DHS Has Made Progress in Fulfilling Geospatial Data Act Responsibilities, But Additional Work is Needed
MEMORANDUM FOR: Eric Hysen  
Chief Information Officer  
Department of Homeland Security

FROM: Joseph V. Cuffari, Ph.D.  
Inspector General

SUBJECT: DHS Has Made Progress in Fulfilling Geospatial Data Act Responsibilities, But Additional Work is Needed

For your action is our final report, **DHS Has Made Progress in Fulfilling Geospatial Data Act Responsibilities, But Additional Work is Needed**. We incorporated the formal comments provided by your office.

The report contains four recommendations aimed at improving DHS’ compliance with the requirements of the **Geospatial Data Act of 2018**. Your office concurred with all four recommendations. Based on information provided in your response to the draft report, we consider all four recommendations open and resolved.

Once your office has fully implemented the recommendations, please submit a formal closeout letter to us within 30 days so that we may close the recommendations. The memorandum should be accompanied by evidence of completion of agreed-upon corrective actions and of the disposition of any monetary amounts. Also, please include responsible parties and any other supporting documentation necessary to inform us about the current status of the recommendations. Until your response is received and evaluated, the recommendations will be considered resolved and open. Please send your response to OIGAuditsFollowup@oig.dhs.gov.

Consistent with our responsibility under the **Inspector General Act of 1978, as amended**, we will provide copies of our report to congressional committees with oversight and appropriation responsibility over the Department of Homeland Security. We will post the report on our website for public dissemination.

Please call me with any questions, or your staff may contact Bruce Miller, Deputy Inspector General of Audits, at (202) 981-6000.
January 11, 2023

Why We Did This Audit

The Geospatial Data Act of 2018 (GDA) requires each covered agency to fulfill 13 responsibilities to foster efficient management and use of geospatial data — information linked to specific geographic locations. The GDA also mandates the Office of Inspector General to submit to Congress a biannual audit report on the agency’s progress fulfilling the GDA’s responsibilities. This is the second in a series of audits assessing DHS’ compliance with the GDA.

What We Found

Since our 2020 audit, the Department of Homeland Security has made progress towards fulfilling the 13 responsibilities in the GDA. We previously reported that DHS had fulfilled only one responsibility — appointing a contact to coordinate with the lead agencies regarding the geospatial data DHS uses. Since then, DHS met four additional responsibilities: (1) promoting the integration of geospatial data from all sources; (2) coordinating with various Federal and non-Federal entities to efficiently and cost effectively manage geospatial data; (3) making geospatial information more useful; and (4) ensuring that a person receiving Federal funds for geospatial data collection provides high-quality data.

Although DHS generally improved its compliance with GDA responsibilities, it has only partially met seven responsibilities and not met one. The delay fulfilling 5 of these remaining 8 responsibilities may have occurred, in part, because DHS has not completed a comprehensive inventory of all its geospatial assets. Without a complete inventory, DHS cannot ensure it complies with the GDA for all its geospatial assets.

DHS Response

DHS concurred with all four recommendations. Appendix A contains DHS’ response in its entirety. All recommendations will remain open pending evidence to support completion of DHS’ corrective actions.

For Further Information:
Contact our Office of Public Affairs at (202) 981-6000, or email us at DHS-OIG.OfficePublicAffairs@oig.dhs.gov

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OIG-23-07
Background

Geospatial data — information linked to specific geographic locations — is invaluable to carry out the various missions of Federal agencies, as well as contributing positively to the U.S. economy. The Federal Government collects, maintains, and uses geospatial data to improve decision making and to support numerous functions, including national security, law enforcement, and health care. Many activities depend on critical analyses of geospatial data, such as maintaining transportation infrastructures and quickly responding to natural disasters, such as floods, hurricanes, and fires. However, some data is collected multiple times by Federal, state, and local entities, resulting in duplication of effort and resources.

On October 5, 2018, Congress enacted the Geospatial Data Act of 2018 (GDA)\(^1\) to promote more efficient management of geospatial data, technologies, and infrastructure through enhanced coordination among Federal, state, local, and tribal governments, as well as the private sector and academia. The GDA is intended to improve access to and use of geospatial data. The GDA expands upon previous Federal initiatives\(^2\) intended to improve the management of geospatial data.

The collection and use of geospatial data are especially critical for the Department of Homeland Security to support its diverse range of missions encompassing law enforcement, border protection, emergency management, critical infrastructure protection, and national operations. For example, after Hurricane Harvey in 2017, the Federal Emergency Management Agency used geospatial data to assist with response and recovery efforts. GDA Section 759(a) requires that certain Federal government entities (agencies), including DHS, comply with 13 responsibilities related to the collection, maintenance, dissemination, and preservation of geospatial data. Appendix B lists the 13 responsibilities.

GDA Section 759(c) mandates that not less than once every 2 years the Inspector General of each agency submit to Congress an audit of the agency’s collection, production, acquisition, maintenance, use, distribution, and preservation of geospatial data, including an assessment of its compliance with

\(^1\) Pub. L. No. 115-254, Subtitle F.
the Section 759(a) responsibilities. This report is the second in that series of mandated audits.

Results of Audit

DHS Has Made Progress in Fulfilling Geospatial Data Act Responsibilities, But Additional Work is Needed

Since our 2020 audit, DHS has made progress fulfilling the 13 responsibilities in Section 759(a) of the GDA. In 2020, we reported that DHS had met one responsibility by appointing a Geospatial Information Officer (GIO). Since then, the Department met four more responsibilities and made progress on several others. Although DHS generally improved its GDA compliance, it has only partially met seven responsibilities and still has not met one.

In addition to the progress made fulfilling these responsibilities, DHS has taken steps to address the recommendations from our previous audit. However, in our current audit, we found that DHS has still not finished identifying all its geospatial assets. Without a complete inventory, DHS cannot ensure it complies with GDA for all its geospatial assets.

DHS Met Four More GDA Responsibilities and Partially Met Three Responsibilities That Were Unmet in 2020

In 2020, we reported that DHS had met the responsibility in the GDA to appoint a contact to coordinate with the lead agencies for the National Geospatial Data Asset themes of the geospatial data used by DHS. Specifically, DHS appointed a GIO designated as the Department’s contact. Since then, we concluded that DHS has met an additional four responsibilities:

- Promoting the integration of geospatial data from all sources.
- Coordinating and working 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,

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3 GDA Section 757 requires the establishment of certain geospatial data standards, including metadata standards. Once the standards are established, the required bi-annual audit must include a review of the agency’s compliance with those standards. Five years after the establishment of Section 757 standards, the audit must also include a determination on compliance with GDA Section 759A limitations on use of Federal funds for geospatial data covered by the standards. Currently, no Section 757 standards have been established.


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building upon existing non-Federal geospatial data to the extent possible.

- Using 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.

- Ensuring that individuals receiving Federal funds for geospatial data collection provide high quality data to the maximum extent practicable.

DHS also made progress by partially meeting three responsibilities it had not met in 2020. Specifically, DHS:

- Published its geospatial data strategy as an addendum to the Evidence-Based Data Strategy (Data Strategy) it published to comply with the Foundations for Evidence-Based Policymaking Act of 2018 (Evidence Act).

- Increased its staffing resources significantly at the department-level for fulfilling its geospatial responsibilities.

- Gained an understanding of the sources of classified geospatial data and identified that the originators would control any declassification decisions.

Although DHS generally improved its GDA compliance, it has only partially met seven responsibilities and still has not met one. DHS’ status for fulfilling all 13 GDA requirements is documented in Appendix B.

DHS Has Taken Corrective Actions to Implement Previous Recommendations

During our 2020 audit of DHS’ compliance with the GDA, we made three recommendations for improvement. Since that time, DHS has taken corrective actions to implement our recommendations.

Geospatial Management Office (GMO) Staffing Increased

We recommended that the DHS Chief Information Officer identify and apply resources needed in the GMO to the Department to fulfill covered agency responsibilities under Section 759 of the GDA. In response, the Department’s GMO has increased staffing from three part-time employees in 2020 to seven full-time employees, with additional hires under consideration. The GIO developed a comprehensive job description for each position and divided the office into a Capabilities Section and a Data Section.
According to DHS’ response to our recommendation, the Office of the Chief Information Officer would coordinate with DHS’ Management Directorate and the components on a Geospatial Data Act-based workforce assessment. The purpose of the assessment would be to identify the staffing resources needed to implement all responsibilities of the GDA. GMO officials indicated they still intend to conduct the assessment. The recommendation remains open.

Increased Communication Between the Department and Components

We recommended that the DHS Chief Information Officer take the steps needed to ensure communication with all DHS components to determine the extent to which geospatial data and standards are used so the Department can integrate geospatial data from all sources and collect, maintain, disseminate, and preserve the data as required by the Act. Subsequently, the GMO communicated frequently with the components during preparation of the annual report required by GDA Section 759(b)(1). The section requires that agencies report their progress implementing their geospatial data strategies and fulfilling GDA responsibilities. The GMO requested information from the components to complete the report. The GMO then compiled the results into a single report and shared it with the components. The GMO also requested and received feedback, and it conducted meetings with the components to discuss the process and results.

Additionally, in 2021, the Department relaunched the DHS Geospatial Working Group (GWG). Composed of representatives from the components and various Department management offices, GWG held its first quarterly meeting on December 16, 2021. GWG provides a forum for communication among the DHS stakeholders concerning geospatial data matters. DHS has forwarded documentation to close this recommendation. The recommendation was closed November 21, 2022.

Increased Coordination With External Stakeholders Concerning Law Enforcement Sensitive Data

We recommended that the DHS Chief Information Officer work with the GIO to coordinate with internal and external stakeholders to ensure a common definition of geospatial data, including the classification of Law Enforcement Sensitive (LES) Information, as it applies to the DHS mission and operating environment. As we previously reported in 2020, DHS and several of its components have expressed concerns about the GDA not containing explicit provisions excluding data from the geospatial data sharing requirements. Because the Act does not specifically exclude LES data from the requirement,
DHS’ concern was that the GDA could be interpreted as directing that this information must be publicly shared. DHS classifies LES data as sensitive unclassified information that, if improperly disclosed, could adversely impact an individual’s privacy or welfare, the conduct of Federal programs, or other programs or operations essential to the national interest. DHS considers this type of data, which could include the locations of law enforcement assets, to be extremely sensitive. As such, DHS officials believe sharing this data could compromise law enforcement activities and have detrimental consequences.

DHS and the Federal Geographic Data Committee (FGDC) submitted to the Office of Management and Budget (OMB) suggested revisions to its Circular A-16 that would delegate authority to the FGDC to decide what and when LES data should be excluded from the public sharing requirement. At the time of our prior audit, DHS officials confirmed that the changes were still under OMB review.

OMB still has not decided what, if any, changes should be made to Circular A-16. Nevertheless, in response to our recommendation to work with stakeholders on the LES data sharing issue, DHS has worked with various internal and external stakeholders on obtaining an exemption for LES geospatial data from the GDA sharing requirements. Specifically, DHS has remained in contact with OMB concerning revising Circular A-16. DHS has also actively participated in FGDC Steering Committee discussions and other activities to resolve the issue. Ultimately, a solution, whether a revision of OMB Circular No. A-16 or an amendment to the GDA, will require the action of the OMB or Congress. The recommendation remains open.

Geospatial Data Strategy Needs Further Development

The GDA requires that agencies publish and implement a geospatial data strategy. However, rather than develop a separate strategy for geospatial data, as noted above, DHS issued an addendum to the Data Strategy it published on July 16, 2021, to comply with the Evidence Act. The addendum indicates that DHS will ensure consideration of geospatial data and GDA responsibilities in implementing the Data Strategy.

Although the Data Strategy defines numerous goals and objectives, and the geospatial addendum indicates the strategy for geospatial data aligns with those goals, neither document provides a detailed plan for achieving the goals and objectives. The lack of a detailed plan may be explained in the Data Strategy, which states that DHS first needs to assess the maturity of its data.

5 OMB Circular No. A-16 Coordination of Geographic Information and Related Spatial Data Activities provides direction to Federal agencies that produce, maintain, or use spatial data either directly or indirectly in the fulfillment of their mission.
According to a partial timeline in the Data Strategy, DHS planned to complete maturity assessments of immigration, management, and cybersecurity data by the fourth quarter of fiscal year 2021 and emergency preparedness and law enforcement data by the second quarter of FY 2022.

According to the Chief Data Officer, whose office is responsible for conducting the maturity assessments, after it completes the FY 2022 assessments, it will schedule additional parts of DHS for assessment as needed. According to the Data Strategy, the results of the assessments will help DHS develop the roadmaps, actions, and plans needed to implement planned goals and objectives. DHS will develop its plan for implementing the Evidence Act (and the GDA) based upon the maturity assessment results.

**DHS Cannot Meet All GDA Responsibilities Without a Complete Geospatial Data Inventory**

Similar to what we reported in 2020, DHS still has not completed a systemic inventory of its geospatial data. This may explain, at least in part, why DHS has not fully addressed five of the eight remaining GDA responsibilities.

In conjunction with activities related to the Evidence Act, DHS is inventorying all its data assets. The Department is collecting the data’s corresponding metadata\(^6\) from the DHS components and responsible offices. DHS intends to use the metadata to create a one-stop electronic data catalog. The catalog will include what data DHS possesses, which entity within the Department houses the data, and from whom access must be requested to obtain the data. Once DHS completes its data inventory, it should make further progress meeting the remaining GDA responsibilities.

DHS plans to rely on the ongoing data inventory initiative to identify its geospatial assets, rather than conducting a separate inventory. Because DHS has made a continued effort to inventory its data assets, we are not making any new recommendations on this issue.

**DHS Has Not Confirmed That All Platforms Are Following Comparable Metadata Standards**

DHS must comply with the data and metadata standards of data.gov and the Geoplatform when sharing geospatial data on those platforms. However, DHS has not confirmed that comparable standards were being followed for the data it shares through its Geospatial Information Infrastructure (GII) and

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\(^6\) Metadata is structural or descriptive information about data such as content, format, source, rights, accuracy, provenance, frequency, periodicity, granularity, publisher or responsible party, contact information, and method of collection.
components may be sharing on their own platforms. Also, until DHS has identified all its geospatial assets, it cannot be certain proper standards are in use for all its geospatial data. Therefore, DHS should ensure all platforms on which it shares geospatial data impose appropriate geospatial metadata standards.

Recommendations

**Recommendation 1:** We recommend the DHS Chief Information Officer develop and execute a separate plan for implementing DHS’ geospatial data strategy or ensure the implementation plan developed for the Department’s Evidence-Based Data Strategy fully considers geospatial data and is consistent with the *Geospatial Data Act of 2018*.

**Recommendation 2:** We recommend the DHS Chief Information Officer pursue a legislative approach, concurrent with existing administrative efforts, for determining how DHS handles, secures, and shares sensitive-but-unclassified geospatial data. As appropriate, the effort should be conducted in coordination with internal DHS stakeholders and in combination with any similar efforts undertaken by other agencies.

**Recommendation 3:** We recommend the DHS Chief Information Officer conduct the planned *Geospatial Data Act of 2018*-based workforce assessment to identify what additional staffing resources may be needed at both the departmental and the component levels to fulfill the responsibilities of the *Geospatial Data Act of 2018*.

**Recommendation 4:** We recommend the DHS Chief Information Officer confirm that all the platforms on which DHS shares geospatial data are following appropriate geospatial metadata standards.

Management Comments and OIG Analysis

DHS concurred with all four recommendations. Appendix A contains a copy of DHS’ management response in its entirety. We also received technical comments to our draft report, and we revised the report as appropriate. A summary of DHS’ response to each recommendation with our analysis follows.

**DHS Response to Recommendation 1:** Concur. The DHS Office of the Chief Information Officer (OCIO) will develop an action plan to implement GDA requirements, in alignment with the strategic objectives of the Department’s Evidence-Based Data Strategy. Estimated Completion Date (ECD): December 29, 2023.
OIG Analysis of DHS Comments: DHS’ corrective action is responsive to the recommendation. This recommendation will remain open and resolved until DHS provides a copy of its action plan to implement GDA requirements.

DHS Response to Recommendation 2: Concur. The DHS OCIO will issue guidance to DHS components on how to handle sensitive-but-unclassified geospatial data to ensure compliance with GDA requirements. Further, the DHS OCIO will engage with the Office of Management and Budget and Federal partners, as appropriate, to define processes and clarify compliance details. ECD: December 29, 2023.

OIG Analysis of DHS Comments: DHS’ corrective actions are responsive to the recommendation. This recommendation will remain open and resolved until DHS provides a copy of the guidance it issued to DHS components on how to handle sensitive-but-unclassified geospatial data as well as an update on the engagement efforts described in its recommendation response.

DHS Response to Recommendation 3: Concur. The DHS OCIO will include a geospatial workforce survey in its annual GDA reporting for submission to Congress. The survey results will be presented to the DHS Chief Data Officer Council for adjudication, and further action will be determined at that time, as appropriate. ECD: November 30, 2023.

OIG Analysis of DHS Comments: DHS’ corrective action is responsive to the recommendation. This recommendation will remain open and resolved until DHS provides a copy of the geospatial workforce survey.

DHS Response to Recommendation 4: Concur. The DHS OCIO will conduct a geospatial platform survey of DHS components to catalog what geospatial metadata standards they used for data sharing. The survey results will be presented to the DHS Chief Data Officer Council for adjudication. Further action will be determined at that time, as appropriate. ECD: November 30, 2023.

OIG Analysis of DHS Comments: DHS’ corrective action is responsive to the recommendation. The recommendation will remain open and resolved until DHS provides a copy of the geospatial platform survey.
Objective, Scope, and Methodology


The GDA requires the OIG to assess, at least every 2 years, DHS’ fulfillment of GDA responsibilities. This is our second report. The objective of our audit was to assess DHS’ progress fulfilling the requirements of the GDA, including geospatial data standards and covered agency responsibilities. The scope of the audit was DHS’ collection, production, acquisition, maintenance, distribution, use, and preservation of geospatial data.

We conducted our fieldwork at DHS Headquarters in Washington, DC. To answer our objective, we interviewed DHS’ Chief Data Officer, Records Officer, Acting Director of Data Operations, and selected officials from DHS’ GMO. We also met with officials at the Federal Emergency Management Agency, U.S. Customs and Border Protection, Transportation Security Administration, and the United States Coast Guard. We obtained and reviewed relevant Federal and departmental criteria, policies, and procedures. We distributed surveys to all DHS components to obtain information about their geospatial data usage and procedures. We used our fieldwork results to assess DHS’ compliance with each responsibility under GDA Section 759(a). Specifically, we applied a rating system using “Meets,” “Partially Meets,” and “Does Not Meet” to each of the 13 covered agency responsibilities. See Appendix B for the ratings.

We assessed the internal controls significant to the audit objective, audit risk, and the potential for fraud. This included a review of relevant DHS’ policies and procedures. We designed our audit procedures to include steps to mitigate the risks we identified.

We did not rely on computer processed data to support our findings, nor did we determine a need for data sampling in the scope of this current audit.

We conducted this compliance audit between February 2022 and August 2022 pursuant to the Inspector General Act of 1978, as amended, and according to 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 upon our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based upon our audit objectives.

The Office of Audits major contributors to this report are Larry Arnold, Director; J. Eric Barnett, Audit Manager; Sonja Capitani, Auditor-in-Charge;
Rodney Johnson, Auditor; Shawn Cosman, Auditor; Vilmarie Serrano, Auditor; Tom Hamlin, Communications Analyst; Alicia Lewis, Independent Referencer; Brendan Burke, Independent Referencer.
Appendix A
DHS Response to the Draft Report

December 6, 2022

MEMORANDUM FOR: Joseph V. Cuffari, Ph.D.
Inspector General

FROM: Jim H. Crumpacker, CIA, CFE
Director
Departmental GAO-OIG Liaison Office

SUBJECT: Management Response to Draft Report; “DHS Has Made Progress in Fulfilling Geospatial Data Act Responsibilities, But Additional Work is Needed” (Project No. 22-029-AUD-DHS)

Thank you for the opportunity to comment on this draft report. The U.S. Department of Homeland Security (DHS or the Department) appreciates the work of the Office of Inspector General (OIG) in planning and conducting its review and issuing this report.

DHS leadership is pleased to note OIG’s recognition of the Department having made progress towards fulfilling the 13 Geospatial Data Act (GDA) responsibilities. Since the previous OIG Audit in Fiscal Year (FY) 2020, DHS met four additional responsibilities: (1) promoting the integration of geospatial data from all sources; (2) coordinating with various Federal and non-Federal entities to efficiently and cost effectively manage geospatial data; (3) making geospatial information more useful; and (4) ensuring that a person receiving Federal funds for geospatial data collection provides high-quality data.

The DHS Office of the Chief Information Officer (OCIO) remains committed to working with DHS Components, and collaborating with other federal agencies as appropriate, to fulfill the Department’s responsibilities under the GDA.

As of August 26, 2022, a reorganization now includes the Geospatial Management Office (GMO) under the DHS Chief Data Officer (CDO). As the GMO is responsible for coordinating across DHS Components and with other federal agencies to fulfill GDA requirements, this reorganization improves collaboration of activities and resources between data governance, records management, and data inventory. DHS also published
its first Geospatial Data Strategy, aligned with similar goals in the DHS Evidence-Based Data Strategy, pursuant to the "Foundations for Evidence Based-Policymaking Act of 2018," (Public Law 115-435), which makes DHS data visible, accessible, understandable, secure, and linked. GMO, through the Chief Data Officer Council, is committed to working with DHS Components to satisfy all GDA requirements while ensuring sensitive but unclassified geospatial data is securely handled.

The draft report contained four recommendations with which the Department concurs. Enclosed find our detailed response to each recommendation. DHS previously submitted technical comments addressing several accuracy, contextual and other issues under a separate cover for OIG’s consideration.

Again, thank you for the opportunity to review and comment on this draft report. Please feel free to contact me if you have any questions. We look forward to working with you again in the future.

Enclosure
Enclosure: Management Response to Recommendations Contained in 22-029-AUD-DHS

OIG recommended that the DHS Chief Information Officer (CIO):

**Recommendation 1:** Develop and execute a separate plan for implementing DHS’ geospatial data strategy or ensure the implementation plan developed for the Department’s Evidence-Based Data Strategy fully considers geospatial data and is consistent with the Geospatial Data Act of 2018.

**Response:** Concur. The DHS OCIO will develop an action plan to implement Geospatial Data Act requirements, in alignment with the strategic objectives of the Department’s Evidence-Based Data Strategy. Estimated Completion Date (ECD): December 29, 2023.

**Recommendation 2:** Pursue a legislative approach, concurrent with existing administrative efforts, for determining how DHS handles, secures, and shares sensitive-but unclassified geospatial data. As appropriate, the effort should be conducted in coordination with internal DHS stakeholders and in combination with any similar efforts undertaken by other agencies.

**Response:** Concur. DHS OCIO will issue guidance to DHS Components on how to handle sensitive-but-unclassified geospatial data to ensure compliance with Geospatial Data Act requirements. Further, DHS OCIO will engage with the Office of Management and Budget and Federal partners, as appropriate, to define processes and clarify compliance details. ECD: December 29, 2023.

**Recommendation 3:** Conduct the planned Geospatial Data Act of 2018-based workforce assessment to identify what additional staffing resources may be needed at both the departmental and the component levels to fulfill the responsibilities of the Geospatial Data Act of 2018.

**Response:** Concur. DHS OCIO will include a geospatial workforce survey in its annual Geospatial Data Act reporting for submission to Congress, the results of which will be presented to the DHS Chief Data Officer Council for adjudication, and further action will be determined at that time, as appropriate. ECD: November 30, 2023.

**Recommendation 4:** Confirm that all the platforms on which DHS shares geospatial data are following appropriate geospatial metadata standards.
Response: Concur. DHS OCIO will conduct a geospatial platform survey of DHS Components to catalog what geospatial metadata standards are used for data sharing. The survey results will be presented to the DHS Chief Data Officer Council for adjudication, and further action will be determined at that time, as appropriate. ECD: November 30, 2023.
## Appendix B
DHS Compliance with *Geospatial Data Act of 2018* Responsibilities, 2020 and 2022

<table>
<thead>
<tr>
<th>Section 759(a) Covered Agency Responsibilities</th>
<th>Compliance 2020</th>
<th>Compliance 2022</th>
<th>Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>(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)</td>
<td>Does Not Meet</td>
<td>Partially Meets</td>
<td>DHS published its geospatial data strategy as an addendum to the data strategy it published to comply with the <em>Foundations for Evidence-Based Policymaking Act</em>. Although the documents provide goals and objectives, neither includes a complete plan for achieving them.</td>
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<tr>
<td>(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</td>
<td>Partially Meets</td>
<td>Partially Meets</td>
<td>DHS shares its public geospatial data on data.gov and the Geoplatform. It shares its non-public geospatial data through its Geospatial Information Infrastructure. However, DHS has not identified all its geospatial assets, so it cannot be certain it is fully complying with the responsibility.</td>
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<tr>
<td>(3) promote the integration of geospatial data from all sources</td>
<td>Does Not Meet</td>
<td>Meets</td>
<td>DHS has improved its promotion of geospatial data integration. The focus of the recently relaunched DHS Geospatial Working Group (GWG) includes promoting geospatial data integration. The DHS Data Inventory Program, a GWG meeting topic, is integrating the metadata of the Department’s data to build a single electronic DHS data catalog.</td>
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<tr>
<td>Section 759(a) Covered Agency Responsibilities</td>
<td>Compliance 2020</td>
<td>Compliance 2022</td>
<td>Details</td>
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<td>(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 (NARA)</td>
<td>Does Not Meet</td>
<td>Does Not Meet</td>
<td>The DHS Records Officer (RO) advised that DHS does not possess a records schedule for its geospatial data assets. Once DHS has identified all of its geospatial assets, the RO will prepare geospatial data record schedules for DHS and submit them to NARA for approval. The RO is waiting until the inventory of geospatial assets has been completed to ensure all DHS geospatial data types are included. DHS has been instructed not to dispose of any geospatial data until approved records schedules are in place.</td>
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<td>(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</td>
<td>Does Not Meet</td>
<td>Partially Meets</td>
<td>DHS has significantly increased its resources at the department-level for fulfilling its geospatial responsibilities. However, DHS has not conducted the planned workforce assessment to assure DHS possess the resources it requires to comply with the GDA responsibilities.</td>
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<tr>
<td>(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</td>
<td>Partially Meets</td>
<td>Partially Meets</td>
<td>DHS must comply with the data and metadata standards of data.gov and the GeoPlatform when sharing geospatial data on those platforms. However, DHS has not confirmed that comparable standards are being followed for the data it shares through its GII and its components may be sharing on their own platforms. Also, until DHS has identified all its geospatial assets, it cannot be certain proper standards are in use for all its geospatial data. GDA Section 757 requires the establishment of government-wide geospatial data and metadata standards. Once the standards are established, DHS will need to ensure it complies with them.</td>
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<tr>
<td>Section 759(a) Covered Agency Responsibilities</td>
<td>Compliance 2020</td>
<td>Compliance 2022</td>
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<td>(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</td>
<td>Partially Meets</td>
<td>Meets</td>
<td>Through various activities, DHS has coordinated and partnered with various Federal and non-Federal entities to efficiently and cost effectively manage geospatial data.</td>
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<td>(8) use geospatial information to—&lt;br&gt; (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</td>
<td>Partially Meets</td>
<td>Meets</td>
<td>As noted above, DHS shares its public geospatial data with the public on both data.gov and the Geoplatform. For example, FEMA makes available geospatial data the public can use to better understand flood risks. DHS webpage Homeland Security Enterprise Geospatial Concept of Operations provides the public and DHS geospatial partners access to geospatial best practices, lessons learned and a geospatial data catalog. Additionally, DHS advised of several instances where DHS geospatial data was used to support government decision making. Finally, DHS was an active participant in the inter-agency effort to develop the self-assessment questionnaire that agencies can use for the required annual GDA reporting to Congress.</td>
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<tr>
<td>(9) protect personal privacy and maintain confidentiality in accordance with Federal policy and law</td>
<td>Partially Meets</td>
<td>Partially Meets</td>
<td>The DHS Privacy Office serves as both an advisor and oversight body for DHS’ privacy sensitive programs and systems. The office ensures Department activities follow DHS privacy policy and applies privacy protections across the Department in a consistent manner. DHS performed a privacy impact assessment of its GII in 2019. However, until DHS has identified all of its geospatial assets, it cannot be certain that it is fully complying with the responsibility.</td>
</tr>
<tr>
<td>Section 759(a) Covered Agency Responsibilities</td>
<td>Compliance 2020</td>
<td>Compliance 2022</td>
<td>Details</td>
</tr>
<tr>
<td>-----------------------------------------------</td>
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</tr>
<tr>
<td>(10) participate in determining, when applicable, whether declassified data can contribute to and become a part of the National Spatial Data Infrastructure</td>
<td>Does Not Meet</td>
<td>Partially Meets</td>
<td>The GMO’s understanding is that any classified geospatial data in use in the Department originated, or is derived from classified data that originated, outside of DHS. Consequently, the originators would control any related declassification decisions. However, until the Department has identified all its geospatial assets, including classified data derived in DHS from nonclassified sources, it cannot be certain that it is fully complying with the responsibility.</td>
</tr>
<tr>
<td>(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</td>
<td>Partially Meets</td>
<td>Partially Meets</td>
<td>DHS Management Directive 034-01-001 requires DHS components search all sources before expending funds for geospatial data. DHS maintains a Blanket Purchase Agreement (BPA) for acquiring geospatial assets. The GMO indicated it is working internally to obtain an update to BPA’s guidance that directs that the GeoPlatform be searched as part of the acquisition process. Additionally, GMO said it is working on adding to the DHS information technology acquisition submission process a step that will require geospatial data procurement requesters affirm they complied with GDA requirements.</td>
</tr>
<tr>
<td>(12) to the maximum extent practicable, ensure that a person receiving Federal funds for geospatial data collection provides high-quality data</td>
<td>Partially Meets</td>
<td>Meets</td>
<td>GMO indicated that it reviews geospatial data purchase submissions under the Department’s geospatial BPA and acts as a resource for those in DHS considering such a purchase. This includes maintaining DHS management directives, instructions, and other internal acquisition controls in place to ensure geospatial investments — including data — are of the highest quality.</td>
</tr>
<tr>
<td><strong>Section 759(a) Covered Agency Responsibilities</strong></td>
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<td><strong>Compliance 2022</strong></td>
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<tr>
<td>(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 (Appoint a contact to coordinate with other lead covered agencies)</td>
<td>Meets</td>
<td>Meets</td>
<td>As reported in 2020, DHS appointed the GIO to serve as the contact.</td>
</tr>
<tr>
<td>Section 759A. Limitation on Use of Federal Funds</td>
<td>N/A</td>
<td>N/A</td>
<td>This section does not require compliance until 5 years after the date on which standards for the related National Geospatial Data Asset data theme are established.(^7)</td>
</tr>
</tbody>
</table>

\(^7\) Pub. L. No. 115-254, Subtitle F, Section 759a.

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