



US DEPARTMENT OF VETERANS AFFAIRS OFFICE OF INSPECTOR GENERAL

Office of Audits and Evaluations

DEPARTMENT OF VETERANS AFFAIRS

Audit of VA's Compliance with Covered Agency Responsibilities for Geospatial Data in FY 2026

Audit

26-00594-267

October 2, 2026



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Executive Summary

Geospatial data link real-world objects, events, and features to specific Earth locations using latitude and longitude. The VA Office of Inspector General (OIG) conducted this audit to determine whether VA complied with the law governing geospatial data and to follow up on recommendations from its 2024 report.¹ Under 43 U.S.C. § 2808(c), the OIG is required to submit an audit report to Congress at least once every two years on VA's collection, production, acquisition, maintenance, distribution, use, and preservation of geospatial data.² Complying with laws related to geospatial data is crucial for VA to make informed decisions about veteran services, improve strategic planning, and manage resources efficiently. It also ensures high-quality data for delivering health care and benefits and helps advance infrastructure modernization.

The law requires the OIG to submit an audit report on VA's (1) compliance with the standards for geospatial data established under section 2806; (2) compliance with the requirements under 2808(a); and (3) compliance with the limitation on the use of federal funds under section 2809. Because the Federal Geographic Data Committee has not fully implemented standards for the Geospatial Data Act of 2018 under section 2806 and because the limitation on the use of federal funds will not apply until five years from implementation of standards, this audit focuses on assessing adherence to the 13 requirements outlined in 43 U.S.C. § 2808(a), *Covered Agency Responsibilities*. This approach is consistent with the Council of the Inspectors General on Integrity and Efficiency's recommendation for prior audits as set forth in a November 30, 2023, letter to Congress.

For fiscal year (FY) 2026, the OIG found that VA was not compliant with requirements 1 and 5, which are related to developing a strategy for advancing geospatial data and allocating enough resources to fulfill those responsibilities. In the absence of an updated strategy and adequate staffing, VA may miss opportunities to coordinate initiatives that use geospatial data, optimize cost efficiency and program effectiveness, and support decision-making.

In April 2026, the OIG team briefed Office of Information and Technology (OIT) officials on its preliminary findings and recommendations. In response, OIT officials said they were actively updating policies, including VA's policy on enterprise data management (VA Directive 0900), to address the deficiencies identified in this audit.³

¹ 43 U.S.C. §§ 2801–2811; VA OIG, [VA Continues Moving toward Full Compliance with Geospatial Data Covered Agency Responsibilities](#), Report No. 24-00122-247, September 19, 2024.

² Geospatial Data Act of 2018, Pub. L. No. 115-254, subtitle F, codified at 43 U.S.C. §§ 2801–2811.

³ VA Directive 0900, *VA Enterprise Data Management (VADM)*, December 8, 2020.

What the Audit Found

The OIG found that VA met 10 of the 12 applicable covered agency requirements of 43 U.S.C. § 2808(a). Requirement 10 was not applicable because, according to VA officials, VA does not collect, hold, manage, or consume declassified geospatial data, and the OIG found no evidence to the contrary. VA continues to collect, maintain, disseminate, and integrate geospatial data, coordinate with internal and external partners, and ensure data quality and privacy protections.

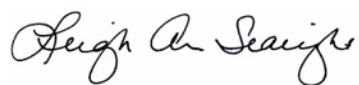
The OIG found that VA was deficient in two critical areas for FY 2026:

- **Requirement 1.** VA has not released a spatial and enterprise data strategy aligned with the objectives of the National Spatial Data Infrastructure Strategic Plan for 2025–2035. In the absence of an updated strategy, VA risks missing opportunities to leverage emerging technologies in the use of geospatial data and to establish interagency partnerships.
- **Requirement 5.** VA has not fully addressed its geospatial staffing needs, particularly after the dissolution and realignment of the Office of Enterprise Integration, resulting in insufficient governance structure and vacancies in key geospatial roles. This is a repeat finding from the previous audit.

In its FY 2024 audit report, the OIG found that VA was not compliant with requirements 5 and 9 under 43 U.S.C. § 2808(a). For FY 2026, the OIG found that VA met requirement 9, protecting personal privacy, in response to the OIG's recommendation from the previous audit, which addressed vulnerabilities in data security and incident response. VA officials reported that they updated training, reinforced reporting protocols, and enhanced system safeguards. The OIG closed the related recommendation in January 2025. The deputy secretary concurred with the OIG's three recommendations to support VA's compliance with requirements 1 and 5 and provided action plans.

Next Steps

The OIG will continue to monitor OIT's corrective actions to comply with requirements 1 and 5 and will close the recommendations once OIT provides sufficient evidence that it has addressed the risks identified in this report.



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Abbreviations

GIS	geographic information system
NCA	National Cemetery Administration
NSDI	National Spatial Data Infrastructure
OIG	Office of Inspector General
OIT	Office of Information and Technology
VHA	Veterans Health Administration



Introduction

Geospatial data link real-world objects, events, and features to specific Earth locations using latitude and longitude. By combining location with other attributes over time, geospatial data can, for example, be used to map veteran populations against VA medical facility locations to analyze service gaps, assess travel times for care, and make data-driven infrastructure decisions.

Under 43 U.S.C. § 2808(c), each covered agency's inspector general must report to Congress every two years on the collection, production, acquisition, maintenance, distribution, use, and preservation of geospatial data. As set forth in a November 30, 2023, letter to Congress, the Council of the Inspectors General on Integrity and Efficiency recommended that inspectors general audits focus on assessing adherence to the 13 requirements outlined in 43 U.S.C. § 2808(a), *Covered Agency Responsibilities*.⁴ This is because the Federal Geographic Data Committee has not fully implemented standards for the Geospatial Data Act of 2018 under section 2806 and because the limitation on the use of federal funds under section 2809 will not apply until five years from implementation of standards. Consistent with the inspector general community's approach, the VA Office of Inspector General (OIG) conducted this audit to determine whether VA complied with the law governing geospatial data and to follow up on recommendations from the OIG's September 2024 report.⁵

VA's Use of Geospatial Data

According to VA, its three administrations rely on geospatial data for strategic planning; budgeting; and deciding policy to provide health care, benefits, and burial services to veterans. For example:

- The Veterans Health Administration (VHA) uses geospatial data to calculate drive time and distance between veterans' homes and nearby VHA healthcare facilities.
- The Veterans Benefits Administration relies on geospatial data to improve the claims process for veterans and determine eligibility for compensation benefits.
- The National Cemetery Administration (NCA) uses geospatial data to strengthen and improve its ability to permanently account for veterans' remains, mark gravesites, track gravesite usage, and digitally map gravesites.

Within VHA, the Office of Rural Health uses geographic information system (GIS) data to enhance healthcare access for rural veterans. The Government Accountability Office defines a GIS as a system "of computer software, hardware, and data used to capture, store, manipulate,

⁴ Geospatial Data Act of 2018, Pub. L. No. 115-254, subtitle F, codified at 43 U.S.C. §§ 2801–2811.

⁵ VA OIG, [*VA Continues Moving toward Full Compliance with Geospatial Data Covered Agency Responsibilities*](#), Report No. 24-00122-247, September 19, 2024.

analyze, and graphically present a potentially wide array of geospatial information.”⁶ The primary function of a GIS is to link multiple sets of geospatial data and display the combined information as maps with different layers of information. The information collected can be shared in various ways and help viewers uncover problems that are occurring or could occur, understand trends and make predictions, monitor existing conditions, and manage and respond to questions.

The Office of Rural Health coordinates with the Strategic and Geospatial Analysis Service, within the VHA Strategic Planning Division, to apply geospatial solutions to support rural policy analysis, strategic planning, rural geographic database design, and implementation in support of rural veteran health care. This includes providing actionable mapping, geospatial data analysis, and strategic modeling to improve service access and inform policy decisions for veterans in rural areas. Figure 1 shows how VA uses geospatial data to map the state-by-state ratio of veterans enrolled in VA health care in rural areas.

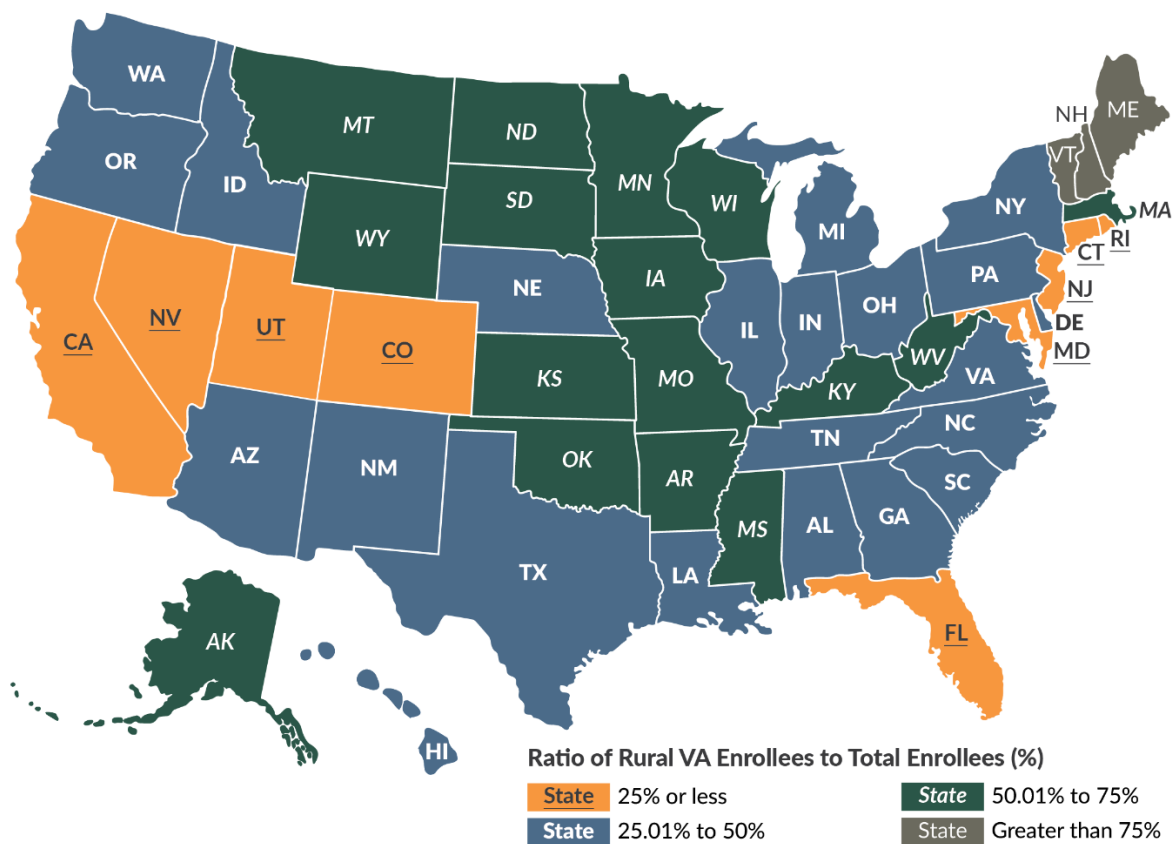


Figure 1. Map of enrolled rural veterans by US state at the end of FY 2024.

Source: VHA Office of Rural Health.

Note: To meet accessibility standards, the OIG revised the most recent map available.

⁶ Government Accountability Office, *Geospatial Information: Better Coordination and Oversight Could Help Reduce Duplicative Investments*, GAO-04-824T, June 23, 2004.

Law Governing Geospatial Data

VA's compliance with laws related to geospatial data is crucial for making informed decisions about veteran services, improving strategic planning, and managing resources efficiently. It also ensures high-quality data for delivering health care and benefits and helps advance infrastructure modernization. VA is a covered agency under 43 U.S.C. §§ 2801–2811, the law governing geospatial data. The law requires the OIG to review VA's compliance with

- the standards for geospatial data (including their metadata, which comprises details like content, source, vintage, accuracy, condition, projection, method of collection, and other characteristics or descriptions of the geospatial information) under section 2806;⁷
- the covered agency responsibilities under section 2808(a); and
- the limitation on the use of federal funds under section 2809.

As noted, the Federal Geographic Data Committee has not finalized the standards that covered agencies are required to follow to implement the law, which also postpones implementation of the limitation of the use of federal funds. These delays limit the inspector general community's ability to conduct audits in compliance with section 2808(c). The 13 legal requirements under section 2808(a) are as follows:

1. Prepare, maintain, publish, and implement a strategy to advance geographic information and related geospatial data and activities appropriate to the agency's mission.
2. Collect, maintain, disseminate, and preserve geospatial data so that the resulting data, information, or products can be shared.
3. Promote the integration of geospatial data from all sources.
4. Ensure geospatial information is included on agency records 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.
6. Use geospatial data standards.
7. Work with other federal agencies; state, tribal, and local governments; institutions of higher education; and the private sector.

⁷ 43 U.S.C. § 2801(11).

8. Make federal geospatial information more useful to the public, enhance operations, support decision-making, and 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 whether declassified data can become part of the National Spatial Data Infrastructure (NSDI).
11. Search all sources to determine whether existing data meet the needs of the agency before expending funds for geospatial data collection.
12. To the maximum extent practicable, ensure that those receiving federal funds for geospatial data collection provide high-quality data.
13. Appoint a contact to coordinate with lead covered agencies.

Requirement 10 is not applicable to VA. According to VA officials, VA does not collect, hold, manage, or consume declassified geospatial data, and the OIG did not find evidence to the contrary.

Changes in VA

Before FY 2026, VA Directive 0900 (the policy on enterprise data management) required VA's Office of Enterprise Integration—along with its subdivision, the Office of Data Governance and Analytics—to manage compliance with the law governing geospatial data.⁸ The Office of Enterprise Integration was designed to provide coordination, structure, and a collaborative forum for complex projects and issues that spanned VA administration and staff offices. The office led initiatives in strategic planning and performance management, enterprise governance, VA data governance, and enterprise policy.

In September 2025, the VA Secretary issued a memorandum to realign the Office of Enterprise Integration by transferring certain components and functions to other VA offices.⁹ Specifically, the Office of Enterprise Integration chief data officer and data governance functions were realigned under the Office of Information and Technology (OIT). The remaining staff and functions, including legislation and regulation implementation, were realigned under the Office of the Secretary.

⁸ VA Directive 0900, *VA Enterprise Data Management (VADM)*, December 8, 2020.

⁹ VA Secretary, "Realignment of the Office of Enterprise Integration," memorandum to the under secretaries, assistant secretaries, and other key officials, September 16, 2025.

Results and Recommendations

Finding: VA Could Improve Compliance with Covered Agency Responsibilities

The OIG team found VA generally has not improved compliance since the 2024 audit. In FY 2026, VA did not meet two requirements of the covered agency responsibilities for geospatial data under 43 U.S.C. § 2808(a) and should continue taking steps to fully comply.

The OIG determined that VA did not meet requirement 1 because it has not released an updated spatial data strategy that aligned with the objectives of the NSDI strategic plan for 2025–2035, which was revised in October 2024.¹⁰ Without an updated strategy, VA risks missing opportunities to leverage emerging technologies in geospatial data usage and to establish interagency partnerships.

Regarding requirement 5, the OIG team found VA has still not permanently staffed key geospatial positions. This was due in part to the loss of resources after a realignment that discontinued the Office of Enterprise Integration, which oversaw compliance with geospatial data laws.

The team briefed OIT officials in April 2026 on the deficiencies related to requirements 1 and 5. In response, the officials said they were updating policies, including VA Directive 0900. Meanwhile, the OIG found VA to be compliant with the other 10 applicable requirements in FY 2026—including requirement 9, which VA was not compliant with two years ago.

Figure 2 on the next page shows VA's progress toward compliance with the law's 13 requirements.

¹⁰ Federal Geographic Data Committee, *Building the Geospatial Future Together—The NSDI Strategic Plan 2025-2035*, October 2024.

Requirements	2024 Results	2026 Results
1. Prepare, maintain, publish, and implement a strategy to advance geographic information and related geospatial data and activities appropriate to the agency's mission.	✓	✗
2. Collect, maintain, disseminate, and preserve geospatial data so that the resulting data, information, or products can be shared.	✓	✓
3. Promote the integration of geospatial data from all sources.	✓	✓
4. Ensure geospatial information is included on agency records 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.	✗	✗
6. Use geospatial data standards.	✓	✓
7. Work with other federal agencies; state, tribal, and local governments; institutions of higher education; and the private sector.	✓	✓
8. Make federal geospatial information more useful to the public, enhance operations, support decision-making, and 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 whether declassified data can become part of the National Spatial Data Infrastructure (NSDI).	N/A	N/A
11. Search all sources to determine whether existing data meets the needs of the agency before expending funds for geospatial data collection.	✓	✓
12. To the maximum extent practicable, ensure that those receiving federal funds for geospatial data collection provide high-quality data.	✓	✓
13. Appoint a contact to coordinate with lead covered agencies.	✓	✓
 Compliant  Not Compliant		

Figure 2. VA's compliance with covered agency responsibilities.

Source: VA OIG's analysis of VA's compliance with 43 U.S.C. § 2808(a).

What the OIG Did

To assess VA's compliance with covered agency responsibilities, the team examined federal laws, regulations, publications, and VA's FY 2024 *Covered Agency Annual Report and Self-Assessment* published in January 2025 (the most recent annual report and self-assessment available as of the team's audit work). The team interviewed officials and staff in VHA, NCA, and OIT's Enterprise Geospatial Team, Office of Data Governance and Analytics, and Enterprise Records Service. In addition, the team reviewed Environmental Systems Research Institute contracts, memoranda of understanding, and memoranda of agreement. For more information on the audit's scope and methodology, see appendix A.

VA's Noncompliance with Covered Agency Responsibilities

As noted, VA was not compliant with two covered agency responsibilities in FY 2026: requirements 1 and 5. The noncompliance with requirement 5 is a repeat finding from two years ago.

Requirement 1

The OIG found VA did not meet requirement 1, which is to prepare, maintain, publish, and implement a strategy to advance geographic information and related geospatial data and activities in support of the NSDI strategic plan.

VA's policies on geospatial data are outdated. Without updated policies, VA has limited oversight, which can result in inconsistent decision-making and accountability. VA published a spatial data strategy and enterprise data strategy that supported the goals in the NSDI strategic plan for 2020–2024, which promoted advancing the use of geospatial data and technology. The NSDI strategic plan for 2025–2035 has different goals; it aims to increase nationwide participation and accountability, establish national oversight and management, and leverage technology such as artificial intelligence to facilitate geospatial data processes. The plan also highlights the importance of raising awareness and building partnerships, testing technology, and increasing public and educational outreach for geospatial information.

As of May 2026, VA was not compliant with requirement 1 of the covered agency responsibilities because the agency has not published a spatial data strategy that supports the goals of the NSDI's 2025–2035 strategic plan. Without an updated strategy, VA may miss opportunities to harness emerging technologies, such as artificial intelligence, in its use of geospatial data and build partnerships across agencies as it seeks to do. According to a management and program analyst for VA's Office of Data Governance and Analytics, VA intended to implement the new strategic plan in three-year increments. The analyst said that VA planned to update its geospatial data strategy to align with the new NSDI strategic plan.

But VA has not done so. The acting deputy chief information officer for compliance, risk, and remediation told the OIG team that the strategy update had not started in part due to limited

resources. She said her team has challenges meeting legislative mandates but emphasized her commitment to fulfilling requirement 1.

To address VA's noncompliance with requirement 1, the OIG recommended that VA update its enterprise data strategy, spatial data strategy, and other related policy documents to align with the NSDI strategic plan for 2025–2035.

Requirement 5

As was the case in FY 2024, the OIG found that VA does not meet requirement 5—which is to allocate resources to fulfill the responsibilities of effective geospatial data collection, production, and stewardship regarding related activities of the covered agency. Specifically, requirement 5 mandates allocating resources, including staff or contractors, for geospatial data management and committee support. However, VA reported that it does not have sufficient resources to provide adequate and timely geospatial support services. In its FY 2024 self-assessment report, VA confirmed that more work is needed to meet this requirement, and according to its own spatial data strategy, VA needs to add staff to improve awareness, communication, and coordinated technology implementation.

During the period covered by this audit, VA had an acting geospatial information officer and made some progress, but VA reported it has not fully addressed geospatial staffing requirements. According to VA officials, these requirements have been documented and prioritized as part of a five-year GIS staffing and resource management plan to secure the necessary resources to add and maintain relevant staffing levels across VA. VA officials stated that VHA and the Geospatial Service Support Center do not have appropriate geospatial staffing resources. VHA no longer has a permanent chief strategy officer or deputy chief strategy officer, and the Geospatial Service Support Center no longer has a permanent director and these positions remain vacant. Although the Office of Enterprise Integration was once responsible for geospatial data compliance, its responsibilities were moved to OIT in October 2025.

VA's data are a strategic asset and critical resource for its administration of benefits and provision of services. VA implemented a Data Governance Council charter in April 2022 that assigned responsibilities and included representation from various program offices with data governance roles, but the charter and related guidance have not been updated to reflect the realignment that resulted in the elimination of the Office of Enterprise Integration. Specifically, VA Directive 0900—which established VA policy and defines roles and responsibilities for data governance and management—has not been updated since December 2020.

According to VA officials, key geospatial staff left VA in 2025. The director of the Healthcare Analysis & Information Group and the director of Enrollment and Forecasting both told the OIG team they did not have adequate resources to support VHA geospatial data responsibilities including the ability to support the implementation and further development of the VA spatial data strategy. As a result, VA does not have the governance structure in place to ensure it can

provide adequate and timely geospatial support services. This affects VA's ability to ensure consistent, accountable, and timely management of geospatial data across its programs and in collaboration with other federal agencies.

To address VA's lack of compliance with requirement 5, the OIG made two recommendations that call on VA to update its directives, handbooks, and procedures to align with operational goals for geospatial functions and responsibilities and also to develop a comprehensive plan to ensure the Office of Data Governance and Analytics and other related offices have the necessary resources for effective geospatial data collection, production, and stewardship.

VA's Compliance with Covered Agency Responsibilities

The OIG found that, in FY 2026, VA was compliant with the other 10 covered agency responsibilities that apply to the department.

Requirement 2

VA continues to meet requirement 2, which is to collect, maintain, disseminate, and preserve geospatial data such that resulting data, information, or products can be shared.

VA continues to enhance data-sharing practices. Geospatial data and related metadata that meet eligibility requirements are accessible in open formats. VA also has policies to ensure all programs follow effective data maintenance procedures. For example, according to the *2024 Covered Agency Annual Report and Self-Assessment*, the VHA GIS adopted a metadata format standard that meets open data standards and VA public-sharing requirements. VA also shares data externally through the Environmental Systems Research Institute's ArcGIS Online, a cloud-based mapping and analysis system.

According to VA officials, the VHA GIS also follows standard operating procedures for producing public content, which includes quality control steps. For example, the Data Governance and Analytics team produces veteran data projection models and works with states to summarize disability compensation and pension benefits by state. Additionally, the VA.gov website allows the public and veterans to search for geospatial information to find a facility within a specific radius of their location.

Requirement 3

VA continues to meet requirement 3, which is to promote the integration of geospatial data from all sources. For example, the department develops data-sharing agreements or memoranda of agreement with public and private partners for collecting or sharing data. According to the deputy chief data officer for OIT's Office of Compliance, Risk, and Remediation, multiple application programming interfaces pull addresses and geospatial data related to veterans and customers. VA uses controlled interfaces with defined business rules to integrate authoritative profiles and geospatial data.

Additionally, VHA's deputy director for dentistry noted that they regularly use geospatial data from the Environmental Systems Research Institute in various applications, such as determining how many veterans qualify for dental care in a specific region. However, he said this information is not used to its full potential, and they see further opportunities for its application. VA has established processes to promote integration of external data sources into applications and to ensure that data are provided in standardized readable formats or as downloadable files. Additionally, VA has developed data-sharing agreements and memoranda of agreement with both public and private partners to enable effective data sharing.

Requirement 4

VA continues to meet requirement 4, which is to ensure data information products and other records created in geospatial data and activities are included on agency records schedules that are approved by the National Archives and Records Administration. VA records must be covered by either the National Archives and Records Administration's General Records Schedule or an approved records control schedule.

For example, NCA continues to follow the existing records schedule for geospatial information. VA provided the OIG team with established policies and procedures for identifying, handling, and disposing of records appropriately to ensure data information products and other records created in geospatial data and activities are included on approved agency records schedules.

Requirement 6

Requirement 6 is to use geospatial data and metadata standards and to make metadata available through GeoPlatform, which is a shared service that provides access to authoritative geospatial data, applications, and tools from across federal agencies.¹¹ As was the case in FY 2024, VA continued to meet this requirement in FY 2025 except for making metadata available on GeoPlatform.

The OIG team confirmed VA's progress toward the expected standard. VA continues to use geospatial and metadata standards endorsed by the Federal Geographic Data Committee and its geospatial datasets follow both the committee's and the International Organization for Standardization's metadata standards, which also comply with Office of Management and Budget Circular A-119.¹² VA's Data Governance Council oversees compliance with enterprise data standards and enforces governance through established guides. In addition, VHA's

¹¹ "Discover Authoritative Federal Geospatial Data" (web page), Federal Geographic Data Committee, accessed June 22, 2026, <https://www.geoplatform.gov/>.

¹² Office of Management and Budget Circular A-16, *Coordination of Geographic Information and Related Spatial Data Activities*, 2002; Office of Management and Budget Circular A-119, *Federal Participation in the Development and Use of Voluntary Consensus Standards and in Conformity Assessment Activities*, February 1998.

Geospatial Service Support Center applies quality control procedures to verify metadata completeness and adherence to standards.

Furthermore, VA does not make metadata publicly available through GeoPlatform. According to a management and program analyst, this is due to the sensitive nature of veteran-related geospatial data, program-specific restrictions, and the need to protect veterans' personally identifiable information. However, VA shares nonsensitive GIS data through its VA Open Data website; the management and program analyst said that VA's geospatial team will continue to review metadata and publish it when permitted under the Privacy Act and federal records laws.

Requirement 7

VA continues to meet requirement 7, which is to coordinate with other federal agencies; state, tribal, and local governments; institutions of higher education; and the private sector to efficiently collect, integrate, maintain, disseminate, and preserve geospatial data. According to VA officials, VA's engagement with external partners in geospatial data management is limited primarily due to the sensitive nature of most VA data, which includes healthcare information, home loan data, and other personally identifiable information. VA engages private companies to provide GIS support and specialized analysis services. As a result of the sensitive nature of most VA data, VA is reassessing its external partnerships.

VA officials gave the OIG team several examples of existing memoranda of agreement and understanding that support collaboration both within the department and with external parties. Although outdated, VA's spatial data strategy from September 2022 includes goals to strengthen collaborative, federated, and accountable governance to leverage data and analytics and drive decision-making, which aligns with requirement 7.

Requirement 8

VA continues to meet requirement 8, which is 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. VA continues to expand GIS usage to improve operations and decision-making. Publicly available information includes the VA Facility Locator and NCA's gravesite integration.

According to the National Cemetery Technical Bulletin, NCA plans to integrate GIS and the Global Navigational Satellite System data into cemetery operations for better management and site analysis. However, NCA's plan has some key challenges including limited public access, lack of an enterprise-wide public GIS platform, and a need for standardized metadata. Overall, VA uses geospatial information to improve agency operations, reporting, and public access to nonrestricted geospatial data.

Requirement 9

VA has made progress since FY 2024 and is now compliant with requirement 9. Requirement 9 for geospatial data is to protect personal privacy and maintain confidentiality in accordance with federal policy and law. During the previous audit, the OIG found that VA was not compliant with this requirement because VHA's GIS—which contains personally identifiable information—was set at a low-risk level for confidentiality, integrity, and availability security objectives. This resulted in fewer controls being applied, thereby increasing the risk of compromising veterans' personally identifiable information. The OIG also determined in 2024 that VA mishandled security incidents and made two recommendations to address those deficiencies, which have since been resolved.

During the FY 2026 audit, the OIG learned that OIT recategorized the VHA GIS boundary from “low” to “moderate.” Also, the Data Breach Response Service director transmitted correspondence to all parties responsible for VA's incident response process to reiterate roles and responsibilities in accordance with VA Handbook 6500.2, which deals with managing breaches of sensitive personal information.¹³

Additionally, according to the information system security officer for VHA's Enterprise Security Operations, VA staff reviewed the language in the required annual VA Privacy and Security Awareness training and Rules of Behavior to ensure the training accurately addresses requirements for reporting suspected incidents. The security officer also said the Data Breach Response Service staff updated recurring monthly training sessions to reinforce the importance of accurately reporting security events for all staff involved in the incident response process. Finally, OIT staff reassessed the prior incidents and decided that the risk factors associated with the concern raised were unwarranted. The OIG closed the related recommendations in January 2025.

The OIG team found that the Office of Data Governance and Analytics follows recommended procedures and practices for securing its systems and data and complies with VA rules and regulations regarding identification and authentication when accessing systems. All VA staff and contractors who require access to servers are required to follow VA procedures for requesting and maintaining elevated privileges.

Requirement 11

VA continues to meet requirement 11, which is to search all sources (including the GeoPlatform) to determine whether existing federal, state, local, or private geospatial data meet the needs of the agency before spending money on geospatial data collection. Before investing in geospatial data, VA first uses its internal data from sources such as the Enterprise Geospatial Team, the

¹³ VA Handbook 6500.2, *Management of Breaches Involving Sensitive Personal Information*, June 20, 2023.

Data Governance Council, and the Geospatial Support Service Center. VA also conducts market research and coordinates with agencies such as the Department of Homeland Security and the Department of Energy, and consults with experts such as contracting officers' representatives, the Enterprise Geospatial Team, and the program manager responsible for prioritizing, coordinating, and managing resources. VA searches relevant databases such as the GeoPlatform, census data, the National Oceanic and Atmospheric Administration's weather data, and NCA's burial and external gravesite data.

Requirement 12

VA continues to meet requirement 12, which is, to the maximum extent practicable, to ensure that a person receiving federal funds for geospatial data collection provides high-quality data. VA has established policies, procedures, and agreements that outline the strategy, goals, objectives, and standards for its data in general. In addition, VA requires contractors to comply with its authoritative data sources. For example, NCA's GIS program manager said rigorous quality assurance and quality control measures are applied to incoming data. He also explained that the Environmental Systems Research Institute's contract helped unify and streamline GIS silos. The OIG team confirmed that quality assurance and control measures were applied and the contract required compliance with the Federal Information Security Modernization Act and the Federal Risk and Authorization Management Program. It also required meeting performance standards such as technical support response time, issue resolution, and Section 508 compliance.¹⁴

To ensure data quality, VA evaluates potential acquisitions and specifies data terms, conditions, and standards in contract documentation. Additionally, the chief data officer and the Data Governance and Analytics team review automated processes such as database controls, script tools, and frequent data quality assessments. A VA senior GIS analyst and the team lead for the VA Enterprise Geospatial Team told the OIG team that VA prefers to use authoritative geospatial data sources, census data for demographics, Department of Homeland Security data, or GeoPlatform data to ensure high quality.

Further, according to the director of the VA Program Evaluation and Resource Center, they performed an extensive quality check and made sure they received high-quality data. For example, they explained that the contract with Oak Ridge National Laboratory required quality assurance processes. The OIG team verified that the contract required the program manager to use a quality assurance surveillance plan to ensure that the contractor is performing the services required at an acceptable level of performance. In addition, the contractor is required to ensure that all delivered applications and system solutions support interfacing with VA's various authoritative data sources, such as the Master Veteran Index and the Capital Asset Inventory.

¹⁴ Federal Information Security Modernization Act (FISMA) of 2014, 44 U.S.C. §§ 3551–3558.

Requirement 13

VA continues to meet requirement 13, which is to 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. VA appointed contacts to coordinate with lead covered agencies as the requirement mandates. The chief data officer, who is also an acting deputy chief information officer, serves as a member of the steering committee for the Federal Geographic Data Committee. Also, a management and program analyst for VA's Analytics Service coordinates with lead covered agencies, serves as a member of the Federal Geographic Data Committee's Address Subcommittee and the committee's working group, and attends steering committee meetings to support the chief data officer. VA's Analytics Service provided evidence of communication and coordination with these committees.

Conclusion

In FY 2026, the OIG team found VA met 10 of the 12 applicable covered agency requirements of 43 U.S.C. § 2808(a). VA did not meet requirements 1 and 5. VA should take steps to ensure that its strategy for advancing geographic information and related geospatial data and activities supports the NSDI 2025–2035 strategic plan and that it has the necessary resources to fulfill the responsibilities of effective geospatial data collection, production, and stewardship to support the activities of the Federal Geographic Data Committee.

Until VA updates its strategy, it risks missing opportunities to leverage emerging technologies in geospatial data usage and to establish interagency partnerships. Without the necessary resources to fulfill its responsibilities, VA cannot provide adequate and timely geospatial support services—impairing its ability to ensure consistent, accountable, and timely management of geospatial data across its programs and in collaboration with other federal agencies.

Recommendations 1–3

The OIG made the following recommendations to the assistant secretary for OIT, who also serves as chief information officer:¹⁵

1. Update VA's enterprise data strategy and spatial data strategy and other related policy documents to align with the goals and objectives of the National Spatial Data Infrastructure strategic plan for 2025–2035.
2. Update VA directives, handbooks, and standard operating procedures to ensure they are current and aligned with operational goals related to geospatial functions and responsibilities.

¹⁵ The recommendations addressed to the assistant secretary for OIT are directed to anyone in an acting status or performing the delegable duties of the position.

3. Develop a comprehensive plan to ensure the Office of Data Governance and Analytics and other related offices have the necessary resources to fulfill the responsibilities of effective geospatial data collection, production, and stewardship regarding related activities of the covered agency and, as necessary, support the activities of the Federal Geographic Data Committee.

VA Management Comments

The VA deputy secretary concurred with recommendations 1–3 and provided VA's action plans for each of the recommendations. VA's full comments are presented in appendix B.

In response to recommendation 1, OIT is reviewing VA's enterprise data strategy, spatial data strategy, and related policy documents. This review will include a gap analysis to identify updates needed to align with the goals and objectives of the NSDI Strategic Plan for 2025–2035 to inform future revisions. OIT will continue to coordinate with VA stakeholders to ensure consistency across affected policy documents.

In response to recommendation 2, OIT is reviewing VA directives, handbooks, and standard operating procedures related to geospatial functions and responsibilities to ensure they reflect current operational goals and are consistent with VA's enterprise data strategy and the NSDI Strategic Plan for 2025–2035.

Regarding recommendation 3, OIT is developing a comprehensive plan to ensure the Office of Data Governance and Analytics and other related offices have the necessary resources to fulfill geospatial data collection, production, and stewardship responsibilities, including support for the Federal Geographic Data Committee's activities, as needed.

OIG Response

The action plans are responsive to the OIG's recommendations, and the OIG will monitor the implementation of the recommendations until all proposed actions are completed.

Appendix A: Scope and Methodology

Scope

The VA Office of Inspector General (OIG) team conducted its work from January through August 2026. The team evaluated VA's efforts to comply with the covered agency responsibilities as required under 43 U.S.C. § 2808(a), consistent with the Council of the Inspectors General on Integrity and Efficiency's recommendation.

Methodology

To assess compliance with the law governing geospatial data, the team reviewed

- the Office of Management and Budget Circular A-16, *Coordination of Geographic Information and Related Spatial Data Activities*;
- National Institute of Standards and Technology 800-37, *Risk Management Framework for Information Systems and Organizations, A System Life Cycle Approach for Security and Privacy*;
- VA Handbook 6500.2, *Management of Breaches Involving Sensitive Personal Information*; and
- VA's fiscal year (FY) 2024 *Covered Agency Annual Report and Self-Assessment*—the most recent assessment available at the time of the audit. (VA's FY 2025 *Covered Agency Annual Report and Self-Assessment* was not released until May 2026, after the OIG team had completed its assessment of the 13 covered agency responsibilities. The team determined the 2025 assessment did not impact the findings of this audit.)

The team also interviewed officials and staff from the following:

- VA Office of Information and Technology's (OIT) Office of Data Governance and Analytics; Office of Enterprise Health Benefits; Enterprise Geospatial Team; Enterprise Records Service; Enterprise Security Operations; and Office of Operations, Security, and Preparedness
- National Cemetery Administration's Geographic Information System Program
- VA Program Evaluation and Resource Center
- Veterans Health Administration's Office of Rural Health

Scope Limitations

The Federal Geographic Data Committee has not fully implemented standards for the Geospatial Data Act of 2018.¹⁶ In response, the Council of the Inspectors General on Integrity and Efficiency convened a working group with representatives from the covered agency inspectors general to reach a consensus on an audit approach for the FY 2026 audits. Based on the recommendation of the council's working group, this audit focused on VA's compliance with the 13 requirements outlined in 43 U.S.C. § 2808(a).

Internal Controls

The team assessed internal controls to determine whether they were significant to the audit objective. This included consideration of the five internal control components: control environment, risk assessment, control activities, information and communication, and monitoring.¹⁷ In addition, the team reviewed the principles of internal controls as associated with the objective and identified three components and three principles as significant.¹⁸ The team identified internal control deficiencies during this audit and proposed recommendations to address those listed in table A.1.

Table A.1. VA OIG Analysis of Internal Control Components and Principles Identified as Significant

Component	Principle	Deficiency identified by this audit
Control environment	4. Management should demonstrate a commitment to recruit, develop, and retain competent individuals.	VA is deficient in its geospatial staffing requirements.
Risk assessment	9. Management should identify, analyze, and respond to significant changes that could impact the internal control system.	VA's Data Governance Council Charter and related guidance have not been updated to reflect the realignment that resulted in the elimination of the Office of Enterprise Integration, the office responsible for overseeing compliance with geospatial data laws.

¹⁶ Geospatial Data Act of 2018, Pub. L. No. 115-254, subtitle F (2018), codified at 43 U.S.C. §§ 2801–2811.

¹⁷ Government Accountability Office, *Standards for Internal Control in the Federal Government*, GAO-25-107721, May 2025.

¹⁸ Because the audit was limited to the internal control components and underlying principles identified, it may not have disclosed all internal control deficiencies that could have existed at the time of this audit.

Component	Principle	Deficiency identified by this audit
Control activities	12. Management should implement control activities through policies and procedures.	VA's spatial and enterprise data strategies do not incorporate new standards issued by the Federal Geographic Data Committee in its National Spatial Data Infrastructure strategic plan for 2025 through 2035.

Source: VA OIG analysis of internal control components and principles consistent with the Government Accountability Office's Standards for Internal Control in the Federal Government.

Data Reliability

The OIG team did not obtain electronic data that required a data reliability assessment.

Government Standards

The OIG conducted this performance audit in accordance with generally accepted government auditing standards.¹⁹ Those standards require that the OIG plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for the findings and conclusions based on audit objectives. The OIG believes the evidence obtained provides a reasonable basis for the findings and conclusions based on the audit objectives.

¹⁹ Government Accountability Office, *Government Auditing Standards 2024 Revision*, GAO-24-106786, February 2024.

Appendix B: VA Management Comments

Department of Veterans Affairs Memorandum

Date: September 22, 2026

From: Deputy Secretary of Veterans Affairs, Performing the Delegable Duties of the Assistant Secretary for Information and Technology and Chief Information Officer (005)

Subj: Office of Inspector General Draft Report, VA's Compliance with Covered Agency Responsibilities for Geospatial Data in FY 2026 (Project Number 2026-00594-AE-0009) (VIEWS 15197377)

To: Assistant Inspector General for Audits and Evaluations (52)

1. Thank you for the opportunity to review the Office of Inspector General (OIG) Draft Report, VA's *Compliance with Covered Agency Responsibilities for Geospatial Data in FY 2026*, Project Number 2026-00594-AE-0009.
2. The Office of Information and Technology (OIT) submits the attached written comments. OIT acknowledges and concurs with the OIG's recommendations and is providing a corrective action plan and target implementation date for each recommendation. The Department of Veterans Affairs is committed to full compliance with the covered agency responsibilities required by the Geospatial Data Act.

<i>The OIG removed point of contact information prior to publication.</i>

(Original signed by)

Paul R. Lawrence, Ph.D.

Attachment

Attachment

Office of Information and Technology

Action Plan

Office of Inspector General (OIG) Draft Report: Audit of VA's Compliance with Covered Agency Responsibilities for Geospatial Data in FY 2026

(OIG Project Number 2026-00594-AE-0009)

Recommendation 1: Update VA's enterprise data strategy and spatial data strategy and other related policy documents to align with the goals and objectives of the National Spatial Data Infrastructure strategic plan for 2025–2035.

VA Comment: Concur. The Office of Information and Technology (OIT) is reviewing the Department of Veterans Affairs (VA) enterprise data strategy, spatial data strategy, and related policy documents. This review will include a gap analysis to identify updates needed to align with the goals and objectives of the National Spatial Data Infrastructure (NSDI) Strategic Plan for 2025–2035 to inform future revisions. OIT will continue to coordinate with VA stakeholders, including the VA Data Governance Council, to ensure consistency across affected policy documents. This effort is in progress and is tracking for completion in fiscal year (FY) 2027.

Expected Completion Date: September 30, 2027.

Recommendation 2: Update VA directives, handbooks, and standard operating procedures to ensure they are current and aligned with operational goals related to geospatial functions and responsibilities.

VA Comment: Concur. OIT is reviewing VA directives, handbooks, and standard operating procedures related to geospatial functions and responsibilities to ensure they reflect current operational goals and to ensure consistency with VA's enterprise data strategy and the NSDI Strategic Plan for 2025-2035. This effort will include the Chief Data Officer's (CDO) work to update VA Directive 0900, VA Enterprise Data Management Policy, to clarify roles and responsibilities for enterprise data management, including geospatial data. The CDO will request feedback from the VA Data Governance Council on any proposed updates to VA Directive 0900 to ensure alignment across impacted Administrations and Staff Offices. The policy reviews are in progress and are tracking for completion no later than FY 2028, Quarter 2.

Expected Completion Date: March 31, 2028.

Recommendation 3: Develop a comprehensive plan to ensure the Office of Data Governance and Analytics and other related offices have the necessary resources to fulfill the responsibilities of effective geospatial data collection, production, and stewardship regarding related activities of the covered agency and, as necessary, support the activities of the Federal Geographic Data Committee.

VA Comment: Concur. OIT is developing a comprehensive plan to ensure the Office of Data Governance and Analytics and other related offices have the resources necessary to fulfill geospatial data collection, production, and stewardship responsibilities, including support for the activities of the Federal Geographic Data Committee, as needed. This plan will identify staffing gaps while also assessing how staffing, technical infrastructure, and funding can be more effectively aligned and integrated to meet projected geospatial workload requirements. The plan will further identify opportunities to leverage automation and artificial intelligence, consistent with the goals of the NSDI strategic plan for 2025-2035, to extend staff capacity and reduce manual data-processing burdens. OIT will coordinate with impacted Administrations

and Staff Offices to prioritize investments in tools, training, and process improvements that maximize the impact of both current and planned staff. This task is in progress and is tracking for completion in FY 2027.

The Veterans Health Administration (VHA) Restructure for Impact and Sustainability Effort (RISE) is underway, of which resource planning is a part thereof. This effort will better define specific requirements to support the geospatial requirements. Additionally, we recognize the geospatial team's critical role in the Chief Strategy Office's (CSO) forecasting for VHA market assessments and other planning functions, and VA is finalizing their roles and resource needs within the CSO.

Expected Completion Date: September 30, 2027.

*The text of VA's management comments is reprinted verbatim as received from the department.
For accessibility, the original format of this appendix has been modified
to comply with Section 508 of the Rehabilitation Act of 1973, as amended.*

OIG Contact and Staff Acknowledgments

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