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Office of Inspector General
United States Department of State

AUD-SI-24-29

Office of Audits

August 2024

Audit of Department of State FY 2024 Compliance With the Geospatial Data Act of 2018

SECURITY AND INTELLIGENCE DIVISION

UNCLASSIFIED



HIGHLIGHTS

Office of Inspector General
United States Department of State

AUD-SI-24-29

What OIG Audited

The Geospatial Data Act of 2018 (GDA) requires federal agencies that collect, produce, acquire, maintain, distribute, use, or preserve geospatial data to comply with certain requirements. The GDA is designed to promote geospatial data sharing and to encourage the use of existing geospatial data when possible. Among other things, the GDA requires covered agencies, including the Department of State (Department), to comply with 13 requirements that each covered agency must implement. The GDA also requires inspectors general to audit covered agencies' compliance with the GDA every 2 years.

The Office of Inspector General (OIG) conducted this audit to determine whether the Department, defined as a covered agency in the GDA, complied with the 13 covered agency responsibilities in accordance with Section 759(a) of the GDA, codified at 43 United States Code § 2808(a).

What OIG Recommends

OIG made seven recommendations to address the deficiencies identified in this report. Based on the Bureau of Intelligence and Research's (INR) response to a draft of this report, OIG considers the seven recommendations resolved, pending further action. A synopsis of INR's comments to the recommendations offered and OIG's reply follow each recommendation in the Audit Results section of this report. The response received from INR is included in its entirety in Appendix C.

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Audit of Department of State FY 2024 Compliance With the Geospatial Data Act of 2018

What OIG Found

The Department continues to make progress implementing the 13 covered agency requirements from the GDA, but improvements are needed to achieve full compliance. OIG found that the Department had fully complied with 2 of 13 covered agency requirements. Specifically, the Department developed a Geospatial Data Strategy and appointed the Department's Geographer to lead the Department's efforts to implement the GDA. However, the Department had not fully implemented the remaining 11 covered agency requirements. Although several bureaus and offices that regularly collect, use, maintain, and disseminate geospatial data have existing practices that may assist in the Department's implementation of GDA requirements, the Department must address its responsibilities Department-wide rather than at the component level to achieve full compliance with each GDA requirement.

The Department had not fully complied with all GDA requirements, in part, because it did not clearly identify what qualified as geospatial data for purposes of compliance with the GDA. In addition, the Department did not maintain a geospatial data inventory as required by the GDA. The Department also lacked overarching policies, procedures, and guidance; instead, bureaus followed informal or general practices to carry out many GDA responsibilities. Additionally, the Department provided insufficient oversight to ensure that bureaus were meeting their GDA responsibilities. Furthermore, the Department did not clearly define roles and responsibilities related to the GDA and lacked a comprehensive, long-term funding plan to facilitate compliance with its GDA responsibilities. Finally, the Department did not ensure that geospatial data and activities were included on records disposition schedules.

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

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OBJECTIVE

The Office of Inspector General (OIG) conducted this audit to determine whether the Department of State (Department), defined as a covered agency in the Geospatial Data Act of 2018 (GDA),¹ complied with the 13 covered agency responsibilities in accordance with Section 759(a) of the GDA, codified at 43 United States Code (U.S.C.) § 2808(a).

BACKGROUND

On October 5, 2018, Congress enacted the GDA to promote geospatial data sharing among government agencies, academia, and private industry and the use of existing geospatial data when possible. The Act states that “[n]ot less than once every 2 years, the inspector general of a covered agency . . . shall submit to Congress an audit of the collection, production, acquisition, maintenance, distribution, use, and preservation of geospatial data . . . which shall include a review of” compliance with GDA Sections 757, 759(a), and 759A,² codified at 43 U.S.C. §§ 2806, 2808(a), and 2809, respectively.

Section 757 of the GDA requires the Federal Geographic Data Committee (FGDC)³ to establish standards for each National Geospatial Data Asset (NGDA) data theme.⁴ Section 759A of the GDA provides a 5-year phase-in period from the establishment of standards developed under Section 757 for each covered agency to comply with the standards before being restricted from using federal funds on its geospatial data.⁵ Given that the FGDC had not established standards for each NGDA theme at the time of this audit, the Department was not required to comply with this section of the GDA

Relevant Terminology

Covered Agencies

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

Geospatial Data

Information that is tied to a location on Earth and that is generally represented in vector datasets by points, lines, polygons, or other complex geographic features or phenomena.

NGDA Data Themes

Primary topics and subjects for which the coordinated development, maintenance, and dissemination of geospatial data will benefit the federal government. As of June 2024, there were 18 themes made up of one or more datasets.

International Boundaries Theme

One of the 18 themes included in the NGDA portfolio.

Large Scale International Boundaries Dataset

Dataset within the International Boundaries theme produced by the Bureau of Intelligence and Research, Office of the Geographer and Global Issues. Sources for these data include treaties, relevant maps, and data from boundary commissions and national mapping agencies. Research and recovery of the data involves analysis of satellite imagery and elevation data.

Metadata for Geospatial Data

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

¹ GDA, Public Law 115-254, Subtitle F—Geospatial Data, §§ 751–759C, codified at 43 U.S.C. §§ 2801–2811.

² 43 U.S.C. § 2808(c).

³ The FGDC is an organized structure of federal geospatial professionals and constituents that provides executive, managerial, and advisory direction and oversight for geospatial decisions and initiatives across the federal government. The FGDC comprises 32 representatives from the Executive Office of the President and cabinet level and independent federal agencies.

⁴ 43 U.S.C. § 2806(a).

⁵ 43 U.S.C. § 2809.

during this audit. Section 759(a) of the GDA establishes 13 requirements that each covered agency must implement to comply with the Act.^{6,7} Although the GDA requires covered agencies to comply with these 13 requirements, it does not identify a specific timeframe for implementation and compliance.

Roles and Responsibilities for Geospatial Data at the Department

The Department is identified as a covered agency for geospatial data.⁸ GDA requirements are broad in scope⁹ and require action from stakeholders with geospatial data equities across the Department. The Department's geospatial activities include visualizing and analyzing geographic features of interest, mapping geopolitical relationships, and disseminating location-specific information to enhance the Department's mission capabilities to make data-driven policy decisions. Additionally, the Department is identified as a lead covered agency¹⁰ for the Large Scale International Boundaries dataset,¹¹ an NGDA data theme, which is the Department's sole dataset for which it must submit an annual report.

In August 2020, the Bureau of Intelligence and Research (INR) Director of the Office of the Geographer and Global Issues was appointed as the Senior Agency Official for Geospatial Information (SAOGI). The SAOGI is charged with leading the Department's response to the GDA and other federal requirements.¹² To assist with compilation and coordination of the GDA requirements, the Department established the Geospatial Data Act Working Group. This group is led by the SAOGI and is composed of two members from each of the bureaus and offices that the Department has identified as using geospatial data and technology. The nine bureaus and offices identified by INR as active stakeholders related to geospatial data are as follows:

- INR
- Bureau of Consular Affairs
- Bureau of Conflict and Stabilization Operations
- Bureau of Diplomatic Security
- Bureau of Diplomatic Technology¹³
- Bureau of Global Health Security and Diplomacy
- Bureau of Overseas Buildings Operations

⁶ 43 U.S.C. § 2808(a).

⁷ Appendix B includes details of the 13 requirements.

⁸ 43 U.S.C. § 2801(3).

⁹ Requirements include submitting an annual report to Congress, maintaining an inventory of all geospatial data assets, and including geospatial data when preparing the Department's budget submission.

¹⁰ Lead covered agencies ensure coordinated geospatial data management, resources, and related services and products for an NGDA data theme.

¹¹ *Federal Geographic Data Committee (FGDC) Designated National Geospatial Data Asset (NGDA) Data Themes, Theme Definitions, and Theme Lead Agencies*, July 3, 2024.

¹² 1 Foreign Affairs Manual 433.3(8), "Office of the Geographer and Global Issues (INR/GGI)."

¹³ The Bureau of Information Resource Management changed its name to the Bureau of Diplomatic Technology on May 16, 2024.

- Bureau of Oceans and International Environmental and Scientific Affairs
- Office of Management Strategy and Solutions, Center for Analytics Directorate

AUDIT RESULTS




Finding A: The Department Continues To Make Progress Implementing GDA Requirements but Improvements Are Needed




OIG found that the Department continues to make progress implementing the 13 covered agency requirements¹⁴ from the GDA, but improvements are needed to achieve full compliance. Specifically, OIG found that the Department had fully complied with 2 of 13 covered agency requirements. For example, the Department developed a Geospatial Data Strategy (GDS) in September 2021 and appointed the Department’s Geographer as the SAOGI, charged with leading the Department’s response to the GDA and other federal geospatial requirements, in August 2020. However, the Department had not fully implemented 11 of 13 covered agency requirements. Although several bureaus and offices that regularly collect, use, maintain, and disseminate geospatial data have existing practices that may assist in the Department’s implementation of GDA requirements, the Department must address its responsibilities Department-wide rather than at the component level to achieve full compliance with each GDA requirement. Table 1 provides details of the status of compliance with the 13 covered agency requirements for the current audit and the prior two audits.

Table 1: OIG Assessment of the Implementation of GDA Requirements During the Current Audit and the Prior Two Audits

Requirement	FY 2020 ^a	FY 2022 ^a	FY 2024 ^a
1. Covered Agency Geospatial Strategies	▲	●	●
2. Support Data Sharing	◆	●	▲
3. Promote Data Integration	▲	●	▲
4. Ensure Records Retention Schedule for Geospatial Data	◆	▲	▲
5. Allocate Resources for Geospatial Data Management Responsibilities	▲	▲	▲
6. Use Data Standards	◆	▲	▲
7. Support Coordination and Partnerships	▲	●	▲
8. Promote Application of Geospatial Data Assets	▲	●	▲
9. Protect Privacy and Confidentiality	◆	▲	▲
10. Declassified Data	N/A ^b	N/A ^b	▲
11. Avoid Duplication of Data	▲	▲	▲
12. Ensure High-Quality Data	◆	▲	▲

¹⁴ Appendix B includes details of the 13 requirements.

Requirement	FY 2020 ^a	FY 2022 ^a	FY 2024 ^a
13. Point of Contact			

^a For this table,  means noncompliant,  means partially compliant, and  means compliant.

^b This requirement was not applicable because Department officials indicated that there were no declassified data in the Large Scale International Boundaries dataset during the FY 2022 audit.

Source: *OIG, Audit of Department of State Compliance With the Geospatial Data Act of 2018* (AUD-MERO-20-41, September 2020), *Audit of Department of State FY 2022 Compliance With the Geospatial Data Act of 2018* (AUD-SI-22-39, September 2020), and results of OIG analysis of data obtained from bureaus that INR considered to be active stakeholders of geospatial data.

The Department had not fully complied with all GDA requirements, in part, because it did not clearly identify what qualified as geospatial data for purposes of compliance with the GDA. In addition, the Department did not maintain a geospatial data inventory as required by the GDA. The Department also lacked overarching policies, procedures, and guidance; instead, bureaus followed informal or general practices to carry out many GDA responsibilities. Additionally, the Department provided insufficient oversight to ensure bureaus were meeting their GDA responsibilities. Furthermore, the Department did not clearly define roles and responsibilities related to the GDA and lacked a comprehensive, long-term funding plan to facilitate compliance with its GDA responsibilities. Finally, the Department did not ensure geospatial data and activities were included on records disposition schedules. As a result, the Department is susceptible to inefficient and ineffective management of geospatial assets, which increases the risk of inconsistent efforts or the inability to minimize the costs to acquire, manage, share, and use geospatial data, expertise, technology, and services.

Compliance With GDA Requirements

Section 759(a) of the GDA requires each covered agency to comply with 13 requirements. OIG concluded that the Department was compliant with 2 requirements but was not fully compliant with 11 requirements.

Department Was Compliant With Two GDA Requirements

OIG concluded that the Department implemented the following two GDA requirements:

- “[P]repare, maintain, publish, and implement a strategy for advancing geographic information and related geospatial data and activities appropriate to the mission of the covered agency” (Requirement 1).¹⁵
- “[A]ppoint a contact to coordinate with the lead covered agencies for collection, acquisition, maintenance, and dissemination of the [NGDA] data themes used by the covered agency” (Requirement 13).¹⁶

¹⁵ 43 U.S.C. § 2808(a)(1).

¹⁶ 43 U.S.C. § 2808(a)(13).

For Requirement 1, OIG found that the Department had developed and issued the GDS in September 2021. The GDS sets forth a 3-year vision¹⁷ to expand the effective use of geospatial data and technologies across the Department.¹⁸ The GDS also provides a framework to improve collaboration across agencies and increase the efficiency of operations, decision-making, and transparency.¹⁹ The GDS also provides a reporting mechanism for the Department's investments in geospatial data.²⁰

For Requirement 13, OIG found that the Department's Geographer, who is organizationally located within INR, was designated as the SAOGI in August 2020. The SAOGI is the Department's formal representative to the FGDC Steering Committee. The SAOGI is also responsible for leading the Department's response to the GDA and other federal geospatial requirements, working in coordination with the Department's Chief Data Officer, the Chief Information Officer, and various geospatial stakeholders across the Department.

Department Was Not Fully Compliant With Eleven GDA Requirements

Although the Department has made progress, it has not fully implemented the following 11 GDA requirements:

- “[C]ollect, maintain, disseminate, and preserve geospatial data such that the resulting data, information, or products can be readily shared with other [f]ederal agencies and non-[f]ederal users” (Requirement 2).²¹
- “[P]romote the integration of geospatial data from all sources” (Requirement 3).²²
- “[E]nsure 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” (Requirement 4).²³
- “[A]llocate 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” (Requirement 5).²⁴
- “[U]se the geospatial data standards, including the standards for metadata for geospatial data, and other appropriate standards, including documenting geospatial

¹⁷ The Department plans to review official versions of the GDS at a minimum of every 3 years from the publication date.

¹⁸ Department, *Geospatial Data Strategy*, September 2021.

¹⁹ Department, *2021 Covered Agency Annual Report and Self-Assessment for Department of State*, February 4, 2022, page 5.

²⁰ *Ibid.*

²¹ 43 U.S.C. § 2808(a)(2).

²² 43 U.S.C. § 2808(a)(3).

²³ 43 U.S.C. § 2808(a)(4).

²⁴ 43 U.S.C. § 2808(a)(5).

data with relevant metadata and making metadata available through the GeoPlatform”²⁵ (Requirement 6).²⁶

- “[C]oordinate and work in partnership with other [f]ederal agencies; agencies of [s]tate, 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” (Requirement 7).²⁷
- “[U]se geospatial information to—(A) make [f]ederal 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” (Requirement 8).²⁸
- “[P]rotect personal privacy and maintain confidentiality in accordance with [f]ederal policy and law” (Requirement 9).²⁹
- “[P]articipate in determining, when applicable, whether declassified data can contribute to and become a part of the National Spatial Data Infrastructure” (Requirement 10).³⁰
- “[S]earch all sources, including the GeoPlatform, to determine if existing [f]ederal, [s]tate, local, or private geospatial data meet the needs of the covered agency before expending funds for geospatial data collection” (Requirement 11).³¹
- “[T]o the maximum extent practicable, ensure that a person receiving [f]ederal funds for geospatial data collection provides high-quality data” (Requirement 12).”³²

For Requirement 2, the Department reported³³ instances in which bureaus or offices collected, maintained, disseminated, and preserved geospatial data to share with other entities. For example, the Department reported that INR continued efforts to update and disseminate the Large Scale International Boundaries dataset on Data.gov³⁴ and the GeoPlatform. Additionally, the Department reported that the Bureau of Consular Affairs enhanced and updated the geospatial databases available on the travel.state.gov website for both federal and public users. However, the Department had not identified what qualifies as geospatial data or maintained an inventory of all of its geospatial data, which means that the Department could not ensure that it was readily sharing all of its geospatial data with federal agencies and non-federal users.

²⁵ GeoPlatform is an FGDC-coordinated electronic service required by Section 2807 of the GDA (43 U.S.C. § 2807) that provides public access to geospatial data and related metadata at geoplatform.gov. It is also the authorized source for all official NGDAs across 18 data themes as guided by the FGDC.

²⁶ 43 U.S.C. § 2808(a)(6).

²⁷ 43 U.S.C. § 2808(a)(7).

²⁸ 43 U.S.C. § 2808(a)(8).

²⁹ 43 U.S.C. § 2808(a)(9).

³⁰ 43 U.S.C. § 2808(a)(10).

³¹ 43 U.S.C. § 2808(a)(11).

³² 43 U.S.C. § 2808(a)(12).

³³ Department, *2023 Covered Agency Annual Report and Self-Assessment for Department of State*, January 19, 2024, pages 3-4.

³⁴ The OPEN Government Data Act, Title II of Public Law 115-435, requires federal agencies to publish their information on Data.gov, the federal government’s open data site managed by the General Services Administration, which aims to make government more open and accountable.

Therefore, OIG was unable to confirm the Department consistently and fully complied with Requirement 2.³⁵

For Requirement 3, the Department reported³⁶ instances in which bureaus or offices promoted the integration of geospatial data. For example, the Department reported that it had advanced its efforts to integrate geospatial data from all sources by increasing the number of users on its enterprise application, GeoState,³⁷ using open data from multiple official sources, and collaborating with other federal agencies. Additionally, the Department reported that GeoState had been pivotal in allowing the Bureau of Consular Affairs to integrate demographic data, which had enhanced the accessibility of passport service locations to the public. However, the Department had not maintained an inventory of all of its geospatial data or defined policies and procedures related to geospatial data, which means that the Department could not ensure that it had promoted the integration of all geospatial data. Therefore, OIG was unable to confirm the Department consistently and fully complied with Requirement 3.³⁸

For Requirement 4, the Department reported³⁹ instances in which data information products and other records created in geospatial data and activities may have been preserved. The Department also reported that records disposition schedules are inclusive of data information products and other records created using geospatial data and activities. For example, the Department reported that the Bureau of Overseas Buildings Operations used existing records disposition schedules for geospatial data hosted on GeoState. Although the Department's existing records disposition schedules may address the preservation of some geospatial data, because the Department has not defined what qualifies as geospatial data, maintained an inventory of all its geospatial data, or developed overarching policies and procedures, the Department cannot ensure that all geospatial data is appropriately preserved. Therefore, OIG was unable to confirm the Department consistently and fully complied with Requirement 4.

For Requirement 5, the Department reported⁴⁰ instances in which it allocated resources to fulfill GDA responsibilities. For example, the Department reported that INR funded several contractors to assist with the Department's efforts to comply with GDA requirements.

³⁵ During the FY 2022 audit (AUD-SI-22-39), OIG concluded that the Department complied with this requirement to give the Department credit for practices developed by some bureaus that addressed GDA requirements. However, during the FY 2024 audit, OIG focused its assessment on Department-wide implementation of GDA requirements, rather than ad hoc implementation by individual bureaus.

³⁶ Department, *2023 Covered Agency Annual Report and Self-Assessment for Department of State*, January 19, 2024, pages 5-6.

³⁷ GeoState is a centralized repository of the Department's geospatial data that provides mapping, visualization, analytics, and geospatial data management tools.

³⁸ During the FY 2022 audit (AUD-SI-22-39), OIG concluded that the Department complied with this requirement to give the Department credit for practices developed by some bureaus that addressed GDA requirements. However, during the FY 2024 audit, OIG focused its assessment on Department-wide implementation of GDA requirements, rather than ad hoc implementation by individual bureaus.

³⁹ Department, *2023 Covered Agency Annual Report and Self-Assessment for Department of State*, January 19, 2024, pages 7-8.

⁴⁰ *Ibid.*, pages 9-10.

Additionally, the Department reported that the Bureau of Consular Affairs had some dedicated staff and several contractors who responded to requests for geographic information system (GIS) data. However, the Department also reported that the Bureau of Overseas Buildings Operations reduced GIS resources because of a strategic resourcing challenge. Until the Department identifies the universe of its geospatial data, it will be unable to effectively develop a comprehensive, long-term funding plan that it can use to allocate resources to fulfill its GDA responsibilities. Therefore, OIG was unable to confirm the Department consistently and fully complied with Requirement 5.

For Requirement 6, the Department reported⁴¹ instances in which it used geospatial data standards, including the standards for metadata. For example, the Department reported that it had used geospatial data standards and documented geospatial data with relevant metadata by enabling access through GeoPlatform for the Large Scale International Boundaries dataset. Additionally, the Department reported that the Bureau of Overseas Buildings Operations developed an initial set of metadata standards and applied them to content that it shared on GeoState. However, the FGDC had not established standards in accordance with Section 757 of the GDA for each NGDA theme as of June 2024. Although the Department may use various international standards, OIG cannot assess compliance with Requirement 6 until the FGDC establishes formal standards. Additionally, the Department cannot be confident that it will be able to comply with future FGDC guidance until it identifies the universe of its geospatial data.

For Requirement 7, the Department reported⁴² instances in which it coordinated and worked in partnership with internal and external stakeholders to efficiently and cost-effectively manage geospatial data activities. For example, the Department reported that the Bureau of Overseas Buildings Operations worked with the Department of Defense and the National Geospatial-Intelligence Agency to foster geospatial data sharing. Additionally, the Department reported that the Bureau of Conflict and Stabilization Operations worked closely with non-governmental organizations, academia, other government agencies, and host governments to acquire data. However, the Department had not identified the universe of its geospatial data, which means that it could not effectively coordinate all relevant data to work in partnership with other organizations. Therefore, OIG was unable to confirm the Department consistently and fully complied with Requirement 7.⁴³

For Requirement 8, the Department reported⁴⁴ instances in which it used geospatial data for a range of activities related to operations, decision-making, and public use. For example, the Department reported that INR used geospatial data to create hundreds of maps and

⁴¹ Ibid., pages 11-12.

⁴² Ibid., pages 13-14.

⁴³ During the FY 2022 audit (AUD-SI-22-39), OIG concluded that the Department complied with this requirement to give the Department credit for practices developed by some bureaus that addressed GDA requirements. However, during the FY 2024 audit, OIG focused its assessment on Department-wide implementation of GDA requirements, rather than ad hoc implementation by individual bureaus.

⁴⁴ Department, *2023 Covered Agency Annual Report and Self-Assessment for Department of State*, January 19, 2024, pages 15-17.

infographics to inform senior policymakers on various issues. Additionally, the Department reported that the Bureau of Consular Affairs used geospatial information to prepare a report to Congress identifying the population centers that are located more than 5 hours driving time from a passport office, the per capita demand for passport services in those areas, and strategies for improving service to those communities. However, the Department had not identified the universe of its geospatial data, which means that it could not ensure that it was making its geospatial data available for use. Therefore, OIG was unable to confirm the Department consistently and fully complied with Requirement 8.⁴⁵

For Requirement 9, the Department reported⁴⁶ instances in which it protected personal privacy and maintained confidentiality related to geospatial data. For example, the Department reported that it had enhanced the security of GIS by assigning specific user groups and granting access based on a “need to know” basis, aligning with overarching policies for data confidentiality and personal privacy protection. Additionally, the Department reported that the Bureau of Overseas Buildings Operations developed and implemented role-based access controls on an initial geospatial product, limiting viewership of data based on end-user location, which means that users would only be able to view data specific to their respective posts. However, the Department had not identified the universe of its geospatial data, which means that it could not ensure that it had appropriately protected personal privacy and maintained confidentiality in accordance with requirements for all geospatial data. Therefore, OIG was unable to confirm the Department consistently and fully complied with Requirement 9.

For Requirement 10, the Department reported⁴⁷ that it had a process to review declassified datasets for inclusion in the National Spatial Data Infrastructure. For example, the Department reported that it had evaluated all unclassified data that was “owned or managed” by the Department for inclusion in the National Spatial Data Infrastructure. However, the Department had not identified the universe of its geospatial data, which means that it could not ensure that it was assessing all of the geospatial data to potentially include in the National Spatial Data Infrastructure. Additionally, the Department had not defined and communicated a process to assess declassified geospatial data for inclusion in the infrastructure. Therefore, OIG was unable to confirm the Department consistently and fully complied with Requirement 10.⁴⁸

⁴⁵ During the FY 2022 audit (AUD-SI-22-39), OIG concluded that the Department complied with this requirement to give the Department credit for practices developed by some bureaus that addressed GDA requirements. However, during the FY 2024 audit, OIG focused its assessment on Department-wide implementation of GDA requirements, rather than ad hoc implementation by individual bureaus.

⁴⁶ Department, *2023 Covered Agency Annual Report and Self-Assessment for Department of State*, January 19, 2024, pages 18-19.

⁴⁷ *Ibid.*, page 20.

⁴⁸ During the FY 2022 audit (AUD-SI-22-39), Department officials indicated that there were no declassified data in the Large Scale International Boundaries dataset. During the FY 2024 audit, OIG determined that this requirement included declassified data Department-wide; therefore, OIG considered this requirement during the audit.

For Requirement 11, the Department reported⁴⁹ instances in which bureaus or offices searched other potential sources for geospatial data before expending funds to gather that data. The Department reported that it generally relied on existing, externally created geospatial data for much of its geospatial operations. Therefore, Department officials searched for published data sources and coordinated with other bureaus and agencies for data. For example, the Department reported that the Bureau of Overseas Buildings Operations coordinated with overseas staff and private consultants to incorporate available private and municipal data products. However, the Department had not identified the universe of its geospatial data, which means that it could not ensure that it was searching all sources for geospatial data before taking action to collect data. Therefore, OIG was unable to confirm the Department consistently and fully complied with Requirement 11.

For Requirement 12, the Department reported⁵⁰ that it traditionally expended little to no money on geospatial data collection. An official from one bureau stated that funds were expended for one program, but the official said they did not know to what extent. Although the Department reported that it did not expend much money to collect geospatial data, without a complete and accurate inventory of geospatial data, the Department could not be sure whether it expended funds for high-quality geospatial data. Therefore, OIG was unable to confirm the Department consistently and fully complied with Requirement 12.

Geospatial Data Not Clearly Identified

One reason for the issues identified in this report is that the Department did not clearly identify what qualified as geospatial data for purposes of compliance with the GDA. Although the GDA includes a broad range of what may qualify as geospatial data for a covered agency,⁵¹ the SAOGI said they believed that if geospatial data were not created, owned, or purchased by the Department then the GDA would not be applicable. One bureau official stated that most of the geospatial data used was from an open-source or was commercially available, so the focus was on the maintenance of products derived from these sources. Another bureau official stated that they do not generate geospatial data and are generally reusing datasets that were open-source and created outside the bureau. The SAOGI stated that they were not concerned with open-source data unless it ended up in a geospatial information system owned and shared by the Department. The SAOGI also stated that INR was more concerned with programs in the Department that made use of information systems to create unique geospatial data. The SAOGI stated that they do not believe that they need to capture all geospatial data used by the Department. Without clearly identifying what qualifies as geospatial data, the Department will be unable to determine what data to include in its geospatial data inventory, which may result in an incomplete list of geospatial data.

⁴⁹ Department, *2023 Covered Agency Annual Report and Self-Assessment for Department of State*, January 19, 2024, pages 21-22.

⁵⁰ *Ibid.*, page 23.

⁵¹ 43 U.S.C. § 2801(5).

Lack of Geospatial Data Inventory

Another reason for the deficiencies identified was that the Department did not maintain a complete and accurate inventory of geospatial data as required by the GDA.^{52,53} In fact, the Department had not identified all the bureaus and offices that maintain or use geospatial data. Specifically, INR identified nine bureaus and offices as active stakeholders related to geospatial data. However, during an OIG meeting with officials from two offices in one bureau, the bureau officials identified four other offices that used geospatial data in that bureau. These offices were not included on the list provided by INR. Additionally, a Bureau of International Narcotics and Law Enforcement Affairs official identified the use of potential geospatial data within the bureau. However, INR did not include the Bureau of International Narcotics and Law Enforcement Affairs as an active stakeholder. INR personnel stated that the Bureau of Diplomatic Technology and the Office of Management Strategy and Solutions, Center for Analytics Directorate, could identify geospatial data used by various bureaus. Bureau of Diplomatic Technology and Center for Analytics Directorate officials stated that the Center for Analytics Directorate was developing an inventory of Department data, but the effort was not specific to geospatial data. Although the effort may include geospatial data, it would not specifically identify which data were related to the GDA. The SAOGI stated that they will never have full knowledge of geospatial data used in the Department and that they plan to focus primarily on critical data versus user needs. Nevertheless, failure to maintain a complete and accurate inventory of geospatial data increases the risk that the Department will be unable to conduct sufficient oversight and comply with all GDA requirements.

Lack of Department-wide Policies, Procedures, and Practices

In addition, the Department had not developed Department-wide policies, procedures, and practices to address GDA responsibilities.⁵⁴ The Government Accountability Office states, “[c]ontrol activities are the actions management establishes through policies and procedures to achieve objectives and respond to risks in the internal control system.”⁵⁵ INR personnel stated that developing policies related to the GDA was an ongoing effort⁵⁶ and that no overarching policies had been developed. INR personnel also stated that each bureau was responsible for having its own policies and procedures related to geospatial data. However, officials from other bureaus stated that their respective bureaus did not have formal policies or guidance specifically related to geospatial data. One bureau official stated that their bureau did not have

⁵² 43 U.S.C. § 2808(b)(2)(B).

⁵³ OIG identified this issue in the *Audit of Department of State FY 2022 Compliance With the Geospatial Data Act of 2018* (AUD-SI-22-39, August 2022). However, INR had not developed an inventory of all its geospatial data as of June 2024.

⁵⁴ OIG identified this issue in report AUD-SI-22-39, but INR had not developed policies, procedures, and practices related to all GDA matters as of June 2024.

⁵⁵ Government Accountability Office, *Standards for Internal Control in the Federal Government* (GAO-14-704G, September 2014), page 44.

⁵⁶ INR developed a “Policies Implementation Plan” in response to Recommendation 2 from report AUD-SI-22-39. The first policy shown on this plan is the “Geospatial Data Classification Policy,” which was in draft format as of June 2024.

formal polices or guidance, but that they know whom to talk to if there are questions. Another bureau official stated that procedures were informal and based on the subject matter expertise of the analyst involved. In general, the bureaus' actions appeared to be ad hoc. Without formal, Department-wide policies, procedures, and practices, the Department cannot reasonably ensure that GDA requirements are implemented equitably and consistently across the Department.

Insufficient Department-wide Oversight

The Department also did not provide sufficient oversight of the implementation of geospatial-related requirements and activities across all Department components. INR personnel stated that each bureau was responsible for maintaining its own geospatial data and having its own policies and procedures related to geospatial data. INR personnel also stated that the Department did not have dedicated, centralized oversight of geospatial issues. According to the Foreign Affairs Manual, the SAOGI leads the Department's response to the GDA and other federal geospatial requirements.⁵⁷ However, the SAOGI stated that they do not believe that they have any authority over other Department bureaus. The SAOGI also stated that the INR memorandum that was issued in August 2020 to designate the SAOGI position did not grant the SAOGI any authority over other bureaus. The SAOGI stated that they have government-wide authority for international boundaries and sovereignty issues but not for the Department's overall geospatial data. The SAOGI stated that this authority should be under the Department's Chief Data Officer. In addition, INR personnel stated they only had one full-time contractor working on GDA issues. Another INR official stated that they decided to conduct data calls every 6 months, which would give them an idea of the use of geospatial data in the Department. Failure to provide sufficient oversight of GDA requirements increases the risk that the Department will not be able to meet its GDA responsibilities.

Lack of Clearly Defined Roles and Responsibilities

Additionally, the Department did not clearly define roles and responsibilities related to GDA activities.⁵⁸ The Government Accountability Office states that “[m]anagement should establish an organizational structure, assign responsibility, and delegate authority to achieve the entity's objectives.”⁵⁹ INR personnel stated that each bureau was responsible for managing its own geospatial data. However, officials from other bureaus stated that their practices were primarily developed to meet individual bureau needs and not developed with the express intent to comply with the GDA covered agency responsibilities. The SAOGI also stated that no bureau would have a lead for all of the geospatial data being used within their respective bureau. According to the Department's GDS, the SAOGI leads the GDS and other GDA efforts, working in coordination with the Chief Data Officer, Chief Information Officer, and various

⁵⁷ 1 Foreign Affairs Manual 433.3(8).

⁵⁸ OIG identified this issue in report AUD-SI-22-39, but INR had not clearly defined roles and responsibilities related to GDA matters as of June 2024.

⁵⁹ GAO-14-704G, page 27.

geospatial stakeholders across the Department.⁶⁰ However, the Department's GDS did not clearly define these roles and responsibilities, leaving each bureau to implement its own efforts on an ad hoc basis. Without clearly defined roles and responsibilities, the Department cannot ensure that GDA implementation efforts are efficient or effective.

Lack of Funding Plan

The Department did not have a comprehensive, long-term funding plan for geospatial data and activities, which limited the Department's ability to fulfill its goals and objectives related to GDA implementation.⁶¹ The GDA directs covered agencies to meet a set of responsibilities but does not provide funding or resources to assist with the implementation. However, the GDA states, that "[e]ach covered agency shall include geospatial data in preparing the budget submission of the covered agency to the President."⁶² The SAOGI stated that they had not included a request for resources to comply with the GDA in past budget requests. Another INR official stated that the financial situation was challenging, and that they were still using their baseline budget to comply with GDA efforts. Officials from other bureaus also stated that they did not have any funding plans specific to geospatial data. Another bureau official stated that they had challenges with funding and maintaining sufficient staffing and reordered priorities because of funding issues. One bureau official stated that until the bureau obtained additional resources, nothing was going to happen with GDA requirements. According to the Department's 2023 Covered Agency Report,⁶³ the Bureau of Overseas Buildings Operations reduced GIS resources and acknowledged a strategic resource challenge for GIS. As the Department's geospatial data program and associated activities increase, the resources required to sustain the program and activities will also need to increase to keep pace. Without a comprehensive, long-term funding plan, the Department cannot be assured that it has sufficient resources to most effectively meet the responsibilities established by the GDA.

Records Disposition Schedules May Not Include Geospatial Data

The Department did not ensure that geospatial data and activities were included in records disposition schedules.⁶⁴ An INR official stated that each bureau should have its own records disposition schedules. This INR official also stated that geospatial data fit within many of the preexisting data retention requirements on the records disposition schedules. Therefore, this INR official said they did not believe that geospatial data needed to be specifically included in records disposition schedules. However, this INR official stated that they were working with the Bureau of Administration to ensure that INR's records disposition schedules were compliant with the GDA, and they assumed that other bureaus were doing the same. Officials from other

⁶⁰ Department, *Geospatial Data Strategy*, September 2021.

⁶¹ OIG identified this issue in AUD-SI-22-39, but INR had not developed a funding plan related to GDA matters as of June 2024.

⁶² 43 U.S.C. § 2808(b)(2)(A).

⁶³ Department, *2023 Covered Agency Annual Report and Self-Assessment for Department of State*, January 19, 2024, page 10.

⁶⁴ OIG identified this issue in report AUD-SI-22-39, but INR had not ensured that geospatial data and activities were included on records disposition schedules as of June 2024.

bureaus stated that they were either not familiar with this GDA requirement or that they used the Department's overarching records disposition schedules because they did not have any specific schedules for geospatial data. OIG reviewed the Department-wide records disposition schedules and the records disposition schedules for eight⁶⁵ of nine bureaus and offices identified as geospatial data stakeholders. Some of the records disposition schedules included terminology that could encompass aspects of geospatial data, such as analyses, activities, assessments, surveys, images, and maps. However, none of the schedules explicitly addressed geospatial data. Records management is essential to ensure that data information products and other geospatial data and activities are properly retained.

Deficiencies Negatively Impact GDA Implementation Efforts

The noncompliance issues identified during the audit increase the risk that geospatial information may not be available for public use or may not be adequately preserved for historical records. Inconsistencies in geospatial data practices across the Department may adversely impact the benefits intended by the GDA. Additionally, without a comprehensive, long-term funding plan, geospatial programs are at risk of being displaced by more pressing needs and competing priorities. OIG concluded that until all applicable GDA requirements are fulfilled, the Department is susceptible to inefficient and ineffective management of geospatial assets, which increases the risk of inconsistent efforts or the inability to minimize the costs to acquire, manage, share, and use geospatial data, expertise, technology, and services. OIG is therefore offering the following recommendations:

Recommendation 1: OIG recommends that the Bureau of Intelligence and Research, in coordination with the Office of Management Strategy and Solutions and the Bureau of Diplomatic Technology, (a) conduct a review to determine whether its Office of the Geographer and Global Issues is best positioned to implement compliance with the Geospatial Data Act of 2018, and (b) develop and implement a plan to address the results of the review.

Management Response: INR concurred with the recommendation, stating that it was not "best positioned for the distinct function of implementing the enterprise-wide lifecycle data management called for in the [GDA]." INR also stated that "Department stakeholders, including INR, will conduct a review to determine the Department component best positioned to implement Department compliance with the [GDA]."

OIG Reply: On the basis of INR's concurrence with the recommendation and planned actions, OIG considers this recommendation resolved, pending further action. The recommendation will be closed when OIG receives documentation demonstrating that INR has (a) conducted a review to determine whether its Office of the Geographer and Global Issues is best positioned to implement compliance with the GDA, and (b) developed and implemented a plan to address the results of the review.

⁶⁵ The Bureau of Global Health Security and Diplomacy was formed in August 2023 and had not developed its own records disposition schedules as of June 2024.

Recommendation 2: OIG recommends that the Bureau of Intelligence and Research, in coordination with the Office of the Legal Advisor, the Office of Management Strategy and Solutions, and the Bureau of Diplomatic Technology, (a) determine what qualifies as geospatial data for purposes of compliance with the Geospatial Data Act of 2018, Section 759(a), codified at 43 United States Code § 2808(a), and (b) formally communicate the determination to affected geospatial data stakeholders.

Management Response: INR concurred in principle with the substance of the recommendation, stating that “determination of the office of primary responsibility and the stakeholders involved in carrying out these actions will be contingent on the outcome of the review proposed” in response to Recommendation 1.

OIG Reply: On the basis of INR’s concurrence with the recommendation and planned actions, OIG considers this recommendation resolved, pending further action. The recommendation will be closed when OIG receives documentation demonstrating that INR has (a) determined what qualifies as geospatial data for purposes of compliance with the GDA, and (b) formally communicated the determination to affected geospatial data stakeholders.

Recommendation 3: OIG recommends that the Bureau of Intelligence and Research, in coordination with the Office of Management Strategy and Solutions and the Bureau of Diplomatic Technology, develop and implement a strategy to maintain an inventory of all Department of State geospatial data as prescribed by the Geospatial Data Act of 2018, Section 759(b)(2)(B), codified at 43 United States Code § 2808(b)(2)(B), after a determination is made regarding what qualifies as geospatial data, as mentioned in Recommendation 2.

Management Response: INR concurred in principle with the substance of the recommendation, stating that “determination of the office of primary responsibility and the stakeholders involved in carrying out these actions will be contingent on the outcome of the review proposed” in response to Recommendation 1.

OIG Reply: On the basis of INR’s concurrence with the recommendation and planned actions, OIG considers this recommendation resolved, pending further action. The recommendation will be closed when OIG receives documentation demonstrating that INR has developed and implemented a strategy to maintain an inventory of all Department geospatial data as prescribed by the GDA.

Recommendation 4: OIG recommends that the Bureau of Intelligence and Research, in coordination with the Office of Management Strategy and Solutions and the Bureau of Diplomatic Technology, develop written policies, procedures, and guidance that can be used to implement requirements 2 through 12 of the Geospatial Data Act of 2018, Section 759(a), codified at 43 United States Code § 2808(a).

Management Response: INR concurred in principle with the substance of the recommendation, stating that “determination of the office of primary responsibility and the stakeholders involved in carrying out these actions will be contingent on the outcome of the review proposed” in response to Recommendation 1.

OIG Reply: On the basis of INR’s concurrence with the recommendation and planned actions, OIG considers this recommendation resolved, pending further action. The recommendation will be closed when OIG receives documentation demonstrating that INR has developed written policies, procedures, and guidance that can be used to implement requirements 2 through 12 of the GDA.

Recommendation 5: OIG recommends that the Bureau of Intelligence and Research, in coordination with the Office of Management Strategy and Solutions and the Bureau of Diplomatic Technology, formally define and communicate areas of authority, roles, and responsibilities in the Geospatial Data Strategy for personnel responsible for carrying out compliance with the Geospatial Data Act of 2018.

Management Response: INR concurred in principle with the substance of the recommendation, stating that “determination of the office of primary responsibility and the stakeholders involved in carrying out these actions will be contingent on the outcome of the review proposed” in response to Recommendation 1.

OIG Reply: On the basis of INR’s concurrence with the recommendation and planned actions, OIG considers this recommendation resolved, pending further action. The recommendation will be closed when OIG receives documentation demonstrating that INR has formally defined and communicated areas of authority, roles, and responsibilities in the GDS for personnel responsible for carrying out compliance with the GDA.

Recommendation 6: OIG recommends that the Bureau of Intelligence and Research, in coordination with the Bureau of Budget and Planning, the Office of Management Strategy and Solutions, and the Bureau of Diplomatic Technology, develop and implement a comprehensive, long-term funding plan and include geospatial data when preparing its budget submission as prescribed by the Geospatial Data Act of 2018, Section 759(b)(2)(A), codified at 43 United States Code § 2808(b)(2)(A).

Management Response: INR concurred in principle with the substance of the recommendation, stating that “determination of the office of primary responsibility and the stakeholders involved in carrying out these actions will be contingent on the outcome of the review proposed” in response to Recommendation 1.

OIG Reply: On the basis of INR’s concurrence with the recommendation and planned actions, OIG considers this recommendation resolved, pending further action. The recommendation will be closed when OIG receives documentation demonstrating that INR has developed and implemented a comprehensive, long-term funding plan and included geospatial data when preparing its budget submission, as prescribed by the GDA.

Recommendation 7: OIG recommends that the Bureau of Intelligence and Research, in coordination with the Bureau of Administration, the Office of Management Strategy and Solutions, and the Bureau of Diplomatic Technology, (a) review current records schedules to determine whether 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 as prescribed by the Geospatial Data Act of 2018, Section 759(a)(4), codified at 43 United States Code § 2808(a)(4), and (b) update the records schedules as necessary to include geospatial data and activities.

Management Response: INR concurred in principle with the substance of the recommendation, stating that “determination of the office of primary responsibility and the stakeholders involved in carrying out these actions will be contingent on the outcome of the review proposed” in response to Recommendation 1.

OIG Reply: On the basis of INR’s concurrence with the recommendation and planned actions, OIG considers this recommendation resolved, pending further action. The recommendation will be closed when OIG receives documentation demonstrating that INR has (a) reviewed current records schedules to determine whether data information products and other records created in geospatial data and activities were included on agency record schedules approved by the National Archives and Records Administration as prescribed by the GDA, and (b) updated the records schedules as necessary to include geospatial data and activities.

RECOMMENDATIONS

Recommendation 1: OIG recommends that the Bureau of Intelligence and Research, in coordination with the Office of Management Strategy and Solutions and the Bureau of Diplomatic Technology, (a) conduct a review to determine whether its Office of the Geographer and Global Issues is best positioned to implement compliance with the Geospatial Data Act of 2018, and (b) develop and implement a plan to address the results of the review.

Recommendation 2: OIG recommends that the Bureau of Intelligence and Research, in coordination with the Office of the Legal Advisor, the Office of Management Strategy and Solutions, and the Bureau of Diplomatic Technology, (a) determine what qualifies as geospatial data for purposes of compliance with the Geospatial Data Act of 2018, Section 759(a), codified at 43 United States Code § 2808(a), and (b) formally communicate the determination to affected geospatial data stakeholders.

Recommendation 3: OIG recommends that the Bureau of Intelligence and Research, in coordination with the Office of Management Strategy and Solutions and the Bureau of Diplomatic Technology, develop and implement a strategy to maintain an inventory of all Department of State geospatial data as prescribed by the Geospatial Data Act of 2018, Section 759(b)(2)(B), codified at 43 United States Code § 2808(b)(2)(B), after a determination is made regarding what qualifies as geospatial data, as mentioned in Recommendation 2.

Recommendation 4: OIG recommends that the Bureau of Intelligence and Research, in coordination with the Office of Management Strategy and Solutions and the Bureau of Diplomatic Technology, develop written policies, procedures, and guidance that can be used to implement requirements 2 through 12 of the Geospatial Data Act of 2018, Section 759(a), codified at 43 United States Code § 2808(a).

Recommendation 5: OIG recommends that the Bureau of Intelligence and Research, in coordination with the Office of Management Strategy and Solutions and the Bureau of Diplomatic Technology, formally define and communicate areas of authority, roles, and responsibilities in the Geospatial Data Strategy for personnel responsible for carrying out compliance with the Geospatial Data Act of 2018.

Recommendation 6: OIG recommends that the Bureau of Intelligence and Research, in coordination with the Bureau of Budget and Planning, the Office of Management Strategy and Solutions, and the Bureau of Diplomatic Technology, develop and implement a comprehensive, long-term funding plan and include geospatial data when preparing its budget submission as prescribed by the Geospatial Data Act of 2018, Section 759(b)(2)(A), codified at 43 United States Code § 2808(b)(2)(A).

Recommendation 7: OIG recommends that the Bureau of Intelligence and Research, in coordination with the Bureau of Administration, the Office of Management Strategy and Solutions, and the Bureau of Diplomatic Technology, (a) review current records schedules to determine whether 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 as prescribed by the Geospatial Data Act of 2018, Section 759(a)(4), codified at 43 United States Code § 2808(a)(4), and (b) update the records schedules as necessary to include geospatial data and activities.

APPENDIX A: PURPOSE, SCOPE, AND METHODOLOGY

The Office of Inspector General (OIG) conducted this audit to determine whether the Department of State (Department), defined as a covered agency in the Geospatial Data Act of 2018 (GDA), complied with the 13 covered agency responsibilities in accordance with Section 759(a) of the GDA, codified at 43 United States Code § 2808(a).

OIG conducted this audit from January to June 2024 in the Washington, DC, metropolitan area in accordance with generally accepted government auditing standards. These standards require that OIG plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for the findings and conclusions based on the audit objective. OIG believes that the evidence obtained provides a reasonable basis for the findings and conclusions based on the audit objective.

To determine whether the Department complied with the 13 covered agency requirements prescribed by Section 759(a) of the GDA, OIG met with geospatial data stakeholders, including officials in the Bureau of Intelligence and Research; the Bureau of Consular Affairs; the Bureau of Conflict and Stabilization Operations; the Bureau of Diplomatic Security; the Bureau of Overseas Buildings Operations; the Bureau of Oceans and International Environmental and Scientific Affairs; the Bureau of Global Health Security and Diplomacy; the Bureau of Diplomatic Technology;¹ and the Office of Management Strategy and Solutions, Center for Analytics Directorate. OIG also met with Department officials regarding records schedules and privacy in relation to geospatial data within the Department.

To obtain background information, OIG reviewed the GDA, the Department's Enterprise Data Strategy² and the Geospatial Data Strategy.³ In addition, OIG reviewed the Foreign Affairs Manual and Office of Management and Budget Circulars A-16,⁴ A-119,⁵ and A-130.⁶ OIG also obtained information from the Department's geospatial portal, which serves as a repository for all products, artifacts, reports, and applications related to the Department's compliance with GDA requirements. Furthermore, OIG reviewed the Department's covered agency reports submitted to the Federal Geographic Data Committee from FY 2020 through FY 2023.

¹ The Bureau of Information Resource Management changed its name to the Bureau of Diplomatic Technology on May 16, 2024.

² Department, "Enterprise Data Strategy," September 2021.

³ Department, "Geospatial Data Strategy," September 2021.

⁴ Office of Management and Budget Circular A-16, "Coordination of Geographic Information and Related Spatial Data Activities" (August 19, 2002).

⁵ Office of Management and Budget Circular A-119, "Federal Participation in the Development and Use of Voluntary Consensus Standards and in Conformity Assessment Activities" (January 27, 2016).

⁶ Office of Management and Budget Circular A-130, "Managing Information as a Strategic Resource" (July 28, 2016).

Data Reliability

OIG did not use computer-processed data for this audit and therefore did not assess data reliability.

Work Related to Internal Control

During the audit, OIG considered a number of factors, including the subject matter of the project, to determine whether internal control was significant to the audit objective. Based on its consideration, OIG determined that internal control was significant for this audit. OIG then considered the components of internal control and the underlying principles included in the *Standards for Internal Control in the Federal Government*⁷ to identify internal controls that were significant to the audit objective. Considering internal control in the context of a comprehensive internal control framework can help auditors determine whether underlying internal control deficiencies exist.

For this audit, OIG concluded that two of five internal control components from the *Standards for Internal Control in the Federal Government*, Control Environment and Control Activities, were significant to the audit objective. The Control Environment component is the foundation for an internal control system. It provides the discipline and structure to help an entity achieve its objectives. The Control Activities component includes the actions management establishes through policies and procedures to achieve objectives and respond to risks in the internal control system, which includes the entity's information system. OIG also concluded that two of the principles related to the selected components were significant to the audit objective as described in Table A.1.

Table A.1: Internal Control Components and Principles Identified as Significant

Components	Principles
Control Environment	Management should establish an organizational structure, assign responsibility, and delegate authority to achieve the entity's objectives.
Control Activities	Management should design control activities to achieve objectives and respond to risks.

Source: OIG generated from an analysis of internal control components and principles from the Government Accountability Office, *Standards for Internal Control in the Federal Government* (GAO-14-704G, September 2014).

OIG then reviewed criteria, interviewed Department officials, and reviewed documentation to gain an understanding of the internal controls related to the components and principles identified as significant to this audit. Although OIG planned to assess the Department's design of key internal controls, OIG did not identify any key controls. Specifically, the Department was still developing controls related to the audit objective. Internal control deficiencies identified

⁷ Government Accountability Office, *Standards for Internal Control in the Federal Government* (GAO-14-704G, September 2014).

during the audit that are significant within the context of the audit objective are presented in the Audit Results section of this report.

Prior Office of Inspector General Reports

In its first GDA report,⁸ OIG stated that the Department was not in compliance with the 13 covered agency requirements in Section 759(a) of the GDA. The Department planned to incorporate geospatial data considerations into its Enterprise Data Strategy to comply with 1 of the 13 requirements. OIG also found that some Department bureaus and offices had established practices that addressed some of the remaining 12 GDA requirements. However, a significant amount of work remained for the Department to achieve full compliance with the GDA. The three recommendations offered in the September 2020 report have been implemented and closed.

In its second GDA report,⁹ OIG stated that the Department partially complied with the 12 applicable covered agency requirements. OIG stated that the Department developed a Geospatial Data Strategy, established the GeoState portal, facilitated data sharing with federal and non-federal entities, supported internal and external partnerships, promoted application of geospatial assets to support various activities, and appointed the Department's Geographer to lead GDA implementation efforts. However, the Department was not in compliance with the remaining requirements, which included records retention, resource allocation, use of data standards, privacy protections, non-duplication of data, and data quality. The four recommendations offered in the August 2022 report have been implemented and closed.

⁸ OIG, *Audit of Department of State Compliance With the Geospatial Data Act of 2018* (AUD-MERO-20-41, September 2020).

⁹ OIG, *Audit of Department of State FY 2022 Compliance With the Geospatial Data Act of 2018* (AUD-SI-22-39, August 2022).

APPENDIX B: DESCRIPTION OF GEOSPATIAL DATA ACT REQUIREMENTS

Section 759(a) of the Geospatial Data Act of 2018 (GDA)¹ identifies 13 requirements that each covered agency must implement to comply with the act. Table B.1 provides details of these requirements.

Table B.1: Geospatial Data Act Requirements From Section 759(a)

Requirement Number	Specific Citation From 43 United States Code § 2808	Requirement Description
1	(a)(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.
2	(a)(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	(a)(3)	Promote the integration of geospatial data from all sources.
4	(a)(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	(a)(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	(a)(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	(a)(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	(a)(8)	Use geospatial information to make federal geospatial information and services more useful to the public, enhance operations, support decision making, and enhance reporting to the public and to Congress.

¹ GDA, Public Law 115-254, Subtitle F—Geospatial Data, §§ 751–759C, codified at 43 United States Code §§ 2801–2811.

Requirement Number	Specific Citation From 43 United States Code § 2808	Requirement Description
9	(a)(9)	Protect personal privacy and maintain confidentiality in accordance with federal policy and law.
10	(a)(10)	Participate in determining, when applicable, whether declassified data can contribute to and become a part of the National Spatial Data Infrastructure.
11	(a)(11)	Search all sources, including the GeoPlatform, to determine if existing federal, state, local, or private geospatial data meet the needs of the covered agency before expending funds for geospatial data collection.
12	(a)(12)	To the maximum extent practicable, ensure that a person receiving federal funds for geospatial data collection provides high-quality data.
13	(a)(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.

Source: 43 United States Code § 2808(a), “Covered agency responsibilities.”

APPENDIX C: BUREAU OF INTELLIGENCE AND RESEARCH RESPONSE



United States Department of State

Washington, D.C. 20520

August 14, 2024

UNCLASSIFIED

TO: OIG/AUD – Director Regina Meade

FROM: INR – Acting Assistant Secretary Lisa Kenna 

SUBJECT: INR Response to OIG Recommendations in the Draft Report on *Audit of Department of State FY 2024 Compliance with the Geospatial Data Act of 2018* (AUD-SI-24-XX)

The geospatial data stakeholder bureaus and offices thank you for sharing your draft report on *Audit of Department of State FY 2024 Compliance with the Geospatial Data Act of 2018* (AUD-SI-24-XX) and are grateful for the opportunity to provide our comments.

Enclosed please find the Bureau of Intelligence and Research's (INR) formal response to the recommendations made in the abovementioned Office of the Inspector General (OIG) report. As the Action Office, INR drafted this response and sought concurrence from stakeholder bureaus and offices: the Bureau of Consular Affairs; the Bureau of Conflict and Stabilization Operations; the Bureau of Diplomatic Security; the Bureau of Diplomatic Technology; the Bureau of Global Health Security and Diplomacy; the Bureau of Overseas Buildings Operations; the Bureau of Oceans and International Environmental and Scientific Affairs; and the Office of Management Strategy and Solutions' Center for Analytics Directorate.

Response to Recommendations

Recommendation 1: OIG recommends that the Bureau of Intelligence and Research, in coordination with the Office of Management Strategy and Solutions and the Bureau of Diplomatic Technology, (a) conduct a review to determine whether its Office of the Geographer and Global Issues is best

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positioned to implement compliance with the Geospatial Data Act of 2018 and (b) if not, develop and implement a plan to address the results of the review.

- **Response:** INR concurs with the recommendation. Although INR's Office of the Geographer and Global Issues is responsible for issuing U.S. Government-wide guidance on international boundary and related sovereignty issues and for the management of the International Boundaries theme and the Large Scale International Boundary data set (the Department's sole National Geospatial Data Asset), INR agrees that it is not best positioned for the distinct function of implementing the enterprise-wide lifecycle data management called for in the Geospatial Data Act. Department stakeholders, including INR, will conduct a review to determine the Department component best positioned to implement Department compliance with the Geospatial Data Act in order to fully address the results of the review.

Recommendation 2: OIG recommends that the Bureau of Intelligence and Research, in coordination with the Office of the Legal Advisor, the Office of Management Strategy and Solutions, and the Bureau of Diplomatic Technology, (a) determine what qualifies as geospatial data for purposes of compliance with the Geospatial Data Act of 2018, Section 759(a), codified at 43 United States Code § 2808(a), and (b) formally communicate the determination to affected geospatial data stakeholders.

- **Response:** INR concurs in principle with the substance of the recommendation. Determination of the office of primary responsibility and the stakeholders involved in carrying out these actions will be contingent on the outcome of the review proposed in

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Recommendation 1(b). INR further notes that information sought in Recommendation 2(a) would be with reference to the definition of “geospatial data” in the Geospatial Data Act itself and, with respect to Lead Covered Agency matters (such as National Geospatial Data Asset designation and the creation of Themes within the National Geospatial Data Infrastructure) by the Federal Geographic Data Committee.

Recommendation 3: OIG recommends that the Bureau of Intelligence and Research, in coordination with the Office of Management Strategy and Solutions and the Bureau of Diplomatic Technology, develop and implement a strategy to maintain an inventory of all Department of State geospatial data as prescribed by the Geospatial Data Act of 2018, Section 759(b)(2)(B), codified at 43 United States Code § 2808(b)(2)(B), after a determination is made regarding what qualifies as geospatial data, as mentioned in Recommendation 2.

- **Response:** INR concurs in principle with the substance of the recommendation. Determination of the office of primary responsibility and the stakeholders involved in carrying out these actions will be contingent on the outcome of the review proposed in Recommendation 1(b), taking into consideration 1 FAM 44.4-3(C)(d)(2).

Recommendation 4: OIG recommends that the Bureau of Intelligence and Research, in coordination with the Office of Management Strategy and Solutions and the Bureau of Diplomatic Technology, develop written policies, procedures, and guidance that can be used to implement requirements 2 through 12 of the Geospatial Data Act of 2018, Section 759(a), codified at 43 United States Code § 2808(a).

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- **Response:** INR concurs in principle with the substance of the recommendation. Determination of the office of primary responsibility and the stakeholders involved in carrying out these actions will be contingent on the outcome of the review proposed in Recommendation 1(b), taking into consideration 1 FAM 44.4-3(C) and 5 FAM 400.

Recommendation 5: OIG recommends that the Bureau of Intelligence and Research, in coordination with the Office of Management Strategy and Solutions and the Bureau of Diplomatic Technology, formally define and communicate areas of authority, roles, and responsibilities in the Geospatial Data Strategy for personnel responsible for carrying out compliance with the Geospatial Data Act of 2018.

- **Response:** INR concurs in principle with the substance of the recommendation. Determination of the office of primary responsibility and the stakeholders involved in carrying out these actions will be contingent on the outcome of the review proposed in Recommendation 1(b), taking into consideration 1 FAM 44.4-3(C).

Recommendation 6: OIG recommends that the Bureau of Intelligence and Research, in coordination with the Bureau of Budget and Planning, the Office of Management Strategy and Solutions, and the Bureau of Diplomatic Technology, develop and implement a comprehensive, long-term funding plan and include geospatial data when preparing its budget submission as prescribed by the Geospatial Data Act of 2018, Section 759(b)(2)(A), codified at 43 United States Code § 2808(b)(2)(A).

- **Response:** INR concurs in principle with the substance of the recommendation. Determination of the office of primary

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responsibility and the stakeholders involved in carrying out these actions will be contingent on the outcome of the review proposed in Recommendation 1(b), taking into consideration 1 FAM 44.4-3(C).

Recommendation 7: OIG recommends that the Bureau of Intelligence and Research, in coordination with the Bureau of Administration, the Office of Management Strategy and Solutions, and the Bureau of Diplomatic Technology, (a) review current records schedules to determine whether 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 as prescribed by the Geospatial Data Act of 2018, Section 759(a)(4), codified at 43 United States Code § 2808(a)(4), and (b) update the records schedules as necessary to include geospatial data and activities.

- **Response:** INR concurs in principle with the substance of the recommendation. Determination of the office of primary responsibility and the stakeholders involved in carrying out these actions will be contingent on the outcome of the review proposed in Recommendation 1(b), taking into consideration 5 FAM 417.1.

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Approved: INR – Lisa Kenna, Acting Assistant Secretary [LK]

Drafted: INR/GGI – Catherine Sweet, 202-647-1935, cell: 703-992-4809
Troy Curry, 202-736-7911, cell: 808-983-9417

Cleared:

Bureau	Name	Clearance Status
INR	BLessenberry	(ok)
INR/EX	JGottfried	(ok)
INR/TIO	JHall	(ok)
M/SS/CDO	MGraviss	(ok)
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ABBREVIATIONS

FGDC	Federal Geographic Data Committee
GDA	Geospatial Data Act of 2018
GDS	Geospatial Data Strategy
GIS	geographic information system
INR	Bureau of Intelligence and Research
NGDA	National Geospatial Data Asset
OIG	Office of Inspector General
SAOGI	Senior Agency Official for Geospatial Information
U.S.C.	United States Code

OIG AUDIT TEAM MEMBERS

Regina Meade, Division Director
Security and Intelligence Division
Office of Audits

Jason Staub, Audit Manager
Security and Intelligence Division
Office of Audits

Sabri Harris, Auditor
Security and Intelligence Division
Office of Audits

Alexandra Vega, Management Analyst
Security and Intelligence Division
Office of Audits

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