



OFFICE *of*  
**INSPECTOR GENERAL**  
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UNITED STATES DEPARTMENT OF  
HOUSING AND URBAN DEVELOPMENT

# Geospatial Data Act of 2018, Fiscal Year 2022

Office of Policy Development and Research

Washington, DC | 2022-LA-0004

September 30, 2022

Date: September 30, 2022

To: Solomon Greene  
Principal Deputy Assistant Secretary for Policy Development and Research, R

*//signed//*

From: Kilah S. White  
Assistant Inspector General for Audit, GA

Subject: Office of Policy Development and Research, Washington, DC, HUD Met 11 of 13 Responsibilities Stated in the Geospatial Data Act of 2018 for Fiscal Year 2022

Attached are the U.S. Department of Housing and Urban Development (HUD), Office of Inspector General's (OIG) final results of our audit of HUD's efforts to meet the 13 responsibilities stated in the Geospatial Data Act of 2018.

HUD Handbook 2000.06, REV-4, sets specific timeframes for management decisions on recommended corrective actions. For each recommendation without a management decision, please respond and provide status reports in accordance with the HUD Handbook. Please furnish us copies of any correspondence or directives issued because of the audit.

The Inspector General Act, Title 5 United States Code, appendix 8M, requires that OIG post its reports on the OIG website. Accordingly, this report will be posted at <https://www.hudoig.gov>.

If you have any questions or comments about this report, please do not hesitate to call Tanya Schulze, Audit Director, at (213) 534-2471.

# Highlights

## GEOSPATIAL DATA ACT OF 2018, FISCAL YEAR 2022 | 2022-LA-0004

### What We Audited and Why

We audited the U.S. Department of Housing and Urban Development's (HUD) efforts to meet the Geospatial Data Act of 2018 (the Act<sup>1</sup>).

Our audit objective was to determine whether HUD met the 13 responsibilities stated in the Act with regard to its collection, production, acquisition, maintenance, distribution, use, and preservation of geospatial data. The Act also generally requires covered agencies provide access to geospatial data and metadata to the public and enhance reporting to Congress. The 16 covered agencies, including HUD, remain in the implementation stage of the Act until the Federal Geographic Data Committee establishes formal standard for use in determining compliance with the responsibilities stated in the Act. The Act requires that HUD's geospatial data be audited at least once every 2 years.

### What We Found

HUD met 11 of the 13 responsibilities stated in the Act. However, HUD did not meet 2 of the 13 responsibilities stated in the Act. HUD needs to dedicate resources to fully implement its geospatial program. HUD's lapse in its contract for services to manage its Geocode Services Center created challenges in meeting the responsibilities stated in the Act. As a result, HUD risks not having accurate and open access to geospatial data available for use by Federal, State, local, and tribal governments; the public; and other interested stakeholders to make decisions.

### What We Recommend

We recommend that the Principal Deputy Assistant Secretary for Policy Development and Research provide adequate resources for the further development of geocoding services through the reactivation of the lapsed Geocode Service Center contract. In addition, we will reopen recommendation 1A from OIG audit report 2020-LA-0002, issued on September 24, 2020, so that HUD can implement the agreed-upon action to meet the responsibility stated in 43 U.S.C. § 2808(a)(5).

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<sup>1</sup> Section 759 of the Act sets forth the responsibilities of covered agencies, and is codified at 43 U.S.C. § 2808.

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## Background and Objective

The U.S. Department of Housing and Urban Development's (HUD) Office of Policy Development and Research (PD&R) supports HUD's efforts to help create cohesive, economically healthy communities. PD&R is responsible for maintaining current information on housing needs, market conditions, and existing programs, as well as conducting research on priority housing and community and development issues. It also provides reliable and objective data and analysis to help inform policy decisions. PD&R is committed to involving greater diversity of perspectives, methods, and researchers in HUD research. In addition, it is responsible for ensuring that HUD meets the responsibilities stated in the Geospatial Data Act of 2018.

On October 5, 2018, Congress passed Public Law 115-254, Subtitle F, also known as the Geospatial Data Act of 2018, which was codified in 43 U.S.C. §§ 2801-11. The Act codifies the committees, processes, and tools used to develop, drive, and manage the National Spatial Data Infrastructure (NSDI) and recognizes responsibilities beyond the Federal Government for its development. The Act reflects growing recognition of the essential role of geospatial data and technology in understanding and managing our world and highlights the need to support their continuing development as critical investments for the Nation.

The Act formalizes governance processes related to geospatial data, provides policy and guidance to empower the use of geospatial data and technology, and facilitates broad cooperation between the public and private sector. Specifically, the Act

- codifies the role and authorities of the Federal Geographic Data Committee;
- directs the Committee to lead the development and management of NSDI Strategic Plan;
- establishes the National Geospatial Advisory Committee as a statutory advisory committee;
- provides policy and guidance to empower the use of geospatial data and technology;
- establishes Federal agency responsibilities as listed in the Act;
- recognizes NSDI as the framework to ensure that geospatial data from multiple sources are available, accessible, and easily integrated;
- recognizes the GeoPlatform as an important tool for accessing and managing geospatial data;
- establishes requirements for stewardship of geospatial assets; and
- identifies budgeting and reporting requirements.

This legislation fosters efficient management of geospatial data, technologies, and infrastructure by enabling better coordination among Federal, State, local, and tribal governments; the private sector; and institutions of higher education. In addition, the Act promotes greater access and use of government information and data, which are expected to innovate products and services; spur economic growth; advance scientific research; and improve public health, environmental protection, and other services. The Act optimizes resources, improves business processes and communication, and promotes best practices. It also 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. The Act aligns business strategies and technology, ensures that resources are managed in accordance with the Nation's needs and priorities, and ensures that all technological resources and employees are used in a manner that provides the best value for the Nation.

The Inspector General of a covered agency, as defined in the Act, is required to perform an audit not less than once every 2 years in accordance with the statutory requirements of the Act. The Inspector General is to submit to Congress an audit of the collection, production, acquisition, maintenance, distribution, use, and preservation of geospatial data by the covered agency. HUD is a covered agency, and the second of these audits is due to Congress by September 30, 2022. PD&R is the office responsible for overseeing the agency's geospatial data.

The Act requires full implementation 5 years after the Committee approves the standards within the Act. The Committee has not approved the standards that will be used by the 16 covered agencies and has not provided a date for implementation. All 16 covered agencies remain in the implementation stage of the Act.

On September 24, 2020, we issued an audit report on HUD's efforts to meet the responsibilities stated in the Act (audit report 2020-LA-0002). That audit reported that HUD had implemented 9 of the 13 responsibilities stated in the Act. We recommended that the Assistant Secretary for Policy Development and Research take appropriate actions to prioritize the required resources to ensure that HUD fully implements the responsibilities stated in 43 U.S.C. § 2808(a)(1), § 2808(a)(2), § 2808(a)(4), and § 2808(a)(5). On June 14, 2022, HUD prematurely closed the audit recommendation. We have discussed the prematurely closed audit recommendation with HUD. In this report, we included the status of HUD's actions to meet the four responsibilities cited in the recommendation.

Our audit objective was to determine whether HUD met the 13 responsibilities stated in the Act with regard to its collection, production, acquisition, maintenance, distribution, use, and preservation of geospatial data.

## Results of Audit

### FINDING: HUD MET 11 OF THE 13 RESPONSIBILITIES STATED IN THE ACT

HUD met 11 of the 13 responsibilities stated in 43 U.S.C § 2808 and did not meet the remaining 2. HUD needs to dedicate resources to implement its geospatial program. Specifically, a lapsed contract for managing its Geocode Services Center created challenges for HUD in meeting the remaining two responsibilities stated in the Act. As a result, HUD may not be able to promote transparency and accountability in providing accurate information to stakeholders. Specifically, HUD risks not having accurate and open access to geospatial data available for use by Federal, State, local, and tribal government; the public and private sector; and other interested stakeholders to make decisions.

#### HUD Met 11 of the 13 Responsibilities of The Act

The Act requires that HUD meet the 13 responsibilities stated in 43 U.S.C. § 2808. HUD met 11 of the 13 responsibilities. The list below details the 11 responsibilities that were met.

1. 43 U.S.C. § 2808(a)(1) requires the preparation, maintenance, publication, and implementation of 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 NSDI. HUD has an approved strategic plan for fiscal years 2022-2025, but did not publish the document to meet the responsibility. After the completion of our audit fieldwork, HUD provided a link to [www.huduser.gov](http://www.huduser.gov) that showed the published strategic plan. As a result, HUD's demonstration supported meeting the responsibility stated in 43 U.S.C. § 2808(a)(1).
2. 43 U.S.C. § 2808(a)(2) requires that HUD 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. HUD had met this responsibility and collected, maintained, and disseminated its geospatial data. HUD collects geographic data from its systems of records. These data are uploaded to PD&R's Policy and Research Information System.<sup>2</sup> Address data are then geocoded by the Geocode Service Center and turned into feature data that are viewable and accessible. The feature data are stored in [www.data.gov](http://www.data.gov), National Geospatial Platform, and ArcGIS Online<sup>3</sup> services where the public may search and use HUD geospatial data. HUD's Geographic Information System (GIS) team refreshes the core data periodically. Currently, the Geocode Service Center is not being managed, and HUD is managing this function. HUD plans to renew its contract for managing the Geocode Service Center. HUD does have a formal schedule in place for when to archive and preserve its geospatial data. The various program departments, such as the Office of Public and Indian Housing, are responsible for the systems of records and have implemented their own formal archive schedules to preserve the geospatial data. HUD provided us a copy of its archive schedules to support its responsibility to preserve

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<sup>2</sup> The Policy and Research Information System is a system of records that serves as a repository of information related to public housing agencies, HUD-assisted families, HUD-assisted properties, and other HUD programs for the purposes of research, evaluation, monitoring, and budget formulation.

<sup>3</sup> ArcGIS Online is a web-based mapping software that allows interaction with data and maps.

geospatial data. As a result, HUD's documentation supported meeting the responsibility stated in 43 U.S.C. § 2808(a)(2).

3. 43 U.S.C. § 2808(a)(3) requires that HUD promote its geospatial data from all sources. HUD stated that it had met this responsibility by acquiring information from local, State, and regional governments and public housing agencies; property owners; and the United States Postal Service. HUD hosts a data-sharing infrastructure, HUD-Enterprise Geographic Information System (eGIS)<sup>4</sup> Storefront, which provides HUD's geospatial datasets, web-based mapping tools, and application programming interfaces that provide convenient access to a broad range of information and empower citizens and organizations to engage in the data-driven decision-making efforts that affect their communities. HUD confirmed that it collected geospatial data from various sources, including records and partnerships with outside agencies for the collection of data from the United States Postal Service and the Great Schools subscription service.<sup>5</sup> As a result, HUD's documentation supported meeting the responsibility stated in 43 U.S.C. § 2808(a)(3).
4. 43 U.S.C. § 2808(a)(4) requires that HUD 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).<sup>6</sup> HUD determined that it would be duplicative to implement a formal record schedule since geospatial data can be recreated at any time using archived data obtained from the various program areas. HUD's various program departments, such as the Office of Public and Indian Housing, have implemented their own formal record schedules to preserve the geospatial data. HUD provided copies of NARA-approved schedules related to the Public Housing Information Center (PIC)<sup>7</sup> and the Tenant Rental Assistance Certification System<sup>8</sup> to support meeting its responsibility as stated in 43 U.S.C. 2808(a)(4). As a result, HUD's documentation supported meeting the responsibility stated in 43 U.S.C. § 2808(a)(4).
5. 43 U.S.C. § 2808(a)(6) requires that HUD use the geospatial data standards, including the standards for metadata for geospatial data and other appropriate standards, including the documentation of geospatial data with the relevant metadata and making the metadata available through GeoPlatform.<sup>9</sup> 43 U.S.C. § 2807(b)(1)(A)(iv) states that the GeoPlatform must include download access to all open geospatial data. HUD's efforts to develop and maintain metadata remain ongoing. HUD is working toward achieving this goal by writing scripts and hiring a

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<sup>4</sup> eGIS is an online storefront where users can search for and discover HUD's geospatial datasets, web-based mapping tools, and application programming interfaces.

<sup>5</sup> The Great Schools subscription service provides data on school performance, including annual school ranking data, that HUD relies on for affordable and fair housing research.

<sup>6</sup> NARA provides retention periods for records of Federal Government agencies, including HUD.

<sup>7</sup> PIC is a software system that maintains and gathers data on all of the Office of Public and Indian Housing's inventories of housing agencies, developments, buildings, units, housing agency officials, HUD offices and field staff, and PIC users.

<sup>8</sup> The Tenant Rental Assistance Certification System is a software system developed to help improve financial controls over assisted housing programs by automating manual procedures and incorporating automated controls.

<sup>9</sup> Currently, the Federal Geographic Data Committee has not established formal standards for metadata and directs the covered agencies to use voluntary consensus standards in place of government-unique standards.



contractor to assist with writing scripts that would enable the metadata to translate into extractable data for use by interested stakeholders. After the completion of our audit fieldwork, HUD provided a demonstration that showed the ability for users to access the metadata in question. HUD showed that the metadata is available through the website, [www.data.gov](http://www.data.gov), by way of the GeoPlatform. The demonstration showed that the GeoPlatform links direct users to [www.data.gov](http://www.data.gov) to access HUD's metadata. As a result, HUD's demonstration supported meeting the responsibility stated in 43 U.S.C. § 2808(b)(6).

6. 43 U.S.C. § 2808(a)(7) requires that HUD coordinate and work with other partners to efficiently and cost-effectively collect, integrate, maintain, disseminate, and preserve geospatial data that build upon existing non-Federal geospatial data to the extent possible. HUD stated that it had met this responsibility, as many of its geospatial datasets are derived through the acquisition of information provided by stewards outside the Federal Government. HUD's research activities also relied on the use of data provided through an interagency agreement with the United States Postal Service and extractions from the U.S. Census American Community Survey 5-Year Estimate data. As a result, HUD's documentation supported meeting the responsibility stated in 43 U.S.C. § 2808(a)(7).
7. 43 U.S.C. § 2808(a)(8) requires that HUD use geospatial information to make Federal geospatial information and services more useful to the public, enhance operations, support decision making, and enhance reporting to the public and to Congress. HUD complied with this requirement by creating tools and applications to make its geospatial information more useful to the public, enhance operations, support decision making, and enhance reporting to the public and to Congress. For example, HUD created the Community Assessment Reporting Tool to show HUD's investments in communities across the United States. This reference tool allows users to search by city, county, metropolitan area, State, or congressional district to view HUD's investments and generate reports in Portal Document Format (PDF) or Excel. As a result, HUD's documentation supported meeting the responsibility stated in 43 U.S.C. § 2808(a)(8).
8. 43 U.S.C. § 2808(a)(9) requires that HUD protect personal privacy and maintain confidentiality in accordance with Federal policy and law. HUD stated that its geospatial data omits personally identifiable information<sup>10</sup> and prohibits the distribution of discreet address information in all enterprise applications, including the eGIS Open Data Storefront. Further, HUD reported that it houses all geospatial data in a system covered by a current authorization to operate agreement and is protected in accordance with applicable laws and regulations. As a result, HUD's documentation supported meeting the responsibility stated in 43 U.S.C. § 2808(a)(9).
9. 43 U.S.C. § 2808(a)(10) requires that HUD participate in determining, when applicable, whether declassified data can contribute to and become a part of NSDI.<sup>11</sup> HUD confirmed that it did not

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<sup>10</sup> Personally Identifiable Information is information that can be used to distinguish or trace an individual's identity, such as his or her name, Social Security number, biometric records, etc., alone, or when combined with other personal or identifying information, which is linked or linkable to a specific individual, such as date and place of birth.

<sup>11</sup> NSDI is the technology, policies, criteria, standards, and employees necessary to promote geospatial data sharing throughout Federal, State, tribal, and local governments, and the private sector.

manage and handle any classified or declassified geospatial datasets during the reporting period. As a result, HUD met the responsibility stated in 43 U.S.C. § 2808(a)(10).

10. 43 U.S.C. § 2808(a)(11) requires that HUD search all sources, including the GeoPlatform, to determine whether existing Federal, State, local, or private geospatial data meet its needs before spending funds on geospatial data collections. Before using funds to obtain new geospatial data, HUD reported that it searched the market, partnership coordination, expert consultants, and databases to ensure that the data did not already exist. HUD did spend funds on geospatial data collection through its Great Schools subscription service for dataset information. In addition, HUD used the United States Postal Service for vacancy data. HUD determined that this method for data collection was necessary to meet its needs and the responsibilities stated in the Act. As a result, HUD's action met the responsibility stated in 43 U.S.C. § 2808(a)(11).
11. 43 U.S.C. § 2808(a)(13) requires that HUD appoint a contact to coordinate with lead covered agencies for collection, acquisition, maintenance, and dissemination of the National Geospatial Data Asset themes<sup>12</sup> used by the covered agency. HUD met this requirement by appointing a primary member on the Committee. This individual manages the data license program that disseminates HUD administrative data for program research and professional researchers who monitor HUD programs. As a result, HUD met the responsibility stated in 43 U.S.C. § 2808(a)(13).

## HUD Did Not Meet 2 of the 13 Responsibilities Stated in The Act

HUD did not meet 2 of the 13 responsibilities stated in 43 U.S.C. § 2808.

1. 43 U.S.C. § 2808(a)(5) requires that HUD allocate resources to fulfill the responsibilities of effective geospatial data collection, production, and stewardship with regard to related activities and, as necessary, to support the activities of the Committee. During our audit fieldwork, the Geocode Service Center was not being managed and staffed to ensure that it performed the necessary duties. A lapse in the contract resulted in the Center's not being able to meet its responsibilities. HUD was in the process of obtaining a contractor to resume the geocoding of data and feature data functions, but the Office of Chief Information Officer and Office of the Chief Procurement Officer had not yet approved the contract renewal. While the mentioned departments are responsible for approving and maintaining the Geocode Service Center contract, there could have been better coordination among the involved departments to minimize lapses in service. As a result, this issue played a role in HUD not meeting the responsibility stated in 43 U.S.C. § 2808(a)(12).

Our previous audit (audit report 2020-LA-0002) cited the lack of adequate resources as a recurring issue that impacted that agency's ability to meet this responsibility. On June 14, 2022, HUD prematurely closed the 2020 audit report recommendation based on the assumption that an organization chart showed that PD&R's hiring of staff to the department would be sufficient to meet the responsibility. Specifically, this staff would assist PD&R in performing the tasks related

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<sup>12</sup> National Geospatial Data Asset themes are primary topics and subjects for which the coordinated development, maintenance, and dissemination of geospatial data will benefit the Federal Government and the interests of the people of the United States.

to geospatial data collection, production, and stewardship that supports the Committee. PD&R hired that staff. However, the issue related to the lapse in the Geocode Service Center contract arose as HUD was resolving this responsibility. We have discussed this issue with HUD and will reopen the audit recommendation to allow HUD the opportunity to address the responsibility not met. As a result, HUD did not meet the responsibility stated in 43 U.S.C. § 2808(a)(5) for the 2022 audit.

2. 43 U.S.C. § 2808(a)(12) requires that HUD, to the maximum extent practicable, ensure that a person receiving Federal funds for geospatial data collection provides high-quality data. As part of its efforts to meet this responsibility, HUD has a partnership with the United States Postal Service, uses the Great Schools subscription service, and spends allocated funds for the collection of high-quality data. HUD confirmed that its Geocode Service Center validates address data obtained from these sources to ensure that the data are high quality. The Geocode Service Center was not managed due to a lapse in the contract with the contractor responsible for managing the Center. Currently, HUD is seeking a new vendor to resume this function. HUD was not able to provide us with an address verification sample to ensure that it obtains high-quality data from the United States Postal Service and through its Great Schools subscription service. As a result, HUD did not meet the responsibility stated in 43 U.S.C. § 2808(a)(12).

We attributed this condition to HUD's need to dedicate resources to implement its geospatial program. The lack of coordination with HUD's Office of Chief Information Officer and Office of the Chief Procurement Officer allowed its renewal contract for managing its Geocode Service Center to lapse, which factored into HUD's not meeting its responsibilities. HUD's efforts to meet the responsibilities stated in the Act are also hampered by the lack of adequate resources to support the development to modernize HUD's geocoding services solution.

As a result, HUD may not be able to promote transparency and accountability in providing accurate and complete information to stakeholders. Specifically, HUD risks not having accurate and open access to geospatial data and metadata available to various stakeholders, which include the public; Federal, State, local, and tribal governments; the private sector, and Congress. These stakeholders will need accurate and open access to HUD data that can help in research, policymaking, and other decisions.

## Conclusion

HUD met 11 of the 13 responsibilities stated in the Act. However, HUD did not meet 2 of the 13 responsibilities stated in 43 U.S.C. § 2808. Also, HUD prematurely closed a recommendation from OIG audit report 2020-LA-0002 that showed one responsibility not having been met. The allocation of resources to meet the responsibility stated in 43 U.S.C. § 2808(a)(5) was part of a recurring issue that was still not met during this audit. In both audits, HUD needs to dedicate resources to implement its geospatial program. Specifically, a lapsed contract for managing its Geocode Services Center factored into HUD not meeting 2 of the 13 responsibilities stated in the Act. As a result, HUD may not be able to promote transparency and accountability in providing accurate information to stakeholders as required by the Act. Specifically, HUD risks not having accurate and open access to geospatial data and metadata available for use by various stakeholders to assist in the research, policymaking, and other decisions.

## Recommendations

Based on the cited issues, we will reopen the recommendation from OIG audit report 2020-LA-0002 that was prematurely closed (1A) until corrective action is fully implemented to meet the responsibility stated in 43 U.S.C. § 2808(a)(5).

In addition, we recommend that the Principal Deputy Assistant Secretary for Policy Development and Research

- 1A. Ensure there are resources available for further development of geocoding services that fulfill HUD's responsibilities stated in 43 U.S.C. § 2808(a)(5) and 43 U.S.C. § 2808(a)(12) through the reactivation of the lapsed Geocode Service Center contract.

## Scope and Methodology

We performed the audit remotely in the Los Angeles, CA, metropolitan area from May 3 through August 8, 2022. Our audit covered the period from June 13, 2020, to March 31, 2022.

To accomplish our objective, we

- Reviewed HUD's geospatial background information.
- Reviewed previous HUD OIG work related to audit report 2020-LA-0002.
- Reviewed the Geospatial Data Act of 2018 and applicable Federal regulations.
- Reviewed HUD's Covered Agency Annual Reports and Self-Assessments of 43 U.S.C. § 2808.
- Obtained an understanding of HUD's internal controls for its geospatial data.
- Interviewed HUD officials to obtain an understanding of HUD's geospatial data.
- Analyzed HUD's strategic plan and other documents to support its efforts in meeting geospatial responsibilities.

We reviewed the 13 required responsibilities stated in 43 U.S.C. § 2808. We relied on interviews with HUD officials and other geospatial supporting documents and records to determine whether HUD met the 13 responsibilities in 43 U.S.C. § 2808.

We conducted the 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(s). We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

## Followup on Prior Audit

### **HUD Had Implemented Most of the Required Responsibilities Stated in the Geospatial Data Act of 2018, Audit Report Number: 2020-LA-0002**

Recommendation 1A recommends that the Assistant Secretary for Policy Development and Research take the appropriate actions to ensure that HUD fully implements the four responsibilities not met during the audit period. Specifically, HUD did not meet the responsibilities stated in 43 U.S.C. § 2808(a)(1), § 2808(a)(2), § 2808(a)(4), and § 2808(a)(5).

On June 14, 2022, HUD prematurely closed recommendation 1A under the assumption that it had taken the appropriate actions to fully implement the one remaining responsibility stated in 43 U.S.C. § 2808(a)(5). Discussions held with HUD and information obtained during the 2022 audit fieldwork determined that HUD did not take the appropriate actions to meet the four responsibilities cited in recommendation 1A. As a result, we will reopen this recommendation upon issuance of this audit report. We have been in communication with HUD to take the appropriate action to address the recommendation. As of September 23, 2022, HUD had provided documentation to support meeting the responsibilities stated in 43 U.S.C. § 2808(a)(1), 43 U.S.C. § 2808(a)(2), and § 2808(a)(4). HUD was working to meet the remaining responsibility stated in 43 U.S.C. § 2808(a)(5). Once HUD has completed meeting the remaining responsibility, we will close recommendation 1A.

# Appendixes

## APPENDIX A - AUDITEE COMMENTS AND OIG'S EVALUATION


Ref to OIG  
Evaluation

Auditee Comments

Comment 1

Comment 2

Comment 3



**U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT**  
WASHINGTON, DC 20410-6000

**OFFICE OF POLICY DEVELOPMENT  
AND RESEARCH**

MEMORANDUM FOR: Kilah S. White, Assistant General for Audit, GA

**TODD RICHARDSON**

FROM: Todd Richardson, General Deputy Assistant Secretary, HUD Office of Policy Development and Research, R

SUBJECT: Discussion Draft Audit Report – Geospatial Data Act of 2018 Fiscal Year 2022

DATE: September 23, 2022

This memorandum reflects HUD’s Office of Policy Development and Research’s formal comments for inclusion with the OIG report. It responds to the September 19, 2022 draft audit report.

Since OIG issuance of the draft audit report, PDR has taken actions to address all three of the recommendations in the draft report, specifically:

- 1A. On 9/22/2022, we posted the strategic plan on HUDUSER.GOV (see: <https://www.huduser.gov/portal/publications/Geospatial-Strategic-Plan.html>). This puts us in full compliance with 43 USC 2808(a)(1) to publish the strategic plan.  
  
While the draft report has stated that it should also be published on HUD.GOV because we had initially planned to do that, we have met the legal requirement by posting on HUDUSER.GOV and we no longer have plans to publish it on HUD.GOV. It is our strong view, supported by the law, that publication on HUDUSER.GOV satisfies the requirement.
- 1B. On 9/23/2022 HUD sent a contract to a vendor for reactivation of the lapsed Geocode Service Contract; when fully executed we will provide a copy of the contract to OIG. Reactivation of the Geocoding Service Contract satisfies the 1B recommendation and supports fulfillment of HUD’s responsibilities stated in 43 USC 2808(a)(5) and 43 USC 2808(a)(12). HUD is proceeding expeditiously to procure a long-term contract to prevent a future break in service.
- 1C. HUD has satisfied requirement 43 U.S.C. § 2808(a)(6) through its preparation and publication of industry-standard machine-readable geospatial metadata that adheres to the Content Standard for Digital Geospatial Metadata (CSDGM), Vers. 2 (FGDC-STD-001-1998) endorsed by the Federal Geographic Data Committee (FGDC).  
  
43 U.S.C. § 2808(a)(6) requires each covered to 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. A search of the [GeoPlatform’s NGDA Theme Portfolio](#) returns the entirety of

www.hud.govespanol.hud.gov

Ref to OIG  
Evaluation

Auditee Comments

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HUD's National Geospatial Data Asset (NGDA) catalogue. The GeoPlatform provides URL access to the geospatial metadata for that catalogue and validates HUD's compliance with the requirements of the statute.

We hope that this new information can be reflected in the final report. Thank you for your consideration.

Cc: Tanya E. Schulze, OIG Audit Director, 9DGA  
Frederick W. Lee, Assistant Audit Director, 9DGA  
Solomon Greene, Principal Deputy Assistant Secretary, HUD IPDR, R



## OIG Evaluation of Auditee Comments

- Comment 1. We appreciate HUD's time and effort to publish its strategic plan on [www.huduser.gov](http://www.huduser.gov). HUD strongly believes that its posting of its strategic plan on only one of two websites, [www.huduser.gov](http://www.huduser.gov), satisfies the responsibility stated in 43 U.S.C. § 2808(a)(1). HUD no longer plans to publish the plan on the other website, [www.hud.gov](http://www.hud.gov). Therefore, we agree that HUD satisfied this responsibility. We revised the report to reflect that HUD met this responsibility and removed recommendation 1A.
- Comment 2. HUD provided a copy of a bridge contract for the reactivation of its lapsed Geocode Service Contract, dated September 23, 2022. HUD stated that this bridge contract would provide a short-term solution as it proceeds with procuring a long-term contract to prevent future lapses in services. HUD believed that this action would satisfy recommendation 1B, now referenced as recommendation 1A in the report. While the bridge contract provides 6 more months of services, we disagree that it fully addresses the recommendation. The reason for our disagreement is because the contract did not include the Performance Work Statement to support that the remaining responsibilities will be met during the performance period. HUD should provide the complete bridge contract during the audit resolution process to address the deficiencies that related to the contract.
- Comment 3. HUD stated that it satisfied the responsibility through the preparation and publication of metadata available through the GeoPlatform. After the completion of our audit fieldwork, HUD provided a demonstration on the ability to access the metadata through the GeoPlatform. HUD's demonstration showed that the GeoPlatform directs users to the website, [www.data.gov](http://www.data.gov), to access its metadata. Therefore, we agree that HUD satisfied this responsibility. We revised the report to reflect that HUD met this responsibility and removed recommendation 1C.