AUDIT REPORT

FY 2026 Audit of the Department's Compliance with Geospatial Data Act Requirements

REPORT NO. OIG-27-003-A

OCTOBER 29, 2026

U.S. Department of Commerce
Office of Inspector General
Office of Audit and Evaluation

UNITED STATES DEPARTMENT OF COMMERCE
Office of Inspector General
Office of Audit and Evaluation
Washington, DC 20230

October 29, 2026

MEMORANDUM FOR: Paul M. Dabbar
Deputy Secretary
Department of Commerce

FROM: Arthur L. Scott Jr.
Assistant Inspector General for Audit and Evaluation

SUBJECT: *FY 2026 Audit of the Department's Compliance with Geospatial Data Act Requirements*
Report No. OIG-27-003-A

Attached is the final report on our audit of the Department's compliance with its 13 responsibilities under the Geospatial Data Act of 2018. We will post the report on our website per the Inspector General Act of 1978, as amended (5 U.S.C. §§ 404, 420).

By December 28, 2026, please provide an action plan addressing the report's recommendations as required by Department Administrative Order 213-5.

We appreciate your staff's cooperation and professionalism during this audit.

Attachment

FY 2026 Audit of the Department's Compliance with Geospatial Data Act Requirements

Audit Report OIG-27-003-A
October 29, 2026

➤ **What We Audited |** Our objective was to review the Department of Commerce's compliance with its 13 responsibilities under the Geospatial Data Act of 2018 (GDA) and progress toward implementing geospatial data standards and best practices.

➤ **Why This Matters |** Within the Department, both the U.S. Census Bureau and the National Oceanic and Atmospheric Administration manage geospatial data that takes many forms, including satellite imagery and maps as well as weather, environmental, and census data.

Geospatial data records contain metadata—data about the data—that provides information (such as content, source, and other characteristics of the data) useful for data discovery and analysis. Accurate and complete metadata enables government agencies, businesses, researchers, and automated tools to find and understand the Department's geospatial data. The GDA mandates how the federal government manages geospatial data and defines 13 requirements for covered agencies, including the Department.

➤ **What We Found |** We found that the Department fully complied with 11 of the 13 responsibilities defined in the GDA and partially complied with the other two. First, the Department did not maintain a current geospatial data strategy after its previous strategy expired at the end of FY 2025. Although it did publish an updated version in September 2026, the update lacks a framework to ensure successful implementation. The Department's second partial compliance was related to the requirement to ensure that all geospatial metadata is complete, of high quality, and available.

➤ **What We Recommend |** We made four recommendations to help the Department improve the completeness, quality, and availability of its geospatial metadata.

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Introduction

Geospatial data, which links information to a specific location, affects the daily lives of Americans and supports federal government policy decisions. Within the U.S. Department of Commerce, both the U.S. Census Bureau and the National Oceanic and Atmospheric Administration (NOAA) manage geospatial data that takes many forms, including satellite imagery and maps as well as weather, environmental, and census data.

The Department's geospatial data and products are essential to the public. For example, the decennial census determines how seats in the House of Representatives are divided among the states, and all levels of government rely on Census's geospatial products to inform allocation of funds to communities nationwide. NOAA collects geospatial data using satellites and scientific research, then transforms this information into useful products like nautical charts, weather forecasts, severe weather tracking and alerts, and resources to assist with emergency planning. The Department provides about 85 percent of the geospatial data listed on the Data.gov website.[1]

Geospatial data records contain metadata—data about the data—to help answer a user's basic questions (who, what, where, when, and how). This geospatial metadata provides information useful for discovery and analysis, such as content, source, age, accuracy, condition, projection, method of collection, and other characteristics (such as keywords).[2] Crucially, accurate and complete metadata enables governments, businesses, researchers, and automated tools to find and understand the Department's geospatial data.

The Geospatial Data Act of 2018 (GDA)[3] mandates how the federal government manages geospatial data and defines 13 requirements for covered agencies, including the Department.[4] By requiring agencies to meet these defined responsibilities, the GDA aims to reduce duplication of and centralize access to geospatial data, ensure the adoption of standards for geospatial data, and enhance coordination between federal agencies and nonfederal data users. The GDA unifies geospatial data strategy, policy, and decision-making through the interagency Federal Geospatial Data Committee (FGDC).[5]

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[1] Data.gov is the federal government's open data portal that provides access to data sets across the government, to drive decision-making and increase the availability and transparency of government data.

[2] See 43 U.S.C. § 2801(11).

[3] Pub. L. No. 115-254, Title VII, Subtitle F (2018), codified at 43 U.S.C. §§ 2801–2811.

[4] "Covered agencies" are those defined in the GDA (see 43 U.S.C. § 2801(3)) as having responsibility for the management of geospatial data.

[5] 43 U.S.C. § 2802(a).

The GDA also provides a framework for oversight. It requires inspectors general to audit their agencies' collection, production, acquisition, maintenance, distribution, use, and preservation of geospatial data at least once every 2 years. This is our fourth biennial audit fulfilling this requirement.[6]

➤ Objective

Our objective was to review the Department's compliance with its 13 responsibilities under the GDA and progress toward implementing geospatial data standards and best practices. Appendix 1 details our scope and methodology.

[6] Our prior reports (2020, 2022, and 2024) are available on our website.

Findings and Recommendations

Summary: We found that the Department fully complied with 11 of the 13 responsibilities defined in the GDA and partially complied with the other two. First, the Department did not maintain a current geospatial data strategy after its previous strategy expired at the end of fiscal year (FY) 2025, although it published an updated version in September 2026. The Department's second partial compliance was related to the requirement to ensure that all geospatial metadata is complete and available.

Specifically, we found that:

- The Department lacked a current, approved geospatial data strategy for nearly all of FY 2026, and its September 2026 update lacks a framework to ensure successful implementation.
- The Department has not ensured that all geospatial metadata is complete.
- Technical changes to Data.gov decreased the availability of metadata on the GeoPlatform (the repository for federal geospatial data).

Improving geospatial metadata will help expand the reach and reliability of the Department's geospatial data.

Appendix 2 summarizes the status of the Department's compliance with each of the 13 GDA responsibilities.

The Department Lacked a Current, Approved Geospatial Data Strategy for Nearly All of FY 2026, and the New Version Lacks a Framework to Ensure Successful Implementation

As defined in the GDA, responsibility 1 requires each covered agency to implement a strategy for advancing its geographic information and related geospatial data and activities and supporting the FGDC National Spatial Data Infrastructure (NSDI), which is a framework to facilitate geospatial data sharing across the federal government; state, tribal, and local governments; and the private sector (including nonprofit organizations and institutions of

higher education).[7] The strategic plan for the NSDI has been updated, requiring the Department to ensure that its strategy is also updated to support the current NSDI strategic plan.[8]

The Department's previous geospatial data strategy expired in September 2025. Although the Department drafted a new geospatial data strategy, it continued to implement the expired strategy until September 16, 2026, according to officials.

Using the Department's outdated strategy did not satisfy the GDA's requirement. The outdated strategy no longer reflected national geospatial data priorities; the Department's draft strategy was better aligned with the new NSDI strategy, but the Department did not publish and implement it.

Department officials said that the draft geospatial data strategy had not been published and implemented because it was under extended review and, according to Census and NOAA officials, the Department wanted the new geospatial data strategy to be published alongside its updated departmental data strategy.

Without a current geospatial data strategy and by continuing to use the old one into September 2026, the Department lacked a unified, up-to-date plan for advancing geographic information and related geospatial data and activities appropriate to its mission and in support of the NSDI. This gap increased strategic and operational risks across the Department's geospatial programs by limiting guidance for governance, data modernization, workforce development, and national-level coordination.

[7] 43 U.S.C. § 2808(a)(1).

[8] The most recent NSDI strategic plan was published in October 2024 and covers 2025 to 2035. In response to the GDA, the first NSDI strategic plan was published in November 2020 and covered 2021 to 2024.

The Department Published a New Geospatial Strategy in September 2026

We briefed Department officials on our findings on September 11, 2026. On September 16, the Department published its *Geospatial Strategy for Fiscal Years 2026–2029*, which is a shortened version of the draft strategy that we previously reviewed. The new strategy consists of four strategic goals that generally align with NSDI priorities, discusses the strategy's alignment to the Department's mission, and identifies the Commerce Geospatial Working Group as the entity that will oversee its implementation.

However, the new version lacks key details from both the previous and draft versions of the strategy that are important to ensure a successfully implemented strategy. Notably, the new strategy lacks supporting objectives, a critical step in clearly linking the Department's ongoing geospatial activities in support of its various missions to NSDI priorities. While the expired and draft plans had these objectives, the Department chose to publish a shortened version and told us that it would inform us of any further updates to the strategy should they be made.

The Department's previous geospatial strategy was supplemented by a separate geospatial strategic action plan that provided additional details on how the Department would meet each strategic goal and objective, including specific deliverables, responsible parties, and target dates. However, the Department's current strategy does not include this performance framework.

With the publication of its new geospatial data strategy, we find that the Department is in partial compliance with responsibility 1 under the GDA. However, to be effective, the FYs 2026–2029 strategy needs further updates or a supplement to address the lack of information and details necessary to understand how the Department will manage and measure its efforts to meet its goals for geospatial data.

Recommendation

We recommend that the Department's Chief Data Officer:

1. Consider further updating or supplementing the geospatial strategy to include a performance framework.

The Department Partially Complies with Metadata Requirements

We found that although the Department has continued improving its geospatial metadata, it still has not fully met the GDA's requirements for responsibility 6, which requires the Department to implement geospatial data standards, including developing high-quality metadata and ensuring that metadata is available on the GeoPlatform (the online repository for federal geospatial data, maps, and applications, at GeoPlatform.gov).[9]

Data.gov and the GeoPlatform both publish geospatial metadata. As the federal government's open data portal, Data.gov compiles metadata for public data sets into a data catalog. The GeoPlatform relies on the Data.gov data catalog because it copies a subset of metadata from Data.gov (public geospatial data) into its own data catalog.

Wherever cataloged or discovered, geospatial metadata provides crucial context for an end user to evaluate the fitness of a given data resource for their needs. To help covered agencies meet this responsibility to provide metadata to the GeoPlatform (via Data.gov), FGDC issued technical guidance for implementing geospatial metadata standards that support discovery of data within Data.gov and the GeoPlatform. In this guide, FGDC recommends best practices that, when followed, help agencies ensure high availability of rich metadata content that adheres to established standards, including the FGDC Content Standard for Geospatial Metadata and the International Organization for Standardization 19000 series metadata standards. The guidance works with these standards, introduces enhancements, and makes sure metadata is easy to find, use, share, and reuse.

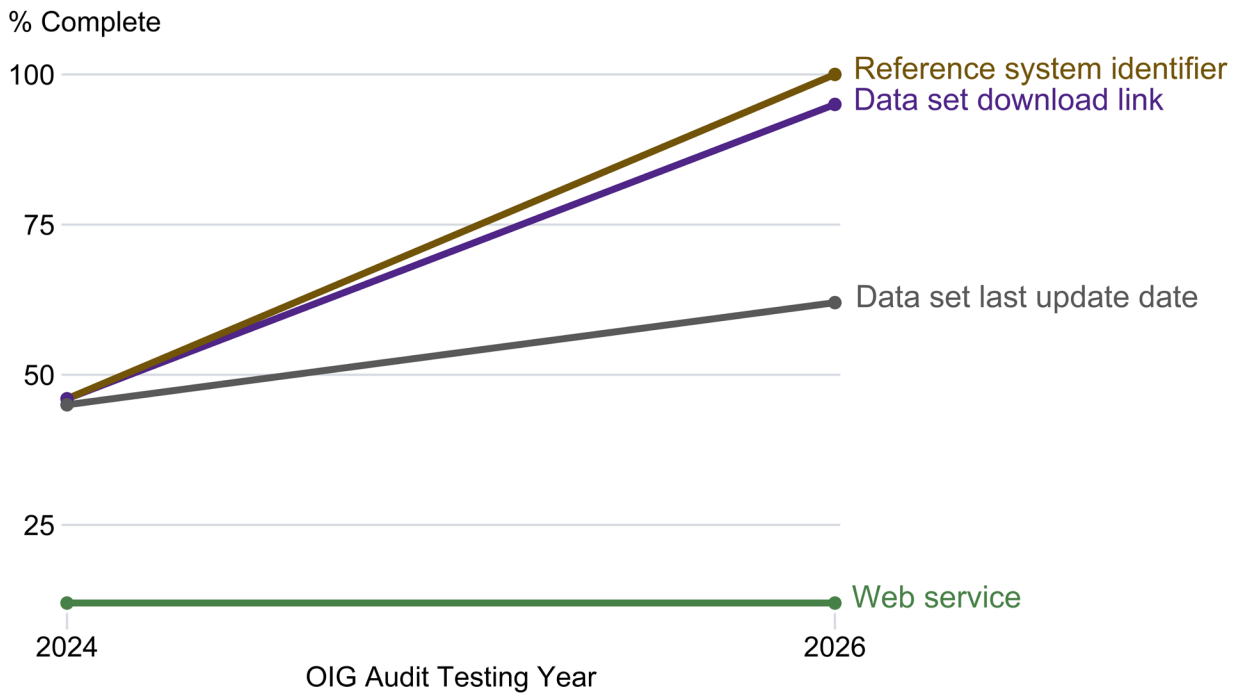
Despite Progress, Department Metadata Remains Incomplete

Since 2024, the Department has improved the completeness of geospatial metadata. However, we identified deficiencies that result in only partial compliance with responsibility 6. Specifically, we found incomplete metadata that did not meet metadata standards.

In our previous audit (2024), we tested 19 of 24 metadata fields and found that the Department did not complete 4 at least half the time. In this audit (2026), we tested 20 of 24 metadata fields and found improvement in metadata completion. We found that the Department made clear progress in improving completion of 3 of the 4 previously low-performing fields (reference system identifier, data set download link, and data set last update date), and we observed no regression in the 1 remaining field (web service), as shown in figure 1.

[9] 43 U.S.C. § 2808(a)(6).

Figure 1. For 3 of 4 Metadata Content Fields, the Department's Completion Rate Has Increased Since 2024



Source: OIG test results of 4 fields identified as completed less than half the time in FY 2024, using data obtained from Data.gov for our FY 2024 and FY 2026 GDA audits

A subset of records we tested were National Geospatial Data Assets (NGDA) metadata records.[10] In our 2024 audit, we found that the Department's NGDA metadata had not improved for one field, the data set download link metadata content field. In 2026, we found that the Department had improved completeness of metadata for that field from 45 percent to 80 percent.

Both Census and NOAA create and control metadata quality through internal processes before Data.gov harvests each record. Despite these processes and the Department's recent improvements, we found that the Department only partially complied with metadata standards when implementing GDA responsibility 6. For example:

- We identified completeness gaps ranging between 53 percent and 69 percent in four NOAA metadata content fields: progress code, maintenance frequency code, data set publication, and data set creation.

[10] FGDC designates data sets as NGDA when they are highly valuable because they support shared federal missions, statutory mandates, and national priorities. The Department is responsible for 56 of 150 NGDA data sets: Census provides 32 data sets, and NOAA provides 24.

- We found that Census consistently completes its metadata content fields at a very high rate. Still, Census should continue working to reduce the gaps across metadata content fields that have completion issues. For example, Census has 97 percent completion in four of its metadata content fields: temporal extent end, temporal extent begin, data set creation date, and data set last update date.

We shared our complete testing results with relevant Census and NOAA officials. They noted various reasons for the missing metadata information, such as the fact that a web service (one of the low-performing fields shown in figure 1) may not exist for every data set, such as databases of geocoded information. They also said that in some cases, a data set is part of a collection and thus lacks a specific data set download link, and that older data sets that are completed may never be updated or revised.

Missing information in metadata content fields makes it more challenging for users to find, understand, and use geospatial data resources efficiently. Further, with the use of generative AI rapidly expanding, government geospatial data has become a foundational input to countless AI applications. Incomplete metadata can propagate errors across AI systems that draw from federal geospatial catalogs, potentially leading to inaccurate, inconsistent, or biased outputs that reach millions of downstream users. Improving metadata completeness supports both human and AI-based discovery, reduces systemic risk, and improves nationwide access to the Department's geospatial assets. This is an especially critical leadership opportunity, as the Department is the single largest producer of geospatial data across all federal agencies, supplying about 85 percent of geospatial data listed on Data.gov.

To maximize discovery and use of geospatial data consistent with the GDA, the Department should strive to populate geospatial metadata content fields with adequate, relevant information. Although the Department has made measurable progress, targeted remediation of the deficiencies we have identified is necessary to achieve full compliance with responsibility 6 requirements.

Recommendation

We recommend that the Department's Senior Agency Official for Geospatial Information:

2. Coordinate with Census and NOAA to review our test results, determine which missing metadata content fields are most significant for current users of geospatial data, and develop a plan (with goals and timeframes) to complete those fields in geospatial metadata records.

The Department Has Not Fully Implemented Quality Controls for Geospatial Metadata Keywords

We assessed the quality of geospatial metadata by testing obtained data against the standards for expected quality within each geospatial metadata content field, alongside data reliability best practices for duplication and data type rules (for a full list of the type and nature of quality tests we performed, see appendix 1). In total, we applied 29 distinct quality tests across the 20 metadata content fields we tested for completeness (described above). Combined with our completeness testing, this approach ensured broad coverage of the key indicators of high-quality metadata that supports the discovery, reliability, and usability of the Department's geospatial data.

We found that the Department generated high-quality metadata in 26 of the 29 quality tests we performed. However, the Department frequently did not follow three FGDC keyword expectations or data reliability principles when tagging geospatial metadata with keywords. Specifically, the Department often structured keyword tags as multiple-word phrases rather than single keywords, used punctuation marks (or other delimiters), and repeated the same words across multiple tags. These practices do not align with standards for high-quality metadata, resulting in only partial compliance with responsibility 6 under the GDA. For example:

- More than half the time, NOAA created duplicate keywords and added multiple words; about 85 percent of the time, NOAA used punctuation marks inside its keyword tags.
- Census created duplicate keywords about 80 percent of the time, added multiple words in every record, and used punctuation marks in 52 percent of its keyword tags.

NOAA officials said that they rely heavily on the National Aeronautics and Space Administration's Global Change Master Dictionary, a hierarchical keyword vocabulary comprised of compound phrases, repeated words, and punctuation. Officials said that this hierarchical vocabulary was incorporated directly into metadata keyword tags. This practice effectively imports the vocabulary's internal structure into keyword tags rather than breaking keywords into the single terms expected under metadata standards.

As a result, the Department's keyword tags often overstate the number of unique keywords, obscure the true keyword structure, and introduce unnecessary formatting variations that hinder discovery. Developing high-quality metadata content within a field helps users more carefully assess the fitness of a given geospatial data resource for their purposes.

In addition, AI systems rely heavily on keyword structures to associate data sets with meaningful contexts, themes, and user queries. As such, strengthening keyword tagging would directly improve generative AI systems' ability to discover and retrieve the Department's geospatial data, thus expanding public accessibility while reducing false or misleading search outputs. Conversely, improperly tagged records may cause both end users and automated systems to miss relevant geospatial resources when searching for information. The Department should continue to refine its keyword tagging to align with standards for geospatial metadata.

Recommendation

We recommend that the Department's Senior Agency Official for Geospatial Information:

3. Coordinate with Census and NOAA to review our test results, determine which metadata content fields currently lacking in quality are most significant for current users of geospatial data, and develop a plan (with goals and timeframes) to ensure that those fields remain aligned with standards for geospatial metadata.

Technical Changes to Data.gov Decreased the Availability of Metadata on the GeoPlatform

The GDA requires covered federal agencies to make metadata available on the GeoPlatform for all geospatial data they collect or produce. Recent events have affected the availability of geospatial data on the GeoPlatform for all covered agencies.

In April 2026, Data.gov introduced a new application programming interface (API) and metadata standard (called DCAT 3.0) but failed to include seven essential geospatial metadata content fields. These omissions stem from technical changes within Data.gov and affect all covered agencies, not just the Department. As of August 28, 2026, updates to the Data.gov API had not included the seven missing geospatial metadata fields:

1. Responsible party
2. Progress code
3. Frequency of update
4. Reference system identifier
5. Data set creation (date)

6. Metadata publication (date)
7. Four bounding boxes (geographic extent)

Because the API automates the flow of geospatial records (and any errors or missing information they contain) from Data.gov to the GeoPlatform, the missing fields resulted in the Department's noncompliance with the GeoPlatform's metadata standards and the GDA's requirement to make metadata available on the GeoPlatform (43 U.S.C. § 2808(a)(6)). However, we recognize that the Department is not directly responsible for the issues now present on Data.gov and subsequent noncompliance with GeoPlatform and GDA requirements. Addressing this ongoing issue and resolving the noncompliance will require coordination among multiple federal entities.

Metadata availability disruptions caused by Data.gov's new API and use of DCAT 3.0 can have amplified effects in generative AI systems because missing or fragmented records limit these systems' ability to provide authoritative answers. Ensuring access to complete metadata strengthens the reliability of AI-based tools that increasingly serve as public gateways into federal geospatial holdings.

Recommendation

We recommend that the Department's Senior Agency Official for Geospatial Information:

4. Coordinate with Census and NOAA to work with the General Services Administration and the Department of the Interior (owners of Data.gov and the GeoPlatform, respectively) to ensure that these websites fully support geospatial metadata requirements.

Conclusion

We found the Department was complying with 11 of its 13 GDA responsibilities. See appendix 1 for details of our scope and methodology and appendix 2 for a breakdown of our results for each of the 13 responsibilities.

The Department did not maintain a current geospatial data strategy after its previous strategy expired at the end of FY 2025, although it did publish an updated version in September 2026. As discussed in the first finding, the newly published strategy is substantially shortened and lacks several important elements for it to be effective.

The Department's remaining area of noncompliance relates to the requirement to ensure that geospatial metadata is complete and available. Our testing identified continued gaps in metadata completeness and quality and technical changes to Data.gov that further reduced the availability of metadata on the GeoPlatform. Strengthening metadata practices will improve discovery and usability of the Department's geospatial data.

Metadata is the key to making the Department's geospatial data findable and usable. Ensuring that metadata is complete and of sufficient quality will help expand the reach and impact of the Department's geospatial data, some of which affects the daily lives of Americans.

In addition, as generative AI increasingly processes and shares government data, the Department has a unique opportunity to further enhance the reach of its data—at AI scale and across the world—by remediating noncompliance with the GDA and implementing standards. Given the rapid technological transformation that is under way, the Department's actions to more efficiently and effectively align its geospatial metadata with standards and best practices will lead the whole government forward into a future with more accessible, authoritative, and high-quality public geospatial data and content.

Summary of the Department's Response and OIG's Comments

The Department reviewed a draft version of this report and responded to our findings and recommendations. Regarding our first finding and recommendation, the Department stated that it published a new geospatial data strategy on September 16, 2026, and that "should the Department make any further revisions," it will communicate those to us. We reviewed the new geospatial data strategy and updated the finding accordingly. We encourage the Department to further revise its strategy to address the issues described in the finding.

The Department generally concurred with our second and third findings and three related recommendations.

The Department's complete response is included in this report as appendix 3. We are pleased with the Department's response and look forward to receiving the Department's action plan.

Appendix 1. Scope and Methodology

The GDA requires OIGs to conduct biennial audits of their agencies' compliance with three requirements:

1. Geospatial data and metadata standards established under the act (43 U.S.C. § 2808(c)(1))
2. The 13 responsibilities outlined in the act (43 U.S.C. § 2808(c)(2))
3. Limitation of use of federal funds for noncompliant data sets (43 U.S.C. § 2808(c)(3))

Because FGDC has not yet set national standards for geospatial data, we were unable to fully assess compliance with the first and third requirements (as was also the case in our three previous GDA audits, for 2020, 2022, and 2024). Specifically, we could not test the Department's compliance with or progress implementing geospatial standards, and we lacked a basis upon which to meaningfully assess whether the Department limited federal funding for noncompliant geospatial resources. We did, however, test the Department's metadata for compliance with FGDC standards (further described below).

Accordingly, our audit objective was to assess the Department's compliance with the 13 covered agency responsibilities in 43 U.S.C. § 2808(a). To satisfy our objective, we developed a questionnaire to obtain updated information for each of the 13 responsibilities from Department officials who implement GDA requirements (i.e., Census and NOAA officials). Then, for each responsibility, we reviewed questionnaire responses, information request artifacts, prior audit results (2020–2024), bureau procedures, and supplemental documentation. As needed, we interviewed Census and NOAA officials to validate statements or clarify technical details. Based on the information provided, we further assessed GDA requirements 1 and 6 in more detail.

To assess requirement 1, we:

- Reviewed the following documents:
    - FGDC, *Building the Geospatial Future Together—The National Spatial Data Infrastructure (NSDI) Strategic Plan 2025–2035*, October 18, 2024, updated February 26, 2025
    - Draft *Commerce Geospatial Strategy, Fiscal Years 2026–2029*, unpublished, February 2026
    - *Commerce Geospatial Strategy, Fiscal Years 2026–2029*, September 16, 2026
    - *Commerce Geospatial Strategy, Fiscal Years 2021–2024*, July 2021
    - *Commerce Geospatial Strategic Action Plan,* October 2021

- Interviewed Department, Census, and NOAA staff on the status of the geospatial data strategy
- Learned about the status of the Department's draft geospatial data strategy from the Office of the Chief Data Officer and the Office of the Undersecretary for Economic Affairs

To assess requirement 6, we limited our assessment of the Department's progress implementing geospatial standards to its provision of metadata for geospatial data records, including developing high-quality metadata and ensuring that metadata is available. We:

- Reviewed the following documents:
    - FGDC, *Technical Guidance: Data.gov and the GeoPlatform Metadata Recommendations, Including Guidelines for National Geospatial Data Assets (NGDA)*, December 13, 2022
    - Government Accountability Office (GAO), *Assessing Data Reliability* (GAO-20-283G), December 2019
- Tested 239,290 Department geospatial metadata records on April 2, 2026, with an automated script we developed that queried the Data.gov API. We also updated this script to account for the new Data.gov API and collected 381,172 metadata records. Specifically:
    - We tested for the existence of 20 key content fields per FGDC technical guidance: title, abstract, responsible party (role code), progress code, maintenance frequency code, citation identifier, metadata identifier, reference system identifier, metadata download link, data set download link, temporal extent begin, temporal extent end, data set publication date, data set creation date, data set last update (revision) date, metadata publication date, metadata last update (revision) date, geographic extent (bounding boxes), web service, and keywords.
    - We tested 29 aspects of quality recommended in both FGDC and GAO best practices: 3 allowed code tests, 4 geographic extent tests, 8 tests for keywords, and 14 date quality tests.
    - We tested the lowest-level unit of keywords as defined in FGDC and Data.gov metadata guidance. We checked each metadata record tagged with keywords for multiword entries and expanded such entries into a list of individual words. We then de-duplicated this list to show the lowest level of keywords present, detect the true count of unique words, identify whether words were duplicated among keyword tags, and obtain the most basic keyword structure. Separately, we also checked each keyword tag for

punctuation mark use and identified those keywords with marks as noncompliant. This testing approach aligned with FGDC standards, which require that keywords be listed individually, without duplication, multiword grouping, or punctuation marks (delimiting).

- Interviewed Department, Census, and NOAA staff responsible for overseeing and implementing geospatial metadata requirements.
- Shared detailed results and field-level summaries with Department, Census, and NOAA officials.

In addition, we assessed the internal controls that were significant to our objective by incorporating prior assessments of both the design and implementation of internal controls significant within the context of our objective—specifically, the policies and procedures required by 43 U.S.C. § 2808(a). Our findings include these assessments.

We relied on computer-processed data to support our findings, conclusions, and recommendations. We tested the data primarily for reliability (e.g., completeness) and validity, where relevant. We found the data to be sufficiently reliable to support our findings and conclusions.

We conducted our audit from March 2026 through September 2026 under the authority of the Inspector General Act of 1978, as amended (5 U.S.C. §§ 401-424), and Department Organization Order 10-13, as amended October 21, 2020.

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 that provides 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 objectives.

Appendix 2. Summary of the Department's Compliance with GDA Responsibilities

Responsibility	Description	Status
1. Strategy	Prepare, maintain, publish, and implement a strategy for promoting the use of geographic information and related geospatial data and activities appropriate to the agency's mission, in support of the NSDI strategic plan.	Partially compliant. The Department did not maintain a current geospatial data strategy after its previous strategy expired at the end of FY 2025. Although it did publish an updated version in September 2026, the update lacks a framework to ensure successful implementation. See the first finding of this report for more details.
2. Management of Geospatial Data	Collect, maintain, disseminate, and preserve geospatial data so that it can be readily shared with other federal agencies and nonfederal users.	Compliant. The Department has implemented measures to meet geospatial data management responsibilities, including collecting, maintaining, disseminating, and preserving geospatial data for broad accessibility. The Department maintains multiple data access points across agencies in addition to providing data to Data.gov, which feeds the GeoPlatform.
3. Promotion of Integration	Promote the integration of geospatial data from all sources.	Compliant. Since 2020, the Department has promoted the integration of geospatial data through its partnerships, outreach, and integration of nonagency data. In 2026, NOAA modernized its authoritative coordinate models and is working with FGDC to encourage broader adoption of updated models to improve the consistency, interoperability, and quality of federal geospatial data.

Responsibility	Description	Status
4. Inclusion of Geospatial Data in Agency Record Schedules	Ensure that data information products and other records created in geospatial data are included on National Archives and Records Administration (NARA)-approved agency records schedules.	Compliant. In 2020 and 2022, Census and NOAA had NARA-approved records schedules for geospatial data and policies and procedures that included geospatial data on such records schedules, respectively. Since 2022, NOAA has maintained its two NARA-approved records schedules while Census does not have any records schedules for geospatial data that were within the scope of this audit.
5. Allocation of Resources	Allocate resources to fulfill responsibilities of collection, production, and stewardship, with regard to related activities of the covered agency, and support FGDC activities.	Compliant. From 2020 to 2024, Census and NOAA faced some resource challenges and planned to address them through various strategies. In 2026, the Department reallocated existing resources to meet its mandatory covered agency responsibilities despite workforce and budget reductions.
6. Use of Geospatial Metadata Standards	Use the appropriate standards for documenting geospatial data with relevant metadata and making metadata available through the GeoPlatform.	Partially compliant. In 2024, the Department agreed on an action plan to continue improving its geospatial metadata. While improvements have been made, the Department is still not fully compliant with metadata standards. See the second and third findings of this report for more details on our testing results.

Responsibility	Description	Status
7. Coordination	Coordinate and work with other federal agencies; 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 nonfederal geospatial data to the extent possible.	Compliant. From 2020 to 2024, Census and NOAA used both established and expanded partnerships with government, private, and academic entities to efficiently collect, integrate, and maintain geospatial data, addressing minor challenges in processes and data submission. In 2026, NOAA further advanced these efforts by gathering data from nonfederal partners for the national geodetic framework, while Census partnered with the Navajo Nation and U.S. Geological Survey to update boundaries and roads, demonstrating continued progress and compliance with this responsibility.
8. Use of Geospatial Information	Use geospatial information to (a) make federal geospatial information and services useful to the public, (b) enhance operations, (c) support decision-making, and (d) enhance reporting to the public and Congress.	Compliant. The Department furnishes various tools that use geospatial information (e.g., ERMA, HAB); such data and tools support decision-making on different topics, most notably public health and safety. Agencies and the public can learn more about the Department's geospatial tools and data on agency websites, Data.gov, and the GeoPlatform.
9. Personal Privacy and Confidentiality	Protect personal privacy and maintain confidentiality in accordance with federal policy and law.	Compliant. In 2022, the Department implemented all applicable privacy controls as required by the Department's *Privacy Program Plan*. In 2026, no significant changes were identified in the Census and NOAA geospatial systems that include personally identifiable information.

Responsibility	Description	Status
10. Declassified Data	Participate in determining whether declassified data can contribute to and become part of the NSDI.	Compliant. In 2020, we assessed this area as "not applicable" as the Department does not have classified geospatial data that could become part of the NSDI. In each subsequent audit (2022, 2024, and 2026), we confirmed that this status has not changed with cognizant Department officials.
11. Review of Existing Geospatial Data	Search all sources, including the GeoPlatform, to determine whether existing federal, state, local, and private geospatial data meets the needs of the covered agency before users expend funds for geospatial data collection.	Compliant. Although the Department awaits revised OMB Circular A-16 guidance before updating its policies, prior fieldwork in 2022 and 2024 shows the Department is meeting this responsibility with interim measures.
12. Collection of High-Quality Data	To the extent possible, ensure that persons who receive federal funds to collect geospatial data provide high-quality data.	Compliant. In 2020 and 2022, NOAA had quality control procedures and processes in place to ensure that it receives high-quality geospatial data, and Census generally did not expend funds to acquire geospatial data from partners (federal, tribal, state, and local). In 2024 and 2026, Census and NOAA had procedures in place to ensure the collection of high-quality data.
13. Appointment of Contact	Appoint a contact to coordinate with lead covered agencies for collection, acquisition, maintenance, and dissemination of NGDA data themes.	Compliant. NGDAs are nationally significant geospatial data. Since 2020, the Department has appointed a Senior Agency Official for Geospatial Information and maintained leads for all NGDA themes. Despite staff changes since 2024, each theme still has a designated contact for external coordination.

Appendix 3. The Department's Response

The Department's response to our draft report begins on the next page.

UNITED STATES DEPARTMENT OF COMMERCE
Office of the Under Secretary for Economic Affairs

TO: Arthur L. Scott, Jr.
Assistant Inspector General for Audit and Evaluation

FROM: Lindsay Monte
Acting Chief Data Officer
Office of the Under Secretary for Economic Affairs

LINDSAY MONTE
Digitally signed by LINDSAY MONTE
Date: 2026.09.24 11:50:27 -04'00'

Anthony LaVoi
Commerce Senior Agency Official for Geospatial Information and
National Oceanic and Atmospheric Administration Chief Data Officer

LAVOI.ANTHONY.ANDREW.1365862580
Digitally signed by LAVOI.ANTHONY.ANDREW.1365862580
Date: 2026.09.24 12:34:56 -04'00'

SUBJECT: Department of Commerce Response to *2026 Biennial Audit of the Department's Compliance with Geospatial Data Act Requirements* Draft Report

This memorandum contains the Department's response to the Office of the Inspector General (OIG) draft report entitled *Biennial Audit of the Department's Compliance with Geospatial Data Act Requirements*. The Deputy Secretary's Office has authorized us to provide this response and serve as Agency Action Officials for recommendations made in the final report.

The Department concurs with the recommendations and findings in the draft report. We will prepare a formal action plan upon issuance of OIG's final report within the 60-day timeframe required.

Findings and Recommendations from the 2026 DOC OIG Audit Exit Conference and the Department's Response:

Finding 1: The Department Lacks a Current, Approved Geospatial Data Strategy

- **Recommendation 1:** We recommend that the Deputy Secretary of Commerce direct management's attention to review, approve, and publish an updated geospatial strategy.
  - **DOC RESPONSE:** *The Department published its Geospatial Strategy for Fiscal Years 2026 - 2029 on September 16, 2026, which is available at: Department of Commerce Geospatial Strategy Fiscal Years 2026 - 2029. Should the Department make any further revisions to the Geospatial Strategy, we will promptly communicate those updates to the Office of Inspector General to ensure transparency.*

Finding 2: The Department Partially Complies with Metadata Requirements

Finding 2A: Despite Progress, Department Metadata Remain Incomplete

- **Recommendation 2:** We recommend that the Department's Senior Agency Official for Geospatial Information coordinate with Census and NOAA to review our test results, determine which missing metadata content fields are most significant for current users of geospatial data, and develop a plan (with goals and timeframes) to complete those fields in geospatial metadata records.
    - **DOC RESPONSE:** *The Department will review the metadata test results, determine which metadata content fields are most significant for current users of geospatial data, and develop a plan including goals and timelines to complete these changes in the geospatial metadata records for both Census and NOAA.*

Finding 2B: The Department Has Not Fully Implemented Quality Controls for Geospatial Metadata Keywords

- **Recommendation 3:** We recommend that the Department's Senior Agency Official for Geospatial Information coordinate with Census and NOAA to review our test results, determine which metadata content fields currently lacking in quality are most significant for current users of geospatial data, and develop a plan (with goals and timeframes) to ensure that those fields remain aligned with standards for geospatial metadata.
    - **DOC RESPONSE:** *The Department will review the metadata test results, determine which metadata content fields currently lacking in quality are most significant for users of geospatial users, and develop a plan that will include goals and timelines to ensure those fields remain aligned with standards for geospatial metadata. Unaligned keywords will be justified with existing standards or remediated.*

Finding 3: Technical Changes to Data.gov Decreased the Availability of Metadata on the GeoPlatform

- **Recommendation 4:** We recommend that the Department's Senior Agency Official for Geospatial Information coordinate with Census and NOAA to work with the General Services Administration and the Department of the Interior (owners of Data.gov and the GeoPlatform, respectively) to ensure that these websites fully support geospatial metadata requirements.
    - **DOC RESPONSE:** *The Department will work with GSA and DOI to ensure an action plan is in place for compliance and the seven geospatial fields addressed in the audit remain available on the GeoPlatform landing pages.*

Additionally, the Department does not believe the report contains any information that cannot be shared publicly with the issuance of the report.

The Department appreciates your team's work on this audit. We look forward to working with you as we continue to address the recommendations in this report.

Should you have questions, please contact MaryAnn Mausser, Commerce GAO/OIG Audit Liaison at mmausser@doc.gov.

REPORT

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