



# **EXIM Open Data Plan**

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**REVISION HISTORY**

Date	Name	Description of Change	Version
07/2025	Acting CDO	Initial Publication	1.0
04/2026	Acting CDO	Review and Administrative Updates	1.1

## **PURPOSE**

This document outlines the Export-Import Bank of the United States (EXIM) compliance with Office of Management and Budget (OMB) Memorandum M-25-05<sup>1</sup> Phase 2 Implementation of the Foundations for Evidence-Based Policymaking Act of 2018: Open Government Data Access and Management Guidance.

## **AUTHORITY**

This plan is issued under the authority of the Evidence Act of 2018<sup>2</sup> and M-25-05. It aligns with the Federal Data Strategy and other federal mandates promoting transparency, accountability, and data-driven decision-making.

## **SCOPE**

The OPEN Government Data Act aims to enhance transparency and accessibility of government data. It requires federal agencies to publish their open data information online in standardized, machine-readable formats, ensuring that metadata is included in the Data.gov Federal Data Catalog. OMB M-25-05 further defines key actions that facilitate improved governance and innovation by making data readily available and accessible to the public. This Open Data Plan outlines EXIM's goals, requirements, and activities regarding open data management and publication.

## **ABOUT EXIM**

EXIM is the official export credit agency of the United States with a mission of supporting American jobs by facilitating the export of U.S. goods and services. EXIM mitigates risk, backed by the full faith and credit of the United States, for American businesses by equipping them with the financing tools necessary to compete for global sales. In doing so, EXIM levels the playing field for U.S. goods and services going up against foreign competition in overseas markets.

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<sup>1</sup> <https://bidenwhitehouse.archives.gov/wp-content/uploads/2025/01/M-25-05-Phase-2-Implementation-of-the-Foundations-for-Evidence-Based-Policymaking-Act-of-2018-Open-Government-Data-Access-and-Management-Guidance.pdf>

<sup>2</sup> <https://www.congress.gov/bill/115th-congress/house-bill/4174/text>

## HOW YOU CAN ENGAGE

EXIM has long been committed to making data readily accessible to the public and easy to use. We invite you to explore, use, and comment on our open data offerings.

**Data.gov Participation:** Since 2018 we've published our data and metadata to [data.gov](https://data.gov), the federal government's central catalog of open datasets. You can browse our contributions there or directly at: <https://catalog.data.gov/organization/exim-gov>

### USASPENDING.GOV

EXIM's financial assistance and contract spending data is maintained and uploaded to [USAspending.gov](https://USAspending.gov).

## GOVERNANCE AND COORDINATION

As a small, independent agency, EXIM does not maintain a formal data governance board. Instead, data governance responsibilities are integrated across several existing structures and collaborative efforts.

The Chief Data Officer (CDO) participates in data governance activities and coordinates open data initiatives. The CDO is an active member of the government-wide Chief Data Officer Council and participates in interagency working groups convened by the U.S. Department of the Treasury, OMB, and other federal partners. These engagements ensure EXIM remains aligned with federal data policy, shares best practices, and contributes to cross-agency collaboration.

Internally, EXIM leverages various working groups to address data-related issues as they arise. These groups provide strategic oversight and technical input on data quality, access, and modernization priorities. While not exclusively focused on open data, they serve as key forums for coordinating data governance activities across the agency.

Key responsibilities include:

- Oversight of data inventory and cataloging
- Ensuring compliance with open data standards
- Coordinating public engagement and feedback
- Reviewing data quality and access controls

EXIM also engages in ad hoc collaboration among program offices, legal, and IT teams to address specific open government data issues. This flexible, cross-functional approach allows the agency to respond quickly to new requirements, ensure data quality, and support transparency goals.

## **DATA INVENTORY AND CATALOGING**

EXIM maintains a comprehensive data inventory that includes all public data assets. Public data assets are:

- Tagged and prioritized for release
- Published to data.gov. Each data set is regularly updated based on a predefined schedule.
- Reviewed regularly for accuracy and completeness

## **PRIVACY, SECURITY, AND RISK MANAGEMENT**

Before releasing data, EXIM assesses privacy risks, confidentiality, and any other restrictions on the data asset and applies safeguards such as de-identification or statistical techniques to protect sensitive information.

EXIM ensures:

- No personally identifiable information (PII) is released without proper de-identification
- Sensitive data is protected in accordance with National Institute of Standards and Technology (NIST) and agency-specific policies
- Data quality and integrity are maintained through automated and manual checks

## **AGENCY DATA REQUIREMENTS**

This plan follows the structure of OMB M-25-05 section 6, AGENCY DATA REQUIREMENTS: OPEN DATA PLAN.

### **Data Collection Processes for Open Formats:**

EXIM has fully implemented the “open by default” principle.

- All public data assets are: Published in machine-readable, non-proprietary formats (e.g., CSV, JSON)
- Accompanied by metadata conforming to the DCAT-US 3.0 schema and will employ any successor schema
- Released under open licenses with no restrictions on reuse

### **Data Usage Information:**

EXIM currently leverages usage metrics captured and available on the Data.gov metrics dashboard here: <https://data.gov/metrics/organization/exim-gov/index.html>

The dashboard has features valuable to users including:

- Public visibility
- Most Viewed Dataset Pages

- Most Downloaded Dataset Files
- Most Clicked Outbound Links
- Downloadable reports
- Monthly updates

### **Collaboration with Data Users:**

Public Input Matters: EXIM has a mechanism in place to collect and analyze user feedback on data assets to identify issues, areas for improvement, and opportunities for new data releases. Public input helps us prioritize and improve what we share.

EXIM is committed to transparency and accountability by ensuring agency-wide compliance with the Freedom of Information Act (FOIA). To optimize technological capabilities and enable enhanced public engagement, EXIM allows requesters to electronically submit requests, check the status, and interact with the FOIA processing staff. <https://www.exim.gov/about/foia>

Multiple EXIM offices oversee and direct outreach to EXIM's external stakeholders, including interactions with Congress, Executive Branch agencies and industry and labor groups, on EXIM issues, and coordinate on policy throughout the agency including:

- Office of Congressional and Intergovernmental Affairs
- Office of Communications
- Office of Policy Analysis and International Relations

### **Open Data Point of Contact:**

- EXIM will respond to public inquiries about quality issues, usability issues, recommendations for improvements, and complaints related to the agencies' open data within a reasonable timeframe. Individuals can suggest a dataset or give input by contacting EXIM's FOIA Office at: [FOIA@exim.gov](mailto:FOIA@exim.gov)

### **Improvement Processes:**

- EXIM is committed to continuous improvement through:
  - Periodic reviews of the open data plan and data inventory, as needed.
  - Participation in interagency working groups and the CDO Council

To the extent practical and appropriate, EXIM will incorporate input from the public regarding data asset prioritization.

### **Open Data Goal Requirements:**

EXIM leverages the resources, controls, and governance capabilities of the Office of Chief Information Officer to ensure rigor around the technology elements of the agency strategic plan, the technology Capital Planning and Investment Control (CPIC) process and various project

governance and agency SDLC policies where EXIM ensures various compliance requirements are brought to bear on agency technology.

**Prioritizing Public Data Asset Review:**

- EXIM will continue to provide data in ways that increasingly support modern analytical applications, and their reliance on automation to handle data volume, complexity, creation speed, and the consumption demands of data science, AI, and business intelligence.

**Compliance Status:**

EXIM will comply with all requirements of OMB M-25-05 and the requirements of 44 U.S.C. § 3511 when disseminating a public data asset pursuant to the Act. EXIM will periodically assess its data inventory, with the goal of improving its breadth and depth.

***Out-year plans:***

- Continue coordination with EXIM’s FOIA Office, General Counsel, Chief Information Officer, Chief Financial Officer, program staff, and other relevant Agency officials, to ensure that any public release of data assets is lawful, appropriate, and adheres to data privacy requirements.
- Periodically review established processes to ensure the Open Data Catalog conforms with the most recent Data Catalog Vocabulary Version metadata schema to improve the discoverability and interoperability of EXIM data.

## **Updating the Strategic Information Resources Management Plan.**

EXIM fulfills the requirements outlined in OMB Memorandum M-25-05 through its comprehensive Information Technology Strategic Plan. The strategic plan serves as EXIM's de facto IRM strategy, aligning technology investments and governance with agency mission objectives and statutory mandates.

- The IT Strategic Plan addresses key IRM elements including:
- Strategic Planning and Governance: Integrates IT investment management with agency-wide planning, budget formulation, and performance goals.
- Enterprise Architecture and Modernization: Guides infrastructure modernization, cloud migration, and technical debt reduction to support resilient and secure operations.
- Data and Information Management: Advances data-driven decision-making, reporting capabilities, and open data initiatives in alignment with the Evidence Act.
- Risk Management and Security: Embeds cybersecurity, privacy, and supply chain risk management throughout the system development lifecycle.
- Workforce and Capability Development: Promotes continuous learning, talent cultivation, and stakeholder engagement across the IT and data ecosystem.

Updated plans will be posted here: <https://www.exim.gov/open-government-data> as they become available.

## **CONCLUSION**

EXIM recognizes that transparency, participation, and collaboration are essential goals of the underlying law(s). EXIM's Open Data program is committed to supporting these goals.