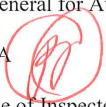


**APPENDIX B: DEPUTY SECRETARY'S RESPONSE TO THE
REPORT**

DEPUTY SECRETARY OF LABOR
WASHINGTON, D.C. 20210

SEP 25 2020

MEMORANDUM FOR: ELLIOT LEWIS
Assistant Inspector General for Audit

FROM: PATRICK PIZZELLA 

SUBJECT: Response to the Office of Inspector General's Draft Report –
*Department of Labor's Progress with Implementing Actions
Required by the Geospatial Data Act of 2018* (Draft Report No.
23-20-004-01-001)

I am responding to the draft Office of Inspector General (OIG) report titled "DOL Needs to do More to Implement the Geospatial Data Act of 2018." The report recommends that I "formalize the assignment of responsibility and authority for developing and implementing DOL policy" under the Geospatial Data Act of 2018 (GDA or Act). While I believe this delegation was sufficiently accomplished through Secretary's Order (SO) 02-2019, which is not mentioned in your report, I agree that a more clear delegation is possible. As such, I will be issuing internal guidance to clarify that implementation of the GDA requirements fall within the scope of the Data Board's responsibilities under SO 02-2019.

Although SO 02-2019 does not reference the GDA by name, it was published in the *Federal Register* on March 26, 2019, less than six months after the GDA was signed into law on October 3, 2018, and clearly encompasses agency actions required under the Act.

SO 02-2019 formalizes a Department of Labor (DOL) Data Board and establishes a Chief Data Officer (CDO) to serve as Chair of the Data Board. Under this SO, and as relevant to implementation of the GDA requirements, the Data Board is charged with creating, implementing, and overseeing a data governance model within the Department; developing a comprehensive DOL Data Strategy and updating this strategy with Subsequent Data Strategies as appropriate; serving as the principal entity acting on the Secretary's behalf with respect to data governance issues; and overseeing Department-level data-sharing agreements with external organizations and across DOL entities. Further, the CDO, as relevant to implementation of the GDA requirements, is charged with managing the data assets of DOL, including the standardization of data format, the sharing of data assets, and the publication of data assets in accordance with applicable law.

I am pleased with the CDO's and the Data Board's actions under the GDA to date, including the CDO's dutiful participation in the Federal Geospatial Data Committee's (FGDC) meetings and the re-establishment of a Data Board subgroup to address requirements under the GDA, even though DOL use of geospatial data is minimal.

I have full confidence in the CDO's and the Data Board's ability and intent to comply with the GDA, including its provision that the Act's requirements be met within five years of the FGDC issuing guidance under the Act—guidance that the Department eagerly awaits.

Thank you for the timely audit, and I appreciate the opportunity to respond to your draft report and recommendations.

cc: Scott Gibbons, Chief Data Officer
Gundeep Ahluwalia, Chief Information Officer
Jonathan Wolfson, Deputy Assistant Secretary for Policy
Alison Kilmartin, Deputy Assistant Secretary for Policy
Stephanie Swirsky, Deputy Assistant Secretary for Policy

APPENDIX C: CHIEF DATA OFFICER'S RESPONSE TO THE REPORT

U.S. Department of Labor

Office of the Assistant
Secretary for Policy
Washington, D.C. 20210



September 28, 2020

MEMORANDUM FOR: ELLIOT LEWIS
Assistant Inspector General for Audit

THROUGH: JONATHAN WOLFSON *JW*
Principal Deputy Assistant Secretary for Policy

FROM: SCOTT GIBBONS *Scott Gibbons*
Chief Data Officer

SUBJECT: Response to the Office of Inspector General's Draft Report –
*Department of Labor's Progress with Implementing Actions
Required by the Geospatial Data Act of 2018* (Draft Report No.
23-20-004-01-001)

The Chief Data Officer (CDO) and Office of the Assistant Secretary for Policy (OASP) appreciate the opportunity to respond to the draft Office of Inspector General's (OIG) report titled "DOL Needs to do More to Implement the Geospatial Data Act of 2018." The CDO and OASP broadly agree with OIG's characterization of progress at the Department of Labor (Department) in meeting the requirements of the law, and with OIG's recommendations presented in the report. The CDO and OASP believe that there is some important context that should be presented while reviewing the findings and determining what appropriate next steps the Department should take to further implement the Geospatial Data Act of 2018 (GDA or Act).

First, it is important to note that the GDA has a single set of requirements for all agencies, regardless of the extent to which the agency collects, manages, or uses geospatial data or assets. The Department does almost no geospatial data collection or analysis beyond capturing addresses in administrative data. While all agencies need to properly administer the data they collect and depend on to guide their work, the current scope of geospatial data collection and use for the Department is minor, and the role for this data in meeting our mission(s) is similarly minor.

Second, it is equally important context to note that the Department has experienced very little IT consolidation, and most production IT databases and data systems are exceedingly heterogeneous in terms of platforms, products, information architecture, and data quality controls. Making corrections at this time would involve extensive triage to numerous inconsistent legacy systems, and this could be prohibitively expensive, complicated, and time consuming given the scale of benefit to DOL's mission. It will be important for the Department to develop approaches to meet the requirements of the GDA in a manner that is consistent with the current and prospective uses of geospatial data and assets and the current and prospective state of its information technology architecture and systems. In addition, it will be important for the Department to balance any

prospective actions by considering the utility that could be realized by federal and public data users from more consistent and optimal geospatial data collection and management, given the very limited volume and types of such data.

Third, the first recommendation from the OIG, to “Provide an official assignment for the responsibility and the authority to develop and implement DOL policy for geospatial laws and regulations” risks becoming an unfunded mandate. Secretary’s Order 02-2019 likely provides sufficient authority for the Office of Data Governance within OASP to leverage the Data Board and to identify consensus solutions to some of the challenges identified through this audit. However, there is no current IT infrastructure or service to validate geospatial data elements that the Department does collect (e.g., postal addresses). Similarly, there is no current funding for any corrective actions or Data Board proposals, and the next opportunity to request such funding will be with the Fiscal Year 2023 budget—a time period falling after a follow-up audit is likely to occur. A mandate to identify corrective action can easily be accomplished, but ensuring that mandate is accompanied by the necessary resources to support planning, design, implementation, and training for staff in order to support the progress envisioned by the GDA is equally important.

Thank you again for your cooperative approach to conducting this audit on a short timeline and in recognizing the limited context for geospatial data at the Department. We appreciate the opportunity to comment on this and anticipate addressing the findings in early FY 2021 with both the Data Board and Departmental management.

cc: Gundeep Ahluwalia
Chief Information Officer

Stephanie Swirsky
Deputy Assistant Secretary for Policy

Allison Kilmartin
Deputy Assistant Secretary for Policy

DOL Chief Data Stewards