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U.S. General Services Administration

GSA Is Not Fully Complying with the Geospatial Data Act of 2018

Report Number A260022/I/T/F27001
October 5, 2026

Executive Summary

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Why We Performed This Audit

We performed this audit because the Geospatial Data Act of 2018 (GDA), Section 759(c), *Audits*, requires the inspector general of each covered agency to conduct an audit, not less than once every 2 years, of the covered agency's compliance with the GDA. Our audit objective was to assess GSA's fulfillment of its responsibilities under the GDA. Specifically, we assessed GSA's compliance with the 13 requirements listed in GDA Section 759(a), *Covered Agency Responsibilities*.

What We Found

GSA is not fully complying with the GDA. We found that GSA is not meeting GDA requirements to:

- Maintain geospatial data;
- Maintain a geospatial data strategy;
- Maintain an inventory of all geospatial data assets; and
- Search for existing geospatial data before procuring new data.

These deficiencies, some of which are recurring, demonstrate that GSA is not managing its GDA responsibilities effectively.

What We Recommend

We recommend GSA's Chief Information Officer:

1. Ensure that the Inventory of Owned and Leased Properties (IOLP) and Federal Real Property Profile (FRPP) datasets contain accurate latitude and longitude coordinates based on each property's physical location except for those properties with a clear exemption for national security by taking the following actions:
 - a. Conduct a cost-benefit analysis to identify cost-effective and feasible corrective actions to improve data accuracy.
 - b. Based on the results of this analysis, implement the identified corrective actions to improve the accuracy of latitude and longitude coordinates in the IOLP and FRPP datasets.
 - c. Describe any remaining data limitations in the IOLP and FRPP datasets' supporting documentation.

2. Establish a process to identify and correct discrepancies in the IOLP's Congressional District Representative Name data.
3. Update GSA's geospatial data strategy to align with the Federal Geographic Data Committee's *Building the Geospatial Future Together – The National Spatial Data Infrastructure Strategic Plan 2025–2035*.
4. Update *The General Services Administration's GEOSPATIAL DATA Standard Operating Procedure (SOP) and Standards Guide*, Version 2.2, to:
 - a. Establish a process for maintaining GSA's geospatial data strategy and geospatial data inventory, including defining roles and responsibilities.
 - b. Require formal documentation of each search performed before procuring new data, including the data sources checked and the results.
 - c. Assign clear roles and responsibilities for performing the required search for existing geospatial data before procuring new data.
5. Establish processes to ensure Agency-wide compliance with the GDA, including clear roles and reporting responsibilities among the Geographic Information Systems Center of Excellence, the Data Evidence Governance Board, and the Chief Data Officer.

GSA's Chief Information Officer agreed with our recommendations. GSA's comments are included in their entirety in **Appendix C**.

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Introduction

We performed an audit of GSA's compliance with its responsibilities under the Geospatial Data Act of 2018 (GDA).

Purpose

We performed this audit because GDA Section 759(c), *Audits*, requires the inspector general of each covered agency to conduct an audit, not less than once every 2 years, of the covered agency's compliance with the GDA.

Objective

Our audit objective was to assess GSA's fulfillment of its responsibilities under the GDA. Specifically, we assessed GSA's compliance with the 13 requirements listed in GDA Section 759(a), *Covered Agency Responsibilities*.

See **Appendix A** – Objective, Scope, and Methodology for additional details.

Background

On October 5, 2018, the GDA was signed into law to promote greater access to and use of geospatial data, which is information that is tied to a location on Earth, such as latitude and longitude coordinates.¹ The GDA's goals are to spur economic growth, advance science, and improve public health and other services. Potential users of geospatial data include federal, state, tribal, and local government agencies; academic institutions; and the private sector.

The GDA formalizes governance processes related to geospatial data, including the requirements agencies must implement to comply with the act. Covered agencies under the GDA, including GSA, are the executive branch departments that collect, produce, acquire, maintain, distribute, use, or preserve geospatial data. The GDA also established the Federal Geographic Data Committee, an executive branch interagency committee, as the lead entity for the development, implementation, and review of policies, practices, and standards relating to geospatial data.

Under GDA Section 759(b), each covered agency must submit an annual report to the Federal Geographic Data Committee, detailing its performance in implementing the 13 covered agency responsibilities (see **Appendix B**). These responsibilities include developing a strategy for advancing geospatial data, sharing geospatial data with other federal and non-federal users, and adhering to data standards.

¹ 43 U.S.C. 2801-2811.

GSA has three offices with responsibilities related to GDA compliance:

- **GSA's Office of Innovation** – This office, which is within the Office of GSA IT, is responsible for establishing data governance frameworks used for compliance with the GDA. It is headed by GSA's Chief Data Officer.
- **GSA's Data Evidence Governance Board** – This board helps ensure data accuracy, including GSA data used for compliance with the GDA. It is chaired by GSA's Chief Data Officer and includes voting members from GSA's services and staff offices.
- **Geographic Information Systems Center of Excellence** – This office serves as GSA's central hub for Agency-wide geographic information systems (GIS) programming and is responsible for GSA's compliance with the GDA. It standardizes tools and enables geospatial capabilities across the Agency. It sits within the Office of GSA IT, under the direction of GSA's Chief Data Officer. The GIS Center of Excellence also maintains *The General Services Administration's GEOSPATIAL DATA Standard Operating Procedure (SOP) and Standards Guide*, Version 2.2, which lists the tasks, responsibilities, and resources for implementing a GIS program.

GSA maintains the following two publicly available geospatial datasets that support the critical business and mission requirements of the federal government and its stakeholders:

- **Inventory of Owned and Leased Properties (IOLP) Dataset** – This dataset contains more than 15,500 records of GSA-controlled properties across the United States and its territories. The IOLP dataset allows federal and non-federal users to easily access and search this information, often to find available office space. The dataset contains two subsets of data: IOLP-Buildings and IOLP-Leases.
- **Federal Real Property Profile (FRPP) Dataset** – This dataset includes all real property under the custody and control of all executive branch agencies, except for those excluded for reasons of national security or Freedom of Information Act exemptions. The FRPP dataset contains information on more than 300,000 federal properties from over 50 federal agencies.² The goals of the dataset are to: (1) increase accountability for asset management; (2) allow for benchmarking across various types of properties; and (3) provide accurate and reliable data to decision-makers, including for the disposal of unneeded federal properties.

Prior GSA Office of Inspector General Reports on GSA's Compliance with the GDA

We conducted our inaugural GDA audit in 2020. In that audit, we found that GSA's ability to comply with its responsibilities under the GDA was impaired by data quality issues and internal

² FY 2024 Federal Real Property Profile (FRPP) Public Dataset (July 9, 2025).

control weaknesses.³ Specifically, the IOLP data and metadata did not consistently comply with geospatial data standards. We found that these issues were caused by insufficient internal controls.

In our 2022 audit, we reported that GSA was not fully complying with the GDA.⁴ We found that GSA excluded geospatial data from its GDA implementation and reporting efforts and was not adhering to geospatial data and metadata standards. These deficiencies occurred because GSA lacked comprehensive, formalized oversight to ensure Agency-wide compliance with the GDA.

In our 2024 audit, we again found that GSA's geospatial data was not fully reliable, limiting its usefulness.⁵ We also found that GSA lacked an effective process to meet the GDA's requirement to search for existing geospatial data before procuring new data. This deficiency could lead to duplicative and unnecessary purchases of geospatial data.

In response to our audits, GSA agreed to implement corrective actions designed to address our findings and improve the management and oversight of its Agency-wide GDA program. However, as shown in our previous reports—and again in this report—GSA's implementation of these corrective actions has been ineffective to ensure full compliance with the GDA. As described in the following pages of this report, the repeated nature of these findings is indicative of ineffective management oversight.

³ *Audit of GSA's Compliance with the Geospatial Data Act of 2018* (Report Number A201005/M/T/F20005, September 25, 2020).

⁴ *GSA Is Not Fully Complying with the Geospatial Data Act of 2018* (Report Number A220037/A/T/F23001, October 5, 2022).

⁵ *Audit of GSA's Compliance with the Geospatial Data Act of 2018* (Report Number A240028/I/T/F24006, September 30, 2024).

Results

Finding – GSA is not fully complying with the Geospatial Data Act of 2018.

GSA is not fully complying with the GDA. We found that GSA is not meeting GDA requirements to:

- Maintain geospatial data;
- Maintain a geospatial data strategy;
- Maintain an inventory of all geospatial data assets; and
- Search for existing geospatial data before procuring new data.

These deficiencies, some of which are recurring, demonstrate that GSA is not managing its GDA responsibilities effectively.

GSA Is Not Fully Complying with the GDA Requirement to Maintain Geospatial Data

The GDA requires GSA to maintain and use geospatial data to enhance operations and reporting, support decision-making, and make federal geospatial services more useful to the public. To meet this requirement, GSA must maintain complete and accurate geospatial data.

However, GSA is not maintaining complete and accurate geospatial data. We found that:

- Both the IOLP and FRPP datasets contain inaccurate or missing latitude and longitude coordinates; and
- The IOLP dataset contains outdated and incorrect Congressional District Representative Name (congressional representative) data.

The IOLP and FRPP datasets contain inaccurate or missing latitude and longitude coordinates.

The Federal Geographic Data Committee's 2014 *U.S. Government Real Property Asset Data Standard, a Geospatial Data Content Standard* (RPADS), is the federal government's primary standard for geolocating real property assets. RPADS requires geospatial datasets for real property to include geospatial locations, which are intended to map properties to a specific location relative to the Earth. GSA's IOLP and FRPP datasets use latitude and longitude coordinates for this purpose.

However, as described on the following pages, we found that:

- The IOLP-Buildings data subset contains inaccurate latitude and longitude coordinates;⁶
- The FRPP dataset contains inaccurate latitude and longitude coordinates; and

⁶ We did not test the IOLP-Leases data subset for latitude and longitude coordinates because this dataset includes multiple leases for the same real property asset and duplicate latitude and longitude data is expected.

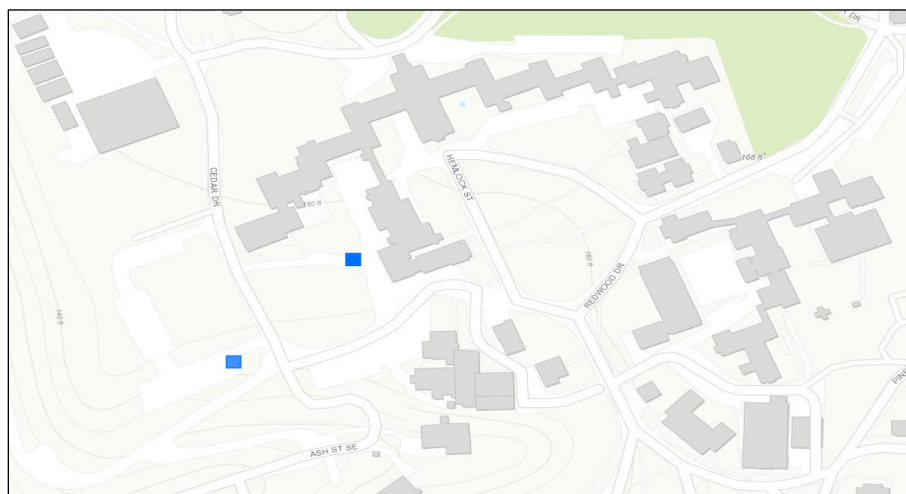
- The FRPP dataset is missing some latitude and longitude coordinates.

The IOLP-Buildings data subset contains inaccurate latitude and longitude coordinates. The IOLP dataset allows federal and non-federal users to easily access and search information about GSA-controlled properties across the United States and its territories.

However, the IOLP-Buildings data subset includes inaccurate latitude and longitude coordinates. We found that 634 (7 percent) of the 8,475 GSA-controlled properties listed in GSA's IOLP-Buildings data subset lack distinct latitude and longitude coordinates.⁷

This occurred because, when a property such as a campus or facility consists of multiple buildings, GSA will assign the same latitude and longitude coordinates to multiple buildings on the property. For example, there are 54 buildings on the 176-acre St. Elizabeths West Campus in Washington, D.C., which share identical coordinates in the IOLP-Buildings data subset. As shown in *Figure 1* below, the IOLP map tool displays only two latitude and longitude location markers for the entire campus.

Figure 1. St. Elizabeths Complex on the IOLP Map Tool



The GIS Center of Excellence project manager told us that GSA's practice meets the RPADS' requirement to locate assets on a map and disagreed that this produces inaccurate information. He asserted that RPADS requires assigning latitude and longitude to each property, but the standard does not require that each building on a property, like a campus, has specific latitude and longitude coordinates.

⁷ This finding is consistent with our 2024 audit. In that audit, we found that 719 of 8,618 properties (8 percent) in GSA's IOLP-Buildings data subset shared latitude and longitude coordinates with other properties.

However, GSA's assignment of the same coordinates to multiple buildings is a recurring finding, which we first reported in our 2024 GDA audit.⁸ In GSA IT's corrective action plan designed to address our finding from 2024, GSA's Spatial Data Management program manager proposed revising RPADS to measure latitude and longitude coordinates at three points on a building. The proposed revision would have addressed the inaccurate coordinates if implemented.

The GIS Center of Excellence project manager asserted that the proposed revision would be difficult to execute and that GSA did not have a business need for it. Notwithstanding GSA's assertion, this is an RPADS requirement, which was implemented to ensure full compliance with the GDA.

In April 2026, GSA's audit liaison told us that GSA had withdrawn the proposed revision. Further, the GIS Center of Excellence project manager stated that GSA can update the IOLP dataset's supporting documentation to clarify that campus properties may share a central coordinate.

Despite these assertions, GSA should take cost-effective measures to improve the accuracy and usefulness of the latitude and longitude coordinates in the IOLP-Buildings data subset.

The FRPP dataset contains inaccurate latitude and longitude coordinates. The 2024 *Guidance for Real Property Inventory Reporting* is the data standard for the FY 2024 *Federal Real Property Profile (FRPP) Public Dataset*. It requires all buildings in the United States and its territories to report latitude and longitude coordinates.

However, as described below, we found that properties listed in the FRPP dataset contain inaccurate latitude and longitude coordinates.

- **Lack of Distinct Coordinates** – Of the 298,221 properties with latitude and longitude coordinates in the FRPP dataset, 78,624 (26 percent) lacked distinct latitude and longitude coordinates. For example, the FRPP dataset contained the same latitude and longitude coordinates for 2,123 real property assets located on the Department of Energy's Savannah River Site in South Carolina.

Shared latitude and longitude coordinates in the FRPP dataset have been a long-standing problem. For example, in our 2024 GDA audit report, we found that 69,134 (22 percent) of the 307,975 properties in the FRPP dataset shared latitude and longitude coordinates with other properties.

The FRPP co-lead attributed many of these data deficiencies to federal agencies reporting identical coordinates for buildings on the same campus. The FRPP co-lead acknowledged the 2024 *Guidance for Real Property Inventory Reporting* does not

⁸ *Audit of GSA's Compliance with the Geospatial Data Act of 2018* (Report Number A240028/I/T/F24006, September 30, 2024).

explicitly prohibit or permit this but said that federal agencies widely understand that shared coordinates are acceptable for campus buildings.

As with the FRPP dataset, the FRPP co-lead asserted that distinct latitude and longitude coordinates for each listed building are neither required by the FRPP's reporting guidance nor cost-effective for agencies to implement. Because of its position, GSA has revised or is in the process of revising the guidance on behalf of the Federal Real Property Council to allow the use of shared latitude and longitude coordinates for buildings located at the same facility or campus.⁹ For example, the FRPP co-lead told us that she had already updated the *2026 Guidance for Real Property Inventory Reporting* on behalf of the council to allow shared coordinates for campus properties.¹⁰

Despite these assertions, GSA should take cost-effective measures to improve the accuracy and usefulness of the latitude and longitude coordinates in the FRPP dataset.

- **Erroneous Coordinates** – Numerous properties in the FRPP dataset listed erroneous coordinates. For example, the FRPP dataset included identical coordinates—a repeating series of “1”s—for 1,759 real property assets listed for the Department of the Interior. These coordinates are erroneous. Although these real property assets are located at 91 installations across 15 states, the coordinates are for a location in the Pacific Ocean.

The FRPP co-lead told us that she was aware of these incorrect coordinates. In July 2023, a Department of the Interior employee told her that many of these assets are irrigation canals—long, linear features that a single geospatial point cannot accurately represent. In June 2026, the FRPP co-lead told us that the Department of the Interior has partially corrected these inaccuracies. She added that the correction would be reflected in the Fiscal Year (FY) 2026 FRPP dataset.

The U.S. Government Accountability Office (GAO) has also reported the FRPP dataset's location data is unreliable. For example, in 2020, GAO reported that some agencies may enter incorrect coordinates simply to complete the data field.¹¹ Furthermore, in 2026, GAO reported that about 20 percent of the FRPP buildings had coordinates that did not match their reported zip codes, including less than 1 percent that were inappropriately located in a body of water.¹²

⁹ The Federal Real Property Council is an interagency council, which provides guidance to agencies on reporting their real property each year. GSA's Asset Management Policy Division supports the council by establishing data standards and publishing standards adopted by the council.

¹⁰ This is the data standard for the Fiscal Year 2026 FRPP dataset.

¹¹ *Federal Real Property: GSA Should Improve Accuracy, Completeness, and Usefulness of Public Data* (GAO-20-135, February 2020).

¹² *Federal Real Property: GSA Should Improve and Streamline Its Real Property Inventory* (GAO-26-107968, June 2026).

The FRPP dataset is missing some latitude and longitude coordinates. The 2024 *Guidance for Real Property Inventory Reporting* requires that all buildings in the FRPP dataset that are in the United States and its territories must include latitude and longitude coordinates. However, 2,258 records (2 percent) of the 112,468 buildings in the United States and its territories listed in the FRPP dataset are missing latitude and longitude coordinates. The FRPP co-lead stated that she was not aware of this missing data and told us that there should not be any blank data fields.

As described above, the IOLP and FRPP datasets contain inaccurate or missing latitude and longitude coordinates. Accordingly, GSA should identify cost-effective measures to improve the accuracy and usefulness of the latitude and longitude coordinates in the IOLP and FRPP datasets based on each property's physical location. To the extent these measures are not fully effective to address the deficiencies identified in our report, GSA should revise the IOLP and FRPP datasets' supporting documentation to inform users of any remaining data limitations.

The IOLP dataset contains outdated and incorrect congressional representative data. The IOLP dataset identifies the congressional representative for an owned or leased property's congressional district. This field allows IOLP dataset users to search for properties or leases by congressional representative. In accordance with the GDA, this data must be complete, accurate, and shareable. However, we found that GSA's IOLP dataset contains outdated and incorrect data on the applicable congressional representatives for some properties as follows:

- **IOLP-Buildings** – 1,736 (20 percent) of the 8,475 real property assets have outdated and incorrect congressional representatives listed.
- **IOLP-Leases** – 1,557 (21 percent) of the 7,392 real property assets have outdated and incorrect congressional representatives listed.

Examples of outdated and incorrect data include:

- Raúl Grijalva is listed as the representative for 83 properties and 35 leases in Arizona's 7th Congressional District. However, he passed away in March 2025 and was succeeded by his daughter, Adelita Grijalva, in September 2025.
- Debbie Lesko is listed as the representative for five leases in Arizona's 8th Congressional District and 14 leases in Pennsylvania's 8th Congressional District. While she represented Arizona's 8th Congressional District from 2018 to 2025, she never represented Pennsylvania's 8th Congressional District.
- Lucy McBath is listed as the representative for six leases in Georgia's 7th Congressional District, which she represented from 2023 to 2025; and one lease in Georgia's 11th Congressional District, which she has never represented.

The IOLP dataset owners attributed these discrepancies to incorrect information stored in the IOLP dataset's system of record—GSA's Occupancy Agreement and Space Inventory System

(OASIS).¹³ While OASIS pulls the congressional representatives from www.house.gov each quarter, it does not automatically update this information. Instead, data owners must manually update each record in OASIS when errors are identified. However, GSA does not have a process to ensure that information that needs to be updated is corrected. Accordingly, GSA should establish a process to identify and correct discrepancies in the IOLP's Congressional District Representative Name data.

GSA Is Not Complying with the GDA Requirement to Maintain a Geospatial Data Strategy

The GDA requires GSA to prepare, maintain, publish, and implement a strategy for advancing geospatial data and activities. In accordance with the GDA, GSA's geospatial strategy should support the strategic plan for the National Spatial Data Infrastructure (NSDI), which the GDA defines as the technologies, policies, standards, and employees needed to promote geospatial data sharing.¹⁴

However, GSA's geospatial data strategy has expired and therefore it does not meet the GDA requirements. GSA developed its current geospatial data strategy, entitled *GSA Geospatial Data Strategy Fiscal Years 2023-2025*, in 2023 to support the *NSDI Strategic Plan 2021–2024*. It expired on October 1, 2025.

To meet the GDA requirements, GSA should update its geospatial data strategy, establish the strategy's approval process, and establish roles for GDA implementation. The geospatial data strategy needs to support the goals of the Federal Geographic Data Committee's the *Building the Geospatial Future Together – The National Spatial Data Infrastructure Strategic Plan 2025–2035* and ensure that GSA's strategy is aligned with the national geospatial priorities.

GSA Is Not Complying with the GDA Requirement to Maintain an Inventory of All Geospatial Data Assets

The GDA requires GSA to maintain an inventory of all geospatial data assets in accordance with Office of Management and Budget Circular A-130, *Managing Information as a Strategic Resource*. This circular provides that agencies must maintain an inventory of their information holdings, including an enterprise-wide data inventory covering data used in the agency's information systems. *GSA Geospatial Data Strategy Fiscal Years 2023-2025* commits to completing this inventory annually.

However, we found that GSA has not maintained its geospatial data inventory for 2 years. The GIS Center of Excellence project manager informed us that before this audit, GSA last updated its geospatial data inventory in 2024. He stated that the inventory exists; however, GSA is not

¹³ OASIS manages the full portfolio of GSA-owned and leased space, defining all of GSA's assets and the full life cycle of occupancy agreements, including direct access by partnered federal agencies.

¹⁴ The GDA also requires the Federal Geographic Data Committee to maintain a strategic plan for the NSDI, which includes core values that guide the design, implementation, and governance of the NSDI.

maintaining it and has not yet decided how to handle future updates. In response to our audit, GSA later provided an updated geospatial data inventory. The updated inventory included 528 more data assets (22 percent) than the 2024 inventory. This significant increase demonstrates the importance of maintaining an updated geospatial data inventory to both ensure compliance with the GDA and ensure that GSA has current and complete geospatial data.

We found that GSA did not maintain an updated geospatial inventory because it lacks a documented process for doing so. *The General Services Administration's GEOSPATIAL DATA Standard Operating Procedure (SOP) and Standards Guide, Version 2.2*, (geospatial data SOP) does not mention the geospatial data inventory and does not establish a process for complying with the GDA's requirement to maintain it. The GIS Center of Excellence project manager said his office is responsible for maintaining the geospatial data inventory, but GSA's Chief Data Officer and the Data Evidence Governance Board determine its contents. However, these roles are not documented.

In addition, the GIS Center of Excellence experienced staffing losses and no longer has the resources to perform some of its functions. The GIS Center of Excellence project manager told us that he is now the GIS Center of Excellence's sole employee, which is down from five staff previously. He said that the office has reduced the scope of its work to match its remaining resource capacity.

To meet the GDA requirements, GSA should update its geospatial data SOP to establish a process for maintaining its geospatial data inventory, including defining roles and responsibilities. Without a current geospatial data inventory, GSA has less assurance that it is identifying all data available for integration and reuse, thus delaying public and federal access to potentially valuable data.

GSA Is Not Fully Complying with the GDA Requirement to Search for Existing Geospatial Data before Procuring New Data

The GDA requires agencies to search all sources before spending funds on new geospatial data. This includes checking whether existing federal, state, local, or private data already meets the agency's needs. In our 2024 GDA audit, we found that GSA did not have an effective process to meet this GDA requirement. In its corrective action plan, GSA management agreed to update its geospatial data SOP to address the recommendation to "establish a process to ensure GSA searches existing geospatial data before procuring new data...." This requirement directed the regional spatial data manager to search for existing geospatial data before purchasing new data. GSA reported that it made this change to the geospatial data SOP.

However, we found that GSA failed to implement this corrective action. GSA's Spatial Data Management program manager told us the search process has never been performed. Further, GSA eliminated the regional spatial data manager role during its 2025 workforce reductions, leaving no one to perform this function as outlined in the geospatial data SOP.

GSA currently has not established a new process to replace the one in the geospatial data SOP. In April 2026, GSA staff said they were evaluating resources to determine a timeline for updating the process.

Additionally, GSA cannot demonstrate that it has met the GDA requirement to search all sources before spending funds on new geospatial data because it does not retain evidence that the searches occur. The GIS Center of Excellence project manager said geospatial data requests have been through informal channels like chat messages or verbal conversations that are undocumented. The most current documented geospatial data requests GSA could provide were from 2021. When asked whether any searches had been performed since 2021, GSA staff again said such requests are informal and not tracked.

To meet the GDA requirements, GSA management should update the geospatial data SOP to: (1) require tracking of each search performed, including the data sources checked and the results; and (2) reflect GSA's current organizational structure and assign clear roles and responsibilities for performing the required searches.

GSA Is Not Managing Its GDA Responsibilities Effectively

The recurring nature of some of the deficiencies described above demonstrates that GSA's management of its GDA responsibilities is not effective. Throughout the course of our audit, we identified breakdowns in GSA's compliance with the GDA. To ensure it meets the GDA requirements, GSA needs: (1) effective processes and procedures and (2) clearly defined roles and responsibilities.

Need for effective processes and procedures. Clear processes and procedures help staff understand their responsibilities and reduce the waste of resources. However, as described in this report, we found that GSA did not have effective processes and procedures in place, resulting in noncompliance with the GDA. For example:

- GSA lacked effective processes to maintain accurate latitude and longitude coordinates for its IOLP and FRPP datasets. Specifically, GSA's processes were ineffective to:
(1) assign latitude and longitude coordinates based on a property's physical location and
(2) identify missing latitude and longitude coordinates;
- GSA does not have a process to identify errors in the IOLP dataset's congressional representative data; and
- GSA's geospatial data strategy was not updated timely because its process for updating and approving the strategy is not formally documented and lacks a timeline for timely updates.

Need for clearly defined roles and responsibilities. GSA needs to establish clearly defined roles and responsibilities for GDA compliance. GSA has assigned oversight of GDA compliance to its GIS Center of Excellence, the Data Evidence Governance Board, and the Chief Data Officer. This

decentralized approach is problematic without clearly defined roles and responsibilities, leading to the confusion and uncertainty about each group's responsibilities described below.

- **GSA's Office of Innovation** – This office is responsible for establishing data governance frameworks, which are used for compliance with the GDA; however, its oversight role is unclear. In May 2026, the Office of GSA IT moved the GIS Center of Excellence under the Office of Innovation to be managed by GSA's Chief Data Officer. However, GSA processes do not reflect this change, and the geospatial data SOP does not mention the Office of Innovation or the Chief Data Officer.
- **GSA's Data Evidence Governance Board** – This board has a role in ensuring data accuracy, including GSA data used for compliance with the GDA and is chaired by GSA's Chief Data Officer. However, the GIS Center of Excellence project manager told us that he does not know the board's role in GDA compliance and has not attended any board meetings. Although GSA staff told us that the board meets biweekly to discuss data initiatives, GSA could not provide evidence that it has discussed the GDA or geospatial data in these meetings over the last 2 years. Furthermore, GSA's geospatial data SOP does not mention the Data Evidence Governance Board or its oversight role.
- **GIS Center of Excellence** – This office serves as GSA's central hub for Agency-wide GIS programming, standardizing tools, and enabling geospatial capabilities across the Agency. The GIS Center of Excellence project manager told us that the responsibility for maintaining GSA's geospatial data inventory is shared between the GIS Center of Excellence, the Chief Data Officer, and the Data Evidence Governance Board. However, they said this arrangement remains undocumented because it is still under review.

Further, the GIS Center of Excellence is not submitting compliance reports to the Chief Data Officer or the Data Evidence Governance Board, as GSA proposed in its corrective action plan associated with our 2022 audit. In that plan, GSA management committed to quarterly compliance reporting. However, the geospatial data SOP does not require these compliance reports. The GIS Center of Excellence project manager told us that no compliance reports have ever been submitted.

These deficiencies are exacerbated by staffing losses that have occurred since 2025. As discussed previously in this report, the GIS Center of Excellence project manager told us his team went from five staff to one in 6 months. Additionally, the Spatial Data Management program manager said her team went from over 35 staff to 11 due to workforce reductions. Accordingly, GSA needs effective management to ensure sustained compliance with the GDA requirements. To effectively meet the GDA requirements, GSA should establish: (1) processes and procedures to address the deficiencies described above; and (2) oversight processes to ensure Agency-wide compliance with the GDA, including clear roles and reporting responsibilities among the GIS Center of Excellence, the Data Evidence Governance Board, and the Chief Data Officer.

Conclusion

GSA is not fully complying with the GDA. We found that GSA is not meeting GDA requirements to:

- Maintain geospatial data;
- Maintain a geospatial data strategy;
- Maintain an inventory of all geospatial data assets; and
- Search for existing geospatial data before procuring new data.

These deficiencies, some of which are recurring, demonstrate that GSA is not managing its GDA responsibilities effectively.

To address these deficiencies, GSA should establish processes to ensure Agency-wide compliance with the GDA. GSA should also ensure the accuracy of data in the IOLP and FRPP datasets. Additionally, GSA should update its geospatial data strategy to align with the *Building the Geospatial Future Together – National Spatial Data Infrastructure Strategic Plan 2025–2035* and update its geospatial data SOP to include processes to ensure GSA fully complies with the GDA.

Recommendations

We recommend GSA's Chief Information Officer:

1. Ensure that the IOLP and FRPP datasets contain accurate latitude and longitude coordinates based on each property's physical location except for those properties with a clear exemption for national security by taking the following actions:
 - a. Conduct a cost-benefit analysis to identify cost-effective and feasible corrective actions to improve data accuracy.
 - b. Based on the results of this analysis, implement the identified corrective actions to improve the accuracy of latitude and longitude coordinates in the IOLP and FRPP datasets.
 - c. Describe any remaining data limitations in the IOLP and FRPP datasets' supporting documentation.
2. Establish a process to identify and correct discrepancies in the IOLP's Congressional District Representative Name data.
3. Update GSA's geospatial data strategy to align with the Federal Geographic Data Committee's *Building the Geospatial Future Together – The National Spatial Data Infrastructure Strategic Plan 2025–2035*.

4. Update *The General Services Administration's GEOSPATIAL DATA Standard Operating Procedure (SOP) and Standards Guide*, Version 2.2, to:
 - a. Establish a process for maintaining GSA's geospatial data strategy and geospatial data inventory, including defining roles and responsibilities.
 - b. Require formal documentation of each search performed before procuring new data, including the data sources checked and the results.
 - c. Assign clear roles and responsibilities for performing the required search for existing geospatial data before procuring new data.
5. Establish processes to ensure Agency-wide compliance with the GDA, including clear roles and reporting responsibilities among the GIS Center of Excellence, the Data Evidence Governance Board, and the Chief Data Officer.

GSA Comments

GSA's Chief Information Officer agreed with our recommendations. GSA's comments are included in their entirety in **Appendix C**.

Appendix A – Objective, Scope, and Methodology

Objective

We performed this audit because GDA Section 759(c) requires the inspector general of each covered agency to conduct an audit, not less than once every 2 years, of the covered agency's compliance with the GDA. Our audit objective was to assess GSA's fulfillment of its responsibilities under the GDA. Specifically, we assessed GSA's compliance with the 13 requirements listed in GDA Section 759(a).

Scope and Methodology

We assessed GSA's compliance with the 13 requirements listed in GDA Section 759(a).

To accomplish our objective, we:

- Reviewed previous GSA Office of Inspector General reports on GDA compliance. This included the corrective action plan for the *Audit of GSA's Compliance with the Geospatial Data Act of 2018* (Report Number A240028/I/T/F24006, September 30, 2024);
- Reviewed the GDA for the requirements and responsibilities of covered agencies;
- Reviewed geospatial-data-related documentation, including:
 - *The General Services Administration's GEOSPATIAL DATA Standard Operating Procedure (SOP) and Standards Guide*, Version 2.2 (May 2025);
 - GSA's 2024 Covered Agency Annual Report and Self-Assessment (January 17, 2025);
 - GSA's 2025 Covered Agency Annual Report and Self-Assessment (March 27, 2026);
 - *Data Evidence Governance Board (DEGB) Leads Committee Charter*, Version 2 (September 3, 2025);
 - *Data Evidence Governance Board (DEGB) Roles and Responsibilities*, Version 4 (September 3, 2025);
 - *GSA Geospatial Data Strategy Fiscal Years 2023–2025* (undated);
 - *National Spatial Data Infrastructure Strategic Plan, 2021–2024* (November 2020); and
 - *Building the Geospatial Future Together – The National Spatial Data Infrastructure Strategic Plan 2025–2035* (October 2024).
- Reviewed applicable geospatial data standards, including the Federal Geographic Data Committee's 2014 *U.S. Government Real Property Asset Data Standard, a Geospatial Data Content Standard* (RPADS) and the Federal Real Property Council's *2024 Guidance for Real Property Inventory Reporting* (April 1, 2024);
- Analyzed the IOLP dataset (March 27, 2026), which has 15,867 records, using RPADS;

- Analyzed the *FY 2024 Federal Real Property Profile (FRPP) Public Dataset* (July 9, 2025), which has 307,919 records, using the *2024 Guidance for Real Property Inventory Reporting*;
- Compared the *GSA Geospatial Data Strategy Fiscal Years 2023–2025* to the *Building the Geospatial Future Together – The National Spatial Data Infrastructure Strategic Plan 2025–2035* to determine if GSA’s strategy supports the NSDI strategic plan;
- Reviewed documentation for three contracts containing geospatial data;
- Assessed the design, implementation, and operating effectiveness of relevant internal controls; and
- Interviewed and corresponded with GSA officials and staff involved in geospatial data management, including individuals from the following GSA offices:
 - GIS Center of Excellence;
 - Office of Government-wide Policy’s Asset Management and Policy Division;
 - Public Buildings Service’s Office of Portfolio Management; and
 - Office of GSA IT’s Office of Innovation.

Data Reliability

We assessed the reliability of GSA’s IOLP and FRPP datasets by performing logical tests (e.g., identifying duplicates, invalid data, and missing data); reviewing existing system and data documentation (e.g., data dictionaries and system policies); and interviewing dataset managers. Our audit objective did not require us to verify the accuracy of the data with source documentation. Rather, we tested whether the datasets comply with the appropriate data standards. We determined that the data was sufficiently reliable for the purposes of this audit.

Internal Controls

We assessed internal controls significant within the context of our audit objective against internal control guidance for federal agencies. The methodology above describes the scope of our assessment, and the report finding includes any internal control deficiencies we identified. Our assessment is not intended to provide assurance on GSA’s internal control structure as a whole. GSA management is responsible for establishing and maintaining internal controls.

Compliance Statement

We conducted the audit between December 2025 and July 2026 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 finding and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our finding and conclusions based on our audit objective.

Appendix B – Excerpt from the GDA: Section 759(a), Covered Agency Responsibilities

SEC. 759. COVERED AGENCY RESPONSIBILITIES.

(a) IN GENERAL.—Each covered agency shall—

- (1) prepare, maintain, publish, and implement a strategy for advancing geographic information and related geospatial data and activities appropriate to the mission of the covered agency, in support of the strategic plan for the National Spatial Data Infrastructure prepared under section 755(c);
- (2) collect, maintain, disseminate, and preserve geospatial data such that the resulting data, information, or products can be readily shared with other Federal agencies and non-Federal users;
- (3) promote the integration of geospatial data from all sources;
- (4) ensure that data information products and other records created in geospatial data and activities are included on agency record schedules that have been approved by the National Archives and Records Administration;
- (5) allocate resources to fulfill the responsibilities of effective geospatial data collection, production, and stewardship with regard to related activities of the covered agency, and as necessary to support the activities of the Committee;
- (6) use the geospatial data standards, including the standards for metadata for geospatial data, and other appropriate standards, including documenting geospatial data with the relevant metadata and making metadata available through the GeoPlatform;
- (7) coordinate and work in partnership with other Federal agencies, agencies of State, tribal, and local governments, institutions of higher education, and the private sector to efficiently and cost-effectively collect, integrate, maintain, disseminate, and preserve geospatial data, building upon existing non-Federal geospatial data to the extent possible;
- (8) use geospatial information to—
 - (A) make Federal geospatial information and services more useful to the public;
 - (B) enhance operations;
 - (C) support decision making; and
 - (D) enhance reporting to the public and to Congress;
- (9) protect personal privacy and maintain confidentiality in accordance with Federal policy and law;
- (10) participate in determining, when applicable, whether declassified data can contribute to and become a part of the National Spatial Data Infrastructure;
- (11) search all sources, including the GeoPlatform, to determine if existing Federal, State, local, or private geospatial data meets the needs of the covered agency before expending funds for geospatial data collection;
- (12) to the maximum extent practicable, ensure that a person receiving Federal funds for geospatial data collection provides high-quality data; and

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

Appendix C – GSA Comments

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U.S. General Services Administration

September 30, 2026

MEMORANDUM FOR Sonya Panzo
Associate Deputy Assistant Inspector General for Auditing
Information Technology and Finance Audit Office (JA-T)

FROM: David Shive
Chief Information Officer
Office of GSA IT (I)

SUBJECT: Response to the Office of Inspector General (OIG) Draft
Report, *GSA Is Not Fully Complying with the Geospatial
Data Act of 2018 (A260022)*

DocuSigned by:
David Shive
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The U.S. General Services Administration (GSA) appreciates the opportunity to review and comment on the subject draft report, in which OIG made the following recommendations:

- (1) Ensure that the Inventory of Owned and Leased Properties (IOLP) and Federal Real Property Profile (FRPP) datasets contain accurate latitude and longitude coordinates based on each property's physical location except for those properties with a clear exemption for national security by taking the following actions:
 - a. Conduct a cost-benefit analysis to identify cost-effective and feasible corrective actions to improve data accuracy.
 - b. Based on the results of this analysis, implement the identified corrective actions to improve the accuracy of latitude and longitude coordinates in the IOLP and FRPP datasets.
 - c. Describe any remaining data limitations in the IOLP and FRPP datasets' supporting documentation.
- (2) Establish a process to identify and correct discrepancies in the IOLP's Congressional District Representative Name data.
- (3) Update GSA's geospatial data strategy to align with the Federal Geographic Data Committee's Building the Geospatial Future Together – The National Spatial Data Infrastructure Strategic Plan 2025–2035.

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Washington, DC 20405
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(4) Update The General Services Administration's GEOSPATIAL DATA Standard Operating Procedure (SOP) and Standards Guide to:

- a. Establish a process for maintaining GSA's geospatial data strategy and geospatial data inventory, including defining roles and responsibilities.
- b. Require formal documentation of each search performed before procuring new data, including the data sources checked and the results.
- c. Assign clear roles and responsibilities for performing the required search for existing geospatial data before procuring new data.

(5) Establish processes to ensure Agency-wide compliance with the GDA, including clear roles and reporting responsibilities among the Geographic Information Systems Center of Excellence, the Data Evidence Governance Board, and the Chief Data Officer.

GSA agrees with the recommendations and is working on a plan to address them.

If you have any questions, please contact Mindy Levit, Director IT Audits and Records Management at mindy.levit@gsa.gov.

Appendix D – Report Distribution

GSA Administrator (A)

GSA Deputy Administrator (AD)

Chief Information Officer (I)

GSA IT Chief of Staff (I)

Chief Information Security Officer (IS)

Associate Chief Information Officer (IA)

Chief Data Officer (IB)

Associate Administrator for Government-wide Policy (M)

Principal Deputy Associate Administrator for Government-wide Policy (M)

Government-wide Policy Chief of Staff (M)

Asset Management Policy Division Director (M1AL)

Chief Financial Officer (B)

Deputy Chief Financial Officer (B)

Audit Management Division (BPA)

Assistant Inspector General for Auditing (JA)

Deputy Assistant Inspector General for Acquisition Audits (JA)

Deputy Assistant Inspector General for Real Property Audits (JA)

Director (JAO)



CONTACT US

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