

# U.S. Territories: Coordinated Federal Approach Needed to Better Address Data Gaps

GAO-24-106574

Q&amp;A Report to Congressional Requesters

May 9, 2024

## Why This Matters

The U.S. government needs evidence, including statistics, to help guide decision-making, evaluate the effectiveness of programs, and determine where best to target resources. The federal government is also expected to ensure the quality of data used for these purposes. As we have previously reported, the U.S. territories of American Samoa, the Commonwealth of the Northern Mariana Islands (CNMI), Guam, the Commonwealth of Puerto Rico, and the U.S. Virgin Islands (USVI) continue to face a range of economic challenges, including declining populations in all territories. Quality statistics are critical to helping the territories and federal agencies better understand and respond to these challenges.

We were asked to report on gaps in data for the territories, the impact of such gaps, and any administrative or legislative actions that can be taken to address them. This report examines the extent and causes of territorial data gaps in publicly available federal statistical products, implications for federal funding to the territories resulting from data gaps, and examples of costs and benefits of addressing the data gaps.

## Key Takeaways

- Territories face many data gaps, primarily because federal agencies do not include them in many federal statistical products. A mix of cost, geographic, technical, and other issues contribute to these gaps. These gaps can limit understanding of the conditions and resource needs of the territories.
- Territories have taken steps to mitigate data gaps through local data collection. Federal agencies also provide some forms of technical assistance to support statistical efforts in the territories. In particular, since fiscal year 2019 the Department of the Interior has provided over \$60 million through a technical assistance program, some of which is to be used to improve statistical collections.
- Treatment of the territories differs across agencies in the federal statistical system, and efforts to collect and report data on the territories are limited and uncoordinated. We recommend that the Office of Management and Budget (OMB) develop a coordinated, government-wide approach for federal statistical agencies to use, in consultation with territories and stakeholders, to examine the costs, benefits, and feasibility of including territories in statistical products and, as appropriate, identify ways to address any data gaps.

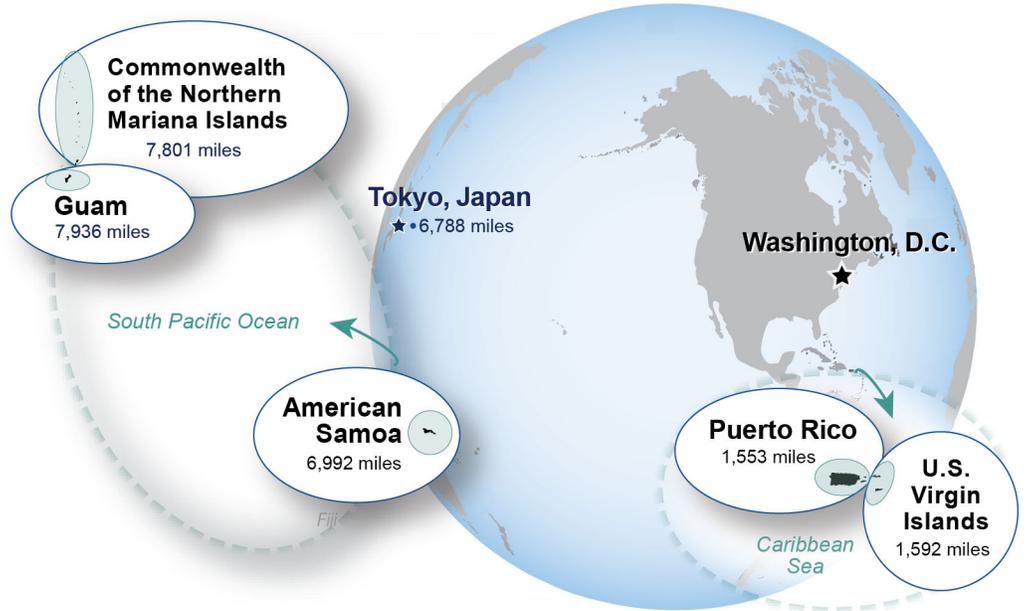
## Background

The U.S. has five permanently inhabited territories: American Samoa, CNMI, Guam, the Commonwealth of Puerto Rico, and USVI. These territories have elected governors, territorial legislatures, and nonvoting members in the U.S. House of Representatives.<sup>1</sup> Each territory has a unique history and relationship with the U.S., including its own territorial laws and customs. Residents of the

territories are classified as U.S. citizens, except for residents of American Samoa, who are classified as U.S. nationals.

As figure 1 shows, Puerto Rico and USVI in the Caribbean Sea are geographically much closer than the Pacific territories to Washington, D.C.—the headquarters of most federal agencies.<sup>2</sup> The distances of the Pacific territories from the mainland create time zone differences, increase travel costs, and contribute to other logistical considerations for federal agencies doing official business with them.

**Figure 1: Distances to U.S. Territories from Washington, D.C.**



Each of the Pacific Territories is farther from Washington, D.C., than is Tokyo.

Source: GAO analysis, GAO (maps), and Yevhenii/stock.adobe.com (globe icon). | GAO-24-106574

The territories, while all geographically small, vary in population size. As of the 2020 Census, the territories' combined population is over 1 percent of the U.S. population. Puerto Rico has almost 3.3 million residents—a population greater than 21 states—and a land area closest to the size of Connecticut. The other four territories have a combined population of around 338,000, which is around 239,000 less than the population of Wyoming, the least populous state. All five territories lie in strategic locations in the Caribbean Sea or the Pacific Ocean for shipping and military purposes. The territories comprise approximately 0.1 percent of the U.S. land mass but 6.1 percent of the U.S. territorial waters.

Table 1 shows the population, geographic sizes, and U.S. territorial water area of these territories in relation to selected states and the District of Columbia.

**Table 1: Comparisons of Populations, Land Area, and Territorial Water Area of Territories with Selected States and the District of Columbia**

U.S. Territories, Selected States, and the District of Columbia	Population (according to the 2020 Census)	Land Area in Square Miles	Territorial Water Area in Square Miles
Connecticut	3,605,944	4,842	—
Puerto Rico	3,285,874	3,424	1,812
District of Columbia	689,545	61	—
Wyoming	576,851	97,093	—
Guam	153,836	210	352
U.S. Virgin Islands	87,146	134	565
American Samoa	49,710	76	497
Commonwealth of the Northern Mariana Islands	47,329	182	1,782

Legend: “—” in this table refers to jurisdictions with a territorial water area square mileage that represents or rounds to zero, according to Census Bureau documentation.

Source: GAO analysis of Census Bureau data. | GAO-24-106574

### What economic challenges do the territories face?

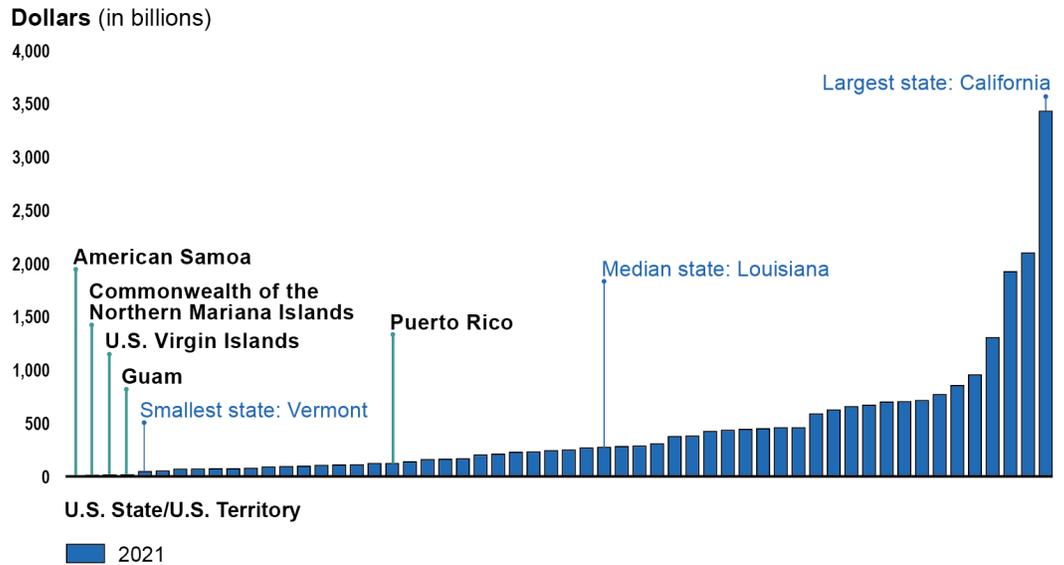
As available data and our prior reporting indicate, the five territories face similar challenges to sustained economic growth:

- outmigration and population loss;
- high cost of energy and imported goods;
- increasing vulnerability to frequent and severe episodes of extreme weather; and
- undiversified economies based on few industries with limited job opportunities.<sup>3</sup>

The COVID-19 pandemic exacerbated some of these conditions in several territories by decreasing tourism.

USVI, American Samoa, CNMI, and Guam are small island areas with small economies, as measured by gross domestic product (GDP), that are particularly susceptible to the above challenges (see fig. 2). As of 2020, all the territories but Puerto Rico had lower levels of GDP than Vermont—the state with the lowest GDP. Further, as noted later in this report, GDP reporting for the territories is lagged relative to the rest of the U.S.

**Figure 2: Gross Domestic Product (GDP) for U.S. States and Territories, 2021**



Source: GAO analysis of data from the U.S. Bureau of Economic Analysis. | GAO-24-106574

Note: The latest available GDP for the Commonwealth of the Northern Mariana Islands is for 2020.

In addition, our prior reports have described many of the fiscal challenges facing certain territorial governments, particularly issues of territorial indebtedness. The economic conditions above contribute to these governments' fiscal challenges.<sup>4</sup> Specifically, low economic growth and the resulting limited tax base can impede a territory's ability to pay for government obligations in the face of shrinking revenues and rising public debt levels.

Territories have also historically had difficulty managing federal grants they have received to help address their economic challenges. For example, internal control weaknesses, such as inadequate cash management practices, have hindered progress in addressing some territories' economic difficulties and compromised financial reporting on their use of federal grants.<sup>5</sup> Officials from the Department of the Interior—which has administrative responsibility for coordinating federal policy in most territories—noted that capacity limitations in territorial governments can contribute to their difficulty in managing federal grants.<sup>6</sup>

## What do we mean by data gaps?

Territorial data gaps take several forms, including gaps in coverage, disparities and lags in reporting, and different mechanisms for measuring data quality. First, many agencies do not include territories in their statistical products. For example, the National Agricultural Statistics Service identified 52 statistical products, of which only one—the Census of Agriculture—includes the territories. Additionally, of the 21 products identified by the Bureau of Labor Statistics (BLS), Puerto Rico has the most coverage—included in four of the statistical products. None of the 21 products identified by BLS include American Samoa or CNMI. In appendix I of this report, we provide a table, organized by the 13 principal statistical agencies, showing counts of statistical products that agencies identified as including or omitting the territories. Some federal statistical products are designed for national-level statistics and do not contain quality data for all states, such as surveys by the National Center for Health Statistics for which, according to officials, state-level estimates are not always available for many states.

Second, even when territories are included, statistical products may have reporting disparities for various reasons. For example, after the 2020 Island Areas Censuses in American Samoa, Guam, and USVI, the Census Bureau did not release its originally planned data on social and economic characteristics for

its group quarters operation, which counts residents of group facilities such as skilled nursing facilities and correctional facilities. The Census Bureau indicated that it held back these data due to incompleteness of data collection stemming from the COVID-19 pandemic.

Additionally, reporting for certain statistical products can be less current for territories than it is for the rest of the U.S. For example, the Bureau of Economic Analysis (BEA) reports GDP data annually for the territories but quarterly for states. Officials there added that for certain products they defer data releases until enough data are available from either territorial governments or other federal statistical products to permit estimation, which can result in lagged reporting for the territories.

Lastly, statistical agencies that include the territories in their products do not always have the same mechanisms for measuring data quality that the agencies have for products covering the rest of the U.S. For example, due to small population sampling constraints, the Census Bureau does not conduct an independent assessment of the accuracy of decennial data for the territories' Island Areas Censuses as it does for the stateside decennial census.

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### What factors contribute to data gaps in the territories?

A range of structural and other characteristics contribute to data gaps for the territories.

- **Statutory.** Statutes governing and funding principal statistical agencies may differ or be ambiguous about the requirement to collect data from the territories. The Census Bureau is required by law to include CNMI, Guam, Puerto Rico, and USVI in the Island Areas Censuses as part of the nationwide decennial count, as well as in the Economic Census.<sup>7</sup> The Secretary of Commerce may also, with the Secretary of State's approval, include American Samoa.

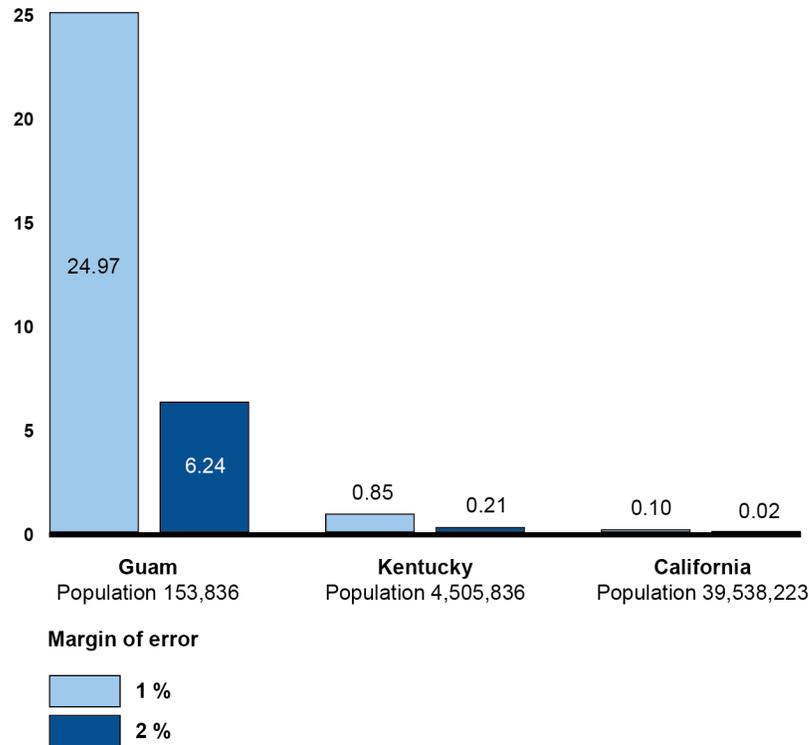
By contrast, the authorizing statute for BLS does not specify whether to include the territories, which can lead to variation in how territories are treated in BLS statistical products.<sup>8</sup> For example, in practice Guam is not included in the Current Employment Statistics program due to a lack of unemployment insurance program data, which are a key data source for the product. However, Puerto Rico is included in the Current Employment Statistics program and requires reporting of such data under local law.<sup>9</sup>

- **Statistical.** Small populations in the territories can present confidentiality concerns when reporting detailed data and can affect the ability of agencies to calculate precise estimates, according to OMB and Census Bureau officials. Figure 3 demonstrates how smaller populations require a greater rate of sampling to achieve the same margin of error, with the effect being larger for the more precise estimate (i.e., the smaller margin of error).<sup>10</sup> Higher sampling requirements for a given level of precision do not preclude the use of sampling in a territory with a smaller population, but, as noted below, they do raise the associated costs.

**Figure 3: Jurisdictions with Smaller Populations Need Relatively Larger Samples for the Same Margin of Error**

Percentage of population required for sampling to reach the same margin of error

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Source: GAO analysis of Census Bureau data. | GAO-24-106574

- Cost.** Estimation costs increase as sample size increases. The Census Bureau in 2018 cited the cost of needing to do a full census of the territories (except Puerto Rico) in lieu of sampling as a primary barrier to including them in the American Community Survey (ACS). The ACS provides detailed demographic statistics used in a large number of federal formula grant programs.<sup>11</sup>
- Geographic.** According to Census Bureau officials we spoke with, some territories' distances from the U.S. mainland can make it difficult for dependable and timely in-person data collection if agencies do not have staff permanently assigned to the territories. As shown in appendix I, Puerto Rico and USVI, the territories closest to Washington, D.C., appeared as often as the Pacific territories—or more frequently—in all but one agency's lists of statistical products we received. However, the Census Bureau's evolution in data collection for the decennial census shows that technology and automation can help overcome geographic challenges associated with in-person data collection.<sup>12</sup>
- Technical.** According to officials from OMB and multiple statistical agencies, several factors can complicate data collection: non-standardized address formats in the territories, difficulty integrating federal information technology with that of the territories, language barriers, and use of paper surveys. In addition, some statistical products have topics that may not be applicable to the territories, such as those that measure geography-specific agricultural commodities or energy sources.

Agencies also cited reasons unique to their operations as contributing to data gaps. For example, the National Agricultural Statistics Service releases Census of Agriculture data for the territories other than Puerto Rico with a one-year lag relative to comparable data for the rest of the U.S. National Agricultural Statistics Service officials explained that, by spreading out the several territories' data collections, the agency can take staff assigned to the Census of Agriculture and balance their workloads. This allows staff to focus on data collection and analysis.

Agencies attributed some of the data gaps to limitations in source data within the territories. For example:

- **Census Bureau.** Census Bureau officials told us that the lack of a robust and up-to-date address list in the territories reduces its ability to include territories in certain mail-based surveys. This requires it to rely on locally labor-intensive, paper-based door-to-door canvassing and enumerations for the decennial Island Areas Censuses.
- **BLS.** According to BLS officials, American Samoa, CNMI, and Guam are excluded from certain employment statistics, in part because none has a permanent unemployment insurance program yielding data that BLS would use to generate such statistics.
- **BEA.** Agency documentation notes that, with funding support from the Department of the Interior, BEA produces annual GDP estimates for the territories instead of quarterly estimates in part because the input data are primarily available annually.

Other factors may also explain why territories' data may sometimes not appear in data collection for federal statistical products for which they are otherwise eligible. For example,

- According to officials at the National Center for Health Statistics, American Samoa has not adopted the most recent (2003) standard certificates for births, deaths, and reports of fetal deaths. These officials told us that, as a result, American Samoa has not been included in the agency's vital statistics reporting since 2022. National Center for Health Statistics officials stated that adoption of the 2003 standards would result in American Samoa receiving funds for the rights to its data as part of contracts signed for the Vital Statistics Cooperative Program. American Samoan officials said that they are scheduled to begin using the 2003 standards by fall 2024.
- Census Bureau officials stated that they offered four territories (USVI, CNMI, American Samoa, and Guam) an option to conduct their local count reviews of the decennial results. Only American Samoa agreed to participate. Census Bureau officials told us that the other territories reported they had limited capacity to participate during the COVID-19 pandemic.
- According to officials from the Department of the Interior, agencies administering federal statistical products may sometimes exclude territories for reasons unrelated to structural barriers. For example, Interior officials stated that this may happen in cases where officials at statistical agencies are accustomed to limiting the scope of their products to the 50 states and are not aware that they could also include the territories.

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## How do data gaps affect the territories?

Territories cited a variety of ways in which data gaps significantly affect their government operations. American Samoa, CNMI, and Guam cited not being included in the Census Bureau's ACS as being significant. Officials from territories described additional data gaps as being significant to their jurisdictions. For example:

- **American Samoa.** American Samoa officials expressed concern that subsistence farming is not fully captured due to underlying issues with the address list the Census of Agriculture relies on, which may mean that its farmers are not eligible for certain farm support programs. Department of Agriculture documentation notes that the Census of Agriculture collects data on agriculture production without any minimum threshold value in American Samoa and determines from where to collect data based on a list of commercial farms supplemented by addresses of places having electric meters. Officials in American Samoa indicated that the reliance on electric meters to identify subsistence farms, instead of building a more traditional list of these farms as is done in other surveys, could lead to gaps in farm coverage. Additionally, American Samoa's gap in vital statistics means that its government cannot participate in the Centers for Disease Control and Prevention's Vital Statistics Cooperative Program, which provides funds to state and local governments in exchange for records on births and deaths.
- **CNMI.** CNMI officials emphasized the absence of recurring economic indicators, such as employment statistics from BLS. For example, territorial officials were working with outdated data when attempting to secure business licensing information and had to go directly to businesses to get the current information.
- **Guam.** Officials from Guam said that not enough reportable data in the Island Areas Census for some of the territory's smaller communities prevent those communities from being included in other composite statistics, such as the Social Vulnerability Index, thus understating the territory's need for resources. The Social Vulnerability Index includes a range of census variables that help local officials identify communities that may need support before, during, or after natural disasters. The information it contains also helps agencies make decisions on allocating emergency preparedness funding.
- **USVI.** The Census Bureau's Current Population Survey (done in concert with BLS) and Household Pulse Survey do not include USVI. Territorial officials indicated that, as a result, they had difficulties assessing the effectiveness of local resilience and recovery efforts during the pandemic.
- **Puerto Rico.** Officials from Puerto Rico described not being able to obtain and use certain detailed labor-force information because of not being included in the Current Population Survey. For example, the lack of labor-force information related to veterans and persons with functional disabilities impedes Puerto Rico's ability to address the needs of these populations, although the Census Bureau's Puerto Rico Community Survey includes topics on employment, veteran, and disability status. Officials also told us that not being included in the Census Bureau's Census of Governments limits the usefulness of the information they have on government expenditures.

Officials from the Department of the Interior provided additional examples of how data gaps can have adverse effects. For example, officials stated that in lieu of being comprehensively included in federal import and export statistics, territories are left to collect their own customs data, despite having limited capacity to do so.

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## How do data gaps affect federal funding to the territories?

- Numerous factors prevent policymakers from precisely quantifying the effects of data gaps for federal funding to the territories. For example,
- Principal statistical agencies we interviewed generally do not track the use of data from their products by federal programs or related decisions about allocations of federal funds.

- Government-wide, data in USASpending.gov have reliability limitations that we have previously documented and reported.<sup>13</sup> These data reliability limitations would make it difficult to estimate federal funding to the territories with precision. Moreover, according to our interviews with Guam and USVI officials, territories may in some cases simply not seek opportunities for federal funds allocations because they are not included in a statistical product or lack the local data sources needed to apply.

In some cases, territories are still able to participate in a federal program even when data from a statistical product are not available. For example, the Community Development Block Grant Program bases eligibility on low- and moderate-income determinations of target communities.<sup>14</sup> Since 2014, the Department of Housing and Urban Development has directed communities to use the ACS instead of the decennial census as the basis for these determinations.<sup>15</sup> Despite not being part of the ACS, American Samoa, Guam, CNMI, and USVI have separately been included in an equivalent Community Development Block Grant Insular Areas Program.<sup>16</sup>

Data gaps can also affect the mechanisms agencies use to allocate funds to the territories. As officials from the Department of the Interior noted, a wide range of federal agencies are involved in administering programs in the territories, with at least 35 agencies represented at the February 2024 meeting of the Interagency Group on Insular Affairs. To better understand examples of potential programmatic effects of data gaps, we reviewed the Census Bureau's 2021 list of the 20 largest federal assistance programs (by expenditure) that cite census data in funding allocation decisions. This review revealed instances of program allocations being handled differently for the territories than for the rest of the U.S. For example:

- Child Care and Development Block Grants to states and Puerto Rico are allotted based in part on estimates of the ratio of the number of children in a state under 5 years old to the number of children in this age group in all states.<sup>17</sup> For the remaining territories, the allotments are capped at 0.5 percent of total program appropriations.
- Supplemental Nutrition Assistance Program payments to Guam and USVI are adjusted to reflect the cost of food in these territories based on federal poverty and consumer price data that are not collected the same way as for the 50 states.<sup>18</sup> Without equivalent data, funds are estimated differently for the needs of residents in these jurisdictions than for the rest of the U.S. American Samoa, CNMI, and Puerto Rico are not eligible for the Supplemental Nutrition Assistance Program and instead receive capped block grants through the Nutrition Assistance Program.<sup>19</sup>

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### **What is currently being done to address or mitigate data gaps?**

In the absence of federal data, several U.S. territories have taken steps to mitigate gaps by collecting their own data. For example:

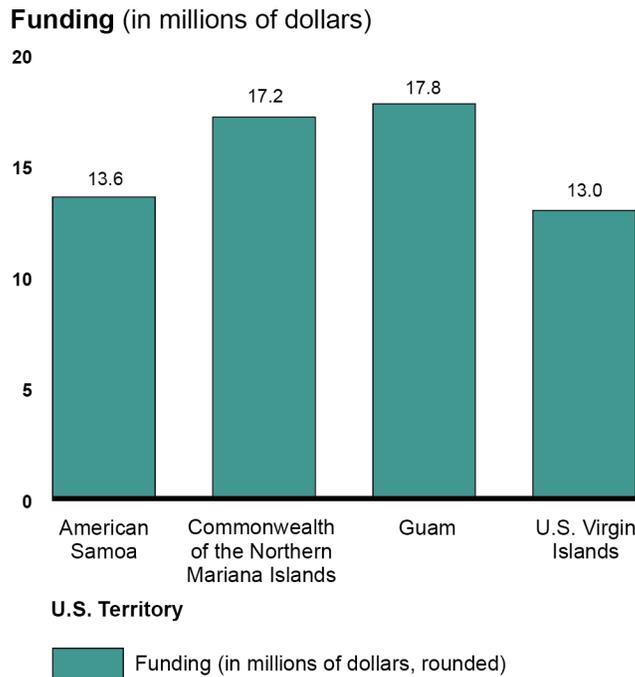
- USVI officials stated that they conducted the Virgin Islands Community Survey to provide more frequent snapshots of data than would be captured by the Census Bureau's decennial Island Areas Census. Officials noted that the prior lack of local funds has kept them from conducting the local survey for 6 years, but they are planning to renew collecting these data at least every other year and said they began their most recent round of data collection in late 2023.
- American Samoa officials stated that they collect and publish data in their annual American Samoa Statistical Yearbook. This statistical product provides statistics and trends on the territory's demographic, social, and economic characteristics from censuses, surveys, and administrative records.

American Samoa officials also stated that they collect their own consumer price index data, which BLS collects for the states but not in the territories. American Samoa conducts a Household Income and Expenditure Survey between decennial censuses to attempt to capture the types of data that BLS would.

- CNMI officials stated that they built their own survey map and address-register database using Census Bureau conventions and procedures so that they could assist the Census Bureau with data collection for the 2020 Island Areas Census.
- Officials from Guam similarly described their efforts to develop an updated address list by the summer of 2024. One of the purposes of the new address list will be to improve address data the Census Bureau uses for its tracking and mapping. Similar to American Samoa, officials also described an annual statistical yearbook that serves as a collection of current and historical data on social, economic, and demographic characteristics.
- Puerto Rico officials described collaboration between the Puerto Rico Planning Board and the University of Puerto Rico to improve the system of national accounts and the frequency of local GDP calculations. They expressed a desire to learn more about the data sources and methodologies of BEA's GDP estimates to better inform their efforts.

The Department of the Interior provides assistance to territories in a variety of ways, including by funding efforts to improve statistics, such as an ongoing effort by Guam to update its Household and Income Expenditures Survey. The Department's Office of Insular Affairs has authority under its technical assistance program to provide grants and other reimbursements to four of the five territories, but not to Puerto Rico. From fiscal years 2019 through 2023, this program provided nearly \$62 million in federal funding to territories (see fig. 4).

**Figure 4: Department of the Interior Technical Assistance Funding to the Territories, 2019-2023**



Source: GAO analysis of Department of Interior Technical Assistance Grant Data. | GAO-24-106574

BLS officials stated that they have provided expertise to some of the territories to help improve their surveys. For example, BLS has assisted the Puerto Rico

Department of Labor to refine its sampling procedures. OMB officials added that there are plans to open a new data center in Puerto Rico as part of the Federal Statistical Research Data Center program. These data centers allow vetted researchers on approved projects access to federal data from throughout the statistical system for evaluation and evidence-building efforts.

American Samoa officials told us that the Centers for Disease Control and Prevention (which houses the National Center for Health Statistics) provided technical assistance to ensure that the new systems being developed for collecting and verifying vital events (i.e., births and deaths) would have the appropriate characteristics for participation in the Vital Statistics Cooperative Program. American Samoa officials expect to be able to participate in the program by fall 2024.

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## How can the federal government address data gaps?

A more coordinated approach would help agencies to consider inclusion of territories in statistical products and to address data gaps as appropriate. OMB guidance notes that agencies should “commit to building evidence where they do not have it” and “use evidence to support processes” such as program and service delivery, among other things.<sup>20</sup> Additionally, federal standards for internal control state that decision-makers should use quality information to inform their decisions and achieve their goals.<sup>21</sup> Gaps in statistics hinder efforts to build evidence, support decisions, and evaluate the effectiveness of policy interventions. For example, if a federal agency makes decisions on the amount of funding to provide to a territory based on population data that are not current, then it may provide assistance that is smaller—or greater—than the current need.

Data gaps for territories are pervasive, but agencies’ efforts to understand and address territorial data gaps across the federal statistical system have been uncoordinated. There have also been few federal efforts to assess the feasibility and cost-effectiveness of actions to add territories to the scope of statistical products. When asked by Congress, the Census Bureau estimated in 2018 that extending the data collection and production for the annual ACS to the remaining territories would cost \$52 million per year (based on Island Areas Censuses costs). The Census Bureau also examined in 2019 the feasibility of extending additional statistical products to Puerto Rico, but this effort did not include the other territories.

In a January 2024 report to Congress, building on the Census Bureau’s earlier research, BEA identified the interagency dependencies that it indicated would need to be coordinated to extend a series of Census Bureau statistical products to the territories. In a separate report to Congress in December 2023, BEA also identified data needs and key challenges (such as lags in and relative infrequency of source data, among others) that currently prevent estimating GDP for the territories in the same way as for the rest of the U.S. Officials at other agencies we interviewed stated that they were unaware of other attempts to assess the costs, benefits, or feasibility of actions to address territorial data gaps.

OMB is responsible for, and the Chief Statistician of the United States carries out the function of, coordinating the federal statistical system to ensure its efficiency and effectiveness.<sup>22</sup> OMB budget documentation notes that as part of that role, the Office of the Chief Statistician identifies priorities for improving statistical programs and methodologies.<sup>23</sup>

However, there is not a coordinated, government-wide approach for agencies to use in deciding whether to collect data and report statistics from territories in federal statistical products. For example, OMB has not developed guidance or directives that explicitly address agency data collection efforts in the territories.

Moreover, outreach to the Department of the Interior from federal statistical agencies looking to work with the territories tends to occur on a case-by-case basis, according to Department of the Interior officials.

OMB has existing mechanisms that could help coordinate policy in this area. For example, the Interagency Council on Statistical Policy advises OMB on exercising its statutory authorities over the statistical system. Additionally, the Federal Committee on Statistical Methodology supports cross-agency research and makes recommendations to OMB on improving federal data quality.

A coordinated, government-wide approach for statistical agencies to examine and address territorial data gaps may reveal considerations—such as statutory barriers, applicability of statistical products to a given territory, or local source data limitations—that were previously unknown. Additionally, such an approach may help identify other administrative steps that statistical agencies could take to address data gaps. In turn, improved data collection for the territories could better inform decision-makers about how to allocate resources to the territories and how to evaluate their effectiveness.

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## Conclusions

Accurate and robust federal statistics could help territorial and federal officials better understand the implications of and potential solutions to various challenges that U.S. territories face. While territories have made efforts to enhance their statistics with support from the Department of the Interior, efforts to better understand and address data gaps in the territories are not coordinated across the principal statistical agencies. We found that principal statistical agencies generally have not conducted research to examine the costs, benefits, and feasibility of actions to expand the scope of federal statistical products to include the territories.

Under its coordination role for the federal statistical system, the Office of the Chief Statistician of the United States is positioned to develop an approach for statistical agencies to examine the costs, benefits, and feasibility of including territories in statistical products and, as appropriate, identify ways to address any data gaps. Developing such an approach for agencies to use consistently, in consultation with territories and other stakeholders as needed, would help improve the transparency of statistical decisions and could also help produce better data on the territories to inform policymakers' decisions on programs and initiatives such as those we have discussed in this report.

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## Recommendation for Executive Action

The Director of OMB should ensure that the Chief Statistician develops a coordinated, government-wide approach for federal statistical agencies to use, in consultation with the U.S. territories and other stakeholders, to examine the costs, benefits, and feasibility of including territories in statistical products and, as appropriate, identify ways to address any data gaps.

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## Agency Comments and Third-Party Views

We provided a draft of this report to OMB, the Department of the Interior, the 13 principal statistical agencies, and each of the territories for review and comment.

American Samoa and the Social Security Administration provided written comments, which are reproduced in Appendices II and III, respectively. OMB neither agreed nor disagreed with the recommendation but joined American Samoa, Guam, and the Departments of Agriculture, Commerce (Bureau of Economic Analysis), and Labor in providing technical comments, which we incorporated as appropriate. Officials from the Department of the Interior also provided technical comments, including suggestions for additional context on challenges faced by the territories and the ramifications of data gaps, which we

incorporated as appropriate. No other agencies or territories provided comments on the draft report.

## How GAO Did This Study

To describe the scope of data gaps, we requested and received lists from the 13 principal statistical agencies in the fall of 2023 of what they considered to be their public-facing statistical products and an indication from those agencies of which products include the various territories. The scope of 13 agencies from which we collected data aligned with initial inventorying of data gaps done by the Department of the Interior, which has administrative responsibility for coordinating federal policy for the territories, except for Puerto Rico. We also interviewed selected stakeholder committees and groups, such as the Association of State and Territorial Health Officials, for information on the existence and effects of data gaps.

In total, the lists that the principal statistical agencies provided in the fall of 2023 identified 449 statistical products. We then confirmed our counts of statistical products, as well as those identified by principal statistical agencies as including territories, with the principal statistical agencies and discussed with relevant officials from the territories which gaps were significant to their government operations.

To describe the factors contributing to data gaps in these federal statistical products, the effects of data gaps on the territories, and what is being done to address data gaps, we reviewed relevant federal statutes and collected testimonial evidence through interviews with officials from principal statistical agencies, the five territories, the Office of the Chief Statistician of the United States (within OMB), and the Department of the Interior. We researched the authorizing statutes of each of the principal statistical agencies to ascertain how, if at all, the agencies were specifically authorized or required to include the territories in their statistical products. In our interviews we inquired about the extent of agencies' and territories' efforts to mitigate federal data gaps, any challenges encountered in collecting and releasing data for federal statistical products or comparable local efforts, and how principal statistical agencies interact with territorial agencies on data collection and technical assistance.

To provide examples of specific program implications of data gaps for the allocation of federal funds to the territories, we reviewed our prior reporting on how the allocation of federal funds depends on decennial census data as well as Census Bureau documentation on the 20 largest (by expenditure) federal programs that use decennial census data to help make funding-allocation decisions. We reviewed these programs to identify whether territories are included in the source data and how, if at all, territories' participation in those federal programs differed relative to states. Due to data reliability limitations with USASpending.gov and nuances in how these federal programs accommodate territories in cases where territories are not included in the source statistical products, we do not provide quantitative estimates of implications for federal funding to the territories resulting from data gaps for the territories.

We also reviewed cumulative data from the Department of the Interior's Office of Insular Affairs on technical assistance funding provided to the territories over fiscal years 2019 through 2023 to present the total amount of assistance provided to each territory. We assessed the reliability of these data and found them to be sufficiently reliable for the purposes of this report.

To describe what is known about the costs and benefits of actions to address data gaps, we conducted a literature search to identify relevant studies, agency documentation of any analyses conducted on the feasibility of expanding coverage of territories in statistical products, and any associated actions or

proposals. We also requested any estimates, feasibility studies, or other research that principal statistical agencies that we interviewed had done related to expanding the scope of their statistical products.

We conducted this performance audit from January 2023 to May 2024 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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## List of Addressees

The Honorable Raúl M. Grijalva  
Ranking Member  
Committee on Natural Resources  
House of Representatives

The Honorable Jenniffer González-Colón  
House of Representatives

The Honorable James C. Moylan  
House of Representatives

The Honorable Stacey E. Plaskett  
House of Representatives

The Honorable Aumua Amata Coleman Radewagen  
House of Representatives

The Honorable Gregorio Kilili Camacho Sablan  
House of Representatives

We are sending copies of this report to the appropriate congressional committees, the Director of OMB, the Secretary of the Interior, the heads of the 13 principal statistical agencies, the five permanently inhabited U.S. territories, and other interested parties. In addition, the report is available at no charge on the GAO website at <https://www.gao.gov>.

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## GAO Contact Information

For more information, contact: Yvonne D. Jones, Director, Strategic Issues at [JonesY@gao.gov](mailto:JonesY@gao.gov), (202) 512-6806, and Latesha Love-Grayer, Director, International Affairs and Trade, at [LoveGrayerL@gao.gov](mailto:LoveGrayerL@gao.gov), (202) 512-4409.

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**Staff Acknowledgments:** Joyee Dasgupta and Ty Mitchell (Assistant Directors), Devin Braun (Analyst-in-Charge), Mark Abraham, Pedro Almoguera, Eugene Beye, Jacqueline Chapin, Ann Czapiewski, Alan Rozzi, and Mercedes Wilson-Barthes.

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## Appendix I: Lists of Identified Statistical Products

**Table 2: Counts of Products Identified by Principal Statistical Agencies in Fall 2023 as Including the Territories.**

Agency (N = number of products identified)	American Samoa	Commonwealth of the Northern Mariana Islands	Guam	Commonwealth of Puerto Rico	U.S. Virgin Islands
Census Bureau (N = 83)	9	9	9	15	9
National Center for Education Statistics (N = 28)	6	6	6	9	6
Bureau of Labor Statistics (N = 21)	0	0	1	4	3
Bureau of Justice Statistics (N = 7)	3	4	4	7	4
Bureau of Transportation Statistics (N = 24)	5	6	5	8	6
Economic Research Service (N = 68)	1	1	1	6	1
Energy Information Administration (N = 62)	5	1	5	5	5
National Center for Health Statistics (N = 6)	0	1	1	3	2
Bureau of Economic Analysis (N = 10)	1	1	1	3	1
Internal Revenue Service Statistics of Income (N = 52)	0	0	0	0	0
National Agricultural Statistics Service (N = 52)	1	1	1	1	1
National Center for Science and Engineering (N = 20)	4	2	5	14	5
Social Security Administration Office of Research, Evaluation, and Statistics (N = 16)	6	9	6	6	6

Source: GAO analysis of metadata on statistical products reported by the 13 principal statistical agencies. | GAO-24-106574

## Appendix II: Comments from the American Samoa Government



### OFFICE OF THE GOVERNOR AMERICAN SAMOA GOVERNMENT

Serial No.: 377 – 24

April 26, 2024

Yvonne Jones  
Director  
Strategic Issues Team  
GAO US Government Accountability Office  
441 G Street, N.W.  
Washington DC 20548

Subject: GAO engagement 106574 – Federal Collection of Data from U.S. Territories

Dear Ms. Jones:

It is with sincere appreciation that we convey our gratitude for the work you and your team are doing to investigate and help address the gaps that exist in the Federal government’s data collection efforts from and regarding U.S. Territories. As we all know, official statistics and data play a significant role in planning and development efforts that lead to a better quality of life for all of our people. The data collected by the federal government also plays a significant role in how federal funds are apportioned to the states and territories. These gaps have led to significant disparities for the people of the territories – especially American Samoa.

As you know more than 3.6 million people live in the territories – a population roughly equal to that of the five smallest U.S. states combined. Yet the territories routinely receive less federal funding during opportunity cycles than even the smallest states. The Department of the Interior has recently undertaken a project to address one example of these disparities.

Executive Order 14008 introduced the Justice40 Initiative as part of the national commitment to environmental justice. The goal of Justice40 is to transform hundreds of Federal programs across the government to ensure that disadvantaged communities receive the benefits of new and existing Federal investments. As part of the implementation, the Administration has put forth guidance on eligible Federal programs and the definition of disadvantaged.

Federal agencies have identified more than 400 “covered programs” that fall in the scope of the Justice40 initiative. These “covered programs” include existing and new programs created by President Biden’s Inflation Reduction Act, the Bipartisan Infrastructure Law, and the American Rescue Plan to name a few. The White House Council on Environmental Quality (CEQ) has been directed to provide guidance around identifying disadvantaged communities that have historically been marginalized, overburdened, and underserved. The Climate and Economic Justice Screening Tool (CEJST) was introduced in 2022 as a way for Federal agencies to help identify Disadvantaged

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communities. However, DOI has identified underlying data challenges unique to the territories that significantly impact how the current version of CEJST identifies disadvantaged communities.

Of the eight categories of burden, only one category of burden currently serves as the basis of identifying disadvantaged communities in American Samoa. Of the 32 underlying metrics, only 6 are available for the U.S. territories. As a result, 60% of all territorial population live in tracts that are identified as not disadvantaged. This simply does not reflect the realities of the territories.

Since the inception of CEJST, OIA has worked to achieve a more equitable identification of disadvantaged using the best science available. In December 2023, the Department of the Interior received an exception from using CEJST for funding determinations and instead has been able to rely on alternative information to identify disadvantaged communities in the territories. However, improved data collection could help fill the data gaps that lead to this type of disparity and the need for exceptions to achieve equitable treatment of American Samoa and the other U.S. territories.

This is just one example of the many gaps in coverage, disparities and lags in reporting, and different mechanisms for measuring data quality that American Samoa faces as reflected in your report. I look forward to working together with our Federal partners to help bridge these gaps and address the disparities and inequities that result from them.

Sincerely,

  
EMANUEL S. MAUGA  
Governor

**Appendix III:  
Comments from the  
Social Security  
Administration**



**SOCIAL SECURITY**  
Office of the Commissioner

April 19, 2023

Yvonne Jones, Director  
Strategic Issues  
Latesha Love-Grayer, Director  
International Affairs and Trade  
United States Government Accountability Office  
441 G Street, NW  
Washington, DC 20548

Dear Director Jones and Director Love-Grayer,

Thank you for the opportunity to review the draft report "U.S. TERRITORIES: Coordinated Federal Approach Needed to Better Address Data Gaps" (GAO-24-106574). Our statistical products are available to governmental agencies and the public to support decisions for policy related to income security and disability in the United State and its territories. As a principal statistical agency, we are proud to provide data relevant for decision making, evaluation, and determining where to target resources in the U.S. Territories.

Please contact me at (410) 965-2611 if I can be of further assistance. Your staff may contact Trae Sommer, Director of the Audit Liaison Staff, at (410) 965-9102.

Sincerely,

A handwritten signature in blue ink, appearing to read "Dustin S. Brown".

Dustin S. Brown  
Acting Chief of Staff

SOCIAL SECURITY ADMINISTRATION BALTIMORE, MD 21235-0001

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## Endnotes

<sup>1</sup>The Federated States of Micronesia, the Republic of the Marshall Islands, and the Republic of Palau are independent countries and so are excluded from our scope.

<sup>2</sup>The 13 principal statistical agencies are the Bureau of Economic Analysis, Justice Statistics, Labor Statistics, Transportation Statistics, and the Census; Economic Research Service; Energy Information Administration; Internal Revenue Service Statistics of Income; National Agricultural Statistics Service; National Center for Education Statistics; National Center for Health Statistics; National Center for Science and Engineering Statistics; and Social Security Administration Office of Research, Evaluation and Statistics.

<sup>3</sup>GAO, *U.S. Territories: Public Debt Outlook – 2023 Update*, [GAO-23-106045](#) (Washington, D.C.: June 29, 2023).

<sup>4</sup>[GAO-23-106045](#).

<sup>5</sup>[GAO-23-106045](#). See also, for example, GAO, *U.S. Insular Areas: Economic, Fiscal, and Financial Accountability Challenges*, [GAO-07-119](#) (Washington, D.C.: Dec. 12, 2006).

<sup>6</sup>See Exec. Order No. 12572, Relations with the Northern Mariana Islands, [51 Fed. Reg. 40401](#) (Nov. 7, 1986); Exec. Order No. 10264, *Transfer of the Administration of American Samoa From the Secretary of the Navy to the Secretary of the Interior*, [16 Fed. Reg. 6417](#) (July 3, 1951); Exec. Order No. 10077, *Transfer of the Administration of the Island of Guam from the Secretary of the Navy to the Secretary of the Interior*, [14 Fed. Reg. 5533](#) (Sept. 9, 1949); and [Exec. Order No. 5566](#), *Placing the Governance of the Virgin Islands under the Supervision of the Department of the Interior*, (Feb. 27, 1931).

<sup>7</sup>[13 U.S.C. § 191\(a\)](#); [13 U.S.C. § 141\(a\)](#); [13 U.S.C. § 131](#).

<sup>8</sup>[29 U.S.C. §§ 1-2](#).

<sup>9</sup>[L.P.R.A. §§ 308, 309, 315](#).

<sup>10</sup>For this figure, we use a hypothetical example to demonstrate what percent of the respective populations would need to be sampled to attain the same level of precision (i.e., the same margin of error). Our calculation assumed an error rate of 0.5, a design effect of 2, and a confidence level of 95 percent.

<sup>11</sup>The Census Bureau administers the Puerto Rico Community Survey, which collects and produces companion data to the ACS.

<sup>12</sup>GAO, *2020 Census: Innovations Helped with Implementation, but Bureau Can Do More to Realize Future Benefits*, [GAO-21-478](#) (Washington, D.C.: June 14, 2021).

<sup>13</sup>For example, see GAO, *Federal Spending Transparency: Opportunities Exist to Further Improve the Information Available on USAspending.gov*, [GAO-22-104702](#) (Washington, D.C.: Nov. 8, 2021).

<sup>14</sup>[42 U.S.C. § 5301](#).

<sup>15</sup>The Department of Housing and Urban Development issued guidance to communities on its transition policy for using the 2006–2010 ACS-based low-to-moderate income summary data on June 10, 2014. See Department of Housing and Urban Development, *Transition Policy for Low/Moderate Income Summary Data Updates during Fiscal Year 2014 for the State Community Development Block Grant Program*, [CPD-14-10](#).

<sup>16</sup>The Community Development Block Grant Program reserves \$7 million annually for American Samoa, Guam, CNMI, and USVI which is distributed based on their relative populations, while program funds are allocated to states and Puerto Rico based on separate formulas. See [42 U.S.C. § 5302\(a\)\(24\)](#); [42 U.S.C. § 5306\(a\)\(2\)](#).

<sup>17</sup>[42 U.S.C. § 9858m](#).

<sup>18</sup>[7 U.S.C. §§ 2012-2014](#); [42 U.S.C. § 9902\(2\)](#).

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<sup>19</sup>7 U.S.C. § 2028; 48 U.S.C. § 1469d(c).

<sup>20</sup>OMB, *Evidence-Based Policymaking: Learning Agendas and Annual Evaluation Plans*, Memorandum M-21-27 (Washington, D.C.: June 30, 2021).

<sup>21</sup>GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: Sept. 10, 2014).

<sup>22</sup>44 U.S.C. § 3504(e)(1), (7).

<sup>23</sup>OMB, *Analytical Perspectives, Budget of the U.S. Government, Fiscal Year 2024* (Washington, D.C.: Mar. 13, 2023).