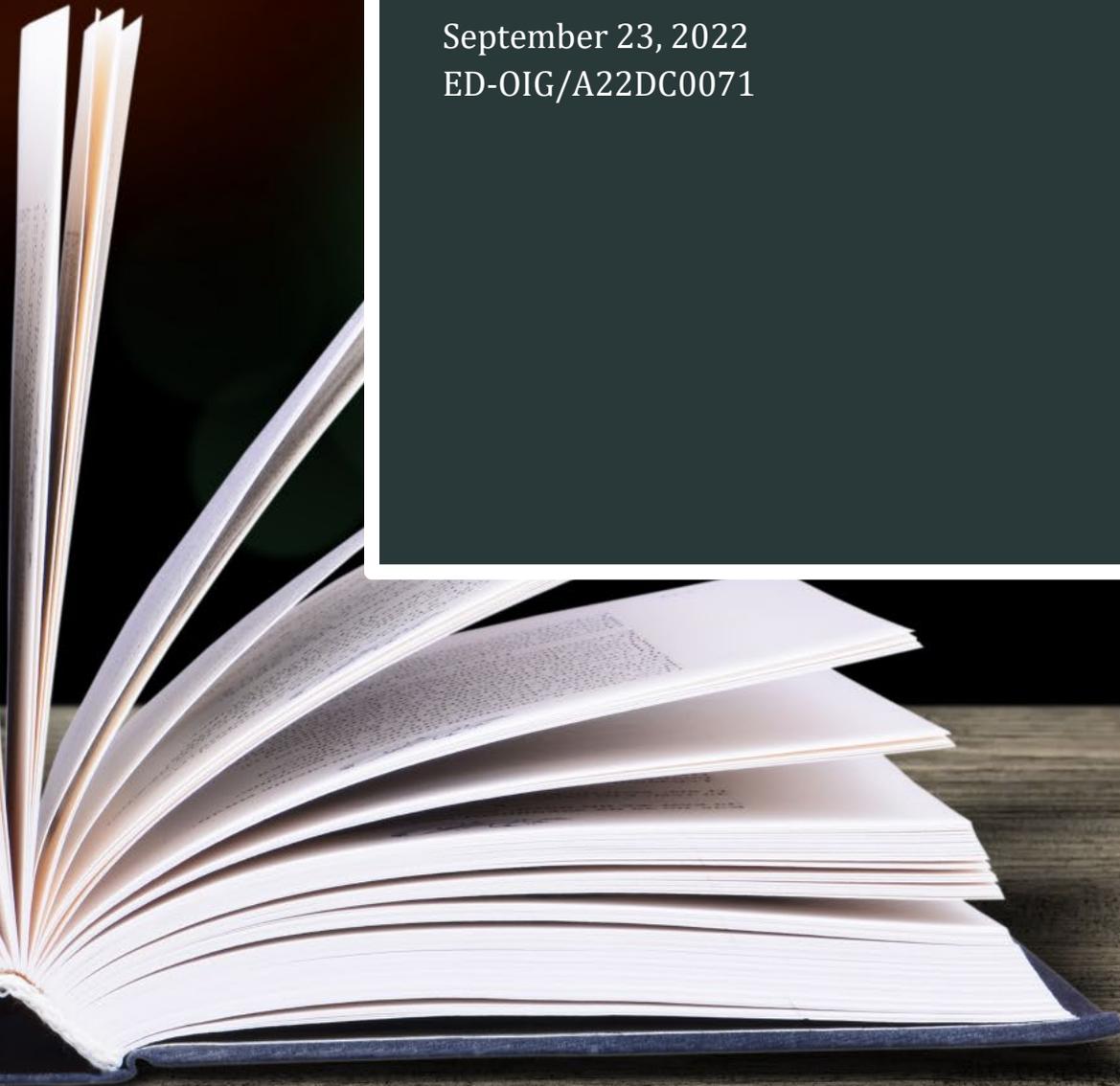




U.S. Department of Education
Office of Inspector General

The Department's Compliance with the Geospatial Data Act

September 23, 2022
ED-OIG/A22DC0071



NOTICE

Statements that managerial practices need improvements, as well as other conclusions and recommendations in this report, represent the opinions of the Office of Inspector General. The appropriate Department of Education officials will determine what corrective actions should be taken.

In accordance with Freedom of Information Act (Title 5, United States Code, Section 552), reports that the Office of Inspector General issues are available to members of the press and general public to the extent information they contain is not subject to exemptions in the Act.



**UNITED STATES DEPARTMENT OF EDUCATION
OFFICE OF INSPECTOR GENERAL**

Audit Services

September 23, 2022

TO: Dr. Mark Schneider
Director, Institute of Education Sciences

FROM: Bryon S. Gordon /s/
Assistant Inspector General for Audit

SUBJECT: Final Audit Report, "The Department's Compliance with the Geospatial Data Act," Control Number ED-OIG/A22DC0071

Attached is the subject final audit report that consolidates the results of our review of the Department's Compliance with the Geospatial Data Act. We have provided an electronic copy to your audit liaison officer. We received your comments agreeing with the findings and recommendations in our draft report.

U.S. Department of Education policy requires that you develop a final corrective action plan within 30 days of the issuance of this report. The corrective action plan should set forth the specific action items and targeted completion dates necessary to implement final corrective actions on the findings and recommendations contained in this final audit report. Corrective actions that your office proposes and implements will be monitored and tracked through the Department's Audit Accountability and Resolution Tracking System.

In accordance with the Inspector General Act of 1978, as amended, the Office of Inspector General is required to report to Congress twice a year on the audits that remain unresolved after 6 months from the date of issuance.

We appreciate your cooperation during this review. If you have any questions, please contact Michele Weaver-Dugan at (202) 245-6941 or Michele.Weaver-Dugan@ed.gov.

Attachment

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Results in Brief

What We Did

The objective of our audit was to review the U. S. Department of Education’s (Department) compliance with the requirements outlined under Section 759(a) of the Geospatial Data Act. Specifically, we determined whether the Department implemented the 13 covered agency responsibilities listed in Section 759(a) of the Geospatial Data Act.

What We Found

We found that the Department is in compliance with the applicable responsibilities outlined under Section 759(a) of the Geospatial Data Act. Specifically, we found that the Department implemented all 12 of the 13 covered agency responsibilities listed in Section 759(a) of the Geospatial Data Act that we reviewed. We were unable to evaluate compliance with one covered agency responsibility as the applicable data standards related to this responsibility have not yet been defined by the Federal Geographic Data Committee and the Office of Management and Budget.

What We Recommend

We recommend that the Department ensure continued implementation of the covered agency responsibilities listed under Section 759(a) of the Geospatial Data Act. Further, we recommend that the Department ensure that Section 759(a)(6) is implemented once applicable guidance becomes available.

Institute of Education Sciences’ Comments and Our Response

We provided a draft of this report to the Institute of Education Sciences for comment. We summarize the Institute of Education Sciences’ comments at the end of the finding and provide the full text of the comments at the end of the report.

The Institute of Education Sciences agreed with the finding and recommendations and noted its intent to continue to implement geospatial data activities consistent with the requirements of the Geospatial Data Act.

The Institute of Education Sciences’ proposed corrective actions, if implemented as described, are responsive to our recommendations.

Introduction

Background

The Geospatial Data Act, enacted on October 5, 2018, formalizes governance processes related to geospatial data,¹ provides policy and guidance to empower the use of geospatial data and technology, and facilitates broad cooperation between the public and private sectors. The Geospatial Data Act reduces duplicative efforts and facilitates the efficient procurement of geospatial expertise, technology, services, and data from the rapidly growing geographic community in the United States. Section 759(a) of the Geospatial Data Act lists 13 responsibilities that covered agencies must fulfill (See [Appendix B](#)).

Additionally, the Geospatial Data Act requires the Inspectors General of covered agencies, not less than once every 2 years, to submit to Congress an audit of the collection, production, acquisition, maintenance, distribution, use, and preservation of geospatial data by the covered agency, which shall include a review of (1) the compliance of the covered agency with the standards for geospatial data, including metadata for geospatial data, established under section 757; (2) the compliance of the covered agency with the requirements under section 759(a); and (3) the compliance of the covered agency on the limitation on the use of Federal funds under section 759A.²

The National Center for Education Statistics (NCES) within the Institute of Education Sciences is the primary Federal entity for collecting and analyzing data related to education in the United States and other nations. The NCES Education Demographic and Geographic Estimates (EDGE) program designs and develops information resources to help understand the social and spatial context of education in the United States. It uses spatial data collected by NCES and the Census Bureau to create geographic locale

¹ Geospatial data is information that is tied to a location on the Earth, including by identifying the geographic location and characteristics of natural or constructed features and boundaries on the Earth, and that is generally represented in vector datasets by points, lines, polygons, or other complex geographic features or phenomena. Geospatial data may be derived from, among other things, remote sensing, mapping, and surveying technologies.

² On September 24, 2020, we issued an audit report on the U.S. Department of Education's (Department) compliance with the Geospatial Data Act. See <https://www2.ed.gov/about/offices/list/oig/auditreports/fy2020/a19u0003.pdf>.

indicators, school point locations, school district boundaries, and other types of data to support spatial analysis.

Governing Bodies and Guidance

The Federal Geographic Data Committee (FGDC) is the primary entity for developing, implementing, and reviewing the policies, practices, and standards relating to geospatial data according to the guidelines and requirements issued by the Office of Management and Budget (OMB). The Geospatial Data Act requires OMB to provide guidance on its implementation within 1 year of enactment. To fulfill this requirement, OMB is revising Circular A-16, “Coordination of Geographic Information and Related Spatial Data Activities,” dated August 19, 2002. However, the circular is still under revision as of July 2022.

The National Spatial Data Infrastructure (NSDI) refers to the technology, policies, standards, and employees necessary to promote geospatial data sharing throughout the Federal, State, tribal, and local governments and the private sector. The Geospatial Data Act requires the FGDC to lead the development and management and operational decision making for the NSDI strategic plan and geospatial data policy in accordance with section 755. The NSDI strategic plan, issued in November 2020, will help ensure that the nation has consistent, trusted, geospatial data to promote effective governance, economic growth, and technological innovation at local and national scales. This plan also provides the basis for the follow-on geospatial strategies that will be developed by the covered agencies.

Availability of the Department’s Geospatial Data

Section 758 of the Geospatial Data Act states that the FGDC “shall operate an electronic service that provides access to geospatial data and metadata for geospatial data to the general public, to be known as the GeoPlatform. ... The GeoPlatform shall ... include download access to all open geospatial data directly or indirectly collected by covered agencies” Section 756(b) of the Geospatial Data Act states that, “for each National Geospatial Data Asset [(NGDA)] data theme,^[3] the FGDC shall designate one or more covered agencies as the lead covered agencies The lead covered agency for [an NGDA] data theme shall be responsible for ensuring the coordinated management of the data, supporting resources ..., and related services and products of the [NGDA] data theme.” Additionally, lead covered agencies shall designate a point of contact “who shall be responsible for developing, maintaining, coordination relating to, and

³ NGDA data themes are core geospatial datasets that relate to a specific topic or subject.

disseminating data using the GeoPlatform.”

The GeoPlatform website⁴ is organized by NGDA data themes. Geospatial data related to education, including elementary school district datasets, unified school district datasets, and secondary school district datasets, are available under the Governmental Units and Administrative and Statistical Boundaries data theme. The GeoPlatform website lists the Census Bureau as the “publisher” of these datasets and the Theme Lead Agency for the Governmental Units and Administrative and Statistical Boundaries data theme. For each dataset, users can download individual data files and relevant metadata, and can also access the Census Bureau website where the geospatial data can be viewed on an interactive map.

The Department’s geospatial data is available on the EDGE program website⁵ and includes data such as school district boundaries, schools’ geographic location indicators, and school attendance boundaries.

Geospatial Data Act Working Group

On October 18, 2021, the Council of the Inspectors General on Integrity and Efficiency (CIGIE) sent a letter to Congress about the scope of the fiscal year 2022 Geospatial Data Act audits, stating that the fiscal year 2022 mandatory audit scope period overlapped with the estimated Geospatial Data Act implementation period established by the FGDC. As part of the implementation phase, the FGDC is evaluating the existing body of standards, among other items, and as a result, conducting the mandatory audits as prescribed by the Geospatial Data Act would result in reports submitted by the Inspectors General in October 2022 being inconclusive for two of the three audit requirements.

In the letter, CIGIE stated that to address this challenge while continuing to meet the mandatory audit requirements, it convened a working group with representatives from the Covered Agency Inspectors General to reach a consensus on an audit approach for the fiscal year 2022 audits. It stated that the Covered Agency Inspectors General determined that audits focused on the Covered Agencies’ progress toward compliance with the Geospatial Data Act, including the agencies’ compliance with requirements under subsection (a), would likely provide the best value to the Covered Agencies, Congress, and the public. It noted this is a somewhat narrower approach than what the

⁴ <https://www.GeoPlatform.gov>.

⁵ <https://nces.ed.gov/programs/edge>.

law requires because it is currently difficult to determine which standards the audits should use in evaluating compliance. It also noted that because the law established a 5-year implementation period before limiting the use of Federal funds for non-compliant activities, this requirement would not be evaluated in the fiscal year 2022 audits. CIGIE believed this consensus approach would afford each Covered Agency Inspector General latitude to perform additional testing based on the Covered Agency's geospatial footprint, as determined necessary by the applicable Inspector General (See [Appendix C](#)).

Finding. The Department is in Compliance with the Requirements Outlined under Section 759(a) of the Geospatial Data Act

We found that the Department is in compliance with 12 of the 13 requirements under Section 759(a). We were unable to evaluate compliance with one requirement (6).

The following is a summary of the results of our review for each requirement under Section 759(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 prepared under section 755(c).

NCES's geospatial data strategy for developing and maintaining geospatial data relies on four primary principles:

1. Develop geospatial data needed for Department programs and educational research;
2. Share geospatial data in common formats through easily accessible locations;
3. Apply geospatial data and methods to create new data solutions; and
4. Provide supplemental resources to explain and visualize Department geospatial data.

We reviewed NCES's geospatial data strategy and the NSDI strategic plan and found that activities conducted under Principle 2—Share geospatial data in common formats through easily accessible locations—help to achieve several of the NSDI's objectives. These activities include providing geospatial data as static, downloadable files from the EDGE website, participating in the FGDC, and registering the Department's geospatial data in the GeoPlatform. Specifically, NCES helps achieve NSDI objectives by:

- Providing geospatial data as web services with open data standards via the EDGE program (NSDI Objective 3.1. "Increase awareness and broaden the use of national shared services, including the GeoPlatform, to publish, discover, integrate, promote, visualize, analyze, and disseminate national geospatial data. Apply open standards to ensure that shared services can be improved and expanded at minimal effort and cost.");
- Sharing geospatial data with other agencies (NSDI Objective 2.3. "Advance the practice of integrating government and nongovernment data into national

datasets, and NSDI Objective 3.3. Update shared services policies and practices to improve the ability of users to discover, qualify, access, combine, and use geospatial services with geospatial data, spatial analytics, and nonspatial data”);

- Improving communication across federal agencies (NSDI Objective 4.2. “Develop processes and tools, in collaboration with partners, to promote effective communication and knowledge exchange about the benefits and uses of geospatial data, technology, and the NSDI.”), and;
- Learning about data sources that may be useful for Department activities (NSDI Objective 3.1. “Increase awareness and broaden the use of national shared services, including the GeoPlatform, to publish, discover, integrate, promote, visualize, analyze, and disseminate national geospatial data. Apply open standards to ensure that shared services can be improved and expanded at minimal effort and cost.”).

We also reviewed the Department’s strategic plan for fiscal year 2018–2022 and found that NCES’s geospatial data strategy helps support Strategic Objective 3.1—“Improve the Department’s data governance, data life cycle management and the capacity to support education data.” NCES achieves this by using core geospatial data to produce annually updated school district boundaries and locale boundaries and using the EDGE website to maintain the Department’s geospatial data in a centralized location.

Additionally, NCES’s geospatial data strategy helps to fulfill the Department’s Strategic Objective 3.3—“Increase access to, and use of, education data to make informed decisions both at the Department and in the education community.” NCES collaborates with State and Federal partners to collect and compile data which inform many activities throughout the Department and provide inputs to develop core geospatial data needed to support Department statistical and statutory programs. Further, the EDGE program produces data in common industry-standard formats and makes data available as easily accessible web services. The EDGE program provides additional comments and resources to address common data user questions, and additional resources are provided via conference presentations and other types of public engagements. Finally, NCES registers its geospatial data services with GeoPlatform and ArcGIS⁶ to make the data easier to find and search.

NCES’s geospatial data strategy is published on its website.

⁶ ArcGIS software (<https://www.arcgis.com>) allows users to create and share interactive web maps.

(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.

The Department's geospatial data is available on the NCES EDGE website. The data is available in common formats and can be downloaded as a data file or viewed on an interactive map. This allows any user to access and explore the Department's geospatial data without specialized software. Users can also access data from previous years through the EDGE website. We found that the number of previous years maintained on the EDGE website varied for each category of data and noted that some of the data dates back to 1995. We noted that the Department's geospatial data is also available on GeoPlatform.gov and Data.gov.

(3) Promote the integration of geospatial data from all sources.

The web services architecture of the EDGE website allows for the integration of data from other agencies and sources. We reviewed the interactive maps available on the EDGE website and found that the Department's geospatial data is combined with information from other sources such as satellite imagery, congressional districts, urban and metropolitan areas, and opportunity zones.⁷

NCES has continued to pursue new opportunities to develop and apply geospatial data and is continuing to work with and learn from states and other stakeholders. One example is the poverty pilot program, a project involving experimental poverty indicators. This project involved discussing how to create a new poverty indicator, how it could be applied, whether it would be useful to States and districts and how NCES could help States and districts build their capacity for geospatial data.

(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.

NCES's geospatial data are included in the Department's records schedules. During our previous audit of the Department's compliance with the Geospatial Data Act, we reviewed a draft records schedule that was with the National Archives and Records Administration

⁷ The Tax Cuts and Jobs Act established opportunity zones to spur private investment in distressed communities throughout the country. Opportunity zones are defined by individual census tract, nominated by America's governors, and certified by the U.S. Secretary of Treasury. Under certain conditions, new investments in opportunity zones may be eligible for preferential tax treatment. There are 8,764 opportunity zones in the United States.

for an initial preclearance review. The records schedule was revised based on comments received during that review, and as of August 2022, the records schedule is with the National Archives and Records Administration for final review and approval. The approval process is expected to take approximately 18–24 months.

(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.

The Department's geospatial data-related activities are funded through the Institute of Education Sciences Statistics program and are supported by one full time equivalent employee that oversees the NCES EDGE program. The Department received \$111.5 million for the statistics program for both fiscal year 2021 and fiscal year 2022. This funding supports the collection, analysis, and dissemination of education-related statistics in response to both legislative requirements and to the particular needs of data providers, data users, and educational researchers. NCES stated that resources for the EDGE program cover demographic, economic, and geographic data production and dissemination, and that NCES provides as much attention to geospatial activities as resources allow. Additionally, we noted that NCES staff represent the Department on the FGDC Steering Committee and the FGDC Geospatial Data Act Working Group.

(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.

We were unable to evaluate the Department's compliance with this requirement. As of June 2021, the FGDC has not adopted or endorsed any standards since the passage of the Geospatial Data Act because FGDC is awaiting guidance from OMB. Once OMB issues the guidance, FGDC plans to review it and implement standards accordingly.

While there are no official standards for metadata yet, NCES stated that all geospatial data have been designed with appropriate data standards and metadata to ensure they can be registered in Data.gov, GeoPlatform.gov, and other data portals that apply metadata validators.

(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.

NCES relies on other agencies and sources of information to produce the Department's geospatial data. NCES coordinates with the Census Bureau to produce geospatial data via two Interagency Agreements. According to the Interagency Agreement documentation, NCES relies on geographic data and spatial analysis from the Census Bureau to clarify the context and conditions of education in the United States. These data include geocodes, locale indicators, and administrative boundaries.

In addition, NCES works with agencies of State and local governments, institutions of higher education, and the private sector to collect and build upon non-Federal geospatial data using nationally representative and local-level surveys. These include the NCES Common Core of Data, NCES Private School Survey, and NCES Integrated Postsecondary Education Data System.

Since our previous audit, NCES has continued to host an annual Summer Data Forum and Conference. The Forum is comprised of representatives from State and local education agencies, the Federal government, and other organizations with an interest in education data. The most recent conference was held in August 2021. We noted that the NCES Statistician was listed as a presenter for three of the sessions held during the most recent conference, providing participants with an overview of NCES data tools that can be used to access data sets and EDGE website applications that can be used to explore the social and spatial context of education.

As noted above, NCES uses the EDGE website to maintain and share the Department's geospatial data. In addition, the Census Bureau has published the Department's geospatial data on Geoplatform.gov.

(8) Use geospatial information to—(A) make Federal geospatial information and services more useful to the public; (B) enhance operations; (C) support decision making; and (D) enhance reporting to the public and to Congress.

The NCES EDGE website makes the Department's geospatial data available to the public through an interactive map so that users without specialized software can access it. As discussed under requirement (7) above, NCES staff hold an annual data conference that includes demonstrations of the ways the Department's geospatial data can be used.

Additionally, we found that the EDGE website describes the information found in each category of geospatial data and gives examples of how the data can enhance operations and support decision making. Examples provided include school district boundaries, schools' geographic location indicators, and school attendance boundaries.

Finally, we found examples of reports to the public and to Congress produced by the Department that incorporate geospatial data:

- The “Report on Indicators of School Crime and Safety” for 2021 provides information about student reports of bullying, student perceptions of school safety, and mental health services provided by schools broken down by locale indicator.
- The School Pulse Survey, implemented by the Institute of Education Sciences and NCES to provide rapid feedback about the impact of COVID on local schools. Data from this survey are disaggregated by locale to help determine whether different types of locations have been impacted differently.
- The “Informational Document on the Rural Education Achievement Program” is an example of how other Department principal offices use NCES data to support program administration. This program overview explains how locale assignments are used to determine program eligibility.
- NCES’s annual “Report on the Conditions of Education” publication fulfills a congressionally mandated reporting requirement. This publication provides information about the conditions of students and schools in different types of geographic areas.
- The Department’s College Scorecard project provides data to help students and families compare college costs and outcomes. The College Scorecard incorporates basic NCES geospatial data such as locale boundaries and postsecondary school locations.

(9) Protect personal privacy and maintain confidentiality in accordance with Federal policy and law.

The Department’s geospatial data does not include personally identifiable information. The data mainly consists of school locations and boundaries, and no personally identifiable information is collected. However, we noted that the Interagency Agreements between the Department and the Census Bureau include standard language regarding protection of personal information and maintaining confidentiality.

(10) Participate in determining, when applicable, whether declassified data can contribute to and become a part of the National Spatial Data Infrastructure.

As noted above, the Department’s geospatial data assets are limited to publicly reported institutions or local government entities and therefore do not include personally identifiable information, classified data, or declassified data.

(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.

NCES is the primary Federal entity for collecting, analyzing, and reporting data related to education in the United States. NCES's geospatial data is produced in collaboration with the Census Bureau, using existing survey and census data. The scope of the Department's geospatial data is relatively small and specialized around schools and school districts.

(12) To the maximum extent practicable, ensure that a person receiving Federal funds for geospatial data collection provides high-quality data.

The Department does not have any private contracts for the development or collection of geospatial data. As noted above, the Department's geospatial data is produced in collaboration with the Census Bureau. We noted that the Interagency Agreement documentation states that the Census Bureau will follow NCES statistical and publication standards.

(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.

The NCES Statistician is the contact for coordination with the Census Bureau (the lead covered agency for the data theme used by the Department). We noted that the NCES Statistician is listed as a point of contact on the Interagency Agreement documentation.

Overall, we found that since our previous audit of the Department's compliance with the Geospatial Data Act, NCES has continued its efforts to comply with the covered agency responsibilities outlined in Section 759(a). These efforts are well informed and largely headed by the NCES Statistician, who has been directing the NCES EDGE program for 7 years and serves as the designated point of contact for coordination with the lead covered agency. The NCES Statistician also represents the Department on the FGDC Geospatial Data Act Working Group. The primary focus of this group has been the 13 covered agency responsibilities under Section 759(a) and assessing the progress that covered agencies have made in meeting the requirements.

Additionally, we found that the NCES Commissioner represents the Department on the FGDC Steering Committee, a policy-level interagency group responsible for providing leadership and direction in support of activities related to OMB Circular A-16 and the development of the NSDI. The Steering Committee's central focus is to provide the executive leadership for the coordination of Federal geospatial activities between, among, and within agencies.

By continuing to implement the covered agency responsibilities listed in Section 759(a), the Department is furthering the goals of the Geospatial Data Act. The Department continues to have assurance that it is efficiently managing geospatial data, technologies, and

infrastructure. By coordinating with other agencies and organizations involved with geospatial data, the Department is reducing duplicative efforts and facilitating efficient procurement of geospatial expertise, technology, and services.

Recommendations

We recommend that the Director for the Institute of Education Sciences:

- 1.1 Ensure that the Department continues to implement the covered agency responsibilities listed under Section 759(a) of the Geospatial Data Act.
- 1.2 Ensure that the Department implements Section 759(a)(6) once applicable guidance becomes available.

Institute of Education Sciences Comments

The Institute of Education Sciences agreed with the finding and recommendations and stated that it intends to continue to implement NCES geospatial data activities consistent with the requirements of the Geospatial Data Act. In addition, the NCES Commissioner and her staff will continue to engage with the FGDC and its subcommittees to ensure that NCES incorporates appropriate standards and provides metadata in appropriate platforms.

OIG Response

The Institute of Education Sciences' proposed corrective actions, if implemented as described, are responsive to our recommendations.

Appendix A. Scope and Methodology

To answer our objective, we gained an understanding of the Department’s implementation of Section 759(a) of the Geospatial Data Act. We reviewed applicable laws, regulations, directives, and other regulatory criteria and guidance related to the Department’s responsibilities under the Geospatial Data Act. In addition, we conducted interviews of NCES officials and staff responsible for the Department’s geospatial data. We also reviewed prior Office of Inspector General, Government Accountability Office, and other Federal agencies’ audit reports related to our audit objective.

Implementation of Section 759(a) of the Geospatial Data Act

We met with NCES officials to discuss the Department’s implementation of Section 759(a) of the Geospatial Data Act. We reviewed the Department’s geospatial data strategy. We obtained copies of meeting minutes, presentations, and email correspondence related to the Department’s implementation of the Geospatial Data Act. We reviewed geospatial data available on the Department’s EDGE website, as well as GeoPlatform.gov and Data.gov. We obtained documentation of the Department’s Interagency Agreements with the Census Bureau. We reviewed the draft update to the Department’s records schedules. Finally, we reviewed a selection of reports to the public and Congress that incorporate the Department’s geospatial data.

Use of Computer-Processed Data

While we reviewed electronic platforms such as the EDGE website, GeoPlatform.gov, and Data.gov, we did not utilize the data itself and instead focused on the data’s existence. Therefore, we determined that an assessment of the reliability of computer-processed data was not required.

We conducted fieldwork at Department offices in Washington, D.C., from March 2022 through August 2022. We provided our audit results to Institute of Education Sciences officials on August 10, 2022.

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

Appendix B. Section 759(a) Covered Agency Responsibilities

Section 759 Covered Agency Responsibilities

(a) Each covered agency shall:

- (1) prepare, maintain, publish, and implement a strategy for advancing geographic information and related geospatial data and activities appropriate to the mission of the covered agency, in support of the strategic plan for the National Spatial Data Infrastructure prepared under section 755(c);
- (2) collect, maintain, disseminate, and preserve geospatial data such that the resulting data, information, or products can be readily shared with other Federal agencies and non-Federal users;
- (3) promote the integration of geospatial data from all sources;
- (4) ensure that data information products and other records created in geospatial data and activities are included on agency record schedules that have been approved by the National Archives and Records Administration;
- (5) allocate resources to fulfill the responsibilities of effective geospatial data collection, production, and stewardship with regard to related activities of the covered agency, and as necessary to support the activities of the Committee;
- (6) use the geospatial data standards, including the standards for metadata for geospatial data, and other appropriate standards, including documenting geospatial data with the relevant metadata and making metadata available through the GeoPlatform;
- (7) coordinate and work in partnership with other Federal agencies, agencies of State, tribal, and local governments, institutions of higher education, and the private sector to efficiently and cost effectively collect, integrate, maintain, disseminate, and preserve geospatial data, building upon existing non-Federal geospatial data to the extent possible;
- (8) use geospatial information to—
 - (A) make Federal geospatial information and services more useful to the public;
 - (B) enhance operations;
 - (C) support decision making; and

(D) enhance reporting to the public and to Congress;

(9) protect personal privacy and maintain confidentiality in accordance with Federal policy and law;

(10) participate in determining, when applicable, whether declassified data can contribute to and become a part of the National Spatial Data Infrastructure;

(11) search all sources, including the GeoPlatform, to determine if existing Federal, State, local, or private geospatial data meets the needs of the covered agency before expending funds for geospatial data collection;

(12) to the maximum extent practicable, ensure that a person receiving Federal funds for geospatial data collection provides high-quality data; and

(13) appoint a contact to coordinate with the lead covered agencies for collection, acquisition, maintenance, and dissemination of the National Geospatial Data Asset data themes used by the covered agency.

Appendix C. Communication of Planned Audit Approach



October 18, 2021

The Honorable Maria Cantwell
Chairwoman
The Honorable Roger F. Wicker
Ranking Member
Committee on Commerce, Science,
and Transportation
United States Senate
Washington, D.C.

The Honorable Eddie Bernice Johnson
Chairwoman
The Honorable Frank Lucas
Ranking Member
Committee on Science, Space,
and Technology
U.S. House of Representatives
Washington, D.C.

Dear Chairwomen and Ranking Members:

The Council of the Inspectors General on Integrity and Efficiency (CIGIE) recognizes and appreciates your leadership on issues of geospatial data. In particular, we believe the enactment of the Geospatial Data Act of 2018 (P.L. 115-254) will improve the continuing development of geospatial data and technology. To make sure this happens, the Geospatial Data Act provides for oversight by way of the Federal Inspectors General. Specifically, the Geospatial Data Act requires the biennial completion of a review of Covered Agencies' compliance with standards established by the Act, Covered Agencies' responsibilities detailed in the Act, and Covered Agencies' compliance with the prohibition of Federal funding for non-compliant datasets.

We are writing this letter on behalf of CIGIE to inform you of an important distinction with the biennial Geospatial Data Act audits by the Inspector General community. Specifically, the Fiscal Year 2022 mandatory audit scope period overlaps with the estimated Geospatial Data Act implementation period established by the Federal Geographic Data Committee (FGDC). As part of the implementation phase, the FGDC is evaluating the existing body of standards, among other items. Due to the continuing implementation of the Geospatial Data Act, conducting the mandatory audits as prescribed by the Act would result in reports submitted by the Inspectors General in October 2022 being inconclusive for two of the three audit requirements.

To address this challenge while continuing to meet the mandatory audit requirements, CIGIE convened a working group with representatives from the Covered Agency Inspectors General to reach a consensus on an audit approach for the Fiscal Year 2022 audits. The Covered Agency Inspectors General determined that audits focused on the Covered Agencies' progress toward compliance with the Geospatial Data Act, including the agencies' compliance with requirements

under subsection (a), would likely provide the best value to the Covered Agencies, Congress, and the Public. This is a somewhat narrower approach than what the law requires because it is currently difficult to determine which standards the audits should use in evaluating compliance. Also, because the law establishes a five-year implementation period before limiting the use of Federal funds for non-compliant activities, this requirement would not be evaluated in the Fiscal Year 2022 audits.

This consensus approach will afford each Covered Agency Inspector General latitude to perform additional testing based on the Covered Agency's geospatial footprint, as determined necessary by the applicable Inspector General.

Should you or your staffs have any questions about our approach or other aspects of our collective Geospatial Data Act oversight activities, please do not hesitate to contact us at (703) 292-4978 or (703) 248-2296 respectively.

Sincerely,

Allison C. Lerner
Chair, Council of the Inspectors General on
Integrity and Efficiency
Inspector General, National Science
Foundation

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

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

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

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

The Honorable Gene Dodaro, Comptroller General, GAO

Appendix D. Acronyms and Abbreviations

CIGIE	Council of the Inspectors General on Integrity and Efficiency
Department	U.S. Department of Education
EDGE	Education Demographic and Geographic Estimates
FGDC	Federal Geographic Data Committee
NCES	National Center for Education Statistics
NGDA	National Geospatial Data Asset
NSDI	National Spatial Data Infrastructure
OMB	Office of Management and Budget

Institute of Education Sciences Comments

MEMORANDUM

DATE: September 15, 2022

TO: Ms. Michele Weaver-Dugan
Regional Inspector General for Audit
Internal Operations/Philadelphia Audit Team
Office of Inspector General

FROM: Dr. Mark Schneider
Director
Institute of Education Sciences

SUBJECT: Draft Audit Report, “The Department’s Compliance with the Geospatial Data Act,” Control Number ED-OIG/A22DC0071

Thank you for the opportunity to review and comment on the Office of Inspector General’s (OIG) September 13, 2022, draft audit report, “The Department’s Compliance with the Geospatial Data Act” (ED-OIG/A22DC0071). The Institute of Education Sciences (IES) appreciates the work that went into the draft report and the professional and cooperative manner demonstrated by the audit team while working with our staff.

We have reviewed the draft report and appreciate OIG’s finding that the Department is in compliance with the applicable requirements outlined under section 759(a) of the Geospatial Data Act. We intend to continue to implement the National Center for Education Statistics’ (NCES) geospatial data activities consistent with the requirements of the Act.

Recommendation 1.1 Ensure that the Department continues to implement the covered agency responsibilities listed under Section 759(a) of the Geospatial Data Act.

IES Response: We concur with this recommendation. The NCES Commissioner and her staff will continue to take steps to comply with the Department’s responsibilities under the Geospatial Data Act.

Recommendation 1.2 Ensure that the Department implements Section 759(a)(6) once applicable guidance becomes available.

IES Response: We concur with this recommendation.

The NCES Commissioner and her staff will continue to engage with the Federal Geographic Data Committee (FGDC) and its subcommittees to ensure that NCES incorporates appropriate standards and provides metadata in appropriate platforms.

Thank you for the opportunity to review and respond to the draft audit report.