

2016 Open Government Plan



MILLENNIUM
CHALLENGE CORPORATION

UNITED STATES OF AMERICA

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Introduction

This document sets forth the Millennium Challenge Corporation’s (MCC) 2016 plan for promoting transparency, participation, and collaboration in all aspects of its work to reduce poverty through economic growth. MCC’s Open Government Plan (OGP) has been developed in accordance with the Open Government Plan memorandum issued by the Executive Office of the President, Office of Science and Technology Policy, on July 14, 2016.

MCC has advanced its mission—to reduce poverty through investments promoting economic growth in developing countries with sound policy environments—by signing large-scale grant agreements called Millennium Challenge Compacts with 27 countries totaling approximately \$11.7 billion since its creation in 2004. MCC also has signed threshold programs with 24 countries, which are smaller grants focused on policy reform with countries that do not yet qualify for compact funding. MCC-funded projects produce sustainable and quantifiable results that improve the lives of the poor in practical and meaningful ways.

Since its inception, MCC has been at the forefront of making foreign assistance transparent and open. MCC provides the public with data and insights on MCC’s decision-making, program management, and policy assessments through posting criteria for country selection, economic analysis, and project evaluation information on its public website; participation in the U.S. Government’s Foreign Assistance Dashboard; public events; press interactions; and participation in the United States’ global development initiatives, as well as those of the global development community, to the extent consistent with the MCC model.

MCC’s 2016 OGP provides an update on efforts, accomplishments, and lessons learned since the prior plans. MCC has made progress on the two Flagship Initiatives identified in MCC’s 2014 Open Government Plan:

1. **Enhanced online presence:** In 2014 MCC launched a redesigned website, with content reorganized in a user-tested menu structure and optimized for viewing on mobile devices. MCC continues to assess the best way to present and visualize data on the website for the best user experience possible. MCC will more vigorously measure traffic to the redesigned MCC website and will regularly assess metrics on the variety of data and other written products. The monitoring and assessment plan calls for measuring not only the number of visits to the site, but also the time spent on each page or product. Over a period of time, this will allow MCC to focus its content development and adjust its outreach on other digital platforms, such as Twitter, e-newsletters and email campaigns, in order to drive more traffic to the website and increase information that is provided to first-time and repeat visitors.
2. **Greater Transparency of Millennium Challenge Accounts (MCAs):** Prior to the implementation of an MCC compact program, the host government designates an accountable entity (called an MCA) that is responsible for implementing the compact projects. While MCC has always set high standards for transparency in our partnerships with MCAs, MCC has aimed to more systematically analyze the results of these efforts and to identify opportunities, leveraging the systems and applications being introduced to MCAs, to further facilitate MCA efforts to share information and

data with the public in the countries where MCC invests. MCC piloted a management information system (MIS) for the MCAs to provide a more efficient tool to manage their core data and business processes. MCC completed this with three MCAs (Zambia, Malawi and Indonesia), has facilitated training and set up of two additional MCAs (Ghana and El Salvador), and plans to continue to implement the MIS in new countries this year (Morocco, Benin, Liberia, Niger). An independent review of the program is underway, with development of a more comprehensive strategy for supporting IT capacity in MCAs expected by September 2017.

New and Expanded Initiatives

Open Data

MCC is committed to publicly sharing data generated in the design, implementation, and evaluation of its grant investments to achieve the following important goals:

- **Transparency:** To enable any stakeholder, researcher, or agency to understand the source data and analysis behind MCC evaluations for replicating, or challenging, reported results.
- **Policy-relevant research for the public good:** Public access to data from MCC-financed projects can stimulate a wide range of policy relevant research, maximizing both the use of this valuable data and the benefits of MCC's investments in large-scale data collection efforts in developing countries:
- **Innovation:** MCC data alone or combined with data from other sources can also be accessed by the tech community and as part of data challenges, innovative data analytics, visualizations and other tools to inform more effective development strategies, policies and programs.

Visitors to MCC's website can access [criteria for country selection](#), as well as [scorecards](#) explaining candidate countries' performance on these criteria. For all compact programs, the website also features five-year budgets, [cost-benefit analyses](#), [projected outcomes](#), program [monitoring and evaluation](#) data, and results of [independent evaluations](#). MCC is also transparent about the way it does business, with [guidance documents](#) and all [upcoming and awarded procurements](#) available online.

To comply with the May 9, 2013, Executive Order on Open Data, and the resulting Open Data Policy Memorandum (M-13-13), MCC continues to develop an "enterprise data inventory" of all data resources across the agency for release of data in open, machine readable formats on the www.mcc.gov/data website.

To date, the MCC Departments of Policy and Evaluation (DPE) and Administration and Finance (A&F) have abided by a Memorandum of Understanding (MOU) for a data transfer and verification process that includes data quality assurance, notification of source system changes that affect the data, approval of data definitions, disclaimers and visualizations, form authorizations of data and values to be released, and automation of data transfer, generation and publication, in support of MCC's open data website. Data approved for release include indicator tracking tables, selection indicators, financial, and key performance indicators. MCC's internal Disclosure Review Board, Chaired by MCC Vice President DPE, clears the survey data associated with independent evaluations for public release.

Processes to identify data assets and to establish specific timelines for online publication in open data formats are under review and will continue to reflect changes as part of MCC's robust implementation of the Executive Order on Open Data. Changes in business, data and technical contacts are communicated to authorizing parties.

MCC is publishing data and using information resources to increase agency accountability and responsiveness and to improve public knowledge about MCC. To further MCC's mission, create economic opportunity and respond to feedback received through public consultation, MCC collaborates regularly with various stakeholders in many venues to develop strategies for effective international development, international aid transparency, evaluation and private sector engagement and investment.

Furthermore, and context of an innovative interagency partnership with the President's Emergency Plan for Aids Relief (PEPFAR), a program that is being referred to [Data Collaboratives for Local Impact](#) (DCLI), MCC has also been promoting greater country-partner attention to and use of open data. More recently through our threshold program with countries like Kosovo, MCC is exploring options to contribute to further our partner countries' own open data programs to drive greater efficiency, transparency and accountability for results.

Proactive Disclosures

MCC shares a wealth of data and information to allow the public to understand not only how we invest taxpayer dollars, but also how the agency makes decisions. On a quarterly basis – and in open, accessible and machine readable formats – MCC posts complete financial and program performance information. MCC's monitoring and evaluation data, independent evaluations, economic analysis and country selection information is available on our website. We also publish all procurement information to the public. As we review all the data and information produced at MCC, we continually identify new sources that could be made available to the public and add to the content available.

In 2014, MCC also developed a Policy on Access to Information and Materials, which provides internal guidance to MCC staff on how to effectively disclose information.

Privacy

Per Office of Management and Budget (OMB) guidance and in accordance with Federal Information Security Management Act (FISMA), MCC provides the Senior Agency Official for Privacy (SAOP) report to the Department of Homeland Security (DHS), Cyberscope.

The following reports are not applicable to MCC and are not scheduled to be provided as part of MCC's 2016 Open Government Plan:

- a. The Federal Agency Data Mining Report, described in [42 U.S. Code § 2000ee-3 – Federal agency data mining reporting](#), requires federal agencies to report on their data mining activities relating to criminal or terrorist activities. MCC does not data mine on these activities; and

- b. MCC does not have a system of records and does not have a system that would meet the criteria for the [Biennial computer matching activity report](#).

Whistleblower Protection

MCC participates in the Office of Special Counsel’s (OSC) 2302(c) Certification Program to ensure that MCC meets its statutory obligation to inform our workforce about the rights and remedies available to them under the Whistleblower Protection Enhancement Act of 2012 (WPEA) and related civil service laws. MCC was certified in January 2015 and the certification expires in January 2018. To achieve certification,

- MCC has posted informational posters on “Prohibited Personnel Practices” (PPPs), “Whistleblowing,” “Whistleblower Retaliation”, and “The Hatch Act and Federal Employees” in a common area on every floor of the agency offices in Washington, DC and on MCC’s internal website available to all US and overseas-based employees;
- New employees receive information about PPPs and the WPEA in their new employee orientation packets;
- All MCC employees received updated written materials via email in May 2014. This information is also available on MCC’s internal website; and
- Users can link from MCC’s [No FEAR Act](#) page to OSC’s website.

MCC currently offers Refresher Supervisory Skills Training twice a year. However, only managers who have not received training within 3 years are required to attend. MCC is considering other training options, such as inviting MCC’s WPEA Ombudsman or an OSC attorney to speak, in order satisfy the final requirement of the 2302(c) Certification.

Websites

MCC is committed to the transparency promoted through government initiatives, like:

- Open Government, including this Open Government Plan, www.mcc.gov/open;
- Digital Strategy, www.mcc.gov/digitalstrategy; and
- Open Data, data.mcc.gov.

MCC continues its long-term, flagship effort to make content and data on our website easy to find, understand and use. In doing so, MCC continuously assesses ways to improve the site’s usability through improvements to navigation and content organization, including a major website redesign that optimized the site for easier use on mobile devices.

Additionally, more and more MCC reports continue to be published in HTML format to make for a better experience regardless of device used. Those reports include:

- Signed compact agreements,
- Information on program-related procurement and investment opportunities,

- Informational publications such as annual reports, and
- Reports to Congress.

Additionally, MCC maintains a comprehensive approach to Information Resource Management (IRM). MCC's internal IT Investment Review Board provides executive decision-making on and oversight of MCC information technology investment planning and management.

MCC is developing a knowledge management strategy and action plan. MCC's five-year strategic plan, [NEXT](#), adopted in February 2017, identified the need to invest in effective and user-friendly systems for capturing, sharing, and deploying the extensive knowledge and learning we have collectively accumulated at MCC. In FY 2017, MCC will assess the key institutional needs and knowledge assets, then prioritize potential opportunities and develop an action plan for enhanced knowledge management; we expect this to include developing the critical human processes, cultural and behavioral changes, and technology systems.

Open Innovation Methods

As discussed in the section on Open Data, MCC is committed to publicly sharing data generated in the design, implementation, and evaluation of its grant investments.

On the MCC Evaluation Data Catalog, MCC has published data packages associated with more than 55 studies. All evaluation data and associated documentation is available on the MCC Evaluation Catalog.

MCC has hosted two Open Data Challenges. Using publicly available data on the MCC Evaluation Catalog, MCC challenged undergraduate, masters, and PhD students to find creative ways to use this data. As the next generation of practitioners, researchers, and policy makers, these students' thoughts and expertise on topics that matter can help inform MCC, and other development stakeholders, on what works and what doesn't in development. MCC looks for submissions that provide analysis in any of the following categories:

- Analysis that supports or challenges assumptions made in ex-ante economic rate of return estimates (all ERRs are available on the MCC public website [here](#));
- Analysis that supports or challenges results of independent evaluations (all final evaluation reports are published on the MCC Evaluation Catalog);
- Deeper dive analysis beyond the analysis presented in independent evaluator reports; and
- Policy relevant analysis, particularly on topics related to MCC priorities, such as gender and poverty-related analysis.

As part of the DCLI program (see "Open Data Section") MCC and PEPFAR are supporting grant competitions to address specific needs and priorities related to HIV/AIDs, gender equality and economic growth data. Specifically, the [Data for Local Impact Innovation Challenge](#) involves periodic competitions to engage, network and support local innovators and youth in using data to solve problems. In addition, under the DCLI program, the [Tanzania data lab](#) supports publishing of data sets on its open data portal, provides data analytics, data visualization and storytelling training – and organizes events such as

mapathons to create valuable mapping data layers accessible by the public.

Open Source Software

MCC's Office of the Chief Information Officer is currently considering how to implement Federal Source Code policy.

Spending Information

MCC submitted a Digital Accountability and Transparency (DATA) Act implementation plan to OMB as part of our FY 2017 budget submission. MCC is in the process of implementing the DATA Act requirements, which will allow MCC to validate their data across the agency and provide assurance that the data is accurate. The DATA Act provides validation between MCC's financial system (Oracle) and procurement system (CCMS) for obligations and disbursements. Once validated at MCC, and certified by the Senior Accountability Officer (SAO), this data will then be published to USASpending.gov and will be available for the public. This certification will be done quarterly. Beginning in May 2017, MCC will be required to provide additional financial information to USASpending.gov. MCC is currently working to create and test the files with the Treasury Broker. We use the International Business Center (IBC) as our financial service provider so we rely on IBC for the technical work. MCC validates the data and ensures we are complying with OMB/Treasury requirements.

Ongoing Initiatives

Participation in Transparency Initiatives

In support of the Digital Accountability and Transparency Act (DATA ACT), Public Law 113-101, MCC participates in USASpending.gov. MCC reports in near-real time all contract data by transaction via the Federal Procurement Data System (FPDS). FPDS data feeds into and is reflected in USASpending.gov. MCC has an agency profile in SAM.gov which is used in accordance with the FAR to do pre-award verification on all of our awardees except for credit-card purchases under \$3,500.00. MCC also posts grant opportunities on Grants.gov.

MCC does not participate in Recovery.gov, which was targeted for agency reporting on stimulus money. MCC did not receive any such funds. MCC does not participate in the Catalog of Federal Domestic Assistance (CFDA) located at CFDA.gov, as our programs are internationally focused rather than domestic assistance focused. The Government Accountability Office (GAO) required MCC to post compact spending in USASpending.gov, which requires a CFDA entry. However, CFDA applies to domestic assistance as opposed to foreign assistance, as MCC has pointed out to the General Services Administration (GSA) and OMB. MCC does not participate in FSRS.gov and MCC is not a rulemaking agency, however we will explore using eRulemaking to the extent we publish in the Federal Register. MCC expects to increase participation in data.gov to include publication of additional data sets.

MCC has also been a leading agency in reporting to the Foreign Assistance Dashboard www.foreignassistance.gov and was the first USG agency to submit data in XML format. MCC has developed a standard, sustainable business process for production of the data submitted to the Dashboard which ensures continuous improvements to the quality, quantity and automation of data submitted each quarter.

Public Notice

MCC has a strong public engagement and information strategy that is carried out through monthly, quarterly and annual events with the general public and stakeholders, and social media engagement. These events include digital activities such as Twitter chats and Facebook Live feeds. MCC's Facebook page continues to grow, having attracted more than 19,000 likes through the first quarter of FY 2017. The agency's Twitter account, @MCCgov, has amassed well over 17,000 followers and has boosted engagement (retweets, shares, and likes) with increased use of photos and videos in almost all posts, more clearly communicating the work of the agency to the digital audience and increasing understanding and interaction with key stakeholders. MCC has also expanded its Twitter presence to a second account, @MCC_Data, which focuses communication to audiences interested in aspects of MCC's work related to data led by Department of Policy and Evaluation and on the Department Compact Operations. On average, MCC's Twitter activity reaches over 300,000 people around the world per month, and has increased collaboration and information sharing with other USG and non-USG entities such as USAID, the State Department, and various NGOs with missions similar to MCC. This increased commitment to digital communication has also enabled MCC to be more responsive to inquiries and information requests through Twitter replies and Facebook comments in a transparent and open manner.

In keeping up with increasing digital channels of communication, MCC has launched a [Medium account](#) to reach new stakeholders on that platform. This allows for not only new, but also deeper engagement with external stakeholders, given the longer format of the account. Over the next several years, MCC will continue to stay apprised of new digital channels and engage in these platforms as they prove to be an effective way to communicate the work and operations of the agency and engage with the public.

MCC also conducts email outreach campaigns with a compilation of MCC activities, announcements and significant actions. Public town hall meetings, which are carried out four times a year following each of MCC's scheduled Board of Directors meetings, draw an average audience of more than 100 people. To reach a diverse and growing audience using media platforms, the town halls take a variety of forms, including twitter chats and live web-based forums, as well as in-person events. MCC participates about six times a year in public and industry-sponsored exhibits relevant to MCC's mission to distribute informational material and enhance awareness of the agency.

MCC also uses tools like media advisories, press releases and our blog to share agency news, make announcements, feature our work, and highlight events. Photos, videos and other digital content often accompany these materials for greater impact. To help tell our story and the stories of MCC beneficiaries, the agency works with targeted media outlets to share information via articles, interviews, op-eds and podcasts.

Records Management

MCC continues to demonstrate compliance with federal records management statutes and regulations. MCC has designated the Managing Director, Administrative Services as the Record Management Senior Agency Official (SAO) tasked with overseeing MCC's Records Information Management (RIM) program and electronic records requirements. To date, MCC has met all mandatory reporting requirements, including completing the National Archives and Records Administration (NARA) annual records management self-assessment (RMSA) and submitting the SAO's annual report describing MCC's plan to meet electronic records and cloud computing requirements. Because MCC was established 13 years ago in 2004, MCC did not have permanent records that had been in existence for more than 30 years to transfer and report to NARA by December 31, 2013. In 2011, NARA approved MCC's comprehensive records retention and disposition schedule wherein MCC identified its permanent records, which the agency first began transferring to NARA in 2015. Finally, in MCC's Fiscal Year 2014 strategic plan, the agency identified and trained records liaisons known as Division Records Managers (DRM) and added classroom RIM training for all new employees. MCC completed NARA's 6-part federal records management certification process in 2006.

In order to better inform and communicate MCC's RIM program and best practices, the MCC records program provides RIM policies and procedures and goals and objectives on MCC's public website. To address more recent records management requirements, including the November 28, 2011, Memorandum on Managing Government Records and the accompanying August 24, 2012, Managing Government Records Directive (M-12-18), MCC will also provide program records retention schedules, and records management contact information in conjunction with [the National Archives and Records Administration \(NARA\)](#).

MCC also improved records management guidance for compact and threshold program-related recordkeeping, including a document retention schedule for MCAs for the retention of their own compact-related records. This will assist MCAs with structuring their own records and information policies and will improve accessibility to compact records, particularly after the compact program is completed.

MCC's Office of the Chief Information Officer developed a designated SharePoint site to store all MCC electronic records and emails. Implementation phase on training all individuals is projected for mid-year 2017. All new MCC employees are trained on MCC's records management program during the required onboarding orientation. MCC continues to improve our records management program every year. As of 2016, MCC is compliant and ahead of schedule in implementing an electronic records system for approved federal records at MCC.

Freedom of Information Act (FOIA) Requests

MCC prides itself on the transparency of its programs. Not only are details of all of our compacts and threshold programs provided on our public website, but we also include the core program documentation and the results of those programs as they progress. MCC pursues a policy of proactive disclosure to ensure

information is generally accessible to the public without the need to submit a FOIA request.

MCC responds promptly to all FOIA requests and closed Fiscal Years 2014, 2015, and 2016 with no backlog of requests or administrative appeals.

Due to the small number of FOIA requests received by MCC (less than 30 requests per fiscal year), the agency has a small FOIA Office in which each member has been trained on the President's FOIA memorandum and the Attorney General's FOIA Guidelines in order to ensure a presumption of openness. MCC's Office of General Counsel (OGC) manages the agency's FOIA program. An OGC attorney acts as the Chief FOIA Officer and a second attorney serves as the FOIA Appeal Authority. An administrative staff member provides support.

FOIA requests can be sent to MCC's Deputy Chief FOIA Officer at: Millennium Challenge Corporation Attn: Deputy Chief FOIA Officer Udvaldo Lopez, 1099 Fourteenth Street N.W., Suite 700, Washington, DC 20005-3550 or electronically via email to foia@mcc.gov. Upon receipt and review of a FOIA request, staff in MCC's Office of General Counsel prepares the agency response by gathering information and input from other MCC departments. MCC's Chief FOIA Officer reviews and approves all responses prior to their release. MCC's average number of days to process non-expedited requests is fewer than the twenty business day statutory response requirement.

MCC's FOIA webpage (www.mcc.gov/resources/foia) includes links for all FOIA reporting, including information on how to submit a FOIA request and electronic access to the Annual FOIA Report in HTML and XML, the Chief FOIA Officer Report, the Department of Justice's (DOJ) FOIA Act Guide, and an "electronic reading room" where the public can access certain previously released documents. Because MCC is required by law to withhold the release of certain information related to government contracts, including bid and business proprietary information, some documents or parts of documents cannot be released to the public. MCC's electronic reading room currently includes policies, procurement guideline documents, and selection criteria and methodology reports. MCC is working on establishing a Pay.gov account to collect FOIA Fees.

Congressional Requests

Congressional requests for information, briefings or meetings are handled by MCC's Department of Congressional and Public Affairs, which is MCC's primary liaison with Congress. The Congressional Affairs (CA) team is responsible for development of MCC's congressional priorities and strategy, as well as keeping MCC senior staff and key internal and stakeholders informed of congressional developments. The CA team coordinates the preparation and dissemination of existing informational material or writes material in response to specific requests from lawmakers, their staff and committee staff; prepares required documentation of MCC activities such as congressional notifications; prepares testimony, Congressional Budget Justifications and responses to questions for the record; prepares and handles correspondence to and from MCC officials and Congress; maintains relationships with members of Congress and staff and committee staff; schedules and attends congressional meetings along with appropriate MCC officials or staff; and ensures congressionally focused materials are posted to MCC.gov.

(www.mcc.gov/resources/congressional-budget-justifications)

Declassification

MCC approved a declassification program in 2011. The public can learn about MCC's program and how to access declassified materials at www.mcc.gov/resources/foia/declassification.

Public Participation

The public is given opportunities to participate by utilizing feedback forms available on MCC's public website. For example, individuals may submit a Request for Correction if he or she believes that MCC has disseminated information that does not comply with OMB Information Quality Guidelines and he or she is directly affected by this information. In addition, quarterly town hall meetings are open to the public; as noted above, to reach a diverse and growing audience using media platforms, these town halls take a variety of forms, including twitter chats and live web-based forums, in addition to in-person events; MCC receives feedback through Twitter, Facebook, phone and email messages. Opportunities for public participation will be refreshed in the continuing redesign of MCC.gov with enhanced feedback tools throughout the website's pages and platforms. MCC staff also regularly take part in public events at which they engage in discussions through question and answer periods.

Collaboration

MCC actively pursues collaboration with donors, academics, non-governmental organizations (NGOs), philanthropies and other institutions that share the agency's values or have an interest in observing, analyzing and contributing to MCC's activities. The agency has rich working relationships with its partner countries and encourages full collaboration with civil society, political, business and other stakeholders in the implementation of MCC compact and threshold programs.

It is standard practice at MCC to consult with internal and external stakeholders on changes to policies and procedures that would constitute a significant change in the way the agency makes decisions and pursues its mission. MCC also works with country partners to ensure broad consultation and input to the analysis of constraints to economic growth that is carried out in each country to select investments that promise the greatest impact.

In addition to collaboration with outside entities, MCC is focused on enhancing collaboration among the MCAs. MCC is building an online platform to allow MCAs to conduct discussions and share knowledge in core MCC process and business areas. Different subject areas were introduced to MCAs on a rolling basis beginning in the summer of 2014.

Public and Agency Ideas

MCC is committed to considering and responding to public feedback. Our open government website has

space for public comment, and MCC will respond to all comments and inquiries within two weeks.