

Department of Health and Human Services

**OFFICE OF  
INSPECTOR GENERAL**

**HHS MADE SOME PROGRESS  
TOWARD COMPLIANCE WITH  
THE GEOSPATIAL DATA ACT**

*Inquiries about this report may be addressed to the Office of Public Affairs at  
[Public.Affairs@oig.hhs.gov](mailto:Public.Affairs@oig.hhs.gov).*



**Amy J. Frontz**  
Deputy Inspector General  
for Audit Services

October 2020  
A-18-20-11500

# ***Office of Inspector General***

<https://oig.hhs.gov>

---

The mission of the Office of Inspector General (OIG), as mandated by Public Law 95-452, as amended, is to protect the integrity of the Department of Health and Human Services (HHS) programs, as well as the health and welfare of beneficiaries served by those programs. This statutory mission is carried out through a nationwide network of audits, investigations, and inspections conducted by the following operating components:

## ***Office of Audit Services***

The Office of Audit Services (OAS) provides auditing services for HHS, either by conducting audits with its own audit resources or by overseeing audit work done by others. Audits examine the performance of HHS programs and/or its grantees and contractors in carrying out their respective responsibilities and are intended to provide independent assessments of HHS programs and operations. These audits help reduce waste, abuse, and mismanagement and promote economy and efficiency throughout HHS.

## ***Office of Evaluation and Inspections***

The Office of Evaluation and Inspections (OEI) conducts national evaluations to provide HHS, Congress, and the public with timely, useful, and reliable information on significant issues. These evaluations focus on preventing fraud, waste, or abuse and promoting economy, efficiency, and effectiveness of departmental programs. To promote impact, OEI reports also present practical recommendations for improving program operations.

## ***Office of Investigations***

The Office of Investigations (OI) conducts criminal, civil, and administrative investigations of fraud and misconduct related to HHS programs, operations, and beneficiaries. With investigators working in all 50 States and the District of Columbia, OI utilizes its resources by actively coordinating with the Department of Justice and other Federal, State, and local law enforcement authorities. The investigative efforts of OI often lead to criminal convictions, administrative sanctions, and/or civil monetary penalties.

## ***Office of Counsel to the Inspector General***

The Office of Counsel to the Inspector General (OCIG) provides general legal services to OIG, rendering advice and opinions on HHS programs and operations and providing all legal support for OIG's internal operations. OCIG represents OIG in all civil and administrative fraud and abuse cases involving HHS programs, including False Claims Act, program exclusion, and civil monetary penalty cases. In connection with these cases, OCIG also negotiates and monitors corporate integrity agreements. OCIG renders advisory opinions, issues compliance program guidance, publishes fraud alerts, and provides other guidance to the health care industry concerning the anti-kickback statute and other OIG enforcement authorities.

## Report in Brief

Date: October 2020

Report No. A-18-20-11500

U.S. DEPARTMENT OF HEALTH & HUMAN SERVICES  
**OFFICE OF INSPECTOR GENERAL**



### Why OIG Did This Audit

The Geospatial Data Act of 2018 (GDA) mandates that the Inspector General (IG) 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 Council of the Inspectors General on Integrity and Efficiency (CIGIE) convened a working group with representatives from the covered agency IGs to reach a consensus on an audit approach for the inaugural audits. CIGIE determined that the inaugural audits should focus on the covered agency's progress toward compliance with the responsibilities established under section 759(a) of the GDA.

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

### How OIG Did This Audit

We contacted HHS and its operating and staff divisions (referred to as HHS components) to identify HHS components that collect, maintain, publish, disseminate, or preserve geospatial data. We contacted the Federal Geographic Data Committee and the contacts responsible for National Geospatial Data Asset themes. Additionally, for the HHS components that acknowledged they prepare, maintain, publish, or implement geospatial data, we surveyed the extent to which they support HHS's fulfillment of covered agency responsibilities as listed in section 759(a) of the GDA.

## HHS Made Some Progress Toward Compliance With the Geospatial Data Act

### What OIG Found

HHS made some progress toward compliance with the GDA, but we identified certain covered agency responsibilities that HHS had yet to meet. Additionally, HHS had not maintained a departmentwide inventory of all geospatial data assets, as required by GDA section 759(b), and had not designated a senior agency official for geospatial information (SAOGI) in accordance with OMB guidance to Federal agencies.

These conditions occurred because of the lack of departmentwide oversight and coordination in its implementation of geospatial-related responsibilities, requirements, policies, and activities. Additionally the Department's senior agency officials were not aware of the GDA and HHS's responsibilities mandated by the GDA. These conditions contributed to HHS's noncompliance with the covered agency responsibilities established in the GDA.

As a result, HHS is susceptible to inefficient and ineffective management of geospatial assets, which increases the risk of inconsistent efforts or inability to minimize the costs to acquire, manage, share, and use geospatial data, expertise, technology, and services.

### What OIG Recommends and HHS Comments

We recommend that HHS ensure that HHS and its components fully implement the covered agency's responsibilities found in GDA section 759(a), maintain an inventory of all geospatial data assets, and appoint an SAOGI.

HHS did not concur or non-concur with our recommendations. However, it indicated that should the HHS Office of the Chief Information Officer be designated the SAOGI, HHS will take action to ensure compliance with the covered agency responsibilities established in the GDA. We will maintain communications with the HHS individuals who will be assigned to implement our recommendations.

## TABLE OF CONTENTS

INTRODUCTION .....	1
Why We Did This Audit .....	1
Objective .....	1
Background .....	1
Geospatial Data Act of 2018 .....	1
Geospatial Data .....	2
The Federal Geographic Data Committee .....	2
Covered Agency Responsibilities Under Section 759 of the Geospatial Data Act .....	3
How We Conducted This Audit .....	4
FINDINGS .....	4
HHS Had Not Yet Met Certain Covered Agency Responsibilities Established Under Section 759(a) of the Geospatial Data Act .....	5
HHS Did Not Maintain a Departmentwide Inventory of All Geospatial Data Assets .....	7
HHS Had Not Designated a Senior Agency Official for Geospatial Information .....	7
RECOMMENDATIONS .....	8
HHS COMMENTS AND OFFICE OF INSPECTOR GENERAL RESPONSE .....	8
APPENDICES	
A: Audit Scope and Methodology .....	10
B: Federal Criteria .....	12
C: HHS Comments .....	19

## 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 its covered agency's collection, production, acquisition, maintenance, distribution, use, and preservation of geospatial data. The U.S. Department of Health and Human Services (HHS) meets the GDA's definition of a covered agency.<sup>1</sup> In addition, the Office of Management and Budget (OMB) recognizes HHS as an executive agency that produces, maintains, or uses geospatial information.<sup>2</sup>

The GDA 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.

### 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 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. Additionally, the GDA is intended to reduce duplicative efforts to procure geospatial data, services, expertise, and technology within the Federal Government. To facilitate efficient geospatial activities in the Federal Government, the GDA formalizes geospatial-related committees and governance processes. Additionally, the GDA codifies portions of OMB Circular No. A-16,

---

<sup>1</sup> The GDA defines a covered agency as 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 to achieve its mission.

<sup>2</sup> OMB Memorandum M-06-07, *Designation of a Senior Agency Official for Geospatial Information*, describes "geospatial information" as information associated with a specific geographic location. Examples of geospatial information include maps, satellite imagery, and census and housing data. Geospatial information supports many missions, including national security, law enforcement, health care, the environment, and natural resources conservation.

*Coordination of Geographic Information, and Related Spatial Data Activities*, and the tools used to develop, drive, and manage the National Spatial Data Infrastructure (NSDI).<sup>3</sup>

## **Geospatial Data**

Geospatial data is information that identifies the geographic location and characteristics of natural or constructed features and boundaries on the 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 detailed definition in Appendix B.

Geospatial data and geospatial data-related information systems and tools at HHS include but are not limited to: HHS emPOWER Map (a map that displays Medicare beneficiaries who are reliant on electricity-dependent medical equipment), Fusion Analytics Dashboard (part of a system that shows the current status of a public health and medical disaster response and patient condition trends), GeoHealth (a system that facilitates emergency management planning, pre-event preparedness, and response), and Joint Patient Assessment and Tracking System (a system used before and after public health emergencies or medical disasters to support patient movement).

## **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 the policies, practices, and standards related to geospatial data and is responsible for facilitating the implementation of the NSDI and the coordination of geographic information and related spatial data activities.<sup>4</sup> FGDC leads the development and management of 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 the responsibilities listed in the GDA. In addition, the GDA requires FGDC to operate the GeoPlatform, an electronic service providing access to geospatial data and metadata<sup>5</sup> to the general public.

The FGDC Steering Committee is the policy-level interagency group responsible for providing leadership and direction in support of OMB Circular No. A-16-related activities and the development of the NSDI. It makes recommendations of high level National Geospatial Data

---

<sup>3</sup> The GDA defines the NSDI as the technology, policies, criteria, standards, and employees necessary to promote geospatial data sharing throughout the Federal Government, State, Tribal, and local governments and the private sector (including nonprofit organizations and institutions of higher education).

<sup>4</sup> OMB Circular No. A-16 defines "spatial data" as information that identifies the geographic location and characteristics of natural or constructed features and boundaries on the Earth. The information may be derived from remote sensing, mapping, charting, surveying technologies, GPS, or statistical data, among other sources.

<sup>5</sup> Data that provides information about other data.

Asset (NGDA) portfolio-wide priorities based on key Federal mission needs, Presidential priorities, and congressional mandates. Responsibilities of the FGDC Steering Committee include but are not limited to voting on the adoption of FGDC standards and decisions; promoting the allocation of agency resources to fulfill the responsibilities of effective spatial data collection, production, and stewardship; and ensuring the communication of key national geospatial activities within the agency.

### **Covered Agency Responsibilities Under Section 759 of the Geospatial Data Act**

Section 759 of the GDA is divided into 3 sections, which relate to a covered agency: (a) responsibilities, (b) reporting, and (c) audits.

Section 759(a) established 13 responsibilities the covered agency is to fulfill (see Appendix B). These responsibilities enable the covered agency to use Federal resources wisely and to build the NSDI.

Section 759(b) requires the covered agency to submit an annual report to FGDC regarding its achievements in preparing and implementing the strategic plan for the NSDI (section 759(a)(1)) and complying with the other requirements in section 759(a). Additionally, this section requires the covered agency to:

- include geospatial data as a capital asset for purposes of preparing the President's budget submission under 31 U.S.C. §§ 1105(a) and 1108;
- maintain an inventory of geospatial data assets in accordance with OMB Circular No. A-130, *Managing Information as a Strategic Resource*;
- prepare an annual report to Congress identifying federal-wide geospatial assets; and
- disclose each contract, cooperative agreement, grant, or other transaction that deals with geospatial data.

Section 759(c) mandates that each IG 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 requires that the audit include a review of a covered agency's compliance with:

- geospatial data standards,
- the codified responsibilities for the covered agency, and
- the limitation on the use of Federal funds for geospatial data.

## HOW WE CONDUCTED THIS AUDIT

The Council of the Inspectors General on Integrity and Efficiency (CIGIE) determined that conducting the mandatory audit as prescribed by the GDA for the inaugural report would result in IG reports that are inconclusive for two of the three audit requirements, i.e., sections 759(c)(1) and (c)(3). Due to the continuing implementation of the GDA, CIGIE determined that the inaugural 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.

This audit approach did not include review of HHS compliance with geospatial standards or the limitation of funding, as required by 759(c)(1) and 759(c)(3). This was because the inaugural mandatory audit scope period overlaps with the estimated GDA implementation period established by the FGDC. As part of this implementation period, the FGDC was evaluating the existing body of geospatial standards, among other items. Without geospatial standards established by the FGDC, it is currently difficult to determine which standards the audits should use to evaluate HHS compliance (section 759(c)(1)). Also, because the law establishes a 5-year implementation period before limiting the use of Federal funds for non-compliant activities, compliance with the requirement in section 759(c)(3) was not evaluated in the inaugural audit.

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. We shared with HHS information about our preliminary findings before issuing our draft report.

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

## FINDINGS

HHS made some progress toward compliance with the GDA, but we identified certain covered agency responsibilities that HHS had yet to meet. Additionally, HHS had not maintained a departmentwide inventory of all geospatial data assets, as required by GDA section 759(b), and had not designated a senior agency official for geospatial information (SAOGI) in accordance with OMB guidance to Federal agencies.

These conditions occurred because of the lack of departmentwide oversight and coordination in its implementation of geospatial-related responsibilities, requirements, policies, and activities. Additionally, the Department's senior agency officials were not aware of the GDA and HHS's responsibilities mandated by the GDA. These conditions contributed to HHS's noncompliance with the covered agency responsibilities established in the GDA.



As a result, HHS is susceptible to inefficient and ineffective management of geospatial assets, which increases the risk of inconsistent efforts or inability to minimize the costs to acquire, manage, share, and use geospatial data, expertise, technology, and services.

## **HHS HAD NOT YET MET CERTAIN COVERED AGENCY RESPONSIBILITIES ESTABLISHED UNDER SECTION 759(a) OF THE GEOSPATIAL DATA ACT**

Section 759(a) of the GDA established the responsibilities of a covered agency. Additionally, OMB Circular No. A-16 states that “to use federal resources wisely, and to build the NSDI, 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 particular requirements in the coordination and use of spatial data. On the basis of information gathered from HHS and nine HHS components, we determined that the Department had not yet met certain covered agency responsibilities established under section 759(a) of the GDA. The following are some of the 13 responsibilities and relevant HHS actions:<sup>6</sup>

- Section 759(a)(1) of the GDA established that, as a covered agency, HHS must “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.” According to the HHS Office of the Chief Technology Officer December 2019 report *Leveraging Data for the Nation’s Health*, an HHS data sharing platform will include a centralized catalog of metadata that will allow users to search all datasets managed and made shareable by HHS agencies and offices and will include a data repository that will support data storage in different data types, including geospatial. However, as a covered agency, HHS’s strategy for advancing geographic information and related geospatial data activities may need to be updated to support the strategic plan for NSDI being developed by the FGDC.
- Section 759(a)(3) of the GDA established that, as a covered agency, HHS must “promote the integration of geospatial data from all sources.” Five of nine HHS components responded that they promote the integration of geospatial data. Three of nine HHS components responded that they did not know whether they promoted the integration of geospatial data from all sources. Additionally, one of nine HHS components responded that its inventory of geospatial data assets and systems that process geospatial information was “unknown;” therefore, they did not know the extent of their inventory. Based on these responses from the HHS components, we determined that HHS had not yet demonstrated that it had satisfied this responsibility departmentwide.
- Section 759(a)(5) of the GDA established that, as a covered agency, HHS must “allocate resources to fulfill the responsibilities of effective geospatial data collection, production,

---

<sup>6</sup> We are reporting on 6 of 13 responsibilities for which we had sufficient information to assess compliance.

and stewardship with regard to related activities of the covered agency, and as necessary to support the activities of the Committee.” HHS has not designated a senior official to ensure that the Department has allocated resources and supports the activities of the FGDC. As a member of the FGDC Steering Committee, the senior official promotes the allocation of agency resources to fulfill the responsibilities of effective spatial data collection, production, and stewardship; ensures the communication of key national geospatial activities with the greater FGDC community; and votes on the adoption of FGDC standards and decisions. Without a designated senior official to carry out these functions, HHS had not yet demonstrated that it satisfied this responsibility departmentwide.

- Section 759(a)(6) of the GDA established that, as a covered agency, HHS must “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.” Seven of nine HHS components characterized its current compliance posture for using geospatial data standards, including the standards for metadata for geospatial data, as “compliant.” One HHS component characterized its current compliance posture for using geospatial data standards, including the standards for metadata for geospatial data, as “partially compliant.” Another HHS component responded that it “didn’t know” its compliance posture. Additionally, although all nine HHS components referred to data policies and standards in their response, none of the nine HHS components referenced any geospatial data or metadata standards. On the basis of the HHS component responses, HHS had not yet demonstrated that it satisfied this responsibility departmentwide.
- Section 759(a)(12) of the GDA established that, as a covered agency, HHS must “to the maximum extent practicable, ensure that a person receiving Federal funds for geospatial data collection provides high-quality data.” Seven of nine HHS components responded that they had the capability to determine when they did not receive high-quality data. Two HHS components responded that they did not have the capability to determine whether or when high quality data was not provided from the person receiving Federal funds for geospatial data collection. On the basis of the HHS component responses, HHS had not yet demonstrated that it satisfied this responsibility departmentwide.
- Section 759(a)(13) of the GDA established that, as a covered agency, HHS must “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.” However, HHS was not able to identify and provide to us an agency official who was responsible or accountable for such departmentwide geospatial activities. Although an HHS agency official was noted as the contact on the FGDC website, the official was no longer an employee of HHS, and a replacement had not been identified. Additionally, all lead covered agency representatives of NGDA data

themes<sup>7</sup> attested that they had no information on an HHS point of contact and had not engaged with HHS.

As a result, HHS had not yet fully satisfied certain covered agency responsibilities outlined in section 759(a) of the GDA. A lack of oversight and coordination related to the implementation of geospatial-related requirements at the Department-level contributed to the lack of compliance.

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

Section 759(b) of the GDA requires covered agencies to maintain an inventory of all geospatial data assets and to identify federal-wide geospatial data assets. However, HHS did not have a departmentwide baseline inventory of all geospatial data assets. For example, one HHS component responded that its inventory of geospatial data assets was “unknown” Also, three HHS components reported that they had “not been asked to report geospatial data assets to HHS,” were “not currently reporting geospatial data assets to the Department,” or “did not have reporting requirements regarding geospatial data.”

As a result, HHS may not be aware of all of its geospatial assets and where they are. Consequently, HHS has not yet made progress to comply with the reporting requirements in section 759(b) of the GDA. The lack of awareness of the GDA by senior agency officials and a lack of departmentwide oversight contributed to the condition.

### **HHS HAD NOT DESIGNATED A SENIOR AGENCY OFFICIAL FOR GEOSPATIAL INFORMATION**

OMB Memorandum M-06-07, *Designation of a Senior Agency Official for Geospatial Information*, asks executive departments “to designate a senior agency official who has agency-wide responsibility, accountability, and authority for geospatial information issues.” Additionally, OMB Circular No. A-16 Supplemental Guidance, states that “any agency or individual with a role described in OMB Circular A-16 or this Supplemental Guidance is accountable to their SAOGI . . .” The SAOGI also represents the Department as a member on the FGDC Steering Committee.<sup>8</sup>

In addition, OMB Memorandum M-06-07 communicates how “some agencies have successfully implemented these policies by designating one agency official to be responsible and

---

<sup>7</sup> Themes are representations of conceptual topics describing digital spatial information for the Nation. Themes contain associated datasets (with attribute records and coordinates) that are documented, verifiable, and officially designated to meet recognized standards. A theme contains one or more datasets of geographic information to be used in common and from which other datasets can be derived.

<sup>8</sup> OMB Memorandum M-06-07, dated March 3, 2006, states that the senior agency official will serve as the policy-level official to represent the agency on the FGDC Steering Committee. Additionally, OMB Memorandum M-11-03, *Issuance of OMB Circular A-16 Supplemental Guidance*, states that FGDC Steering Committee members are SAOGIs, designated by their agencies according to OMB Memorandum M-06-07.

accountable for geospatial activities and investments” and may designate a senior official (at the Assistant Secretary or equivalent level) for this role. OMB stated that it will rely on the senior agency official for information regarding the agency’s coordination of geospatial-related requirements, policies, investments, initiatives, and activities.

The Department did not designate an SAOGI, which oversees, coordinates, and facilitates the Department’s implementation of geospatial-related requirements, policies, and activities. In addition, neither the HHS Chief Information Officer nor an official at the Assistant Secretary level, or equivalent, are serving in the role of the SAOGI.

The Department’s senior officials were not aware of the GDA. As a result, the Department was more susceptible to inefficient and ineffective coordination and inconsistent implementation of geospatial-related requirements across HHS components’ operating environments and was not prepared to provide OMB and FGDC with accurate information regarding HHS’s implementation of geospatial-related requirements, policies, investments, initiatives, and activities.

## **RECOMMENDATIONS**

We recommend that the U.S. Department of Health and Human Services:

- ensure that HHS and its components fully implement the covered agency responsibilities found in GDA section 759(a);
- maintain an inventory of all geospatial data assets, per section 759(b) of the GDA; and
- appoint, in accordance with OMB M-06-07, an SAOGI whose responsibilities include:
  - departmentwide responsibility, accountability, and authority for geospatial information issues;
  - overseeing, coordinating, and facilitating the Department’s implementation of the geospatial-related requirements, policies, and activities; and
  - providing applicable appointments designated by the GDA and OMB.

## **HHS COMMENTS AND OFFICE OF INSPECTOR GENERAL RESPONSE**

In written comments on our draft report, HHS did not concur or non-concur with our recommendations. However, it indicated that should the HHS Office of the Chief Information Officer be designated the SAOGI, HHS will take action to ensure compliance with the covered agency responsibilities established in the GDA.

We will maintain communications with the HHS individuals who will be assigned to implement our recommendations.

HHS's comments are included as Appendix C.

## **APPENDIX A: AUDIT SCOPE AND METHODOLOGY**

### **SCOPE**

This is the first 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 inaugural 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.

Our scope included HHS components and their divisions, centers, institutes, and offices that collect, maintain, publish, disseminate, and preserve geospatial data.

We performed our fieldwork from June through August 2020.

### **METHODOLOGY**

Our methodology included a request for information (RFI) to HHS and its operating and staff divisions (referred to as "HHS components") to identify HHS components that collect, maintain, publish, disseminate, or preserve geospatial data. The methodology also included an RFI to the FGDC and to the Federal agency contacts responsible for NGDA themes. Additionally, for HHS components that acknowledged that they prepare, maintain, publish, or implement geospatial data, we surveyed the extent to which they support the Department's fulfillment of covered agency responsibilities.

To accomplish our objective, we:

- determined whether HHS engaged with FGDC or any of the NGDA theme leads;
- reviewed relevant Federal laws, requirements, and Government websites on geospatial-related assets and investment information;
- surveyed the Department and HHS components to determine whether they collect, maintain, publish, disseminate, or preserve geospatial data;
- surveyed nine HHS components which stated that they dealt with geospatial data about their geospatial activities supporting the Department's implementation of the covered agency responsibilities detailed in GDA sections 759(a) and (b)(2);
- obtained statements and limited documentation that supported HHS components' assertions on the implementation of the responsibilities detailed in GDA section 759(a) and (b)(2); and
- discussed our results with Department 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 CRITERIA

### **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](http://www.USAspending.gov) and [www.itdashboard.gov](http://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, *Coordination of Geographic 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



DEPARTMENT OF HEALTH & HUMAN SERVICES

Office of the Secretary

Office of the Chief Information Officer  
Washington, D.C. 20201

**DATE:** September 18, 2020

**TO:** Amy J. Frontz, Deputy Inspector General for Audit Services

**THROUGH:** Scott W. Rowell, Assistant Secretary for Administration

**FROM:** Perryn Ashmore, Acting Chief Information Officer

**SUBJECT:** Response to OIG Draft Report: HHS Made Some Progress Toward Compliance With the Geospatial Data Act, A-18-20-11500

The Department of Health and Human Services (HHS), Office of the Chief Information Officer (OCIO) is committed to effective stewardship of information and data assets in line with designated responsibilities by HHS senior leadership. The memorandum references the Office of the Inspector General (OIG) draft report, "HHS Made Some Progress Toward Compliance With the Geospatial Data Act, A-18-20-11500," which is the result of an audit conducted by OIG in September 2020 on the collection, production, acquisition, maintenance, distribution, use, and preservation of geospatial data across HHS. In the September 1 memorandum, OCIO, under the guidance of the Assistant Secretary of Administration (ASA), was asked to provide OIG with written comments within 15 days from receipt to properly consider the validity of the facts and reasonableness of the stated recommendations. The following two sections list the Findings and Recommendations made by OIG along with the OCIO responses.

### **OIG Draft Audit Findings (pages 4 through 8 of September Draft Audit Report)**

#### ***Summary:***

1. *"HHS made some progress toward compliance with the GDA (Geospatial Data Act of 2018), but we identified certain covered agency responsibilities that HHS had yet to meet. Additionally, HHS had not maintained a departmentwide inventory of all geospatial data assets as required by GDA section 759(b) and had not designated a senior agency official for geospatial information (SAOGI) in accordance with OMB guidance to Federal agencies. These conditions occurred because of the lack of departmentwide oversight and coordination in its implementation of geospatial-related responsibilities, requirements, policies, and activities. Additionally, the Department's senior agency officials were not aware of the GDA and HHS's responsibilities mandated by the GDA.*

*These conditions contributed to HHS's noncompliance with the covered agency responsibilities established in the GDA.*

*As a result, HHS is susceptible to inefficient and ineffective management of geospatial assets, which increases the risk of inconsistent efforts or inability to minimize the costs to acquire, manage, share, and use geospatial data, expertise, technology, and services."*



**OCIO Response:**

Should HHS OCIO be designated the senior agency official for geospatial information (SAOGI) in accordance with 759(a)(5), the HHS OCIO will take action to ensure compliance with the covered agency responsibilities established in the GDA and relevant implementing OMB guidance.

**Individual Findings:**

**2. “HHS HAD NOT YET MET CERTAIN COVERED AGENCY RESPONSIBILITIES ESTABLISHED UNDER SECTION 759(a) OF THE GEOSPATIAL DATA ACT”**

*Section 759(a) of the GDA established the responsibilities of a covered agency. Additionally, OMB Circular No. A-16 states that “to use federal resources wisely, and to build the NSDI (National Spatial Data Infrastructure), 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 particular requirements in the coordination and use of spatial data. On the basis of information gathered from HHS and nine HHS components, we determined that the Department had not yet met certain covered agency responsibilities established under section 759(a) of the GDA. The following are some of the 13 responsibilities and relevant HHS actions:*

- a. Section 759(a)(1) of the GDA established that, as a covered agency, HHS must “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.” According to the HHS Office of the Chief Technology Officer December 2019 report Leveraging Data for the Nation’s Health, an HHS data sharing platform will include a centralized catalog of metadata that will allow users to search all datasets managed and made shareable by HHS agencies and offices and will include a data repository that will support data storage in different data types, including geospatial. However, as a covered agency, HHS’s strategy for advancing geographic information and related geospatial data activities may need to be updated to support the strategic plan for NSDI being developed by the FGDC (Federal Geographic Data Committee).*
- b. Section 759(a)(3) of the GDA established that, as a covered agency, HHS must “promote the integration of geospatial data from all sources.” Five of nine HHS components responded that they promote the integration of geospatial data. Three of nine HHS components responded that they did not know whether they promoted the integration of geospatial data from all sources. Additionally, one of nine HHS components responded that its inventory of geospatial data assets and systems that process geospatial information was “unknown”, therefore, they did not know the extent of their inventory. Based on these responses from the HHS components, HHS had not yet demonstrated that it satisfied this responsibility departmentwide. We are reporting on 6 of 13 responsibilities in which we had sufficient information to assess compliance.*
- c. Section 759(a)(5) of the GDA established that, as a covered agency, HHS must “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.” HHS has not designated a senior official to ensure that the Department has allocated resources and supports the activities of the FGDC. As a member of the FGDC Steering Committee, the senior official promotes the allocation of agency resources to fulfill the responsibilities of effective spatial data collection, production, and stewardship; ensures the communication of key national geospatial activities with the greater FGDC community; and votes on the adoption of FGDC standards and decisions. Without a designated senior official that to carry out these functions, HHS had not yet demonstrated that it satisfied this responsibility departmentwide.

- d. Section 759(a)(6) of the GDA established that, as a covered agency, HHS must “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.” Seven of nine HHS components characterized its current compliance posture for using geospatial data standards, including the standards for metadata for geospatial data, as “compliant.” One HHS component characterized its current compliance posture for using geospatial data standards, including the standards for metadata for geospatial data, as “partially compliant.” Another HHS component responded that it “didn’t know” its compliance posture. Additionally, although all nine HHS components referred to data policies and standards in their response, none of the nine HHS components referenced any geospatial data or metadata standards. Based on these responses from the HHS components, HHS had not yet demonstrated that it satisfied this responsibility departmentwide.
- e. Section 759(a)(12) of the GDA established that, as a covered agency, HHS must “to the maximum extent practicable, ensure that a person receiving Federal funds for geospatial data collection provides high-quality data.” Seven of nine HHS components responded that they had the capability to determine when they did not receive high quality data. Two HHS components responded that they did not have a capability to determine if or when high-quality data was not provided from the person receiving Federal funds for geospatial data collection. Based on these responses from the HHS components, HHS had not yet demonstrated that it satisfied this responsibility departmentwide.
- f. Section 759(a)(13) of the GDA established that, as a covered agency, HHS must “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.” However, HHS was not able to identify and provide to us an agency official who was responsible or accountable for such departmentwide geospatial activities. Although an HHS agency official was noted as the contact on the FGDC website, the official was no longer an employee of HHS and a replacement had not been identified. Additionally, all lead covered agency representatives of NGDA data themes 7 attested that they had no information on an HHS point of contact and had not engaged with HHS.

As a result, HHS has not yet fully satisfied certain covered agency responsibilities outlined in section 759(a) of the GDA. A lack of oversight and coordination related to

*the implementation of geospatial-related requirements at the Department-level contributed to the lack of compliance.*

**OCIO Response:**

Should HHS OCIO be designated the senior agency official for geospatial information (SAOGI) in accordance with 759(a)(5), the HHS OCIO will take action to ensure compliance with the covered agency responsibilities established in the GDA and relevant implementing OMB guidance.

**3. “HHS DID NOT MAINTAIN A DEPARTMENTWIDE INVENTORY OF ALL GEOSPATIAL DATA ASSETS”**

*Section 759(b) of the GDA requires covered agencies to maintain an inventory of all geospatial data assets and to identify Federal-wide geospatial data assets. However, HHS did not have a departmentwide baseline inventory of all geospatial data assets. For example, one HHS component responded that its inventory of geospatial data assets was “unknown.” Also, three HHS components reported that they had “not been asked to report geospatial data assets to HHS,” were “not currently reporting geospatial data assets to the Department,” or “did not have reporting requirements regarding geospatial data.” As a result, HHS may not be aware of all geospatial assets that it has and where they exist. Consequently, HHS has not yet made progress to comply with the reporting requirements in section 759(b) of the GDA. The lack of awareness of the GDA by senior agency officials and a lack of departmentwide oversight contributed to the condition.*

**OCIO Response:**

Should HHS OCIO be designated the senior agency official for geospatial information (SAOGI) in accordance with 759(a)(5), the HHS OCIO will take action to ensure compliance with the covered agency responsibilities established in the GDA and relevant implementing OMB guidance.

**4. “HHS HAD NOT DESIGNATED A SENIOR AGENCY OFFICIAL FOR GEOSPATIAL INFORMATION”**

*OMB Memorandum M-06-07, Designation of a Senior Agency Official for Geospatial Information, asks executive departments “to designate a senior agency official who has agencywide responsibility, accountability, and authority for geospatial information issues.” Additionally, OMB Circular No. A-16 Supplemental Guidance, states that “any agency or individual with a role described in OMB Circular A-16 or this Supplemental Guidance is accountable to their SAOGI . . .” The SAOGI also represents the Department as a member on the FGDC Steering Committee.*

*In addition, OMB Memorandum M-06-07 communicates how “some agencies have successfully implemented these policies by designating one agency official to be responsible and accountable for geospatial activities and investments;” and may designate a senior official (at the Assistant Secretary or equivalent level) for this role. OMB stated that it will rely on the senior agency official for information regarding the agency’s coordination of geospatial-related requirements, policies, investments, initiatives, and activities.*

*The Department did not designate an SAOGI, which oversees, coordinates, and facilitates the Department's implementation of geospatial-related requirements, policies, and activities. In addition, neither the HHS Chief Information Officer nor an official at the Assistant Secretary level, or equivalent, are serving in the role of the SAOGI.*

*The Department's senior officials were not aware of the GDA. As a result, the Department was more susceptible to inefficient and ineffective coordination and inconsistent implementation of geospatial-related requirements across HHS components' operating environments and was not prepared to provide OMB and FGDC with accurate information regarding HHS's implementation of geospatial-related requirements, policies, investments, initiatives, and activities.*

**OCIO Response:**

Should HHS OCIO be designated the senior agency official for geospatial information (SAOGI) in accordance with 759(a)(5), the HHS OCIO will take action to ensure compliance with the covered agency responsibilities established in the GDA and relevant implementing OMB guidance.

**5. OIG Draft Audit Recommendations (page 8 of September Draft Audit Report)**

*"We recommend that the U.S. Department of Health and Human Services:*

- ensure that HHS and its components fully implement the covered agency responsibilities found in GDA section 759(a);*
- maintain an inventory of all geospatial data assets, per section 759(b) of the GDA; and*
- appoint an SAOGI in accordance with OMB M-06-07 whose responsibilities include:*
  - Departmentwide responsibility, accountability, and authority for geospatial information issues;*
  - overseeing, coordinating, and facilitating the Department's implementation of the geospatial-related requirements, policies, and activities; and*
  - providing applicable appointments designated by the GDA and OMB."*

**OCIO Response:**

Should HHS OCIO be designated the senior agency official for geospatial information (SAOGI) in accordance with 759(a)(5), the HHS OCIO will take action to ensure compliance with the covered agency responsibilities established in the GDA and relevant implementing OMB guidance.

**Conclusion**

OCIO appreciates the information provided by OIG in the draft audit report for progress made on the Geospatial Data Act by HHS. The information collected as part of this audit will be of great assistance to the SAOGI, and OCIO acknowledges and appreciates the efforts and work of the IG to support effective stewardship of geospatial assets.