300, *Records and Information Management* and VA Handbook 6300.1, *Records Management Procedures* (Attachments A & B).

VA Records Officers review their records control schedules annually to ensure that they are current, accurately reflect program office needs and meet all statutory requirements. As a result of these reviews, VA Records Officers submit any requested changes through the records appraisal process procedures contained in Chapter 8, "Submission and Approval of Requests for Disposition Authority" of VA Handbook 6300.1 dated March 24, 2010, or new records schedules to the VA Records Officer for submission to NARA for approval.

VA has started the process of ensuring that geospatial data and activities are included in VA records schedules by completing the Standard Form (SF) 115, "Request for Records Disposition Authority," which is currently staffed for Office of General Counsel concurrence. Once the SF115 has been submitted to NARA and NARA has completed its review and returned the approved SF115 to the VA Records Officer, the approved disposition will be published in the records control schedule. VA will provide additional information on the timeline for publication of the approved disposition to the records control schedule in the 90-day update to the final report.

<p><i>For accessibility, the original format of this appendix has been modified to comply with Section 508 of the Rehabilitation Act of 1973, as amended.</i></p>

OIG Contact and Staff Acknowledgments

Contact	For more information about this report, please contact the Office of Inspector General at (202) 461-4720.
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