October 2, 2015

Ms. Mary Beth Goodman
Senior Director
National Security Council
The White House
1600 Pennsylvania Avenue NW
Washington, DC 20500

Dear Ms. Goodman:

We at the Modernizing Foreign Assistance Network appreciate the open and consultative process led by the White House to gather recommendations for the third Open Government Partnership (OGP) U.S. National Action Plan. Your leadership has been instrumental in the formation and implementation of the previous two OGP National Action Plans, and we welcome the opportunity to help build on those gains with strong new commitments in the next plan.

We applaud the OGP Steering Committee, of which the U.S. is a part, for its recent adoption of the "Joint Declaration on Open Government for the Implementation of the 2030 Agenda for Sustainable Development." We strongly support the integration of the SDGs into the U.S Government OGP National Action Plan and vice versa -- leveraging the OGP plans, platform and principles for the achievement not only of Goal 16, but the entire SDG 2030 agenda.

The inclusion of commitments to improve the transparency of U.S. foreign assistance in the previous two plans has helped motivate the progress agencies have made over the past four years. However, much work remains to be done. In order to fully deliver on prior commitments, a robust new commitment to improving **data quality** and **data use** is needed.

We propose that the U.S. government make the following new commitments in the area of foreign assistance transparency.

1.   **All U.S. agencies administering foreign assistance will publish data at the activity level and on a quarterly basis, in line with the International Aid Transparency Initiative (IATI). By 2017, the data published will represent 100% of U.S. official development assistance (ODA).**

This commitment represents full implementation of the International Aid Transparency Initiative, which the U.S. joined in 2011. The 100% figure comes from the implementation schedule presented in December 2012 by the State Department and USAID on behalf of the U.S. Government.[1] Though the previous two National Action Plans called for all agencies administering foreign assistance to publish

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[1] IATI Implementation schedule. http://publishwhatyoufund.org/files/IATI-Implementation-Schedule_Final_USA.xlsx

their aid data to ForeignAssistance.gov and in line with the international standards, only some data has been published and the quality of the data is generally low.[2]

In order to meet this commitment, each U.S. agency administering foreign assistance should publish a cost management plan that assesses how the agency will collect and publish aid data, what resources the agency will need, and the source of those resources. The U.S. government's commitment to IATI will only be achieved when responsible agencies have clear plans that identify how they will collect and publish the data. Agency-specific plans should be developed by December 2016 to allow at least one year for implementation. USAID's publication of such a plan this year demonstrates that this commitment is feasible.[3]

2. **The U.S. government will encourage the use of the data it publishes by domestic and international stakeholders. It will develop capacity-building programs within U.S. agencies and with domestic and international stakeholders so the data can be accessed and used for different purposes.**

The potential of open data to have a transformative impact on development will not be realized unless the data is used. Capacity training programs should be developed in the first quarter of 2016 and should continue for the duration of the plan. During the course of the third National Action Plan, the U.S. government must build on the progress made in opening data by encouraging its uptake and use. This requires identifying and responding to demand for the data by multiple stakeholders.

The interagency team led by the State Department and USAID responsible for ForeignAssistance.gov has made some progress over the last two National Action Plans in understanding the information needs of domestic stakeholders like Congress, the academic community, and the public. Going forward, the attention to data use must expand to include more partner country perspectives.

Partner country governments have a critical need for foreign aid information. Aligning this information with country budget classifications, for example by implementing the IATI budget identifier, will help users bridge the gap between the aid and the domestic budget. It is this more complete picture that can lead to better decision making. A recent USAID study found that, despite increases in the quantity of data published, the local communities that U.S. foreign assistance serves rarely access or use the data to monitor and give feedback on the development activities of donors and their own governments.[4] To remedy this, the U.S. should implement capacity building programs within foreign assistance agencies to work with local media and civil society partners as "infomediaries" on innovative ways to effectively communicate U.S. foreign assistance information to local audiences.

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[2] 2015 U.S. Aid Transparency Review. http://roadto2015.org/wp-content/uploads/2015/06/2015-US-Aid-Transparency-Review.pdf
[3] USAID International Aid Transparency Initiative Cost Management Plan, July 2015. See https://www.usaid.gov/documents/1870/usaid-iati-cost-management-plan

[4] https://www.usaid.gov/transparency/country-pilot-assessment

We appreciate the effort and attention that will be necessary to realize these commitments, and we look forward to providing assistance and public support to help translate these commitments into outcomes during the course of the third U.S. National Action Plan.

Thank you for your consideration and your leadership in using the Open Government Partnership as a global platform to set a high standard of open and responsive government. We look forward to your response and continued dialogue.

Sincerely,

George Ingram, The Brookings Institution & MFAN Co-Chair

Diana Ohlbaum, Independent Consultant & MFAN Accountability Working Group Co-Chair

Lori Rowley, The Lugar Center & MFAN Accountability Working Group Co-Chair

Didier Trinh, MFAN Executive Director