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HHS Has Not Made Additional Progress Toward Compliance With the Geospatial Data Act

REPORT HIGHLIGHTS



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HHS Has Not Made Additional Progress Toward Compliance With the Geospatial Data Act

Why OIG Did This Audit

- The Geospatial Data Act of 2018 (GDA) mandates that the Inspector General (IG) of a covered agency submit to Congress, not less than once every 2 years, an audit of its covered agency's collection, production, acquisition, maintenance, distribution, use, and preservation of geospatial data.
- The GDA further requires the audit to review HHS compliance with the (a) standards for geospatial data, (b) covered agency's responsibilities established in the GDA, and (c) limitation on the use of Federal funds for geospatial data.

What OIG Found

Since 2024, HHS has not made additional progress toward compliance with the GDA. We identified certain covered agency responsibilities that HHS still has not fulfilled.

- HHS has not fulfilled certain covered agency responsibilities established under section 759(a) of the Geospatial Data Act;
- HHS did not maintain a departmentwide inventory of all geospatial data assets; and
- HHS did not properly prepare the annual report because its self-assessment did not include all HHS divisions.

What OIG Recommends

We made 4 recommendations for HHS to improve compliance with the GDA:

- fulfill the remaining seven covered agency responsibilities established in GDA section 759(a);
- ensure that the HHS Office of the Chief Data Officer oversees, coordinates, and facilitates HHS's implementation of geospatial-related requirements, policies, and activities;
- develop and maintain an inventory of all geospatial data assets in accordance with section 759(b) of the GDA; and
- prepare the required annual reports regarding the achievements of the covered agency in preparing and implementing the strategic plan for the National Spatial Data Infrastructure (section 759(a)(1)) and complying with the other requirements in section 759(a).

HHS concurred with all our recommendations.

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INTRODUCTION

WHY WE DID THIS AUDIT

The Geospatial Data Act of 2018 (GDA) mandates that the Inspector General (IG) of a covered agency submit to Congress, not less than once every 2 years, an audit of the agency's collection, production, acquisition, maintenance, distribution, use, and preservation of geospatial data. The Department of Health and Human Services (HHS) meets the GDA's definition of a covered agency.¹ In addition, the Office of Management and Budget recognizes HHS as an executive agency that produces, maintains, or uses geospatial information.

The GDA requires our audit to review HHS compliance with the (a) standards for geospatial data, (b) the covered agency's responsibilities established in the GDA, and (c) the limitation on the use of Federal funds for geospatial data.

OBJECTIVE

Our objective was to determine HHS's progress toward compliance with the GDA.

BACKGROUND

The Geospatial Data Act of 2018

On October 5, 2018, the President signed into law the GDA as part of the FAA (Federal Aviation Administration) Reauthorization Act of 2018 (P.L. No. 115-254, Subtitle F). The purpose of the GDA is to foster efficient administration of geospatial data, technologies, and infrastructure by improving the coordination and partnerships between the producers and consumers of geospatial information in Federal, State, Tribal, and local governments; the private sector; and academia. In addition, the GDA intends to reduce duplicative efforts to procure geospatial data, services, expertise, and technology within the Federal Government. To facilitate efficient geospatial activities, the GDA formalizes geospatial-related committees and governance processes. In addition, the GDA codifies portions of the Office of Management and Budget (OMB) Circular No. A-16, "Coordination of Geographic Information, and Related Spatial Data Activities," and the tools used to develop, drive, and manage the National Spatial Data Infrastructure (NSDI).²

¹ The GDA defines a covered agency as an executive department, as outlined in section 101 of Title 5, United States Code, that collects, produces, acquires, maintains, distributes, uses, or preserves geospatial data to achieve its mission.

² The GDA defines the NSDI as the technology, policies, criteria, standards, and employees necessary to promote geospatial data sharing throughout Federal, State, Tribal, and local governments and the private sector, including nonprofit organizations and institutions of higher education.

Geospatial Data

Geospatial data are information that identify the geographic location and characteristics of natural or constructed features and boundaries on Earth. This information may be derived from, among other things, remote sensing, mapping, and surveying technologies. Statistical data may be included in this definition at the discretion of the collecting agency. See the detailed definition in Appendix B.

Geospatial data and related information systems and tools at HHS include, but are not limited to: (1) the National Environmental Public Health Tracking Network, which brings together health data and environmental data from national, State, and city sources and provides supporting information to make the data easier to understand; (2) HHS emPOWER Map, which displays Medicare beneficiaries in geographic areas who are reliant on electricity-dependent medical equipment; (3) GeoHealth, a secure geographic information system (GIS)-based mapping application that integrates information from Federal and public agencies into a single visual environment to improve situational awareness, assessments, and resource management for planning and responding to natural, man-made, or pandemic events; and (4) Indian Health Service (IHS) GIS, which includes maps, apps, content, and services based on IHS data and a publicly accessible thematic and population data system.

The Federal Geographic Data Committee

The Federal Geographic Data Committee (FGDC) is an interagency committee that acts as the lead entity in the executive branch and develops, implements, and reviews policies, practices, and standards related to geospatial data. The FGDC is responsible for facilitating the implementation of the NSDI and coordinating geographic information and related spatial data activities. The FGDC also leads the development, management, and operational decision-making for the NSDI strategic plan. The GDA requires the FGDC to evaluate, summarize, and report on every covered agency's performance in fulfilling their responsibilities listed in the GDA, rating them as meeting expectations, having made progress toward expectations, or fails to meet expectations. In addition, the GDA requires the FGDC to operate GeoPlatform, which provides public access to geospatial data and metadata.³

The FGDC Steering Committee recommends priorities for the National Geospatial Data Asset portfolio based on key Federal mission needs, Presidential priorities, and congressional mandates.⁴ Responsibilities of the FGDC Steering Committee include, but are not limited to, voting on the adoption of the FGDC standards and decisions, promoting the allocation of

³ Metadata is defined as data that provides information about other data. The FGDC says [geospatial metadata](#) documents attributes such as the source, age, and scale of the data.

⁴ The FGDC Steering Committee is the policy-level interagency group responsible for providing leadership and direction in support of activities related to [Office of Management and Budget \(OMB\) Circular A-16](#) and the development of the [National Spatial Data Infrastructure \(NSDI\)](#).

agency resources, and ensuring the communication of key national geospatial activities within the agency.

Covered Agency Expectations Under Section 759 of the Geospatial Data Act

Section 759 of the GDA is divided into three sections that relate to a covered agency's responsibilities, reporting, and audits. They are:

- Section 759(a), which established 13 responsibilities a covered agency must fulfill to use Federal resources wisely and help build the NSDI
- Section 759(b), which requires an annual report to the FGDC on a covered agency's progress implementing the NSDI strategic plan (section 759(a)(1)) and compliance with the rest of section 759(a)
- Section 759(c), which requires each agency's Inspector General to submit an audit to Congress, at least every 2 years, on the agency's collection, production, acquisition, maintenance, distribution, use, and preservation of geospatial data

HOW WE CONDUCTED THIS AUDIT

The Council of the Inspectors General on Integrity and Efficiency (CIGIE) determined, that due to the continuing implementation of the GDA, conducting the mandatory audits as prescribed by the GDA would result in reports submitted by the IGs in October 2026 being inconclusive for two of the three audit requirements (i.e., sections 759(c)(1) and (c)(3)). CIGIE determined that the fiscal year (FY) 2026 audits should address section 759(c)(2), which focuses on the covered agency's progress toward compliance with the responsibilities established under section 759(a). Therefore, based on guidance from CIGIE, the scope of our audit focused on determining the status of HHS's compliance with the 13 responsibilities established in section 759(a) of the GDA.⁵ We also reviewed HHS annual reports (section 759(b)(1)) and determined whether HHS maintained an inventory of geospatial data assets (section 759(b)(2)(B)).

This audit approach did not include a review of HHS compliance with geospatial standards or the limitation of funding, as required by 759(c)(1) and 759(c)(3). FGDC had not yet finalized geospatial standards during the GDA's implementation period, leaving no standard against which to assess compliance. In addition, because the GDA's five-year implementation period has not concluded, the limitation on Federal funds was not yet applicable.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions

⁵ Geospatial data standards and data collection protocols are found in GDA §§ 759(c)(1) and (c)(3).

based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives. We shared with HHS our preliminary findings before issuing our draft report.

Appendix A describes our audit scope and methodology, and Appendix B contains Federal requirements.

FINDINGS

HHS has not made progress toward compliance with the GDA. Specifically, we identified certain covered agency responsibilities that HHS has not fulfilled. HHS has not maintained a departmentwide inventory of all geospatial data assets and did not include all its divisions in its self-assessment of progress toward fulfilling GDA responsibilities.⁶

These conditions occurred because there was limited departmentwide oversight and coordination in HHS' implementation of geospatial-related responsibilities, requirements, policies, and activities across all of its divisions. In addition, HHS officials were unaware that they should be documenting (1) their progress in preparing and implementing the strategic plan for the NSDI and (2) their compliance with other GDA section 759 requirements in the annual report.

As a result, HHS is vulnerable to inefficient and ineffective management of geospatial assets, contrary to the intent of the GDA. This increases the risk that HHS will be unable to reduce the costs of acquiring, managing, sharing, and using geospatial data, expertise, technology, and services.

HHS HAS NOT FULFILLED CERTAIN COVERED AGENCY RESPONSIBILITIES ESTABLISHED UNDER SECTION 759(a) OF THE GEOSPATIAL DATA ACT

Section 759(a) of the GDA established 13 responsibilities a covered agency must fulfill to ensure it uses Federal resources wisely and help build the NSDI (see Table 1). In addition, OMB Circular No. A-16 states that to accomplish these two goals, "all agencies that collect, use, or disseminate geographic information and/or carry out related spatial data activities will, both internally and through their activities involving partners, grants, and contracts," meet certain requirements in the coordination and use of spatial data.

⁶ HHS consists of 27 divisions: 13 staff divisions and 14 operating divisions. The staff divisions support the HHS Secretary by overseeing operations, providing guidance, and ensuring laws are followed fairly. The operating divisions, or Agencies, administer a wide variety of health and human services and conduct life-saving research for the nation.

Table 1: HHS's Responsibilities Under the Geospatial Data Act

Number	Responsibility	Summary	Fulfilled
1	Geospatial strategy	Prepare, maintain, publish, and implement a strategy for advancing geographic information and related geospatial data aligned with the agency's mission and the NSDI strategic plan.	Yes
2	Share geospatial data	Collect, maintain, disseminate, and preserve geospatial data so it can be readily shared with other Federal agencies and non-Federal users.	Yes
3	Promote Data Integration	Encourage the integration of geospatial data from all available sources	Yes
4	Include records in agency schedules	Ensure geospatial data products and related records are included in agency record schedules approved by the National Archives and Records Administration.	No
5	Allocate resources	Designate sufficient resources for geospatial data collection, production, stewardship, and to support FGDC activities.	No
6	Use applicable data standards and metadata	Apply geospatial data standards (including metadata), document data properly, and make metadata available on GeoPlatform.	No
7	Coordinate partnerships	Work with various stakeholders to efficiently collect, integrate, maintain, disseminate, and preserve geospatial data.	No
8	Use geospatial information effectively	Ensure Federal geospatial data and services are useful to the public, enhance agency operations, support decision-making, and improve reporting to the public and Congress.	No
9	Protect privacy	Safeguard personal privacy and confidentiality in accordance with Federal policies and laws.	No
10	Enable use of declassified data	Participate in determining when declassified data should be included in the NSDI.	Yes
11	Avoid duplication	Before funding new data collection, review all available data sources (including GeoPlatform) to ensure data meets the needs of stakeholders.	No
12	Ensure data quality	Where Federal funds are used for data collection, ensure recipients provide high-quality geospatial data.	Yes
13	Appoint a liaison	Designate a point of contact to coordinate with lead covered agencies managing National Geospatial Data Asset themes.	Yes

We determined that HHS and its divisions fulfilled 6 of the 13 responsibilities the agency has under GDA section 759(a). However, HHS has not met seven others. They include allocating insufficient resources, not employing applicable data standards, and ineffective use of information.

We determined that a lack of HHS departmentwide oversight and coordination of its implementation of geospatial-related responsibilities, requirements, policies, and activities across all HHS divisions contributed to this noncompliance. By not fully complying with the

GDA, HHS cannot ensure that geospatial data are properly maintained in coordination with other agencies to promote efficiency and cost-effective data collection, integration, dissemination, and preservation.

HHS DID NOT MAINTAIN A DEPARTMENTWIDE INVENTORY OF ALL GEOSPATIAL DATA ASSETS

Section 759(b) of the GDA requires agencies to maintain an inventory of all geospatial data assets and to identify which ones qualify as Federal-wide geospatial data assets. However, HHS has not developed or maintained an inventory of all departmentwide geospatial data assets, leaving the agency at risk. As a result, HHS may not employ all its relevant geospatial data when implementing cybersecurity controls or reporting to OMB and Congress.

HHS DID NOT PROPERLY PREPARE THE ANNUAL REPORT BECAUSE STAFF DIVISIONS WERE NOT INCLUDED IN HHS'S SELF-ASSESSMENT

Section 759(b)(1) of the GDA requires agencies to submit to the FDGC an annual report describing their progress in preparing and implementing their geospatial data strategy and in meeting all 13 responsibilities under the GDA. The agency's annual report must include a self-assessment that rates its performance on each responsibility: meeting expectations, making progress toward expectations, or failing to meet expectations. For FY 2025, the FGDC posted each agency's annual report and self-assessment on its website.

HHS submitted its FY 2025 annual report to the FGDC that included its self-assessment and achievements toward fulfilling its 13 responsibilities. HHS based this report on surveys sent to its Operating Divisions (OpDivs). However, our FY 2024 Audit Report found that several of HHS's 22 Staff Divisions (StaffDivs) also collect, maintain, publish, disseminate, or preserve geospatial data. HHS said at the time that, "Moving forward, the Office of the Chief Data Officer (OCDO) will survey both OpDivs and StaffDivs to ensure that all HHS divisions are represented in future assessments."

Despite this, HHS again surveyed only its OpDivs for the FY 2025 annual report. As a result, the self-assessment and achievements listed in that report did not present a complete picture of HHS's geospatial activities.

RECOMMENDATIONS

We recommend that the Department of Health and Human Services:

- fulfill the remaining seven covered agency responsibilities established in GDA section 759(a);
- ensure that its Office of the Chief Data Officer oversees, coordinates, and facilitates implementation of geospatial-related requirements, policies, and activities;

- develop and maintain an inventory of all geospatial data assets in accordance with section 759(b) of the GDA; and
- include all divisions, including StaffDivs, in preparing its required FGDC annual reports.

HHS COMMENTS

In written comments on our draft report, HHS concurred with our recommendations and described actions that it has taken and planned to take to address them. For the first recommendation, HHS stated it has already taken meaningful steps towards fulfilling its responsibilities. For the second recommendation, HHS stated that its Office of the Chief Information Officer (OCIO) and OCDO will continue to develop its GDA program to oversee, coordinate, and facilitate implementation of geospatial-related requirements. For the third recommendation, HHS stated that the OCIO and OCDO supported the publication of the HHS geospatial data inventory and HHS data on GeoPlatform and will continue working to fulfill the remaining responsibilities and developing its GDA program. For the fourth recommendation, HHS stated that the OCIO and OCDO have made progress towards identifying the correct Persons of Contact at all HHS components and will ensure that both OpDivs and StaffDivs are included in upcoming annual reports and OIG audit responses.

APPENDIX A: AUDIT SCOPE AND METHODOLOGY

SCOPE

This is the fourth in a series of audits mandated by Congress to oversee compliance with the GDA. CIGIE convened a working group with representatives from the covered agency IGs to reach consensus on an audit approach for the FY 2026 GDA-related audits. Based on guidance from CIGIE, the scope of our audit focused on determining the status of HHS's compliance with the 13 responsibilities established in section 759(a) of the GDA. We also reviewed HHS annual reports (section 759(b)(1)) and determined whether HHS maintained an inventory of geospatial data assets (section 759(b)(2)(B)).

Our scope included HHS and its divisions, centers, institutes, and offices that collect, maintain, publish, disseminate, and preserve geospatial data. Our review did not include an evaluation of internal controls.

We performed our fieldwork from March 2026 through September 2026.

METHODOLOGY

Our methodology included a request for information, identified by the HHS Chief Data Officer (CDO), from HHS and its divisions that prepare, maintain, publish, or implement geospatial data that support HHS's requirements to fulfill its covered agency responsibilities.

To accomplish our objective, we:

- Reviewed relevant Federal laws, requirements, and Government websites on geospatial-related assets and investment information
- Reviewed HHS annual reports, including self-assessments, Geospatial Data Strategy, and source documentation provided by the HHS CDO
- Discussed our results with HHS officials

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

APPENDIX B: FEDERAL REQUIREMENTS

GEOSPATIAL DATA ACT OF 2018 (GDA), (P.L. NO. 115-254)

SEC. 752: Definitions

(3) the term “covered agency”—

(A) means—

(i) an Executive department, as defined in section 101 of title 5, United States Code, that collects, produces, acquires, maintains, distributes, uses, or preserves geospatial data on paper or in electronic form to fulfill the mission of the Executive department, either directly or through a relationship with another organization, including a State, local government, Indian tribe, institution of higher education, business partner or contractor of the Federal Government, and the public;

(ii) the National Aeronautics and Space Administration; or

(iii) the General Services Administration; and

(B) does not include the Department of Defense (including 30 components and agencies performing national missions) or any element of the intelligence community;

(5) the term “geospatial data”—

(A) means 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;

(B) may be derived from, among other things, remote sensing, mapping, and surveying technologies;

(C) includes images and raster datasets, aerial photographs, and other forms of geospatial data or datasets in digitized or non-digitized form; and

(D) does not include—

(i) geospatial data and activities of an Indian tribe not carried out, in whole or in part, using Federal funds, as determined by the tribal government;

(ii) classified national security-related geospatial data and activities of the Department of Defense, unless declassified;

(iii) classified national security-related geospatial data and activities of the Department of Energy, unless declassified;

(iv) geospatial data and activities under chapter 22 of title 10, United States Code, or section 110 of the National Security Act of 1947 (50 U.S.C. 3045);

(v) intelligence geospatial data and activities, as determined by the Director of National Intelligence; or

(vi) certain declassified national security-related geospatial data and activities of the intelligence community, as determined by the Secretary of Defense, the Secretary of Energy, or the Director of National Intelligence.

SEC. 753: Federal Geographic Data Committee

(a) IN GENERAL. —There is established within the Department of the Interior an interagency committee to be known as the Federal Geographic Data Committee, which shall act as the lead entity in the executive branch for the development, implementation, and review of policies, practices, and standards relating to geospatial data.

(b) MEMBERSHIP. —

(1) CHAIRPERSON AND VICE CHAIRPERSON. —The Secretary of the Interior and the Director of the Office of Management and Budget shall serve as Chairperson of the Committee and Vice Chairperson of the Committee, respectively.

(2) OTHER MEMBERS. —

(A) IN GENERAL. —The head of each covered agency and the Director of the National Geospatial-Intelligence Agency shall each designate a representative of their respective agency to serve as a member of the Committee.

(B) REQUIREMENT FOR APPOINTMENTS. —An officer appointed to serve as a member of the Committee shall hold a position as an assistant secretary, or an equivalent position, or a higher-ranking position.

(c) DUTIES. —The Committee shall—

(1) lead the development and management of and operational decision making for the National Spatial Data Infrastructure strategic plan and geospatial data policy in accordance with section 755;

(2) designate National Geospatial Data Asset data themes and oversee the coordinated management of the National Geospatial Data Asset data themes in accordance with section 756;

(3) establish and maintain geospatial data standards in accordance with section 757;

(4) periodically review and determine the extent to which covered agencies comply with geospatial data standards;

(5) ensure that the GeoPlatform operates in accordance with section 758;

(6) direct and facilitate national implementation of the system of National Geospatial Data Asset data themes;

(7) communicate with and foster communication among covered agencies and other entities and individuals relating to geospatial data technology development, transfer, and exchange in order to—

(A) identify and meet the needs of users of geospatial data;

(B) promote cost-effective data collection, documentation, maintenance, distribution, and preservation strategies; and

(C) leverage Federal and non-Federal resources, such as promoting Federal shared services and cross-agency coordination for marketplace solutions;

(8) define roles and responsibilities and promote and guide cooperation and coordination among agencies of the Federal Government, State, tribal, and local governments, institutions of higher education, and the private sector in the collection, production, sharing, and use of geospatial information, the implementation of the National Spatial Data Infrastructure, and the identification of proven practices;

- (9) coordinate with international organizations having an interest in the National Spatial Data Infrastructure or global spatial data infrastructures;
- (10) make available online and update at least annually—
 - (A) a summary of the status for each National Geospatial Data Asset data theme, based on the report submitted by the applicable lead covered agency under section 756(b)(3)(E)(ii)(I), which shall include—
 - (i) an evaluation of the progress of each lead covered agency in achieving the requirements under subparagraphs (A), (B), (C), and (D) of section 756(b)(3); and
 - (ii) a determination of whether, for each of subparagraphs (A), (B), (C), and (D) of section 756(b)(3), each lead covered agency meets expectations, has made progress toward expectations, or fails to meet expectations;
 - (B) a summary and evaluation of the achievements of each covered agency, based on the annual report submitted by the covered agency under section 759(b)(1), which shall include a determination of whether the covered agency meets expectations, has made progress toward expectations, or fails to meet expectations for each of paragraphs (1) through (13) of section 759(a);
 - (C) a collection of periodic technical publications, management articles, and reports related to the National Spatial Data Infrastructure; and
 - (D) a membership directory for the Committee, including identifying members of any subcommittee or working group of the Committee;
- (11)
 - (A) make available to and request comments from the Advisory Committee regarding the summaries and evaluations required under subparagraphs (A) and (B) of paragraph (10);
 - (B) if requested by the Advisory Committee, respond to any comments by the Advisory Committee; and
 - (C) not less than once every 2 years, submit to Congress a report that includes the summaries and evaluations required under subparagraphs (A) and (B) of paragraph (10), the comments of the Advisory Committee, and the responses of the Committee to the comments;
- (12)
 - (A) make available to and request comments from covered agencies regarding the summaries and evaluations required under subparagraphs (A) and (B) of paragraph (10); and
 - (B) not less than once every 2 years, submit to Congress a report that includes the comments of the covered agencies and the responses of the Committee to the comments; and
- (13) support and promote the infrastructure of networks, systems, services, and standards that provide a digital representation of the Earth to users for many applications.

SEC. 759: Covered Agency Responsibilities

(a) IN GENERAL. —Each covered agency shall—

- (1) 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, in support of the strategic plan for the National Spatial Data Infrastructure prepared under section 755(c);
- (2) collect, maintain, disseminate, and preserve geospatial data such that the resulting data, information, or products can be readily shared with other Federal agencies and non-Federal users;
- (3) promote the integration of geospatial data from all sources;
- (4) ensure that data information products and other records created in geospatial data and activities are included on agency record schedules that have been approved by the National Archives and Records Administration;
- (5) 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 Committee;
- (6) use the geospatial data standards, including the standards for metadata for geospatial data, and other appropriate standards, including documenting geospatial data with the relevant metadata and making metadata available through the GeoPlatform;
- (7) 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;
- (8) use geospatial information to—
 - (A) make Federal geospatial information and services more useful to the public;
 - (B) enhance operations;
 - (C) support decision making; and
 - (D) enhance reporting to the public and to Congress;
- (9) protect personal privacy and maintain confidentiality in accordance with Federal policy and law;
- (10) participate in determining, when applicable, whether declassified data can contribute to and become a part of the National Spatial Data Infrastructure;
- (11) 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;
- (12) to the maximum extent practicable, ensure that a person receiving Federal funds for geospatial data collection provides high-quality data; and
- (13) appoint a contact to coordinate with the lead covered agencies for collection, acquisition, maintenance, and dissemination of the National Geospatial Data Asset data themes used by the covered agency.

(b) REPORTING. —

(1) IN GENERAL. —Each covered agency shall submit to the Committee an annual report regarding the achievements of the covered agency in preparing and implementing the strategy described in subsection (a)(1) and complying with the other requirements under subsection (a).

(2) BUDGET SUBMISSION. —Each covered agency shall—

(A) include geospatial data in preparing the budget submission of the covered agency to the President under sections 1105(a) and 1108 of title 31, United States Code;

(B) maintain an inventory of all geospatial data assets in accordance with OMB Circular A–130, or any successor thereto; and

(C) prepare an annual report to Congress identifying Federal-wide geospatial data assets, as defined in OMB Circular A–16, as set forth in OMB memo M–11–03, Issuance of OMB Circular A–16 Supplemental Guidance (November 10, 2010), or any successor thereto.

(3) DISCLOSURE. —Each covered agency shall disclose each contract, cooperative agreement, grant, or other transaction that deals with geospatial data, which may include posting information relating to the contract, cooperative agreement, grant, or other transaction on www.USAspending.gov and www.itdashboard.gov, or any successors thereto.

(4) OMB REVIEW. —In reviewing the annual budget justifications submitted by covered agencies, the Office of Management and Budget shall take into consideration the summary and evaluations required under subparagraphs (A) and (B) of section 753(c)(10), comments, and replies to comments as required under paragraphs (11) and (12) of section 753(c), in its annual evaluation of the budget justification of each covered agency.

(5) REPORTING. —The Office of Management and Budget shall include a discussion of the summaries and evaluation of the progress in establishing the National Spatial Data Infrastructure in each E-Government status report submitted under section 3606 of title 44, United States Code.

(c) AUDITS. —Not less than once every 2 years, the inspector general of a covered agency (or senior ethics official of the covered agency for a covered agency without an inspector general) shall submit to Congress an audit of the collection, production, acquisition, maintenance, distribution, use, and preservation of geospatial data by the covered agency, which shall include a review of—

(1) the compliance of the covered agency with the standards for geospatial data, including metadata for geospatial data, established under section 757;

(2) the compliance of the covered agency with the requirements under subsection (a); and

(3) the compliance of the covered agency on the limitation on the use of Federal funds under section 759A.

OMB CIRCULAR NO. A-16, REVISED, M-11-03, SUPPLEMENTAL GUIDANCE, "COORDINATION OF GEOGRAPHIC INFORMATION COORDINATION OF GEOGRAPHIC INFORMATION AND RELATED INFORMATION AND RELATED SPATIAL ACTIVITIES," ISSUED NOVEMBER 10, 2010.

SEC. 1. Purpose of this Circular:

Spatial data refers to information about places or geography and has traditionally been shown on maps. This Circular describes the effective and economical use and management of spatial data assets in the digital environment for the benefit of the government and the nation. The Circular affirms and describes the National Spatial Data Infrastructure (NSDI) as the technology, policies, standards, human resources, and related activities necessary to acquire, process, distribute, use, maintain, and preserve spatial data. The Circular describes the management and reporting requirements of Federal agencies in the acquisition, maintenance, distribution, use, and preservation of spatial data by the Federal Government. The Circular establishes the FGDC as the interagency coordinating body for NSDI-related activities, chaired by the Secretary of the Interior with the Deputy Director for Management, Office of Management and Budget (OMB) as Vice-Chair.

SEC. 2. National Spatial Data Infrastructure:

a. The National Spatial Data Infrastructure (NSDI) assures that spatial data from multiple sources (federal, state, local, and tribal governments, academia, and the private sector) are available and easily integrated to enhance the understanding of our physical and cultural world.

b. Components of the NSDI:

1) Data themes are electronic records and coordinates for a topic or subject, such as elevation or vegetation. This Circular requires the development, maintenance, and dissemination of a standard core set of digital spatial information for the Nation that will serve as a foundation for users of geographic information. This set of data consists of themes of national significance (see Appendix E). Themes providing the core, most commonly used set of base data are known as framework data, specifically geodetic control, orthoimagery, elevation and bathymetry, transportation, hydrography, cadastral, and governmental units. Other themes of national significance are also an important part of the NSDI and must be available to share with others. Additional data themes may be added with the approval of the FGDC.

NSDI data themes developed with appropriate metadata, using FGDC standards and served through the Clearinghouse, facilitate interoperability and information exchange across administrative boundaries.

2) Metadata are information about data and/or geospatial services, such as content, source, vintage, spatial scale, accuracy, projection, responsible party, contact phone number, method of collection, and other descriptions. Metadata

are critical to document, preserve and protect agencies' spatial data assets. Reliable metadata, structured in a standardized manner, are essential to ensuring that geospatial data are used appropriately, and that any resulting analysis is credible. Metadata also can be used to facilitate the search and access of data sets or geospatial services within a Clearinghouse or data library. All spatial data collected or derived directly or indirectly using federal funds will have FGDC metadata.

SEC. 4. Federal Geographic Data Committee (FGDC):

The FGDC is an interagency committee responsible for facilitating Circular A-16 related activities and implementation of the NSDI. The FGDC is chaired by the Secretary of the Department of the Interior, with the Deputy Director for Management, OMB, serving as Vice-Chair. Chair and Vice-Chair may designate an individual to act in their stead. All agencies responsible for spatial data themes are required to be members of the FGDC.

The FGDC will establish procedures and committee structures as are necessary and sufficient to carry out interagency coordination and the implementation of the NSDI, in accordance with existing law, statute, and policy.

SEC. 6. Types of data activities applicable to the Circular:

All spatial data and geographic information systems activities—financed directly or indirectly, in whole or in part, by federal funds.

APPENDIX C: HHS COMMENTS



September 2026

General Comments to **OIG's** Draft Report, "*HHS Has Not Made Additional Progress Towards Compliance with the Geospatial Data Act*" (OAS-26-18-044)

The U.S. Department of Health & Human Services (HHS) Office of the Chief Information Officer (OCIO) appreciates the opportunity from the HHS Office of the Inspector General (OIG) to review and comment on this draft report.

Recommendation 1: We recommend that HHS fulfill the remaining seven covered agency responsibilities established in GDA section 759(a).

HHS Response: HHS OCIO concurs with this recommendation. HHS has already taken meaningful steps towards fulfilling its responsibilities, including participating in GeoPlatform Oversight Steering Body Meetings (responsibility 7), updating geospatial data standards (responsibility 6), publishing data from HHS Divisions on GeoPlatform, and publishing the HHS geospatial data inventory. HHS OCDO will continue working to fulfill the remaining responsibilities by ensuring geospatial data products are included in agency record schedules (responsibility 4), allocating sufficient resources for geospatial data collection (responsibility 5), ensuring that geospatial data enhances agency operations and supports decision-making (responsibility 8), protecting privacy in accordance with Federal policies and laws (responsibility 9), and avoiding duplication by reviewing all available data sources to ensure data meets the needs of stakeholders (responsibility 11).

Recommendation 2: We recommend that HHS ensure that its Office of the Chief Data Officer (OCDO) oversees, coordinates, and facilitates implementation of geospatial-related requirements, policies, and activities.

HHS Response: HHS OCIO concurs with this recommendation. HHS OCIO/OCDO will continue to develop its GDA program to oversee, coordinate, and facilitate implementation of geospatial-related requirements.

Recommendation 3: We recommend that HHS develop and maintain an inventory of all geospatial data assets in accordance with section 759(b) of the GDA.

HHS Response: HHS OCIO concurs with this recommendation. HHS OCIO and OCDO supported the publication of the HHS geospatial data inventory and HHS data on GeoPlatform and will continue working to fulfill the remaining responsibilities and developing its GDA program.

Recommendation 4: We recommend that HHS include all divisions, including StaffDivs, in preparing its required Federal Geographic Data Committee (FGDC) annual reports.

HHS Response: HHS OCIO concurs with this recommendation. HHS OCIO and OCDO have made progress towards identifying the correct Persons of Contact (POCs) at all HHS components and will ensure that both OpDivs and StaffDivs are included in upcoming annual reports and OIG audit responses.

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