

UNITED STATES OFFICE OF PERSONNEL MANAGEMENT



Open Government Plan Version 3.0

May 2014

a New Day for Federal Service

From the Director

I am pleased to share with you Version 3 of our Open Government Plan.

We at OPM are committed to all three pillars of open government – transparency, participation, and collaboration -- not only because it is the right thing to do, but also because doing so helps us fulfill our mission to recruit, retain, and honor a world-class 21st Century workforce to serve the American people.

One way this Open Government Plan will help us meet our mission and also make sure we continue to be a model employer is by strengthening internal collaboration. This will enable OPM employees to more effectively and efficiently respond to Federal employees, retirees, and to those people looking for a Federal Government position. We will also continue to improve our services based on user feedback, as we routinely do with USAJOBS®.

This plan aligns with two OPM initiatives: the agency's [2014-2018 Strategic Plan](#) and our [Strategic Information Technology Plan](#).

A key initiative presented in this Open Government effort, called The Flagship, is an Enterprise Information Management project that will enable us to fulfill many of the commitments in the Strategic IT Plan.

This Flagship project will work to manage our information holistically, strategically, and at the enterprise level. In concert with the Strategic IT Plan, we will take a lifecycle approach to our information and maintain a strong focus on security and privacy.

Once this project is completed, our information will be well organized without unnecessary, costly duplication; properly backed up and safeguarded; and easily searchable and retrievable by those with proper permission to access the information. We also will make sure that the information is of consistently high quality as well as sufficiently usable and valuable for analytics and decision making. Some of our programs and organizations are already close to achieving these goals. As we move forward, we will collaborate across all agency programs to make sure all of OPM meets the standards set by this plan.

Thank for you reviewing this plan and I look forward to hearing from you. Please visit [our site](#) and post your comments on [our blog](#).



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Executive Summary

We are pleased to release our third [Open Government Plan](#). We continually seek to refine the ideas we received from many of our internal and external stakeholders in 2010, 2012, and 2014. Today, our relationships with various stakeholders, including OPM employees, other agencies, and other entities with which OPM interacts are much more mature and collaborative than they were four or even two years ago. We appreciate their diverse thoughts and insights, and we deeply value the input they provide us to improve our plan through participation and engagement.

Likewise, the [Freedom of Information Act](#) (FOIA) remains a viable means for the public to obtain government information and is essential for openness. We periodically assess our processes to improve our FOIA outcomes, including reducing delays and improving the public's perception of our ability to balance the countervailing openness and privacy or confidentiality concerns that FOIA requests call into play. Processing FOIA requests requires close internal collaboration that may allow employees to both benefit from and contribute to appropriate openness at OPM. This behavior will result in more meaningful disclosures to the public as well as more thoughtful decisions about what not to disclose. Furthermore, our FOIA personnel routinely encourage program offices to proactively disclose information on [OPM.gov](#) whenever legal and appropriate.

Indeed, our websites remain central to our openness efforts. We redesigned OPM.gov in 2012 to make it more usable and relevant. The design decisions were based on analytics and the results of usability studies and focus groups. Since 2012, we have also expanded our use of social media, and we continue to refine our use of social media to reach our stakeholders and hear from them.

Building on our success in improving the website and increasing collaboration, we are excited to launch our Version 3.0 flagship initiative, Enterprise Information Management. We aligned this initiative to OPM's [Strategic Plan for 2014-2018](#) and [Strategic Information Technology Plan](#). Doing so ensures the initiative helps fulfill OPM's mission and business needs, which will enable us to be more open and responsive to the American people, to the extent appropriate. We draw from two initiatives in the Strategic IT Plan as examples of this alignment: enterprise case management and data management and warehousing.

Through the flagship, we will take a holistic, strategic, enterprise wide, lifecycle approach to managing our information. Doing so will permit us to better manage, use, reuse, and properly dispose of our records and information as scheduled. Security and privacy remain fundamental tenets of our approach, requiring, for example, role-based access to data. Enterprise information management will also support collaboration across programs and contribute to better evidence-based decision making by our program leadership. We are partnering with the National Archives and Records Administration (NARA) on this initiative to leverage its expertise and improve our service delivery.

The first step for implementing this flagship initiative is to collect information in multiple inventories (e.g., records, processes, systems, and applications), including the data inventory required by the [Open Data Policy \(M13-13\)](#). One intended result is expanded public access to OPM's information much like the

work currently being done by USAJOBS® with application programming interfaces (APIs), which provide machine-to-machine access to job announcement data that private developers of mobile or web applications can use to provide services to the public, for example, job boards that make Federal job announcements available alongside other, similar job announcements. We look forward to the implementation of the flagship, enabling better, collaboration, records management, and FOIA processing.

Introduction

The Open Government Memorandum (M10-06) of December 8, 2009, commonly known as the Open Government Directive, sets a standard for a more transparent, participatory, and collaborative government – that is, a more open government.

When we are open, we increase our own accountability and build trust with the American people by sharing information, listening about and implementing ideas, and engaging in ongoing conversations with employees and the public. The free exchange of ideas helps us learn, innovate, and grow more effective and efficient. Of course, a countervailing aspect of accountability is protecting material that it is not appropriate to share, so this policy must be carried out in accordance with other interests arising from applicable law.

This document expands on our past open government efforts as well as on our [2014-2018 Strategic Plan](#) and [Strategic Information Technology \(IT\) Plan](#). Our flagship initiative draws heavily on and supports both.

Our Commitment to Openness

We are committed to providing information that increases opportunities for the public to participate in and give feedback on the delivery and quality of our core mission activities. We are equally committed to working together – across our organizational silos and with members of the public – to improve everything from work processes to satisfaction with how OPM performs its duties. In the OPM Strategic Plan for 2014-2018, our values are clearly stated:

Service: We pledge through our oath to encourage and support those who serve the wider public or community through their work as Federal employees.

Respect: We extend consideration and appreciation to employees, customers and stakeholders fostering a fair, open and honest workplace environment. We listen to the ideas and opinions expressed by others. We treat others as we would wish to be treated.

Integrity: We uphold a standard of transparency, accountability, and reliability. We conscientiously perform our operations to promote a Federal workforce that is worthy of the public trust.

Diversity: We honor our employees and customers through inclusiveness and respect for the various perspectives and backgrounds that each brings to the workforce.

Enthusiasm: We embrace our work and the challenges of the future with excitement, energy, and optimism. We are open to the myriad possibilities of change and eagerly unite in the spirit of “yes we can.”

Excellence: We fulfill our mission by providing relevant and timely products and superior customer service that reflect our commitment to collaboration and the highest standards of quality.

Innovation: We constantly seek new ways to accomplish our work and to generate extraordinary results. We are dedicated to delivering creative and forward-looking solutions and advancing the modernization of human resources management. (p. 5)

All of these values incorporate openness.

Policy Statement

We are committed to fostering an environment that values openness, and our organizational values and Strategic Plan for 2014-2018 reflect this commitment. The Strategic Plan describes our commitment to excellence, which incorporates openness throughout the course of our day-to-day commitment to serve the American people:

The Office of Personnel Management exists to support and strengthen the Federal workforce. As such, we strive to be a model of employee engagement, diversity and inclusion, and workforce development so that all our people feel connected to our mission and responsibly empowered to serve our stakeholders. At OPM, we encourage open, honest and direct dialogue between and among supervisors and employees – genuine, respectful dialogue that values diversity of thought to enable creativity and innovation. We expect supervisors and their teams to be mutually accountable for providing world-class customer service and consistently excellent results. Above all, we are committed to building trust in OPM by listening to those we serve, collaborating with our colleagues, utilizing our collective expertise, and analyzing our results so we may continuously improve. Only by working together in this way can we truly recruit, retain, and honor a world-class workforce to serve the American people. (p. 5)

Public and Agency Ideas

This plan reflects input from senior policy and technology leadership through senior leadership's representation on our Open Government Core Team and our document vetting process. Extensive employee input and engagement also informed this plan in the form of input from members of the Core Team themselves, including one representing the union; our Labor-Management Transformation Forum (LMTF); and our agency-wide Project Management Community of Practice (PM CoP). We achieved public and interagency engagement through our open government blog and other social media outlets, meeting with civil society groups, conversations with the National Archives and Records Administration (NARA) regarding records management, and ideas from the Big Data CoP that we lead and which comprises academicians, civil society representatives, and employees of both OPM and other Federal agencies.

Extensive employee and public engagement will be part of our periodic review and modification of the plan in the form of continued engagement with the Core Team, LMTF, and civil society groups, as well as

engagement on our blog and other social media outlets. We will respond to feedback on a regular basis, again via the blog and also through our Frequently Asked Questions (FAQs) engine, the mechanism we use to receive input regarding our open data efforts.

Flagship Initiative: Enterprise Information Management

Information is one of our most valuable assets. We will therefore manage our information holistically (both electronic and analog information, whether it is structured or unstructured), strategically, and at the enterprise (agency) level. We will take a lifecycle approach and maintain a strong focus on security and privacy. In a nutshell, we envision an end state in which (1) we fully meet all of our policy and legal obligations easily even as these evolve and (2) our information is well organized without unnecessary, costly duplication; properly backed up and safeguarded; easily searchable and retrievable by those with proper permission to access the information; of consistently high quality; and highly usable and valuable for analytics and decision making.

This flagship initiative will support our Strategic Plan, especially goals three (“serve as the thought leader in research and data-driven decision making”), four (“manage information technology systems efficiently and effectively”), and seven (“ensure that Federal retirees receive timely, appropriate, transparent, seamless, and accurate retirement benefits”). It will also rely on or help build a foundation for several enabling and enterprise initiatives in our Strategic IT Plan, among them platform consolidation, data management and warehousing, data analytics, and electronic recordkeeping.

This flagship supports many of our programs and offices, including Federal Investigative Services (FIS) and Retirement Services (RS), both of which have identified a need for enterprise case management. Business process management and case management tools are also an initiative in our Strategic IT Plan.

While this flagship depends on OPM's technical expertise and capabilities, our approach entails (1) a focus on clear, frequent, substantial communication; (2) a culture of collaboration that fosters knowledge sharing, including the use of shared technologies, and (3) partnerships with internal and external stakeholders, all in an atmosphere in which data-driven decision making is valued.

This initiative addresses transparency by making information more available, searchable, discoverable, usable, and, most importantly, re-usable for internal and external stakeholders, to the extent consistent with legal requirements and appropriate. It also aids Freedom of Information Act and Privacy Act (FOIA/PA) processing. By better organizing our information, we will be better positioned to release information, subject to the Privacy Act and other relevant laws and regulations, especially structured data, for meaningful use by all stakeholders. By releasing structured data, and application programming interfaces (APIs), we will foster participation by external developers and individuals who use the tools the developers create, both inside and outside OPM. The initiative addresses collaboration through the ways mentioned below under “engaging others” and by making information easier to share and re-use with authorized individuals, which will allow employees to work better together, across offices and from different locations, make well informed decisions, and provide high quality services.

Benefits

Taking this approach will have many benefits, including:

- Helping us take advantage of synergies across areas such as data management, content management, and knowledge management;
- Facilitating the management of information in cost-effective, rational ways that allow for (1) the identification and reuse of information in legally permissible ways and (2) keeping our information current and, therefore, more trustworthy and useful;
- Helping us safeguard the privacy or confidentiality of the people or entities with respect to which we collect data, including, for example, applicants for Federal positions, members of the Federal workforce, the families of Federal employees, citizens whose data is submitted to the Healthcare Data Warehouse (HCDW), and contractors submitting proposals in response to a request for proposals. Keeping this information within secure boundaries will help safeguard the sensitive information we collect from the public;
- Reducing duplication through collaboration, thereby (1) reducing repetitive requests to other agencies for information, (2) leading to cost savings on servers and related services, and (3) providing reliable information for analysis and decision making;
- Making it easier for our employees to do their jobs efficiently by making high quality information easily available and usable so they can work more effectively;
- Providing opportunities to make more and better self-service options available to our stakeholders, particularly retirees;
- Positioning us to make full use of our data, including through evidence-based, data-driven analysis and decision making;
- Assisting us in complying with Federal policy mandates and laws, including the Open Data Policy, Digital Government Strategy, Managing Government Records Directive, FOIA, PA, and DATA Act;
- Making it easier to share information, as appropriate, in response to FOIA and PA requests and to respond to discovery during litigation;
- Facilitating the Office of the Chief Information Officer's (OCIO's) ability to serve as a provider of services that impact agency mission outcomes, and not just a provider of technology; and
- Fostering a culture of openness, trust, and engagement within OPM.

Three Phases: Plan, Implement, Assess

In phase 1 (plan), we will complete a variety of interrelated inventories, many of which are underway and some of which require only updating: inventories of our data, records, processes, hardware, software, and other information and IT assets. We will continue to maintain these inventories throughout all of the phases. For example, the Open Data Policy requires that we inventory our data by November 30, 2014. Nonetheless, we understand that inventorying is an ongoing process; if we were to stop after completing an inventory, it would quickly grow out of date. Instead, each inventory is a living

document that we will use to build and maintain an understanding throughout OPM of the assets we have.

With the inventories in hand, we will complete a gap analysis to identify the differences between our current state and our desired end state and how to bridge these gaps. This gap analysis will determine our exact actions in phase 2 (implement).

Nonetheless, because we are aware of our needs and industry best practices, it is already possible to describe the general contours of the implementation phase. Indeed, the planning stage will overlap with the implementation stage slightly, in that the very act of inventorying and categorizing our information and IT assets is an act of organizing and beginning to standardize information, both of which are critical components of information management.

We already know we will need to train our leadership and staff so they understand the “big picture” of information management, better organize the information they collect and use, create well-formed documents that can be easily parsed by machines, and otherwise manage information as an asset. We will leverage our consolidated platform to organize our information, store it in appropriate, safe locations (not, for example, many times on the hard drives of each of the individuals working on a project, but rather once in a secure central location and backed up off-site), and dispose of records responsibly and on schedule. Our employees and their knowledge are among our greatest assets; we will also facilitate their exchange of ideas through easy-to-use collaboration tools, especially regarding how we can best manage our information. All of this will lighten the burden on our servers (or cloud storage) while making records more easily accessible to those who have the permission to access them, reducing loss of information, and making it easier to comply with the law (including safeguarding information and systems) and records schedules, which require us not only to keep records for a certain amount of time, but also to destroy them at an appropriate juncture.

Finally, as required by the Open Data Policy, we will continue to maintain our Enterprise Data Inventory and Public Data Listing (available in a machine-readable format at <http://www.opm.gov/data.json> or in a more human-friendly format at <http://catalog.data.gov/organization/opm-gov>) and identify information eligible for release to the public. Enterprise wide information management will make this identification and release process less burdensome, more collaborative, and more transparent to OPM’s data stewards, their leadership, OGC, FOIA/PA personnel, and members of our IT governance structure, all of whom play a role in safeguarding privacy while increasing transparency by making informed decisions about the release of information. Releasing more information, especially non-attributable structured data in open formats, will foster a broader conversation with the public by allowing third parties to conduct their own analyses and even create their own applications using our data.

In phase 3 (assess), we will revisit our gap analysis to determine what has changed and whether we have successfully filled the gaps. We will then conduct any needed additional planning and implementation and repeat as necessary, with the goal of reaching a state of ongoing maintenance. Assessment is not a one-time activity; rather, ongoing monitoring of the flagship's progress against our goals will be

necessary so we can make small adjustments when they become necessary, rather than larger, more costly adjustments later.

Engaging Others

We will continue to reach out periodically to our civil society and academic partners with whom we forged relationships during our earlier open government efforts. Since those days, we have also founded a Big Data CoP that meets monthly; our engagement with members of that community has deepened over the years.

We are engaging our internal stakeholders, including our union partners, as well as other agencies. For that, we rely on our open government network, as well as our technology governance structure. For example, we are partnering with NARA regarding records management.

Measuring Improved Transparency, Participation, and Collaboration

While assessment is the final phase described above, measurement must be an ongoing activity as we iteratively and frequently make corrections to keep ourselves on course.

To measure transparency, we will track the number of items (assets) in each of our inventories, which should initially rise but in some cases may eventually fall as we reduce redundancies. Changes in inventories will indicate that we are progressing in the planning phase, which is essential for an effective implementation phase. Once we have begun implementation, we will continue to maintain our inventories and will track our information release activities, the structuring of data for both internal and external use, downloads of data we share, use of our APIs, and other technical information that will indicate whether our information is more available, as appropriate, and people inside and outside OPM are finding and using our information. We will also conduct more usability testing on new and existing systems and websites, within the confines of the Paperwork Reduction Act (PRA).

Data downloads, API use, the creation of applications or websites by developers, and public discussions of our data will be indicators of participation.

We will measure collaboration by analyzing the use of information across organizations within OPM on our shared platform.

Sustainability and Continued Improvement

As mentioned above, we linked this initiative to our Strategic Information IT Plan and overall Strategic Plan to ensure it aligns with our priorities. In fact, much of what we describe here is foundational for Strategic IT Plan initiatives. That plan includes agile IT as an enabling initiative. To foster continued improvement, we will take an agile, iterative approach to enterprise information management.

Initiatives Introduced in OPM's Strategic IT Plan

Again, this Open Government Plan draws heavily on and supports our recently released Strategic IT Plan. All of the initiatives in the Strategic IT Plan have some connection to the Open Government Plan. Indeed, our Open Government Plan is best understood in the context of our Strategic IT Plan, and we encourage

you to read both. Below are just two examples of initiatives described in OPM's Strategic IT Plan that support transparency and collaboration.

Enterprise Case Management

As we noted in our Strategic IT Plan, Retirement Services is in particular need of a new case management tool. However, many other offices would also benefit from case and business process management tools. Such tools would, among other advantages, help us track and report on cases at a more granular level than we currently can, make it easier for offices across OPM to collaborate on workflows such as the document review process, and enable our agency to save on licensing fees.

In fact, FIS and RS, in partnership with our Chief Technology Officer (CTO), has begun work toward enterprise case management.

By the end of this calendar year, we will finish documenting needs for case management and business process management tools throughout OPM and conduct an evaluation of available solutions to meet those needs. The solution we choose will provide case management capabilities throughout OPM and, depending on our market research and resources, either incorporate business process management or be deployed in such a way as to easily enable future interoperability with a business process management tool. We will begin implementation in 2015.

Improved case and business process management will make our work more transparent to and benefit our stakeholders, including retirees and our own employees. For example, greater understanding of other offices' processes will make it easier for employees who interact with those offices to understand and do what is expected of them.

Data Management and Warehousing

In our Strategic IT Plan, we also committed to revitalizing our data management and warehousing efforts:

We will leverage economies of scale by coordinating our work on each of these data warehouses and reusing technologies and controls where possible. A robust data management and warehousing architecture will allow us to eliminate redundant data and better associate data to meet business information needs. As a result, we will be positioned to collect information from other agencies more efficiently and avoid redundant requests for information from agencies. Our architecture will include robust security controls to enable strict information security access and protections. (p. 23)

We will complete the planning phase in September 2014 and then begin replacing aged infrastructure, relocating a data center, consolidating databases, and creating a more data-centric environment. These changes will facilitate our open data work of (1) maintaining a data inventory and (2) releasing data responsibly and in a timely manner.

Other New and Expanded Initiatives

Open Data

Data Inventory

Our Data Governance Board is responsible for overseeing the processes of inventorying and releasing data. To begin the systematic inventorying of data assets, our Chief Operating Officer (COO) and CIO sent memoranda to all Associate Directors (ADs) and Heads of Office (OHs) requesting, first, metadata for three data assets from each AD or OH and data dictionaries and, later, full inventories from their organizations. When those requests yielded insufficient results, we began using lists of known systems, information on OPM's website, and our organizational chart to target offices. Collaborating through subsequent one-on-one sessions is steadily yielding results. In the process of inventorying the data, we identify data assets and individual datasets that are not yet publicly available and discuss the possibility and appropriateness of release with the program office's representative, along with tentative timelines for those data assets that can be released, in part or in whole.

Publicly Available Information

[FedScope](#), launched in 2000, allows users to access and analyze the most popular data elements from OPM's Enterprise Human Resources Integration-Statistical Data Mart (EHRI-SDM). It provides access to data about Federal employees, their positions (for example, occupation and salary level), and where they work (both the agency and the location). Visitors to the site use FedScope's interface or download raw data from OPM's [data page](#). Also available on that data page are a variety of retirement and Combined Federal Campaign (CFC) data sets.

Federal pay tables are very popular and are found on our [Salaries & Wages](#) pages. Tables from recent years are in machine-readable formats, and we are working to make additional tables machine readable.

USAJOBS®, the Federal Government's official one-stop source for Federal jobs and employment information, is leading the way in creating APIs at OPM. The [USAJOBS® API](#) (application programming interface) provides a data feed of all Public Job Opportunity Announcements (JOA). When a company reaches to USAJOBS® for data, we point them to the API. We have communicated with a number of innovative private sector entities that are using the API, including a major technology company, a business that connects veterans with jobs, a leading online job board, and a university. We also provided an overview of the API to USAJOBS®' Agency User Group and our USAJOBS® Integration Services community, which comprises the Talent Acquisition System (TAS) vendors, and we pointed people to the API at a January 2014 Data Jam co-hosted by the Office of Science and Technology Policy (OSTP) at the Office of Management and Budget (OMB) and OPM.

In an effort to improve the USAJOBS® API and make it even more useful to the public, we recently participated in a user experience session at which three developers provided constructive feedback about the API. USAJOBS® is now working on a short term plan and long term strategy to improve the API and supporting documentation as a result of the session. Included in the long term strategy will be the

transformation of documentation into plain language so a greater audience can take advantage of this data.

We have also developed three APIs for the Washington, DC operating status: current status, status types, and status history back to January 1, 1995.

Our USAJOBS® and operating status APIs provide opportunities for software developers to create new services. As noted above, some entities are already using the USAJOBS® API to improve their services.

Social media is a direct line to our audiences, particularly those that want to engage. Through our social media platforms, we are able to share public information about our activities, mission, and goals. There, information is updated to better fit the context of social media communication and shared in a way that is digestible for the general public.

Responsiveness and Accountability

We consistently work to interact with our audiences, including Federal employees, retirees, and the general public. Through increased use of social media, we aim to encourage interaction and engagement with our audiences, thereby improving our responsiveness. However, each social media platform differs in its uses, response levels, and methods of engagement. We will consistently work to enhance our interaction with stakeholders in a way that is beneficial to the agency through a variety of social media platforms that are appropriate to OPM's mission.

Additionally, we participate in the eRulemaking Advisory Board, which shapes agency-wide policies on eRulemaking. The eRulemaking Advisory Board recently oversaw the release of the Federal Document Management System (FDMS) 4.0. This new version of the FDMS allows agency users to collect, sort, and publish comments with greater speed and efficiency than ever before. We also make our proposed regulations available on [regulations.gov](https://www.regulations.gov), which allows the public to provide comments quickly and easily via the site's web portal. We respond to these comments in the final published rule.

Goal 3 of our Strategic Plan is to “serve as the thought leader in research and data-driven human resource management and policy decision making.” Accompanying this goal are two initiatives in our Strategic IT Plan: the enterprise initiative around data warehousing and management mentioned above and an enabling initiative around data analytics. We have begun to take a corporate approach to data management, and we are working to collect, manage, and use data for better policy making. These efforts enhance OPM's accountability by providing new ways to look at our performance. They also further our core mission (“recruit, retain, and honor a world-class workforce to serve the American people”) by supporting evidence-based decisions about human resources.

Proactive Disclosure

We follow the Department of Justice's (DOJ's) guidance in providing information that can be segregated and can be proactively disclosed. We look to go beyond the standard DOJ “Rule of Three” guidance for placing requests on the agency's website where there have been requests for the same information. Requests are open to disclosure if it is determined that the subject matter would be of interest to the public — and can be released without violating applicable law (e.g., the Privacy Act) or waiving an

applicable privilege — even if only one request has been received. A plan has been put into motion in which the Chief FOIA Officer in conjunction with the FOIA Team and the program offices will review FOIA requests to determine opportunities for proactive disclosures. The Chief FOIA Officer will work with the program offices and OGC to ensure that such releases are appropriate and compatible with the Privacy Act, the Trade Secrets Act, regulations governing examination material, and other relevant law, including the need to protect privileged material in order to protect processes that need to remain confidential.

We routinely send notices to program offices reminding them of the need to proactively disclose data and records, where appropriate. The Chief FOIA Officer, in conjunction with the OPM FOIA Processing team, systematically reviews OPM records for potential posting on OPM.gov. The FOIA points of contact (POCs) are asked to encourage their program offices to find opportunities to proactively post information on their websites, with the caveat that they must consider whether such material is prohibited from disclosure or subject to an applicable privilege. (It is understood that applicable privileges may not be waived without the advance approval of the General Counsel.) Our internal training as well as agency-wide training recently provided by DOJ also strongly encouraged OPM to make more proactive disclosures, whenever possible.

With improved, enterprise-wide information management, searching for documents, including those we disclose proactively, will become easier. Such information management, along with the practices discussed in the Open Data section above, will also make it easier to identify information to disclose proactively while safeguarding information that cannot be disclosed and potentially reducing the need for people to submit FOIA requests to OPM.

Privacy

We are required to submit the following privacy compliance reports:

- **Senior Agency Official for Privacy (SAOP) Reports** to the Department of Homeland Security (DHS) via the Cyberscope application on OMB MAX, a website used by Federal agencies to collaborate and report on their activities. For fiscal year (FY) 2014,¹ OMB cancelled all previously required quarterly SAOP Federal Information Security Management Act (FISMA) reports; only the annual report is required for FY14. This report provides information on the following agency privacy activities: information security systems, Privacy Impact Assessments (PIAs) and System of Records Notices (SORNs), SAOP responsibilities; privacy training; PIA and Web privacy policies and processes; conduct of mandated reviews; written privacy complaints; policy compliance reviews; SAOP advice and guidance; and agency use of Web management and customization technologies.
- **Annual Privacy Act Report** to Congress. This report is required by Section 522(a) of the Consolidated Appropriations Act of 2005, which includes the following requirement: “Privacy Officer— Each agency shall have a Chief Privacy Officer to assume primary responsibility for privacy and data protection policy, including” ...“(6) preparing a report to Congress on an annual

¹ Fiscal years run from October 1 through September, so FY 2014 began in October 2013.

basis on activities of the Department that affect privacy, including complaints of privacy violations, implementation of section 552a of title 5, 11 United States Code, internal controls, and other relevant matters.”

- **Biennial Computer Matching Activity Report** to OMB. This report is required by OMB Circular A-130, Appendix I, Section 4.b, which requires agencies to submit to OMB a Biennial Computer Matching Report on their current computer matching agreements and activities.

Whistleblower Protection

OPM is currently not certified under the Office of Special Counsel’s (OSC’s) certification program. We plan to ensure that the following actions are in place in 2014, which will qualify us for OSC certification:

1. Place informational posters at agency facilities;
2. Provide information about Prohibited Personnel Practices (PPPs) and the Whistleblower Protection Act (WPA) to new employees as part of the orientation process;
3. Provide information to current employees about PPPs and the WPA;
4. Train supervisors on PPPs and the WPA; and
5. Create a link from the OPM’s website to OSC’s site.

Websites

Our Digital Strategy page can be found at <http://www.opm.gov/digitalstrategy>. There you will find our Digital Government Strategy report and a link to our [public data listing](#).

Our agency website, OPM.gov, was designed with the help of usability testing and focus groups. We constructed the site based on the results of these meetings and on analytics. We implemented a content management system (CMS) that allows us to maintain a consistent look and feel. The site is also 508 compliant, which not only makes the site accessible, but increases usability across multiple platforms. We also implemented code that we can use to dynamically update a particular page to improve the page for sighted users as well as inform visually impaired users that an update was made to the page.

Websites are, by their nature, always works in progress. We:

- Use analytic tools to evaluate user behavior and gather empirical evidence about the usage of the site;
- Routinely assess feedback provided by the public through the feedback survey on each page of the website;
- Collect analytics to identify how effectively users maneuver through the website and make adjustments as appropriate;
- Evaluate how we are doing by addressing feedback from users’ experiences through emails; and
- Collaborate with internal and external Web and Social Media forums on user experience.

Adjustments to the website are made based on the results of these activities. Furthermore, when we approach new functionality or significant re-design of existing functionality, we perform focus groups and take feedback into consideration.

We provide users with multiple navigation paths: they can drill down to multiple levels of content from any page with persistent navigation, use the search box, or use the site structure listed on the footer of every page. This gives the site the flexibility to accommodate various types of users. Users also have in-page notifications through a breadcrumb system. Finally, we ensure relevant content is available to users on every page by providing links to related information.

Examples of commonly sought-after information include federal salaries and wages (pay tables), DC area operating status, federal holidays, Federal Employee Health Benefits (FEHB) information, and retirement information. For the operating status, we developed an application with push notifications and accompanying APIs.

OPM.gov is undergoing a variety of efforts to make the site more informative, effective, and engaging to the public. For example, we are evaluating a responsive design that will make the site more accessible across multiple platforms. To improve search results, we are evaluating our internal search engine as well as implementing metadata within our CMS to comply with search engine optimization (SEO) best practices. Our outreach efforts include increasing our social media presence, better integrating social media into our tools, and exploring the possibility of providing operating status to the Federal Executive Board (FEB) offices outside the DC area.

To be more accessible to the public, we already:

- Have integrated social media with our site and actively use a variety of social media tools to amplify our messaging to the public;
- Post webcasts, short videos, and photos on popular publicly available social media platforms;
- Have provided online a variety of data sources that include our most frequently requested data such as General Schedule (GS) levels, salary calculators, and federal holiday calendars;
- Have developed a USAJOBS® application and the API mentioned above under "open data"; and
- Make substantial changes to the FEHB portion of our website and embark on a social media campaign to help users choose the right plans for them, leading up to and during open season for the FEHB.

Outside of OPM.gov, USAJOBS® uses agile development to make frequent improvements. We are also revamping [Telework.gov](https://telework.gov) to assist employees in gaining more information about teleworking and hosting training modules with completion certificates that employees can submit to their supervisors.

Ongoing Initiatives

OPM leadership not only values transparency, but is also working to realign resources and streamline functions in the CIO's office to reduce unnecessary redundancies. This will allow us to make better use of scarce resources and provide more responsive service to stakeholders, including other OPM units, other agencies, and individual Federal jobseekers, employees, and annuitants. It will also help us build greater transparency into the CIO's activities and create culture change. For the flagship, we are inventorying our business processes throughout the agency. This project will also provide greater transparency for employees into other units' operations.

Information Dissemination

We are constantly looking for ways to improve our websites as well as other ways to disseminate information using techniques such as proactive disclosure. Our FOIA websites, both internal and [external](#), were recently updated to better reflect our FOIA program's goals and mission and in keeping with the need to provide as much information to the public as possible. We will follow DOJ's guidance and policy updates and revise our sites as needed to meet new requirements.

Government-wide Transparency Initiatives

We participate in a range of Federal transparency initiatives:

Our public data listing, located at <http://www.opm.gov/data.json>, was among the first to be automatically harvested by [Data.gov](#), so it remains up-to-date and accurate. Data.gov provides a user-friendly interface to the information contained in the harvested file.

eRulemaking: as noted above, we participate in the eRulemaking Advisory Board and use FDMS 4.0, which allows agency users to collect, sort, and publish comments with greater speed and efficiency than ever before, and we make our proposed regulations available on [regulations.gov](#).

Through the [IT Dashboard](#), Federal agencies and the public can view details of Federal IT investments online and track their progress over time. The IT Dashboard display shows the health of all the agency's active major investments based on data received from the agency through its Exhibit 53 and Exhibit 300 reports. This is a requirement of the agency's IT Capital Planning and Investment Control (CPIC) activities, per OMB Circular A-11, "Preparation, Submission, and Execution of the Budget." The data is updated frequently for each investment.

The IT Dashboard provides transparency on the performance and spending of IT investments across the Federal Government. If a project is over budget or behind schedule, the details are visible on the IT Dashboard. The IT Dashboard gives the public access to the same tools and analysis that the government uses to oversee the performance of the Federal IT investments. The transparency and analysis features of the IT Dashboard make it harder for underperforming projects to go unnoticed and easier for the government to focus required action.

We participate in the IT Dashboard by providing the IT investment data along with the evaluations from the agency CIO, who is responsible for the IT investment.

In May 2010, we developed a Data Quality Plan to support the Open Government Directive. Our Data Quality Plan includes two sections: Implementation of the Data Quality Framework and the Federal spending data segments. OPM's Federal spending data segments address the following OMB initiatives: (1) SAM.gov and (2) USASpending.gov, which incorporates acquisition data from the Federal Procurement Data System – Next Generation (FPDS-NG) and the Federal Funding Accountability and Transparency Act (FFATA) Subaward Reporting System (FSRS).

In November 2012, we transitioned to the System for Award Management (SAM or sam.gov), which consolidated the capabilities of the Central Contractor Registration (CCR), Online Representations and Certifications Application (ORCA), Federal Agency Registration (FedReg), and the Excluded Parties List System (EPLS) and is used by OPM as a source for vendor and Federal agency data and information. On a daily basis, OPM's financial systems interface with SAM.gov to update vendor and Federal agency data with the most current information possible.

In February 2014, we developed an approach to validate USASpending.gov prime Federal award financial data and began reporting the results of a monthly comparison of these awards between FPDS-NG (which feeds USASpending.gov) and OPM's core financial system. Since reporting, OPM has found zero discrepancies between our Consolidated Business Information System (CBIS) and USASpending.gov.

The Catalog of Federal Domestic Assistance, cfda.gov, contains program descriptions of Federal assistance programs. We report on six programs: Federal Civil Service Employment, Federal Employment Assistance for Veterans, Pathways (employment) Programs for students and recent graduates, Federal Employment for Individuals with Disabilities, Intergovernmental Personnel Act (IPA) Mobility Program, and Presidential Management Fellows Program.

We do not participate in recovery.gov because we do not receive funds under the American Recovery and Reinvestment Act of 2009 (ARRA). Similarly, grants.gov does not apply to OPM.

Public Notice

In accordance with the Federal Register notification process, we notify Federal agencies, employees, managers, and other stakeholders each time new proposed, interim, and final regulations are available for public comment. The notice briefly explains the changes and tells stakeholders where the full text is available for review and comment. The notice may also provide a Web link for easy access to the documents.

In addition to the Federal Register and OPM.gov, we use social media to inform the public of any relevant agency activities, news, or updates. We also utilize the [Director's Blog](#) for agency-wide or government-wide announcements or issues of interest. Additionally, the [Open Government blog](#) can be utilized for technology and data related discussion and announcements. These announcements could include a new initiative, an updated report, a new regulation, or a training session available to the public. Whenever we make these announcements through social media, we try to make sure they are communicated in appropriate language and the proper context for that platform and audience.

Records Management

The primary laws regarding records management are 44 U.S.C. chapter 31 (the Federal Records Act) and 44 U.S.C. chapter 33 (Disposal of Records), but these are only two parts of a wider universe of pertinent laws, regulations, and guidance. We are actively working to maintain, improve, or achieve compliance with each pertinent records management requirement.

Our Records Management group is reviewing records management practices throughout the agency. We are:

- Completing an internal, agency-wide records inventory to identify all records, paper and electronic, both those that have been assigned an appropriate amount of time after which they will be destroyed or given to the National Archives and Records Administration (NARA) (i.e., those that have been *scheduled*) and those that are as yet unscheduled. With this inventory in hand, we will create an effective file plan and records maintenance and disposition procedures for the agency to follow regarding all Federal records;
- Creating a workable system for retaining records and storing inactive records in accordance with our internal policies and legal requirements at all organizational levels within OPM;
- Developing a systematic method for disposition and destruction of outdated records in accordance with the OPM and NARA retention and disposition schedules;
- Establishing guidelines for selecting and identifying archival records, that is, those that should be maintained permanently;
- Providing training to all OPM personnel, both at Headquarters and in field offices, in records management procedures and responsibilities;
- Providing guidance to all OPM personnel for the periodic disposition of records that are not in use (inactive records) and non-records in the office work areas;
- Planning a communications forum for disseminating records management information to all OPM personnel on records management issues and policies; and
- Establishing a program for the periodic evaluation of all aspects of our records management program.

We are working to identify all the ways in which OPM is and is not responding to records management requirements at all of our locations. Our current records management system consists of a decentralized set of processes, procedures, and practices, making this a lengthy process. The following table reflects our research to date:

Table 1: Records Management Requirements

Citation	Requirement	Compliant?	Notes
44 U.S.C. 3101	Management Support of RM Program	Yes	Renewed commitment in 2009
36 C.F.R. Chapt. 12	Staffing	In process	Reviewing schedules as part of RM Handbook update
44 U.S.C. 3302 44 U.S.C. 3302	Records Inventory	Yes	Completed in FY 2010
44 U.S.C. 3302 44 U.S.C. 3302	Records Schedules	Under review	Reviewing schedules as part of RM Handbook update
36 C.F.R. 1222	Maintenance	Unknown	Status and condition of records is being addressed as part of the Records Inventory
44 U.S.C. 3303	Disposition	No	Identifying records that have passed their retention during Records Inventory

The above information, including the table, can also be found on our [Records Management Compliance webpage](#).

In April 2012, we submitted a response to the November 2011 presidential memorandum on Managing Government Records, and we have met all deadlines for the subsequent Managing Government Records Directive that have since passed. This includes appointing a senior agency official, completing NARA records management training, establishing internal records management training, identifying permanent records older than 30 years to be transferred, and identifying unscheduled records held at Federal Records Centers. We are in the process of identifying technology solutions to allow OPM to meet goals 1.1 and 1.2, managing permanent records and email records electronically.

Freedom of Information Act (FOIA)

Reaching the correct decision, under applicable law, about the appropriateness of disclosure and providing requesters with courteous and timely responses are the central goals of the FOIA Processing Service Team (see our [Open Government page](#) on our FOIA site for information on staffing). Timeliness, responsiveness, and openness are essential for effectively communicating with internal and external stakeholders. We have two hotlines that allow customers the opportunity to seek assistance and status updates on FOIA requests. Honesty and communication with our customers help alleviate misunderstandings and potential appeals or lawsuits. Real-time responses are more acceptable than

standardized, generic status updates to our customers, and such transparency further helps to promote a positive outcome and a strong working relationship based upon trust.

Presumption of Openness

Our FOIA Team promotes transparency and openness on all aspects of the review and redacting process, encouraging program offices to segregate as much information as possible. Each reviewer of responsive records is aware of the need to review each record for potential disclosures and seek out discretionary disclosures, if the disclosure of such information would not cause foreseeable harm, and is not protected by applicable privacy or confidentiality laws or other exemptions. Meetings have been held prior to the review process to discuss potential areas for disclosure on a case-by-case basis. Additionally, our FOIA Council will educate our FOIA Points of Contact (POCs) on and promote the importance of openness, especially transparency, to the extent possible, given OPM's other mandates, which include, among other things, the need to protect the privacy interests of individuals about whom we maintain records, the need to protect trade secrets, and the need to protect the confidentiality of certain processes (e.g., examining and investigations) in order for those processes to be effective.

For our Annual FOIA Report, we are required by DOJ to report data to substantiate proactive and discretionary disclosures made during the year. We must also provide narratives that further substantiate activities and actions within OPM promoting openness and transparency throughout the agency. The Chief FOIA Officer's report summarizes and lists examples of openness and disclosures. To meet these needs, our FOIA tracking system was revised to allow for data collection on proactive and discretionary disclosures. Our reports can be found in the [Reports section](#) of our FOIA website.

Our FOIA Process

To ensure the OPM [FOIA process](#) operates efficiently, effectively, and openly, the Chief FOIA Officer, in conjunction with the OPM FOIA Processing team, conducts assessments and makes revisions to the standard operating procedures and other internal procedures. Periodic assessments are done on every aspect of the FOIA process, including disseminating referral and consultation requests, closing out FOIA requests, eliminating redundancy and refining search parameters, reducing non-responsive records, making more timely responses to requesters, and providing status updates. These revisions, as implemented throughout OPM, reduce delays and improve customer service. The OPM FOIA processing team also conducts assessments to revise the process whenever an issue that has a negative impact on the referral and consultation process arises.

We recently revised our FOIA standard operating procedures for a more efficient flow in processing requests. The revised process includes procedures for (1) clarifying a request, which helps identify the proper program office or Federal agency for the referral or consultation; (2) contacting the proposed program office or Federal agency to ensure it will accept the referral or consultation; and (3) following up with either a telephone call or an email to make sure the referral or consultation was received to reduce any delay.

After someone submits a FOIA request, our personnel enter the request into our tracking system. The initial stage of entering a request includes analyzing the request to make sure it clearly states what

records are requested, the time frame for the search, and whether those records are produced or maintained as legitimate records within OPM's mission and functions. This may entail a telephone call or email to the requester to seek clarification as to the records sought or any other information that would help in identifying the data sought. For the last 18 months, this practice has reduced delays in processing requests, increased assignment of requests to the proper program offices, reduced the need for time extensions, and reduced the potential for appeals that are due to delays caused by assignment to incorrect offices.

We coordinate FOIA requests with the proper program offices and agencies. The process entails contacting program offices to see if a time extension is needed. A time extension can be granted due to the complexity of the request, the need to retrieve records from the National Archives or OPM's archived records, the existence of a backlog that is being reduced, or the need to review voluminous records from a variety of sources. Proper FOIA coordination requires follow up with the subject matter expert or FOIA POC to make sure that the request is processed in a timely fashion, so as to meet the due date required by the Attorney General's FOIA guidelines. If OPM is not responsible for producing or maintaining the requested materials, the request is referred to the responsive agency and the requester is given notice as to where the records can be located.

In keeping with the Attorney General's guidelines for the use of technology to facilitate the processing of requests, we conducted a self-assessment regarding what applications could be used to help in responding to FOIA requests in a timely manner. The analyses showed that the purchase and use of redacting software would greatly reduce the manpower needed to manually review and redact responsive records. The use of redacting software would also reduce office supply costs and the use of paper in keeping with the PRA. We are also reviewing a variety of case management systems designed to electronically store records and allow for the retrieval of responsive records, greatly reducing the present labor intensive process. The present FOIA tracking system is updated in keeping with the Department of Justice's data prerequisites for the Annual, Chief FOIA Officer, and Quarterly Reports.

Backlog of Requests

Our FOIA requests increased approximately 18% (1,669) from FY 2012 (9,519) to FY 2013 (11,188). The FOIA Service Processing Center Team promotes the reduction of backlogged requests by sending out status reports to the FOIA POCs to provide notice to middle management and staff of the pressing need for timeliness. A status report is also provided bi-weekly to senior management to provide notification of the outstanding backlogged requests that remain in their programs and to obtain a higher level of support for timely response to FOIA requests and backlog reduction within their organizations. Backlog reduction is promoted at the OPM FOIA Council meetings and notices are sent out starting in May, with monthly, then bi-monthly notices until September, when weekly notices are sent to the program offices encouraging them to close out backlogged requests. These efforts have demonstrated major reductions in the backlog even as we have experienced an increase in requests.

Congressional Requests

Within OPM, Congressional, Legislative, and Intergovernmental Affairs (CLIA) is the focal point for all congressional, legislative, and intergovernmental activities. CLIA educates, responds to, interacts with,

and advises Congress and State, local, and tribal officials on programs and policies administered by OPM. CLIA also counsels and advises the Director and other OPM officials on congressional, State, local, and tribal matters.

CLIA is organized into four subgroups that have unique roles and areas of responsibility:

- **Congressional Relations (CR):** CR serves as the principal liaison with Congressional Committees, individual Members of Congress, and as the agency's congressional and legislative liaison with the White House and OMB. Working with CLIA's subgroups and OPM program offices, CR designs and implements legislative strategies that support OPM's legislative agenda. While CR takes the lead, it staffs congressional hearings, meetings, and briefings with other CLIA and program office staff.
- **Legislative Analysis (LA):** LA coordinates the development of OPM's annual legislative agenda, including drafting and clearance of legislative proposals. Working with OPM program offices, LA prepares Congressional testimony and letters to OMB or to Congress conveying OPM's views on pending and proposed legislation. Through OMB, LA reviews legislative documents and testimony from other departments and agencies to ensure that OPM's positions are accurately and appropriately represented. LA also provides technical assistance in drafting legislation to other agencies, Members of Congress, and Congressional committees.
- **Constituent Services (CS):** CS provides services to Members of Congress and active and retired federal employees with questions about retirement, health care, and other OPM programs and policies. CS responds to constituent and federal employee inquiries in a timely, professional, and, when related to private personal information, confidential manner. CS monitors inquiries and develops educational and outreach activities.
- **Intergovernmental Affairs (IA):** IA serves as OPM's principal interface with State, local, and tribal governments. IA develops and maintains relationships with these governments and monitors State legislation and regulations for their impact on OPM programs and policies. IA also ensures that OPM meets requirements for tribal consultation, including maintaining and updating the OPM tribal consultation plan and serving as OPM's designated tribal consultation official.

The public-facing CLIA Web site is located at: <http://www.opm.gov/about-us/our-people-organization/congressional-legislative-intergovernmental-affairs/>.

Declassification

At OPM, we do not have authority to classify or declassify national security information. Classified information in the Agency's possession will be declassified upon proper notification and authorization from the original classification authority. A [list of original classification authorities](#) can be found on the White House Web site. To meet the requirements of the Open Government Directive, we have posted a [statement regarding our lack of classification authority](#) on our website.

Participation

Several of our offices routinely hold meetings with their stakeholders. For example, Healthcare and Insurance holds conferences with healthcare carriers, and Retirement Services meets with the National Active and Retired Federal Employees Association (NARFE).

[Regulations.gov](https://www.regulations.gov) promotes public participation by giving the public an easy way to comment on our proposals. This is particularly important given the third goal of our Strategic Plan, “serve as the thought leader in research and data-driven decision making”: what we learn from the public shapes our evidence-based policy making.

We currently engage with the public through our social media platforms. Updates are often made through the Director’s blog. More consistent use of current mechanisms, including the Open Government blog for data and other related announcements, can improve engagement. Another avenue for reaching the public is the civil society groups with which we engage. They have brought us the concerns of the people they represent and will continue to do so. Additionally, training and awareness of best practices, especially those that have been shown to work in government, will improve the quality of content, and we are considering additional tools for improving engagement and customer service.

Collaboration

Through the National Aeronautics and Space Administration’s (NASA’s) [Center of Excellence for Collaborative Innovation](#) (CoECI), we contracted with a private company that provides solutions by running challenges. Through these challenges, that company is developing a modernized replacement for OPM’s Service Credit² application. They broke the project into a series of competitions for analysis, design, development, and testing and provided prizes to the analysts, designers, and developers with the best solution for each competition. The project consisted of two phases. Phase I was to analyze and learn from the current Service Credit application, including tasks such as decomposing the code and studying documentation. Phase II was to design and build the new Service Credit application. A team of OPM experts and a team of technical experts from the private company evaluated the submissions. This was our first foray into the world of challenges or incentive prizes. We will evaluate the outcomes of this experiment before determining how to move forward with similar projects.

We are collaboratively prototyping case management solutions in RS and FIS, and another example of our collaboration is the industry days we host to openly and within the confines of the law discuss best practices with private sector innovators.

² Service Credit is a retirement program mandated by law that provides government employees an opportunity to make payments into the Civil Service Retirement System (CSRS) or Federal Employee Retirement System (FERS) for periods of service during which they either did not contribute to the Retirement Trust Fund and Disability Fund, or for which they received a refund of their retirement contributions. An employee may participate in the Service Credit program to ensure receipt of the maximum retirement benefits to which he or she is entitled. Eligible employees may pay a deposit into the Retirement Fund to cover any creditable Federal civilian service that was not subject to retirement deductions, or they may make a redeposit to cover any period of Federal service for which a refund of retirement contributions was received.

Additionally, in our Strategic Information Technology Plan, we committed to providing collaboration tools to OPM employees to, among other purposes:

- Support efforts to strengthen collaboration between program offices, making data management, and therefore data analytics, easier to achieve;
- Make work processes seamless for employees, reducing barriers to collaboration and increasing productivity, for example, among personnel who process retirement claims; and
- Enable us to better fulfill business requirements.

We have piloted three collaboration tools and will make a selection soon. To accompany the rollout of these tools, we will review and update relevant policies.

Collaboration across OPM and with our external stakeholders is at the heart of our open government efforts. As discussed above, we have engaged with other agencies, academia, and civil society through our Big Data CoP and conversations specifically around our openness efforts, including this plan. These relationships have grown stronger over the years, and we will continue to cultivate them. We are also collaborating with NARA on the flagship and looking into the possibility of collaborating with additional agencies to increase transparency, participation, and collaboration at OPM and throughout the Federal government.

Appendix A: Version 2 Initiatives

Table 2: Status of Version 2 Initiatives

Initiative	Status	Notes
Enhance OPM's Performance Management Culture	Ongoing	Introduced GEAR (Goals-Engagement-Accountability-Results)
Establish Communities of Practice (CoPs) and other Networks for Innovation	Ongoing	Big Data CoP, Project Management CoP, Diversity and Inclusion CoP, several Employee Resource Groups and affinity groups
Centralize Call Centers and Help Desks (Flagship)	Partially completed	Consolidated our most outward-facing programs at our in Macon, GA location
Enable Widespread and Uniform Use of Social Media	Ongoing	Released Social Media Policy ; hired a Social Media Director, who is formulating new goals
Proactively Disclose Information via OPM.gov	Ongoing	Developed a strategy; FOIA personnel frequently remind program offices of this expectation

Appendix B: Contributors

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