

EXPORT-IMPORT BANK of the UNITED STATES



Open Government Plan

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Open Government Plan of the Export Import Bank of the United States

Executive Summary

“The Export-Import Bank of the United States (Ex-Im Bank) is committed to the implementation of President Obama’s Open Government Directive. The Ex-Im Bank Open Government Plan will complement the Bank’s strategic goals:

1. Expand awareness of Ex-Im Bank services through focused business development and effective partnerships.
2. Improve ease of doing business for customers
3. Create an environment that fosters high performance and innovation.”

Fred P. Hochberg, Ex-Im Bank Chairman and President

The Export-Import Bank is currently meeting its legal information dissemination obligations through significant progress in achieving the President’s goal of transparency with increased accountability of the Bank operations by making public detailed information on the majority of the Bank’s transactions. These datasets are published in electronic open formats via USASpending.gov. These datasets were first published in November 2007 as the Ex-Im Bank’s response to the Federal Funding Accountability and Transparency Act (FFATA). Ex-Im Bank has published its transaction information for the last three fiscal years on this cross-Agency website. The subcategories for Ex-Im Bank’s FFATA information include Insurance, Direct Loans, and Guaranteed Loans.

The Bank publishes all its notices and regulations on the e-Rulemaking government-wide Regulations.gov web site. This site provides the public with the ability to submit comments electronically.

““We will double our exports over the next five years, an increase that will support two million jobs in America.” President Barack Obama, March 11, 2010. The Bank is a major export finance agency participating in the National Export Initiative (NEI). The NEI is a multi-year effort to increase U.S. jobs by increasing the number of companies exporting and expanding the number of markets current U.S. companies sell to. The Bank will play a critical role in the implementation of this initiative and is taking the necessary steps to identify new markets, double our exports and level the playing field for American workers.

Reference: <http://www.whitehouse.gov/the-press-office/executive-order-national-export-initiative>

The Bank works closely with its business partners and is always seeking additional partners to turn export opportunities into real sales that help to maintain and create U.S. jobs and contribute to a stronger national economy. Examples include Lenders (Delegated Authority Lenders); Insurance Brokers; City/State Partners; and U.S. Trade Agencies.

The Bank currently employs diversified methods for achieving public participation including Feedback capability on www.exim.gov; Outreach: Town-hall style meeting, training sessions, outreach to trade associations and an Annual Conference; Regional Offices staff interact with the public and cover high volume locations; Surveys (annual competitiveness survey to ascertain the Bank’s competitiveness);

Subscription Services; and Public Posting of Information and Reporting on a variety of sites such as www.Export.gov.

In the spirit of open government, we actively seek public input and advice regarding the key elements of this plan. **We welcome thoughts and ideas with respect to the key elements of the plan.**

In summary, the plan indicates that Ex-Im Bank will:

- Designate a high-level, senior Ex-Im official and establish an Ex-Im Bank Governance Structure for the Open Government Directive and Data Quality. (Completed on time.)
- Establish data quality metrics and monitoring of FFATA submissions. (Completed on time.)
- Publish an Open Government webpage at the following link: <http://www.exim.gov/open> by February 6, 2010 (Completed on time.)
- Publish three new Ex-Im Bank datasets in an Open Format by January 21, 2010 (Completed on time.)
 - (a) Total authorizations (e.g., \$, counts, and export value) for FY2010, year to date
 - (b) Total Small Business authorizations for FY2010, year to date
 - (c) Total Authorizations by Country for FY2010, year to date.
- Add new datasets covering authorizations for FY2007, FY2008, and FY2009. (Completed on time.)
 - (a) Total authorizations (e.g., \$, counts, and export value) for FY2007, FY2008, and FY2009
 - (b) Total Small Business authorizations for FY2007, FY2008, and FY2009
 - (c) Total Authorizations by Country for FY2007, FY2008, and FY2009.
- Publish the “Country Limitation Schedule” datasets in Open Format for download. (Completed on time.)
- Publish additional data sets including authorizations for women and minority owned businesses. (Completed on time.)
- Publish tabulated format for FOIA report data for FY2010.
- Expand the Electronic Freedom of Information Act (e-FOIA) Room on www.exim.gov.
- Establish Ex-Im Bank Social Media Environment for Partnership and Collaboration.
- Establish an Export Forum for International Buyers.

Recognizing the need for timely access to data on current business trends, transactions, and customers; the Bank has embarked on a program to develop a data warehouse with real-time reporting and business intelligence analysis capabilities. The Bank’s **Flagship initiative** is based on this new data warehouse, the Ex-Im Bank Reporting System (ERS), that has already begun to revolutionize the availability, use, accuracy of the business data, and key performance metrics on which the business decisions of the Bank are based. The Bank plans to use this new tool to develop and publish the data sets most

frequently requested by the public through the Freedom of Information Act on its Open Government web page.

The Bank plans to incentivize employees and others to identify and implement innovative methods to increase collaboration with those in the private sector, non-profit, and academic communities. The Bank will obtain nominations for a new honor awards category called “Ex-Im Bank Open Government Initiative” and will make it available to those who contribute to innovative methods of collaboration with the general public or targeted segments of the public.

1. Export-Import Bank Open Government Plan

The Export Import Bank of the United States (hereafter, Ex-Im Bank or the Bank) Open Government Plan provides a roadmap and timelines detailing the specific actions that Ex-Im Bank has and will undertake to implement the President's January 21, 2009 memorandum on Transparency and Open Government and the Open Government Directive of December 9, 2009. This plan incorporates the Bank's visions and goals as well as the Office of the Chief Information Officer's technology applications. Over time, the plan will be updated to include feedback from the general public, particularly, those members of the public involved in exports of United States goods and services to overseas markets.

In the spirit of open government, we actively seek public input and advice regarding the key elements of this plan. We welcome thoughts and ideas with respect to each of these milestones.

2. Plan Availability

The Export Import Bank's plan is published online on the Bank's Open Government Webpage in an open format enabling the public to download, analyze, and visualize any information and data contained in the Plan. The plan is located at the following link:

<http://www.exim.gov/open/index.cfm>

3. Plan Component

The Plan will address three complementary components:

- Transparency to promote accountability by providing the public with information about what the Ex-Im Bank does.
- Participation to allow members of the public to contribute ideas and expertise so that Ex-Im Bank can promote policies with the benefit of information that is widely dispersed in society.
- Collaboration to improve the effectiveness of Ex-Im Bank by encouraging partnerships and cooperation within the Federal Government, across levels of government, and between the Government and private institutions.

a- TRANSPARENCY

The Export-Import Bank is a customer oriented agency. Ex-Im Bank enables U.S. companies — large and small — to turn export opportunities into sales that helps to maintain and create U.S. jobs and contribute to a stronger national economy. Ex-Im Bank fulfills its mission through three primary service delivery methods:

- Direct Loans
- Loan Guarantees
- Insurance

A great deal of the data related to these programs is already being published on USASpending.gov. The Bank will continue to work to expand the scope of the data made available to the public by publishing data not currently available there, such as the export values of the products supported by these authorizations and the foreign markets that are the primary buyers in deals supported by these authorizations. Through these Open Government Initiatives, we hope to support those researchers who want to use the data in their analyses and provide broader exposure of the activities of the Bank to potential customers who may benefit from our services.

i. Strategic Action Plan

1 Inventory of Ex-Im Bank high-value information currently available for download

The Export-Import Bank is currently meeting its legal information dissemination obligations through significant progress in achieving the President's goal of transparency with increased accountability of the Bank operations by making public detailed information on the majority of the Bank transactions. These transactions are published in electronic open formats via USASpending.gov. These datasets were first published in November 2007 as Ex-Im Bank's response to the Federal Funding Accountability and Transparency Act (FFATA). Ex-Im Bank has published its transaction information for the last three fiscal years as well as its data for the current fiscal year up to the current month closed in our financial systems on this cross-agency website. We provide links from our Agency's website to the datasets on USASpending.gov for FY2007, FY2008, and FY2009 and FY2010 on the Ex-Im FOIA page (see item number 5):

<http://www.exim.gov/about/disclosure/foia.cfm>

Four additional Datasets were published and catalogued on DATA.GOV on January 21, 2010:

1. Summary Authorizations for FY2010 - Loan, Guarantees, Insurance and Working Capital. This data set provides the public with an understanding of the scope of products offered by the Bank to assist in financing the export of U.S. goods and services to international markets and to create US Jobs
2. Summary - Small Business authorizations for FY2010. This data set provides the public with an understanding of the scope of Ex-Im Bank products to enable small U.S. companies to turn export opportunities into sales that help to maintain and create U.S. jobs and contribute to a stronger national economy.
3. Summary - Authorizations by Country for FY2010. This data set provides the public with an understanding of the international markets covered by the Ex-Im Bank products and services.
4. FOIA report for FY2009 in XML format - This data set provides the FOIA FY2009 annual report including the disposition of FOIA Requests.

2 Mechanism in place to foster the public's use of this information to increase public knowledge and promote public scrutiny of Ex-Im Bank's services

The Bank uses a variety of methods to increase public knowledge of the information we provide and promote scrutiny of the agency's services, including:

- Publishing details about the Bank's transactions on the USASpending.gov website.
- Publication of the www.exim.gov/open web page (deployed on February 6, 2010) that provides a central point of access for all the information we publish.
- Providing links to the Bank's Open Government web page on the main www.exim.gov in 2 locations: under short cuts and under other useful links to attract interest to the Open Government web page. The Bank also provides links to the data published on USASpending.gov on the Bank's FOIA page to attract additional attention to the available datasets.
- The Bank solicits feedback through our Internet web site for users to submit comments and requests for information. A special feedback button is on all our web pages.
- The Bank responds to questions and requests for additional data sets and information submitted by the public through DATA.GOV.

3 Identification of high value information not yet available and timeline for publication online in open formats.

The Bank has established a Governance structure, policies and procedures to identify and evaluate high value information (objective, high quality, timely and accurate information) and communications and monitoring mechanisms to ensure participation from our customers. Since so much of our data is already available on USASpending.gov, the Bank is focusing on making additional details available about the deals public, such as the export value of the products exported and the foreign markets that buy the products exported.

The objective is to improve public knowledge of Ex-Im Bank's products and services and to create economic opportunity through exports. The team also reviews and responds to needs and demands identified through public collaboration whether that comes from customers or potential customers or the public at large through our web site or DATA.GOV.

Target dates for publications of datasets already identified for publication are listed in section iv and Section d (Flagship initiatives), as appropriate.

ii. Publication of Ex-Im Data in Open Formats and Availability

Ex-Im Bank will make all the datasets it publishes available in designated open formats on the Bank's website (www.exim.gov). Data published on other government websites, such as USASpending.gov, will be provided in the format required as necessary to achieve the goals of the directive. Open formats envisioned for use by Ex-Im at this time include: (a) comma-separated value (CSV) format and (b) eXtensible Markup Language (XML) format.¹ All new datasets that are designated for public access will be registered with DATA.GOV.

The Bank will ensure that the exposed datasets are as granular as possible, consistent with statutory responsibilities and subject to valid privacy, confidentiality, security, and other restrictions as identified. At this time, the Bank has identified two datasets currently published in PDF format (the Country Limitation Schedule and our organizational chart) that the Bank will make available in an open format.

¹ Other potential formats will be identified and used as best practices for open formats become clearer and suitability of these formats in promoting public access.

iii. Transparency initiatives at Ex-Im Bank

This section provides a summary on how Ex-Im Bank is complying with transparency initiative guidance such as participation on DATA.GOV, USASpending.gov, e-Rulemaking, and OMB MAX dashboards.² Where gaps exist, we identify the steps that Ex-Im Bank is taking to meet the requirements for each initiative.

- [USASpending.gov: Ex-Im Bank reporting for FFATA.](#)

Since November 2007, Ex-Im Bank has been submitting electronic file updates (in CSV formats) to USASpending.gov.

Ex-Im Bank demonstrates its commitment to data quality, by our progress in reducing the number of transactions withheld for data quality reasons. Ex-Im Bank will continue to define metrics and improve data quality.

- [DATA.GOV](#)

Ex-Im Bank has registered, with DATA.GOV and made available on www.exim.gov/open, five new datasets. Three of these datasets provide Bank authorizations on an accrual and annual basis; Bank authorizations to small businesses; and Bank authorizations by country.

Additional datasets will be identified and posted as new datasets, data feeds, or displays on a regular basis. These datasets will be registered on DATA.GOV for ease of identification by the interested public.

- [Regulations.gov/e-Rulemaking](#)

The Bank publishes all its notices and regulations on the e-Rulemaking government-wide Regulations.gov web site. This site provides the public with the ability to submit comments electronically.

- [Interagency Country Risk Assessment System \(ICRAS\) Community Website on OMB portal MAX.gov.](#)

Ex-Im Bank has deployed a new community website using the MAX Federal Community on the Office of Management and Budget (OMB) MAX Portal. Ex-Im is the secretariat for the Federal Government's ICRAS program which produces economic analyses on most foreign countries - documented in country reports for each country. The ICRAS program employs an iterative review process in which consensus amongst economists employed in a number of Federal Agencies collaborate. Using a convenient wiki format and document management system, the MAX Federal Community permits comments and comments-on-comments for each country report under review. It is also ideal for managing the 200+ countries on which country reports are produced; 100% of which are to be reviewed at least once every three years – with many to be reviewed annually.

² To date, Ex-Im Bank has no presence on the IT Dashboard. Ex-Im Bank does not receive Recovery Act funding and therefore has no reporting obligations on Recovery.gov.

Eleven agencies are participating in the ICRAS website and an average of 72 critical new country reports are published and shared on a yearly basis.

The Ex-Im Bank is the developer and system administrator for the site and will continue to expand on collaboration capabilities for the Government agencies sharing the data. Due to the sensitive nature of the data contained in these reports, the Bank is in need of a secure collaboration capability. The MAX Federal Community on the OMB MAX Portal provides an ideal computing environment for this collaboration as it is an available resource to all Federal Agencies. This is a particularly valuable collaboration as Ex-Im did not have to invest in the infrastructure (hardware, software, and staffing) required to mount and secure its own community site.

- Electronic Freedom of Information Act (eFOIA) Reading Room on www.exim.gov

The Ex-Im Bank has a FOIA page with links to pertinent information for customers, direct links to Ex-Im Bank data on USASpending.gov, and others.

Internally, the Bank currently uses commercially available software to track FOIA requests. This software provides the capability to post FOIA requests and responses in accessible forms on the Internet. The Bank is evaluating the suitability of this system as an e-FOIA Room on its public website. This initiative is further discussed in Section b.ii., Proposed Feedback Mechanisms. The timeline for this initiative will be provided in future updates to this plan.

The existing FOIA process includes the entry of new requests in the FOIA tracking system (FOIAXpress); an acknowledgement letter of receipt of the request; an initial evaluation of the scope and identification of internal organizations best suited to provide the information requested; sending requests for responsive records to the pertinent organizations including a request for time spent searching for documents, so that we may provide the requester with a fee estimate (if the request is lengthy and complex). In a number of cases, we make determinations as to whether or not a requester qualifies for a fee waiver and/or expedited treatment. We also negotiate with the requester in an effort to narrow the scope of broad FOIA requests when the estimated fees would be cost-prohibitive, and/or when the requester would like a quicker response than could be provided under the broader request. A weekly review meeting is held with the Office of General Counsel to review the list and status of open FOIA requests with the objective to answer questions and discuss legal ramifications, triage the cases (Fast Track) and ensure an ongoing reduction of the pending cases. Simple request requiring relatively minimal review are placed in one processing track and more voluminous and complex requests are placed in one or more other tracks. Requests in each track are processed on a first-in/first out basis. In general, cases in the backlog are related to large holdings of paper transactions and requests for large volume of emails requiring manual reviews.

With 80% of our transactions now using our online system Ex-Im Online, and with over 95% of the Bank financial information now available on public web site, we are going to decrease and expedite the number of FOIA requests. Our FOIA related resources will be targeting more complex FOIA requests (especially the ones requesting older paper records).

As part of our continuous improvement milestones, we will review the requests for information as well as input from the public to define additional data sets of interest to publish on our e_FOIA Reading Room.

iv. Open Government Plan: Milestones

The proposed milestones shall encourage contributions of ideas and expertise by citizens on key issues, facilitate cooperation and partnerships across the government, and boost collaboration between the government and private institutions. These milestones may be achieved through changes in current Ex-Im Bank practices and policies, new feedback mechanisms that create new and easier methods of public engagement, innovative methods such as prizes and competitions, the use of technology platforms to facilitate new forms of collaboration, etc.

The following Milestones are proposed for the implementation of this plan:

Milestone 1. February 6, 2010, Status: Completed

Title: Designation of a high-level, senior Ex-Im official and establish an Ex-IM Bank Governance Structure for the Open Government Directive and Data Quality.

Ex-Im Bank designated a high-level, senior Ex-Im Bank official accountable for the quality and objectivity of, and internal controls over, the Federal spending information publicly disseminated through USASpending.gov. Ex-Im has coordinated the selection of the official with OMB. Ex-Im has designated its Chief Technology Officer as the senior Ex-Im Bank official in this role. The Bank's Chief Technology Officer is the Bank's coordinator on Open Government, DATA.GOV, and FFATA compliance.

Ex-Im Bank has established an Open Government Governance structure with the following officials:

Chair: The Senior Accountable Official - Chief Technology Officer - Office of the Chief Information Officer (OCIO) coordinates and collaborates across multiple offices (OCFO, EFG/OPS, etc.) and leverages the Senior Management Council for this coordination and collaboration.

Vice President, Controller - Office of the Chief Financial Officer (OCFO)

Vice President, Operations and Data Quality - Export Finance Group (EFG)

Chief Information Officer - Office of the Chief Information Officer- (OCIO)

Support for accomplishing the objectives of the Open Government Initiatives is available from the Bank's Web Content Managers (OCIO and Communications) and the IT Systems Engineering division.

This Governance structure ensures the participation of pertinent senior officials at the Bank. These senior officials are responsible for the oversight, execution, and improvements to our Open Government and data quality processes.

Milestone 2. February 12, 2010, Status: Completed

Title: Establish data quality metrics and monitoring of FFATA submissions

Timely FFATA Reporting to USASpending.gov is one of our key goals for meeting the public's need for information. Ex-Im Bank will continue to maintain its timely upload on the reporting of loans, insurance, and other financial products through USASpending.gov. Ex-Im Bank has been submitting electronic file updates (in FAADS Plus formats) to USASpending.gov on insurance, direct loans and loan guarantees provided to our customers since November, 2007. Ex-Im Bank has consistently met the monthly submission deadlines since the inception of USASpending.gov.

Ensuring data quality and completeness of the transactional data we provide to USASpending.gov has been an integral component of this process. Currently, our electronic files report on 9,628 transactions. Our investment in ensuring data quality has resulted in an eight-fold reduction in the number of transactions withheld from our monthly FFATA updates for 2009 alone. At the beginning of CY2009, we withheld approximately 9.8% of our total transactions for data quality reasons. As of the end of CY 2009, we were withholding only 1.3% of our transactions from the monthly FFATA update. Ex-Im demonstrates its commitment to data quality, by our progress in reducing the number of transactions withheld for data quality reasons.

Note: Ex-Im Bank's contracts transactions are not represented in USASpending.gov, as we are exempt from FPDS reporting and do not have an FPDS account.

Milestone 3. January 21, 2010, Status: Completed

Title: *Publish three new Ex-Im Datasets in an Open Format (catalogued in DATA.GOV)*

Ex-Im Bank has made available three FY2010 new datasets on its public website. These datasets are registered on DATA.GOV for ease of identification by the interested public. These datasets provide Bank authorizations, Bank authorizations to small businesses, and Bank authorizations by country. These datasets are made available in an open format (Comma Separated Values or CSV) via a download link on the Bank's public website.

- (d) Total authorizations (e.g., \$, counts, and export value) for FY2010, year to date (open format: CSV)
- (e) Total Small Business authorizations for FY2010, to date (open format: CSV)
- (f) Total Authorizations by Country for FY2010, to date (open format: CSV)

The Ex-Im Bank will continue to refresh the three data sets on a monthly basis.

Milestone 4. February 6, 2010, Status: Completed

Title: *Publish an Open Government webpage at the following link:*

<http://www.exim.gov/open>

This webpage has been published following the guidelines and serves as the integrated gateway to all Ex-Im activities related to the Open Government Directive. Ex-Im will update and maintain the webpage in a timely manner.

Milestone 5. April, 2010, Status: Completed

Title: *Publish Final 2010 Ex-Im Bank Open Government Plan*

Ex-Im Bank will update its Open Government Plan and publish it on the Ex-Im Open Government webpage. The plan describes how Ex-Im will improve transparency and integrate public participation and collaboration into the Bank's activities. This plan will be updated and re-published on the Ex-Im Open Government webpage every two years. Also, Ex-Im will provide links to web pages that show how we are meeting our existing records management requirements and for analyzing and responding to Congressional Requests for information.

Milestone 6. July, 2010, Status: Completed

Title: *Publish nine new datasets covering authorizations for FY2007, FY2008, and FY2009*

The Ex-Im Bank is proposing the deployment of three new datasets per fiscal year for authorization data. These datasets will cover FY2007, FY2008, and FY2009 (FY2010 year-to-date is already available) are designed to permit targeted users to evaluate and visualize the last three fiscal years authorizations of Ex-Im Bank in the aggregate and broken down in accordance with specific demographics, for example, American small businesses and foreign countries. These datasets will be registered on DATA.GOV for ease of identification by the interested public.

Milestone 7. August, 2010, Status: Completed

Title: *Publish the "Country Limitation Schedule" data sets in Open Format*

The Ex-Im Bank is presently publishing the "Country Limitation Schedule" in a PDF format for download. The data is also available for searching alphabetically on www.exim.gov

http://www.exim.gov/tools/country/pdf/cls_december_2009.pdf

The Ex-Im Bank will make the information available as a CSV or XML file for easier integration by the Bank's customers. The archived data will also be available for download for scholars doing research on changing financial trends.

Milestone 8. September, 2010, Status: Completed

Title: *Publish authorizations for special demographics such as women and minority owned businesses*

This information will be available on a monthly basis. Presently, the Bank publishes these numbers once a year as part of the Bank's annual report.

Milestone 9. January, 2011, Status: Completed

Title: *Publish tabulated format for FOIA report data for FY2010*

The FOIA reports are published on www.exim.gov

<http://www.exim.gov/about/disclosure/foia2009.cfm>

The FY2009 FOIA report is presently published in XML format at:

<http://www.exim.gov/about/disclosure/xml/foia2009.xml>.

The FY2010 FOIA report is now available in XML format at:

<http://www.exim.gov/about/disclosure/xml/FOIA2010.xml>.

The Ex-Im Bank will seek guidance from the Justice Department on the best format to publish the FOIA report for download.

Milestone 10. Open (subject to availability of funds)

Title: *Expanded Electronic Freedom of Information Act (e-FOIA) Room on www.exim.gov*

Ex-Im Bank currently uses commercially available software to track FOIA requests to the Bank. This software provides the capability to post FOIA requests in accessible forms on the Internet. The Bank is evaluating the suitability of this system as an e-FOIA Room on its public website. This initiative is further discussed in section b.ii. Proposed Feedback Mechanisms. The timeline for this initiative will be provided in future updates to this plan and a target date of October 2012 is established subject to availability of funds.

Milestone 11 – October, 2011, Status: Completed

Title: *Ex-Im Bank FY2011 Open Government Plan*

Update the Ex-Im Bank Open Government Plan.

Milestone 12. December 2012, Status: Under evaluation

Title: *Ex-Im Bank Social Media Environment for Partnership and Collaboration*

The Bank will:

- Establish an agency policy on what to share on social media websites.
- Training
 - Staff Training: Users are almost always the weakest link in an information system, and may inadvertently divulge sensitive information through a social network. Few effective technical security controls exist that can defend against clever social engineering attacks.
 - Provide guidance to employees to be mindful of blurring their personal and professional life. Don't establish relationships with working groups or affiliations that may reveal sensitive information about their job responsibilities.
- Privacy and Security: Address the reliance on public site policies, procedures, and security as well as a risk evaluation on discussions/data stored on these sites and ensuring that there will be no PII, business confidential, or internal information stored there.
- Records: Provide proper records management retention in accordance with the National Archives and Records Administration (NARA) record schedules, Freedom of Information Act (FOIA) requests, and e-discovery litigation holds.

Milestone 13 – December 2012, Status: Under evaluation

Title: *Export Forum for International Buyers*

The use of public forums and chat rooms will be explored to the nation increase exports by encouraging buyers to post comments and needs. The interest in such forums will be evaluated for ways to increase exports.

Milestone 14 – October, 2011 - Status: Completed

Title: *Flagship Initiative*

The Bank will analyze Freedom of Information Requests received over the past several years to identify the data the public most commonly requests access to. Programs will be developed to extract that data covering periods beginning with fiscal year 2006 and the data sets will be published in raw format on our web site as well as registered with the DATA.GOV metadata repository to increase its visibility. In addition, our FOIA officers will send an email to our most common FOIA requesters announcing the free availability of the data after the data is published.

v. Records Management

Requirements for records management serve as the foundation for Ex-Im's records management program. This includes such activities as identifying and scheduling all electronic records and ensuring the timely transfer of all permanently valuable records to the National Archives. Ex-Im is continuing the process of seeking approval from NARA for its electronic records and related schedules. Ex-Im Bank has implemented a webpage describing our compliance with these records requirements on our public website.

vi. Responding to Freedom of Information Act (FOIA) Requests

Ex-Im Bank has an excellent record of making information available to the general public via its FOIA program as defined in 12 C.F.R. § 404.1. As described in the links provided below, the Bank's FOIA program is a mature and robust program. The followings links identify the Bank's staffing, organizational structure, and process for analyzing and responding to FOIA requests:

<http://www.exim.gov/about/disclosure/foiahowto.cfm>

<http://www.exim.gov/about/disclosure/foia.cfm>

The public can submit FOIA requests online at

<https://webappsprod01.exim.gov/apps/foia/request.nsf/frmRequest?openform>

The link to the FOIA page above also provides ongoing FOIA reporting metrics for the Bank. Metrics are reported on an annual basis at the end of each fiscal year in the Bank's Annual FOIA Report. These metrics include: (a) total number of FOIA requests received, (b) number of FOIA requests approved (in full or in part) and denied; (c) number of appeals and their outcomes, and (d) request servicing time; among others. Ex-Im has annual FOIA reports located on this page (see item number 10) dating back to FY1998.

These metrics are accessible to the general public; however, the data is embedded within each annual report for each fiscal year. In the interests of increased transparency, the Bank has provided the information as one of the DATA.GOV data sets in an XML format. The Bank can improve the

accessibility of this information by re-displaying this data in a FOIA metrics page. The metrics will be tabulated by fiscal year in order to preserve the meaningfulness of the information. Significant trends in the servicing of FOIA requests by Ex-Im Bank will be discussed (see Milestone 11 in Section iv).

For improving our e-FOIA room, we are proposing the direct publication of our FOIA documents using our COTS software (this depends on availability of funds).

vii. Responding to Congressional Requests for Information

Ex-Im Bank is small agency (with less than 400 employees). The Ex-Im Bank's Office of Congressional Affairs is responsible for analyzing and responding to Congressional requests for information. This office currently consists of a total of 5 employees and has no subordinate organizational structure. Employees within the Office of Congressional Affairs use an automated system, the Case Action Tracking System (CATS), to track Congressional requests for information, internal workflows for gathering and reviewing the information, and a document management system to search and archive the responses.

viii. Declassification of Classified Information

Ex-Im Bank does not generate classified information and does not have the authority to do so. Most of the sensitive information generated or collected and stored by the Bank is business confidential,³ which is classified under the label "sensitive but unclassified". As such, there is no declassification schedule associated with all Ex-Im Bank data. Release of Ex-Im data to the public that is classified as business confidential is managed in accordance with the Bank's Freedom of Information Act (FOIA) program as defined in 12 C.F.R. § 404.1.

b. PARTICIPATION

To create more informed and effective policies, Ex-Im Bank promotes opportunities for the public to participate in the Bank's decision-making process. The Bank works closely with its business partners and is always seeking additional partners to turn export opportunities into real sales that help to maintain and create U.S. jobs and contribute to a stronger national economy. As such, we design our business offerings to support American exporter sales in the riskier overseas markets and are extremely interested in exporter feedback on these programs and offerings.

The Bank has redefined its strategic goals to target partnership, customer services and innovation:

1. Expand awareness of Ex-Im Bank services through focused business development and effective partnerships
2. Improve ease of doing business for customers
3. Create an environment that fosters high performance and innovation

³ Ex-Im Bank defines 'Business Confidential' as information that includes confidential commercial or financial information that is provided to Ex-Im Bank. This may include information in any form, documentary or otherwise, submitted by a third party to Ex-Im Bank or an agent or representative of Ex-Im Bank, that contains non-public commercial, financial or technical information, including, but not limited to, patterns, plans, compilations, program devices, formulas, designs, prototypes, methods, techniques, processes, procedures, programs or codes.

For example, this fiscal year's goal includes outreach to 500 Banks, brokers and other financial institution partners.

The Bank includes on the web site a comprehensive list of contacts by region as well as by product at <http://www.exim.gov/contact/contactus.cfm>.

The Bank provides its services with the participation of private and public partners. Regularly updated lists are available at: <http://www.exim.gov/about/partners/index.cfm>.

Lenders: Delegated Authority Lenders: Working Capital delegated authority lenders. The list is provided by state.

Insurance Brokers: The Export-Import Bank strongly encourages the use of a specialist insurance broker for exporters who are interested in export credit insurance. Brokers provide a number of valuable services to existing and prospective policyholders. Brokers receive their compensation from commissions paid by Ex-Im Bank - there is no additional charge to the customer. The Bank provides the following services to brokers on its active list:

- Assistance when applying for an insurance policy (or buyer credit limit) including review of completeness of financial and non-financial information.
- Assistance in using the new EX-IM *Online* system, that allows application, processing and other functionalities over the Internet.
- Interpretation and guidance with respect to Ex-Im Bank policies (e.g., U.S. content, maximum repayment terms), credit standards and documentation requirements.
- Assistance in reporting shipments and paying premium, in maintaining insurance-related documents, and in filing claims for losses.

City/State Partners: The City/State Partners Program brings state, county, and local non-profit economic development entities together with Ex-Im Bank in a partnership designed to expand export opportunities. City/State partners receive the following services from the Bank:

- All the essential support and resources the organization needs, including training and marketing materials at no cost.
- Highly qualified trade finance specialists to speak at their events.
- Assistance with joint marketing and outreach campaigns.
- A network of lenders, insurance brokers, and other U.S. Government export resources.
- One-on-one trade finance counseling.

U.S. Trade Agencies: Partnership with the Department of Commerce, Overseas Private Investment Corporation, Trade and Development Agency, US Trade Representative, Small Business Administration, National Women's Business Council, Department of Transportation, Department of State, and the Department of Energy.

We use metrics to judge the overall success of the Bank's programs and offerings. For example, we conduct an annual competitiveness survey to ascertain the Bank's competitiveness. The Bank's annual competitiveness survey provides an assessment of the competitiveness of the medium- and long-term export credit programs of Ex-Im Bank each year. This assessment compares Ex-Im Bank programs to those of the G-7 official export credit agencies (ECAs), the traditional competitors to Ex-Im Bank. The

report also incorporates competitiveness information on other large ECAs, when such information is available and relevant.

Finally, as an Agency of the U.S. Federal Government, we are interested in expanding public participation in our core business processes. We have developed innovative technological solutions to enhance public participation in Freedom of Information Act (FOIA) requests, and make maximum use of cross-agency platforms, including: USASpending.gov, DATA.GOV, e-Rulemaking, and FedBizOps.gov.

i. Public Access to Ex-Im Bank Participatory Processes

The Bank currently employs diversified methods for achieving public participation in the activities of the Bank.

1. Feedback Capability on www.exim.gov

The Bank provides the ability for the public to submit feedback on **every** one of its web pages. The feedback button is built and included as part of the basic template of the web pages. http://www.exim.gov/website_guidance/feedback.cfm

2. Outreach: Town-hall style meeting and training sessions

The Bank promotes its offerings and programs through public town-hall style meetings; training sessions; [outreach marketing to small businesses](#), [foreign buyers](#), [exporters](#), and [lenders](#), among others; utilization of strategic partnerships with [Federal and non-Federal organizations](#), and using the [Bank's public website](#).

3. Online FOIA Request

The Bank also employs its public website and email to address FOIA requests (using an online form on the web site) in an interactive exchange with the requesting public.

4. Surveys

The Bank conducts an annual competitiveness survey to ascertain the Bank's competitiveness. The Bank's annual competitiveness survey provides an assessment of the competitiveness of the medium- and long-term export credit programs of Ex-Im Bank each year. This assessment is based on information gathered from a number of sources, including surveys and focus groups with exporters and lenders; data from the Organization for Economic Cooperation and Development (OECD), the World Bank, the International Monetary Fund (IMF), and the World Trade Organization (WTO); and information from various ECAs and their host governments.

5. Subscription Services

The Bank provides its users with email subscription services. The customer can select from a variety of options to keep informed of Bank's updates. Subscriptions include news letter and news updates; regional and topical newsletters, and country limitation schedule changes.

6. Public Posting of Information and Reporting Mechanisms

Additionally, the Bank uses www.fedbizops.gov to announce new opportunities for contracting and purchasing of goods and services for use by the Bank in conducting its mission. The Bank has made all of its regulations available on www.Regulations.gov and we accept public comments on upcoming regulatory actions of the Bank on this website as well. While each of these mechanisms are effective and will remain so, there are newer, more innovative mechanisms available for the Bank to increase partnership and feedback.

ii. Proposed New Feedback Mechanisms

FOIAXpress

The Bank uses FOIAXpress (a commercial FOIA solution) to address the internal management needs of the Bank's FOIA program. We are investigating the capability to apply FOIAXpress as the Bank's electronic reading room for FOIA requests. This capability would leverage the existing internal capabilities of FOIAXpress by expanding its use to the general public. We will evaluate (subject to availability of funds) this use of FOIAXpress and obtain feedback from the general public regarding its usefulness prior to making a decision to deploy it on our public website on a permanent basis.

Bank moderated Blog and WIKI

The Bank is examining a variety of innovative solutions for obtaining feedback from the general public, especially the members of the public involved in the exports of American goods and services to foreign buyers. One innovative concept being explored is the creation of a restricted access by self-registration blog site to accompany the Bank's public website. The utility of such a site will be evaluated in conjunction with the result of internal discussions with our employees and with our strategic partners, among others.

The following solutions will be evaluated for obtaining the required public feedback:

- A Secure Extranet (Webex-type with self-registration followed by review and approval by the Bank's Operations office) for our customers to share lessons learned and provide feedback
- A LinkEdIn profile adds the ability to share recommendations and build networks of exporters and export related services
- YouTube videos of the Bank's overview, training sessions and conference proceedings
- Social Media. The use of social media for federal services and interactions is growing tremendously, supported by initiatives from the administration, and demands from the public. This situation presents both opportunity and risk. The decision to embrace social media technology is a risk-based decision, not a technology-based decision. It must be made based on a strong business case, supported at the appropriate level from Ex-Im Bank, considering its mission space, threats, technical capabilities, and potential benefits.
 - a. Risk: Federal Government information systems are targeted by persistent, pervasive, aggressive threats. In order to defend against rapidly evolving social media threats, the Bank will evaluate a multi-layered risk management approach, including risks to the individual, risks to the agency, and risks to the federal infrastructure.

- b. Risk Mitigation: Policies will be created to focus on user behavior, both personal and professional, and to address information confidentiality, integrity, and availability when accessing data or distributing government information. Procedures will be created and updated frequently to address rapid changes in specific technologies.

c. COLLABORATION

The Ex-Im Bank has a unique primary mission: the creation of American jobs through the promotion of exports of American goods and services to foreign buyers. To closely align our collaboration efforts with our mission, our collaboration efforts are primarily focused at the target audience that uses the services the Bank provides.

Since the National Export Initiative (NEI) was announced, the President has signed an Executive Order and formed an Export Promotion Cabinet that consists of top leaders Administration-wide. The Bank is playing a critical role in the implementation of this initiative and is taking the necessary steps to identify new markets, double our exports and level the playing field for American workers.

The Export Promotion Cabinet consists of:

- (a) the Secretary of State;
- (b) the Secretary of the Treasury;
- (c) the Secretary of Agriculture;
- (d) the Secretary of Commerce;
- (e) the Secretary of Labor;
- (f) the Director of the Office of Management and Budget;
- (g) the United States Trade Representative;
- (h) the Assistant to the President for Economic Policy;
- (i) the National Security Advisor;
- (j) the Chair of the Council of Economic Advisers;
- (k) **the President of the Export-Import Bank of the United States;**
- (l) the Administrator of the Small Business Administration;
- (m) the President of the Overseas Private Investment Corporation;
- (n) the Director of the United States Trade and Development Agency; and
- (o) the heads of other executive branch departments, agencies, and offices as the President may, from time to time, designate.

Reference <http://www.whitehouse.gov/the-press-office/executive-order-national-export-initiative>

The Bank partner with a variety of lenders and financial institutions, export insurance brokers, city/state partners, and U.S. Trade Agencies. For example, we provide an [‘Active Broker List’](#) of active insurance brokers on our public website, which is regularly updated and available to companies interested in export sales. Also, we bring state, county, and local non-profit economic development entities together in our [‘City/State Partners Program’](#), a partnership designed to expand export opportunities. We partner with a number of [U.S. Government Agencies](#) with trade mission objectives (see Section b for details).

Organization for Economic Co-operation and Development (OECD): The United States is a member of the OECD, with Ex-Im Bank participating in the activities of the Directorate for Trade and Agriculture and as a participant to the Arrangement on Export Credits. There are currently 30 full members of the OECD. The OECD is a forum of countries committed to democracy and the market economy, providing a setting to compare policy experiences, seek answers to common problems, identify good practices, and coordinate domestic and international policies. The OECD objectives are:

- To achieve the highest sustainable economic growth and employment and a rising standard of living in member countries, while maintaining financial stability, and thus to contribute to the development of the world economy;
- To contribute to sound economic expansion in member as well as nonmember countries in the process of economic development; and
- To contribute to the expansion of world trade on a multilateral, nondiscriminatory basis in accordance with international obligations.

Small Agency Council (SAC): The Bank is an active member of SAC. The SAC provides a rich environment in which to share pertinent information and documents between its Government members. The main goals of the Small Agency Council are:

- To help Federal policy oversight agencies develop management policies that affect small agencies.
- To exchange approaches for improving management and productivity in small agencies.
- To share management resources so as to strengthen the internal management practices of small agencies.

The Bank is also a major contributor to www.Export.gov and www.Business.gov portals.

Opportunities for increasing collaboration and strategic partnerships are discussed in the following sections.

i. Collaborative Technology Platforms

There are a variety of technology platforms available that are suitable for meeting the Bank's collaboration requirements. The Bank is currently using a variety of methods and tools for enhancing collaboration including the Bank's public website which provides information 'feeder' technologies; public event registration tools at Bank events such as the annual Ex-Im conference, the recently completed '8 city Exports-Live Tour', and regional outreach seminars hosted by the Bank in various U.S. cities and states; and the use of commercially-available customer relationship management (CRM) software to identify and target current and potential partners, customers, and exporters.

Building on these foundations, we are investigating a variety of innovative collaboration platforms, using both open (public) and closed (government-to-government) applications. This includes the use of social networking sites, blogging platforms, and collaboration suites. As applications for these collaborative platforms (described in Section b) to ongoing collaborative opportunities are identified and implemented, the Bank will update this plan.

The following examples illustrate a current initiative to increase government-to-government collaboration:

MAX Federal Community Portal - As described above, the Ex-Im Bank has deployed a new community website using the MAX Federal Community on the Office of Management and Budget (OMB) MAX Portal. Ex-Im is the secretariat for the Federal Government's ICRAS program which produces economic analyses on most foreign countries which are documented in country reports for each country. This site and data sets are shared by 11 Government Agencies (EOP (OMB (ICRAS Chair), NSC, and the Council of Economic Advisors); DOD (DSCA); State; OPIC; USDA; DOT; USAID; FRB; Treasury; Commerce; and Ex-Im Bank).

A lesson learned from this 'government-to-government' collaboration initiative is the leveraging of cross-agency collaboration platforms. This is a good opportunity to further the goal of increased collaboration using existing well developed and secure collaboration tools.

ii. Public Access to Ex-Im Collaboration Efforts

As a consequence of the Congressional charter under which the Bank operates, engaging the members of the public involved with the export of American goods and services to foreign buyers is of paramount importance to the successful implementation of the Bank's mission. Ex-Im Bank employs targeted outreach, marketing, and educational campaigns to a number of components within the exporting American public, including: small business, insurance brokers, lenders and other financial institutions. We are always looking for first time American businesses that have not exported before, and might not have been a customer of the Bank before and may not be aware of the scope and magnitude of the support to exports available within Ex-Im Bank. One of the performance metrics the Bank tracks is the number of first time users participating in Ex-Im Bank programs.

In the area of collaboration with small businesses, the Bank is maintaining a Web portal specifically for small businesses: "[If you're a Small-Business Exporter . . .](#)". This portal provides step-by-step assistance, including an interactive guide and Ex-Im Bank contacts for assistance.

e-mail subscriptions: The Bank continues to expand its Web-based subscription service to provide customers with the ability to get up-to-date news from the Bank. In return, we are always interested in feedback on the Bank's programs, business offerings and opportunities, and outreach activities.

Export and Business gateway portals: Ex-Im Bank is a major participant in the government-wide "[Export.gov](#)" initiative integrating the content and functions of the Web sites of several business-focused agencies and a [U.S. government exports](#) website. Export.gov provides the exporter with one stop for information and services. This portal was designed to deliver critical export information and services to small and medium-sized U.S. companies. The website has a contact page and a mechanism to send feed back – The feedback is sent to all the partners as needed.

The Partner agencies are:

International Trade Administration
Department of Energy
Export-Import Bank
Foreign Agricultural Service (FAS)

Agency for International Development (USAID)
Overseas Private Investment Corporation (OPIC)
Small Business Administration
Department of State
U.S. Trade and Development Agency (USTDA)
Office of Foreign Assets Control
United States Trade Representative

Trade Promotion Coordinating Committee (TPCC): The Bank collaborates in the Trade Promotion Coordinating Committee's (TPCC) "One Stop, One Form" registration system for all federal-government export programs. "One Stop", a web-based registration system, allows exporters to electronically apply for export-related financing from TPCC member agencies with a single user ID and password. The benefit of "One Stop" is that an exporter, after registering at Export.gov, or at the website of any participating TPCC agency, will have a user ID and password that will work at the sites of any participating TPCC agency. Importantly, exporters will not have to file the same information over and over because TPCC agencies are able to share information. "One Stop" simplifies the registration, login and data entry processes for exporters by putting the technical burden on agencies of consolidating their respective online registration processes and asking agencies to electronically share information.

Regional Office Staff Collaboration Objectives: The Regional Office network is the vital link between exporting communities located throughout the United States and Ex-Im Bank. The regional office network provides a geographic market-focused enterprise which broadens Ex-Im Bank's reach into small-size U.S. exporting companies. They also work in partnership with other agencies serving the export communities' needs in order to harness all available Federal, State and Local resources to enhance and encourage small business export activity. Some Ex-Im Bank Regional Offices are housed in the Department of Commerce US Export Assistance Centers (USEAC) sites. The regional offices staff shares trade information and prospects with its partners.

Trade Association Outreach: Trade Association Outreach is the Bank's primary liaison to industry associations to spread the word about the Bank's offerings to the small business community. It is common knowledge that small businesses, on average, make up some 80-90% of a trade association's corporate membership. The goal is to foster long-term relationships with trade associations identified as having a high quality nucleus of small business exporters.

Finally, Ex-Im Bank makes an innovative use of technology in combination with town hall style meetings to outreach and educate the members of the American public tied to the exports of American goods and services to foreign buyers. For example, the Bank recently completed an eight city 'Exports-Live' Tour in which Ex-Im executives and well-known executives of companies met in an open forum in eight major cities to educate the public on the Bank's programs and outreach to members of the public with an interest in business expansion via exports to foreign buyers. Technology was used to promote this tour of eight cities, including:

- Publicized tour events for the 8-City Exports-Live Tour and advanced registration of attendees on www.exports.gov as well as the Bank's public website, www.exim.gov.

- Extracted customer contact data from electronic mailing lists by state. This capability was used to increase outreach to the broadest range of persons with an interest in opportunities for expanded sales via exports.

The success of the 8 City Exports-Live Tour was in part due to the use of technology promoting the opportunity for the exporting public to participate in meetings, presentations, and discussions with the Bank's executives and successful exporters.

iii. Ex-Im Incentives for Collaboration Innovations

The Bank plans to incentivize employees and others to identify and implement innovative methods to increase collaboration with those in the private sector, non-profit, and academic communities. The Bank will obtain nominations for a new honor awards category called "Ex-Im Bank Open Government Initiatives" and will make it available to those who contribute to innovative methods of collaboration with the general public or targeted segments of the public.

The Bank is also planning to implement innovative collaboration forums as described in Milestone 15 "Export Forum for International Buyers".

d. FLAGSHIP INITIATIVE

i. Overview.

The lifeblood of any financial and banking institution is the business data and business intelligence tools available to that institution on which it bases sound business decision making and judgments regarding the transactions that it approves and the customers with whom it partners. The same is true for Ex-Im Bank. Recognizing the need for real-time access to data on current business trends, transactions, and customers (in the Bank's case those customers involved or potentially involved with the exports of American goods and services to foreign buyers), the Bank embarked on a program to develop a unified data warehouse with near real-time reporting and business intelligence analysis capabilities. The new Ex-Im Reporting System (ERS) has revolutionized the availability, use, accuracy of the business data, and key performance metrics on which the business decisions of the Bank are based.

The new ERS provides us with a unique opportunity to promote transparency, participation, and collaboration with the Bank's external business partners (current, as well as possible future) financial institutions involved in the financing of exported goods and services; the full range of exporters who are involved in the export trade for American goods and services; as well as the foreign buyers of these American products and services. Consequently, the goal of the Bank's Flagship Initiative is to use this tremendous data analysis capability of our new ERS to develop a set of raw data files suitable in support of the Open Government Initiative that we can publish on our web site and make available to the members of the public involved in American exports, as well as the American public in general, (within the constraints of data protections to that portion of the Bank's information, largely business confidential, which are not releasable) through DATA.GOV.

Our Flagship Initiative will represent a collaboration of staff from our Information Technology department, our Chief Financial Officer's office, our Operations and Data Quality Division, and our Office of General Counsel. This team will collaborate to review requests that have been received by

the Bank over the past several years under the Freedom of Information Act, to identify the core sets of business data that the public has expressed an interest in over the past few years and make that data available to the public in a format they can easily use.

We believe that providing access to core business data to our current and potential business partners, and the general public, will provide the public with the raw data that will help answer export-related economic questions, country risks, identify expanded markets, etc. Our Flagship Initiative will provide businesses with rich information which they can use to better determine which export markets to penetrate (by country, by sector, by potential buyers, by lender, etc.).

ii. Engaging the Public

Ex-Im Bank has a strong repository of business information which, when accessible, can be extracted and displayed in a variety of ways to make the core mission activities of the Bank transparent to the interested general public. This can be achieved in a manner that displays only public information without compromising any sensitive business confidential or proprietary commercial information of American exporters, which could adversely affect their ability to compete in global markets. Kicking off this innovation, the Bank will make available a variety of datasets, which are designed to make key portions of the Bank's information repositories available to the general public while allowing the public to reuse this data in ways not currently envisioned by the Bank. Additional datasets will be identified for publication based on reviews of which datasets are of value and for what purposes.

Feedback from the general public and American exporters in particular will be a key to successfully engaging the public in this activity. When the Flagship Initiative is deployed, a feedback link will be made available to allow users to submit comments and suggestions aimed at improving the usefulness of this tool to the public. FOIA requests will also be periodically reviewed to detect new trends in the data requested by the public. This feedback received from the public will be reviewed and evaluated by the ERS governance committee as part of their monthly application development prioritization meetings.

iii. External Partner Collaboration

Once the datasets of Ex-Im business data are available to the public on the Bank's website, we will endeavor to establish contact with members of the public and institutions to establish what use and outcomes are achieved through the general availability of these datasets. These cannot be identified in advance. Should the need arise, the Bank will seek to partner with strategically positioned organizations that are capable of using these datasets (including the use of appropriate financial partnerships, where it is deemed appropriate and meaningful). Opportunities for additional partnerships will be announced and openly addressed, where appropriate.

iv. Measuring Performance

Ex-Im Bank will track the utilization of the business information datasets that it makes available on its public website. The Bank will keep track the most active "consumers" of this information as well (to the extent that they are willing to communicate with us). From this we can establish the usage to which these data sets are put and develop metrics which summarize how this initiative improves transparency of the Bank's activities over time

We are also interested in knowing how the availability of this data indirectly enhances participation and collaboration with the Bank. As such, the Bank will look at the following measures to attempt to gauge the impact of the Flagship Initiative:

- Number of new first time exporters
- Number of new first time small businesses
- Expansion of trade in countries of interest
- Periodic surveys of our customers

v. Making ERS Sustainable and Continuous Improvement

ERS is automated information and business intelligence system that has been highly customized to support and report on the data the Bank maintains in its transaction processing and financial systems. It is viewed as a key system within the Bank and is replicated at our disaster recovery site to insure continuous availability. It is routinely maintained under the Bank's IT program and resources and funds for the contract that provides corrections and new enhancements are a standard part of the Bank's O&M budget. The Bank has an active governance oversight committee for the ERS that is continually identifying new data requirements and reports. These enhancements are currently being developed and released on a monthly basis. The ERS governance committee will incorporate public feedback related to the Flagship Initiative as part of its monthly agenda. It is important to realize that the ERS is in daily, continuous use by the Bank's internal staff in addition to its use as the source for the Open Government Flagship Initiative data sets. As such, it is expected that the system will be both sustainable and continuously enhanced to meet both the objectives of the internal as well as the public user of the data it contains.

e. PUBLIC AND AGENCY INVOLVEMENT

Ex-Im Bank has discussed the contents of this plan with its senior employees, and through the publication of the Open Government Plan with its primary business partners, exporters, and other contacts. We will continue to have open and frank discussions of the contents of this plan with those parties and with the general public, promoting visibility of the plan on the Bank's public website as well as other avenues available to the Bank, including public forums, as appropriate. The Bank treats the involvement of all interested parties as an underlying and overarching goal of the plan.