



Office of Policy Development and Research, Washington, DC

Geospatial Data Act of 2018

**Office of Audit, Region 9
Los Angeles, CA**

**Audit Report Number: 2020-LA-0002
September 24, 2020**





OFFICE OF INSPECTOR GENERAL
U.S. Department of Housing and Urban Development

To: Seth D. Appleton, Assistant Secretary, Office of Policy Development and Research, R

//SIGNED//

From: Tanya E. Schulze, Regional Inspector General for Audit, 9DGA

Subject: HUD Had Implemented Most of the Required Responsibilities Stated in the Geospatial Data Act of 2018

Attached is the U.S. Department of Housing and Urban Development (HUD), Office of Inspector General's (OIG) final results of our review of HUD's implementation of 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 me at 213-534-2471.

Office of Audit (Region 9)

300 North Los Angeles Street, Suite 4070, Los Angeles, CA 90012
Phone (213) 894-8016, Fax (213) 894-8115

Visit the Office of Inspector General website at <https://www.hudoig.gov>.



Audit Report Number: 2020-LA-0002

Date: September 24, 2020

HUD Had Implemented Most of the Required Responsibilities Stated in the Geospatial Data Act of 2018

Highlights

What We Audited and Why

We audited the U.S. Department of Housing and Urban Development's (HUD) Office of Policy Development and Research's implementation of the responsibilities stated in the Geospatial Data Act of 2018 (The Act). We performed this review in response to a congressional mandate that HUD's geospatial data be audited at least once every 2 years. The Act requires that we audit HUD's collection, production, acquisition, maintenance, distribution, use, and preservation of geospatial data. Our audit objective was to determine whether HUD had implemented the 13 required responsibilities stated in section 759(a) of the Act.

What We Found

HUD had implemented 9 of the 13 responsibilities stated in section 759(a) of the Act. It was working toward implementing the remaining four responsibilities stated in sections 759(a)(1), 759(a)(2), 759(a)(4), and 759(a)(5) of the Act. This condition occurred because HUD did not allocate the necessary resources to ensure that it accomplished all 13 required responsibilities. As a result, HUD may not meet the necessary standards to promote transparency and accountability in providing accurate and complete information to stakeholders. Specifically, there is a risk that HUD may not have accurate and complete geospatial data available for use by other Federal agencies; State, local, and tribal governments; and other interested stakeholders. These uses include public health, economic growth, environmental protection and other purposes, improved policymaking, creation of public-private partnerships, and enhanced data usability and value.

What We Recommend

We recommend 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 as required by sections 759(a)(1), 759(a)(2), 759(a)(4), and 759(a)(5) of the Act.

Table of Contents

Background and Objective.....	3
Results of Audit	5
Finding: HUD Had Implemented Most of the Required Responsibilities Stated in the Geospatial Data Act of 2018	5
Scope and Methodology.....	11
Internal Controls.....	12
Appendix	14
A. Auditee Comments and OIG’s Evaluation.....	14

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 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, PD&R is responsible for ensuring that HUD adheres to 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. Specifically, 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 (FGDC);
- directs the FGDC to lead the development and management of the 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;
- recognizes the NSDI as the framework to ensure that geospatial data from multiple sources are available, accessible, and easily integrated;
- recognizes the GeoPlatform¹ as an important tool for accessing and managing geospatial data;
- establishes requirements for stewardship of geospatial assets; and
- identifies budgeting and reporting requirements.

¹ The GeoPlatform is a strategic national resource that supports the Administration's – Open Government, Open Data and Digital Government strategies to enhance transparency, collaboration and participation. The GeoPlatform provides a suite of well-managed, highly available, and trusted geospatial data, services, and applications for use by Federal agencies and their State, local, Tribal, and regional partners to meet their mission needs and the broader needs of the Nation.

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 is 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. Also, the 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. 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 section 752(3)(A)(i)² of 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 first of these audits is due to Congress by October 5, 2020.

Our initial audit objective was to determine whether HUD had implemented the Act, concerning its collection, production, acquisition, maintenance, distribution, use, and preservation of geospatial data. Specifically, we planned to perform this review to determine whether HUD had implemented the (1) standards for geospatial data, including metadata³ for geospatial data, established in Section 757 of the Act; (2) 13 responsibilities in section 759(a) of the Act; and (3) limitation on the use of Federal funds in section 759A of the Act. However, on March 23, 2020, the Council of the Inspectors General on Integrity and Efficiency (CIGIE) notified Congress that the inaugural mandatory audit scope period overlaps with the FGDC's estimated implementation period of the Act. CIGIE concluded that due to the continuing implementation of the Act, conducting mandatory audits prescribed by the Act would result in reports by the Inspectors General in October 2020 to be inconclusive for two of the three audit requirements. Therefore, we revised our audit objective to determine only whether HUD implemented the 13 required responsibilities stated in section 759(a) of the Act.

² Section 752(3)(A)(i) defines the term covered agency as an executive department that collects, produces, acquires, maintains, distributes, uses, or preserves geospatial data on paper or in electronic form to fulfill the mission of the executive department, either directly or through a relationship with another organization, including a State, local government, Indian tribe, institution of higher education, business partner or contractor of the Federal Government, and the public.

³ According to National Archives Bulletin 2015-04, metadata are elements of information that answer the questions "who, what, where, when, and why" regarding electronic records. Metadata elements provide administrative, descriptive, and technical information that describes the structure and content of electronic records. Metadata elements also provide contextual information that explains how electronic records were created, used, managed, and maintained before their transfer to the National Archives and Records Administration (NARA) and how they are related to other records. This information enables NARA to appropriately manage, preserve, and provide access to electronic records for as long as they are needed.

Results of Audit

Finding: HUD Had Implemented Most of the Required Responsibilities Stated in the Geospatial Data Act of 2018

HUD had implemented most of the 13 required responsibilities stated in section 759(a) of the Geospatial Data Act of 2018. Specifically, HUD had implemented 9 of the 13 responsibilities in the Act. It was working toward implementing the remaining four responsibilities. This condition occurred because HUD did not allocate the necessary resources to ensure that it accomplished all 13 required responsibilities. Also, the Act became law less than 2 years ago and HUD has been focused on other priorities that have delayed its progress toward meeting all responsibilities for its geospatial data, such as the circumstances related to the COVID-19 pandemic. As a result, HUD may not meet the necessary standards to promote transparency and accountability in providing accurate and complete information to stakeholders.

HUD Had Implemented Most of the Required Responsibilities Stated in the Act

The Act requires HUD to implement the 13 responsibilities stated in section 759(a). HUD had implemented 9 of the 13 required responsibilities. It was working toward meeting the remaining four responsibilities stated in sections 759(a)(1), 759(a)(2), 759(a)(4), and 759(a)(5) of the Act. The table below shows the status of HUD's implementation of the 13 required responsibilities.

Geospatial Data Act of 2018 responsibilities in sections	HUD implemented	HUD working toward implementing
759(a)(1)		X
759(a)(2)		X
759(a)(3)	X	
759(a)(4)		X
759(a)(5)		X
759(a)(6)	X	
759(a)(7)	X	
759(a)(8)	X	
759(a)(9)	X	
759(a)(10)	X	
759(a)(11)	X	
759(a)(12)	X	
759(a)(13)	X	
Total	9	4

HUD Had Implemented 9 of 13 Required Responsibilities Stated in the Act

HUD had implemented 9 of the 13 responsibilities stated in section 759(a) of the Act. The list below details the nine responsibilities that HUD had met.

1. Section 759(a)(3) requires HUD to promote the integration of geospatial data from all sources. HUD used standard formats for data and metadata to promote easy integration of its data with information from other sources. HUD also showed us its enterprise data inventory file to demonstrate its use of required metadata standards for all National Geospatial Data Asset (NGDA) items identified as necessary by the FGDC.
2. Section 759(a)(6) requires HUD to use geospatial data standards, which include the standards for metadata for geospatial data and other appropriate standards, such as documenting geospatial data with the relevant metadata and making metadata available through the GeoPlatform. HUD was working to provide all geospatial data in standard, nonproprietary data formats so that each dataset should have standard metadata. During the reporting period, HUD had a total of 12 geospatial datasets that delivered standard formats with standard metadata, which were available through the GeoPlatform. HUD provided an example of its Housing Choice Voucher Program datasets to show that it delivered in standard formats with standard metadata.
3. Section 759(a)(7) requires HUD to 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. HUD stated that it coordinated with other Federal agencies; State, local, and tribal governments; institutions of higher education; and the private sector. Specifically, HUD participated on the FGDC Steering Committee,⁴ FGDC Executive Committee, and FGDC Address Subcommittee. The FGDC Steering Committee focuses on providing executive leadership for the coordination of Federal geospatial activities between, among, and within agencies. Also, the FGDC Executive Committee is a subset of the Steering Committee, which develops, reviews, and coordinates interagency concepts and proposals as requested by the FGDC chairperson for consideration by the FGDC Steering Committee as a whole. Further, the FGDC Address Subcommittee assists the address theme⁵ managing agencies in developing and promoting a national strategy to identify, prioritize, implement, coordinate, manage, and provide oversight of geospatial address data-related activities. These activities include activities related to supporting accessible, accurate, and spatially referenced national

⁴ Based on FGDC.gov, HUD's Program Monitoring and Research Division Director serves as a member of the FGDC Steering Committee.

⁵ The address theme consists of the data elements, attributes, and metadata that specify a fixed geographic location by reference to a thoroughfare or landmark, or specifies a point of postal delivery, or both. The address theme does not include occupants or addressees nor does it include the feature that may be specified by an address. The theme may include linkages between these features and other location reference methods.

address data available in partnership with Federal, State, county, local, tribal, nonprofit, and private organizations.

4. Section 759(a)(8) requires HUD to 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 showed that it implemented this responsibility 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 had created the Community Assessment Reporting Tool, also known as CART, 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.
5. Section 759(a)(9) requires HUD to protect personal privacy and maintain confidentiality in accordance with Federal policy and law. HUD stated that it did not release private or confidential geospatial data and it presented geospatial data only at the city, county, metropolitan area, State, or congressional district level, avoiding any individual reporting level. HUD also stated that it queried the data received from its program offices to exclude personally identifiable information, also known as PII, before importing data into the geospatial enterprise database. We reviewed HUD reports generated from its tools and applications and they did not reveal any PII information.
6. Section 759(a)(10) requires HUD to participate in determining, when applicable, whether declassified data can contribute to and become a part of the NSDI. HUD declared that it did not have any declassified geospatial datasets during the reporting period. However, HUD stated that it would contribute and become a part of the NSDI if it has declassified data in the future.
7. Section 759(a)(11) requires HUD to search all sources, including the GeoPlatform, to determine whether existing Federal, State, local, or private geospatial data meet its needs before spending funds for geospatial data collections. HUD reported that it searched the FGDC Marketplace,⁶ ArcGIS Online,⁷ and the National Geospatial Platform to ensure

⁶ The Geospatial Platform Marketplace provides a listing of datasets that are planned for acquisition by one or more of the FGDC member agencies. The listing can be used to determine whether a potential partner is already trying to acquire data where there is an interest. Marketplace functionality is constantly being enhanced in new releases of the Geospatial Platform to help Federal agencies and their partners meet their geospatial data needs in the most timely and cost effective manner possible.

⁷ ArcGIS Online enables connection to people, locations, and data using interactive maps. It works with smart, data-driven styles and intuitive analysis tools that deliver location intelligence. It shares insights with the world or specific groups.

that the data did not already exist before spending funds to obtain new geospatial data. As a result, these data collection searches met HUD's needs.

8. Section 759(a)(12) requires HUD, to the maximum extent practicable, to ensure that a person receiving Federal funds for geospatial data collection provides high-quality data. HUD showed us that it had created Structured Query Language (SQL) scripts to check on the advertised data values to ensure that collection of geospatial data provides high-quality data. HUD also provided an example of its SQL queries for "Great Schools" data to show how it tested for quality data.
9. Section 759(a)(13) requires HUD to appoint a contact to coordinate with the lead covered agencies for collection, acquisition, maintenance, and dissemination of the NGDA themes used by the covered agency. In 2017, HUD appointed an official to coordinate with other lead covered agencies regarding HUD's geospatial data. The appointed HUD official manages the data license program, which disseminates HUD administrative data for program research and professional researchers who monitor HUD programs. Currently, the appointed official and their team have implemented 9 of the 13 required responsibilities.

HUD Was Working Toward Implementing 4 of 13 Required Responsibilities Stated in the Act

HUD was working toward implementing the remaining four responsibilities stated in section 759(a) of the Act. The list below details the four responsibilities that HUD was working to implement.

1. Section 759(a)(1) requires HUD to prepare, maintain, publish, and implement a strategy for advancing geographic information and related geospatial data and activities appropriate to its mission, in support of the strategic plan for NSDI prepared under section 755(c). HUD did not complete and publish a strategic plan for managing its geospatial data assets in supporting the NSDI plan. However, HUD had partially implemented this responsibility because it provided a draft strategic plan with the goal of completion by 2021.
2. Section 759(a)(2) requires HUD to collect, maintain, disseminate, and preserve geospatial data such that the resulting data, information, or products are readily available to share with other Federal agencies and non-Federal users. HUD stated that it collected, maintained, and disseminated its geospatial data. Specifically, HUD collects HUD program data and geocodes the data to pin the location on a map that represents a HUD program asset. We reviewed HUD-eGIS Storefront, which provides HUD's geospatial assets, web-based mapping tools, and application programming interfaces. This information allows the public to access HUD's geospatial data to assist in decision making efforts that affect their communities. HUD also stores its geospatial assets at www.data.gov, National Geospatial Platform, and ArcGIS Online services, where the public may search and use HUD's geospatial data. HUD refreshes the core data periodically. However, HUD had not set up a formal schedule for when to archive and

preserve its geospatial data. HUD had partially implemented this responsibility and stated that it anticipated meeting this responsibility by 2021.

3. Section 759(a)(4) requires HUD to ensure that its agency record schedules approved by the National Archives and Records Administration (NARA) include data information products and other records created in geospatial data and activities. During HUD's reporting period, HUD's NARA schedule did not include retention guidelines for its geospatial data assets. HUD stated that it would implement this responsibility and anticipated updating its schedule with the required retention guidelines by 2021.
4. Section 759(a)(5) requires HUD to 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 FGDC Committee. HUD stated that it did not have adequate resources to support its operations and maintenance and development, modernization, and enhancement needs. Specifically, HUD indicated that it had a staff of only two Geographic Information System (GIS) experts, one senior project manager from the Office of the Chief Information Officer, and a team of contractors that performed operations and maintenance work on the GIS applications for its geospatial data management. HUD had partially implemented this responsibility and stated that it anticipated meeting this responsibility by 2021.

We attributed this condition to HUD's not allocating the necessary resources, such as staff and funding, to PD&R to ensure that it could accomplish all 13 responsibilities stated in section 759(a) of the Act. In addition, HUD had other priorities that delayed its progress toward meeting the responsibilities for its geospatial data. Specifically, the Act became law less than 2 years ago and HUD has been focused on other priorities that have delayed its progress toward meeting all responsibilities for its geospatial data, such as the circumstances related to the COVID-19 pandemic.

Because HUD had implemented only 9 of the 13 required responsibilities, it may not be able to meet the necessary standards to promote transparency and accountability in providing accurate and complete information to stakeholders. Specifically, HUD risks not having accurate and complete geospatial data available for use by other Federal agencies; State, local, and tribal governments; and other interested stakeholders. These uses include public health, economic growth, environmental protection and other purposes, improved policymaking, creation of public-private partnerships, and enhanced data usability and value.

Conclusion

HUD did not allocate sufficient resources toward accomplishing the 13 required responsibilities and therefore, it was continuing to work toward implementing the four remaining responsibilities. As a result, HUD risks not having its geospatial data readily available for various government entities and other interested stakeholders.

Recommendation

We recommend that the Assistant Secretary for Policy Development and Research

- 1A. Take appropriate actions to prioritize the need for resources necessary to ensure that HUD fully implements the remaining four responsibilities as required by sections 759(a)(1), 759(a)(2), 759(a)(4), and 759(a)(5) of the Geospatial Data Act of 2018.

Scope and Methodology

We performed our audit work from our office in Los Angeles, CA, between April and June 2020. Our audit covered the period September 1, 2018, to June 12, 2020.

To accomplish our objective, we

- Reviewed HUD’s geospatial background information.
- Reviewed the Geospatial Data Act of 2018 and other applicable Federal regulations.
- Reviewed HUD’s self-assessment of section 759(a) compliance annual report.
- Obtained an understanding of HUD’s internal controls for its geospatial data.
- Interviewed HUD’s staff to obtain an understanding of HUD’s geospatial data.

We reviewed the 13 required responsibilities stated in section 759(a) of the Act. We relied on HUD’s self-assessment of section 759(a) compliance annual report, interviews with HUD officials, and other related geospatial supporting documents and records to determine whether HUD had implemented all 13 responsibilities stated in section 759(a) of the Act.

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.

Internal Controls

Internal control is a process adopted by those charged with governance and management, designed to provide reasonable assurance about the achievement of the organization's mission, goals, and objectives with regard to

- effectiveness and efficiency of operations,
- reliability of financial reporting, and
- compliance with applicable laws and regulations.

Internal controls comprise the plans, policies, methods, and procedures used to meet the organization's mission, goals, and objectives. Internal controls include the processes and procedures for planning, organizing, directing, and controlling program operations as well as the systems for measuring, reporting, and monitoring program performance.

Relevant Internal Controls

We determined that the following internal controls were relevant to our audit objective:

- Effectiveness and efficiency of program operations – Policies and procedures that management has implemented to reasonably ensure that a program meets its objectives.
- Validity and reliability of data – Policies and procedures that management has implemented to reasonably ensure that valid and reliable data are obtained, maintained, and fairly disclosed in reports.
- Compliance with applicable laws and regulations – Policies and procedures that management has implemented to reasonably ensure that resource use is consistent with laws and regulations.

We assessed the relevant controls identified above.

A deficiency in internal control exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, the reasonable opportunity to prevent, detect, or correct (1) impairments to effectiveness or efficiency of operations, (2) misstatements in financial or performance information, or (3) violations of laws and regulations on a timely basis.

Significant Deficiency

Based on our review, we believe that the following item is a significant deficiency:

- HUD did not allocate adequate resources necessary to fully implement all of the required responsibilities in section 759(a) of the Geospatial Data Act of 2018 to ensure that its geospatial data are available for other Federal agencies; State, local, and tribal governments;

and other interested stakeholders to use for public health, economic growth, environmental protection and other purposes, improved policymaking, creation of public-private partnerships, and enhanced data usability and value (finding).

Appendix


Appendix A

Auditee Comments and OIG's Evaluation

Ref to OIG Evaluation

Auditee Comments

Comment 1


OFFICE OF POLICY DEVELOPMENT
AND RESEARCH

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

September 17, 2020

MEMORANDUM FOR: Tanya E. Schulze, Regional Inspector General for
Audit, 9DGA

FROM: Todd M. Richardson, General Deputy Assistant Secretary for
Development and Research, RICHARDSON

SUBJECT: HUD's Comment to the OIG Report Resulting from the Completed
Review of HUD's Implementation of the Geospatial Data Act
(GDA) of 2018

Digitally signed by TODD RICHARDSON
DN: cn = TODD RICHARDSON C = US O =
U.S. Government OU = Department of
Housing and Urban Development, Policy
Development and Research
Date: 2020.09.17 12:36:51 -0400

This memo is in connection with the OIG's draft report resulting from the completed review of the U.S. Department of Housing and Urban Development's (HUD)'s Implementation of the Geospatial Data Act (GDA) of 2018. As discussed during the Exit Conference, there is one comment PD&R would like to add on page 9, item #4 of your report:

"Note for the 759(a)(5) responsibilities, PDR depends on IT resources that are appropriated to the CIO to allocate. The CIO has many competing needs for these funds to upgrade many legacy systems. Congress has not been increasing appropriations to match these needs. It would be helpful to note that for this recommendation resources to implement IT requirements of the geospatial act are a shared responsibility of PDR, CIO, and the Congress."

cc:
David Chow, Chief Information Officer, Q
Kevin R. Cooke, Jr., Principal Deputy Chief Information Officer, Q
Hun Kim, Chief Information Security Officer, QS
Paul Scott, Acting Deputy CIO for Customer Relationship and Performance, QS
Calvin Johnson, Deputy Assistant Secretary for Research, Evaluation and Monitoring, RR
Mark D. Shroder, Associate Deputy Assistant Secretary for Research, Evaluation and Monitoring, RR
Ted Payne, Director of Program Monitoring and Research Division, RRR
Virginia Der, Audit Liaison for PD&R, RB
Wynecé Watts-Mitchell, Director, Audit Compliance Branch, OCIO, QMAC
Helen McBride, Senior Adviser, Office of the Chief Information Officer, Q
Kathleen Cheeseman, OCIO Project Manager, QREA

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OIG Evaluation of Auditee Comments

Comment 1 We appreciate HUD's time and consideration to review and respond to the audit report. We did not make the requested change to the body of the report because evaluating PD&R's funding levels was outside the scope of our audit fieldwork. However, we acknowledge the current circumstances and funding shortages that affect PD&R's ability to ensure that HUD implements all of the responsibilities stated in section 759(a) of the Geospatial Data Act.

HUD has implemented the majority of the responsibilities stated in the Act and its commitment to meeting the remaining responsibilities will depend on the resources provided to PD&R. HUD will need to allocate the necessary resources, such as staffing and funding, to ensure that it can implement the remaining four responsibilities stated in sections 759(a)(1), 759(a)(2), 759(a)(4), and 759(a)(5). Any additional funding allocated to PD&R would help HUD meet its remaining responsibilities before the end of the upcoming fiscal year.