

Independent Reporting Mechanism

Results Report:
United States 2022-2024

Open
Government
Partnership



Independent
Reporting
Mechanism

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Editorial Note

The IRM produced this report in 2025. It assesses the level of completion and early results of the fifth U.S. Open Government National Action Plan, which was officially implemented between December 2022 and December 2024. It also examines compliance with OGP standards throughout the action plan cycle and highlights how changes occurred, including the enablers and constraints that influenced the implementation of open government reforms.

The action plan was co-created in 2022 during President Biden’s administration and submitted in December of that year. The Biden White House managed the co-creation process and oversaw implementation until September 2023. From that point until the plan concluded, the newly established U.S. Open Government Secretariat within the General Services Administration (GSA) assumed oversight.

The 2024 U.S. presidential election resulted in a change of administration, with President Donald Trump sworn in January 2025. In March 2025, 11 U.S. civil society organizations submitted a letter of concern to the OGP Support Unit under OGP’s Response Policy. After reviewing the submissions, the Support Unit determined that they met the eligibility criteria to trigger a Response Policy inquiry. At the time of writing this report (October 2025), the inquiry remains open.

Executive Summary

The federal government of the United States developed its fifth open government national action plan (2022–2024) with limited civil society involvement. During implementation of the action plan, the U.S. General Services Administration established a secretariat and multi-stakeholder forum to better support the OGP process and clarify commitments. While the implementation achieved moderate early results in some areas, the second Trump administration has since reversed or weakened some of this progress.

Implementation

The fifth U.S. Open Government National Action Plan saw a high level of completion, comparable to the previous one. Many of the commitments reflected the Biden administration’s previously existing priorities, were already mandated, or part of an ongoing initiative—contributing to a high overall completion rate.

All six commitments identified as “promising” in the Action Plan Review were either fully or substantially completed and led to moderate early results.¹ However, even those commitments which showed some early results have since seen progress stalled under the second Trump administration or reversed with little prospect for sustained impact.

Compared to the previous action plan, a lower percentage of commitments achieved early results as many had limited ambition or an unclear open government lens. No commitments produced significant early results.

Participation and Co-Creation

Under President Joe Biden, the White House created and published the fifth action plan in December 2022 with limited civil society involvement. Engagement largely took place through digital forms, online forums, and virtual listening sessions, with no evidence of in-person meetings or collaborative workshops. Civil society stakeholders consulted for this report indicated that their proposals were either excluded or diluted, which contributed to a lack of interest in engaging with the plan’s implementation.

In September 2023, midway through the action plan cycle, the U.S. General Services Administration (GSA) established an Open Government Secretariat to strengthen support for open government initiatives.² The Secretariat had dedicated staff and budget. It was responsible for leading the development and implementation of the national action plans, as well as engaging with the OGP Support Unit, the public, and federal agencies on U.S. open government efforts. In response to IRM recommendations from its 2022–2024 Action Plan Review, the Secretariat took several key steps to align U.S. practices with OGP minimum requirements and improve outreach to civil society and the public.³ The Secretariat clarified commitments by identifying sub-commitments and responsible agencies, developed a new public repository for tracking implementation progress, and launched the Open Government Federal Advisory Committee (OG

At a Glance

LEVEL OF COMPLETION

31/36

Complete or substantially complete commitments

EARLY RESULTS

22/36

Commitments with early results

0/36

Commitments with significant results

KEY OBSERVATIONS

- Commitments reflected government priorities but lacked strategic focus and civil society buy-in.
- GSA’s stewardship provided clarity and foundation for better commitment implementation and monitoring.
- Progress made during the action plan cycle has reversed under the second Trump administration.

Met the minimum requirements during implementation: Yes

FAC) with civil society participants to start planning for the next action plan. Secretariat officials considered OG FAC to be the closest the U.S. regulatory system allows to a multi-stakeholder forum in line with OGP Participation and Co-Creation Standards.

Implementation in Context

Implementation of the action plan achieved notable progress in some areas. However, many of these gains were vulnerable to political transitions as they did not have strong legal safeguards in place that could ensure their continuity. The end of the implementation cycle coincided with a major U.S. federal election. Since the end of the implementation period, the second Trump administration has reversed or weakened some of the early results achieved during the action plan period under the Biden administration. The second Trump administration revoked or replaced several executive orders that supported key commitments, including those related to equity, data transparency, and law enforcement accountability. It also disbanded the federal advisory committee in February 2025.⁴ These actions have undermined or halted the continuity and durability of reforms initiated during the action plan cycle.

¹ Open Government Partnership, Independent Reporting Mechanism, Action Plan Review: United States 2022–2024, <https://www.opengovpartnership.org/documents/united-states-action-plan-review-2022-2024>

² U.S. General Services Administration, U.S. General Services Administrator Robin Carnahan Leads Delegation to Open Government Partnership Global Summit in Estonia, 5 September 2023, <https://www.gsa.gov/about-us/newsroom/news-releases/us-general-services-administrator-robin-carnahan-leads-delegation-to-open-government-partnership-global-summit-in-estonia-09052023>

³ U.S. General Services Administration, Mid-Term Self-Assessment Report of the United States' 5th Open Government National Action Plan, 5 August 2024, https://open-staging.usa.gov/assets/files/NAP5_Mid-Term_Self_Assessment_2024.pdf

⁴ Sean Michael Newhouse, Advisory government transparency committee terminated, Government Executive, 25 February 2025, <https://www.govexec.com/transition/2025/02/advisory-government-transparency-committee-terminated/403275>; Caroline Nihill, GSA terminates Open Government Federal Advisory Committee, Fed Scoop, 25 February 2025, <https://fedscoop.com/gsa-terminates-open-government-federal-advisory-committee>; Daniel Schuman, Statement on Termination of Open Government Federal Advisory Committee, American Governance Institute, 25 February 2025, <https://americalabs.org/2025/02/25/statement-on-termination-of-open-government-federal-advisory-committee>

Section I. Key Observations

The key observations below offer reflections from the United States’ 2022–2024 action plan cycle. These lessons aim to support the United States’ future action plans and broader open government journey.

Observation 1: Commitments reflected government priorities but lacked strategic focus and civil society buy-in.

The United States’ fifth action plan did not reflect civil society input. It contained many pre-existing initiatives of the administration, leading to a high level of implementation as there was already strong overall commitment from agencies. However, this meant non-governmental actors had little influence, which limited the relevance of the action plan for civil society. Several people interviewed for this report noted this to be a longstanding trend of U.S. OGP action plans, making civil society groups less willing to spend time and energy on the process. The plan was also very broad with numerous commitments assessed by the IRM in its Action Plan Review as having no relevance to open government. For example, several commitments advanced existing data transparency or equity initiatives, but it was not clear how they made more information available for public use. Early collaboration between government and civil society would help prioritize a smaller, shared set of priorities that are relevant to open government reform. This may have helped build civil society trust in any future co-creation process.

Observation 2: GSA’s stewardship provided clarity and a foundation for better commitment implementation and monitoring.

A notable feature of this action plan was that many commitments, as originally submitted, lacked specificity and were not verifiable. However, during implementation, the U.S. General Services Administration (GSA) played a pivotal role in clarifying commitments, identifying milestones, and designating implementing agencies and sub-agencies. When the Open Government Secretariat began tracking progress in August 2023, it inherited very few points of contact (POCs) for the 70 sub-commitments and actively identified responsible officials across government—particularly in agencies such as the Department of Health and Human Services and the Department of Education. In many cases, the Secretariat had to introduce newly identified POCs to the commitments they were expected to lead and build their ownership through outreach, education, and progress updates every six months.⁵ Secretariat officials noted that maintaining consistent communication with POCs ultimately contributed to more successful commitments.⁶ In turn, implementing agencies credited the Secretariat with creating consistent channels for engagement by establishing infrastructure for public input, communicating expectations and timelines, and proactively informing the public of open government initiatives.⁷ GSA’s stewardship also provided consistency and accountability across the action plan; highlighting the importance of designating commitment owners early in the co-creation process to ensure ownership, mutual understanding, and accountability from the outset.

Observation 3: Progress made during the action plan cycle has reversed under the second Trump administration.

Timing of the fifth action plan cycle presented challenges for both government and civil society actors. The office tasked with overseeing open government was not established until well into the implementation period. While the GSA took useful steps to coordinate activities, it had not led the design of the plan and did not fully own its execution. As a result, implementation relied on limited institutional memory and informal coordination—reducing momentum across commitments. When the action plan concluded in the final month of the Biden administration at the end of 2024, many of the involved agency officials had left government or were awaiting new leadership directives, which hindered efforts to carry forward action plan activities during the transition in late 2024.

⁵ U.S. Open Government Secretariat officials, correspondence with the IRM, 8 August 2025.

⁶ U.S. Open Government Secretariat officials, interview by the IRM, 5 February 2025.

⁷ U.S. Government career official who has worked on open government issues over the last few U.S. administrations, interview by the IRM, 14 August 2025.

Section II. Early Results

This section analyzes commitments that achieved the strongest early results in the action plan by the end of the implementation period (December 2024). To assess early results, the IRM considers commitments' objectives, the country context, the policy area, and the evidence of changes. The IRM early results assessment is determined by the depth of change that occurred and evidence that the change is expected to be sustained in time.

Table 1. Commitments with Early Results

Commitment 4: Expanded access to federally funded research through public access plans and cost-sharing mechanisms.
Commitment 27: Improved access to government information through updated agency FOIA guidelines and an enhanced FOIA online record search tool.

Commitment 4: Public access to federally funded research (US0116)

Implementers: Executive Office of the President and Office of Science and Technology Policy (OSTP)

Context and Objectives

This commitment aimed to ease public access to federally funded research, especially for those in under-resourced institutions such as universities serving minority populations and community colleges, where barriers like high costs and long delays deepen existing inequalities.⁸ The commitment sought to ensure that publications and associated data resulting from federally funded research are freely and publicly available without delay once published through three separate mechanisms. The first would permit researchers to include publication and data-sharing costs in their research budget proposals for federal grant programs. The second would launch programs aimed at awarding more grants to early-stage researchers. Meanwhile, the third included exploring new incentives to recognize institutions and researchers who support public access to data or research. The commitment built on progress from the third and fourth action plans, which led to the publication of recommendations on making research data findable, accessible, interoperable, and reusable, along with a federal guidance mandating all agencies to update their public access policies before 31 December 2025.⁹ Unlike its predecessors that focused on data providers, this commitment focuses on users.¹⁰

Early Results: Moderate

The commitment had moderate early results as it led to expanded access to federally funded research through public access plans and cost-sharing mechanisms. It comprised four sub-commitments identified by the Open Government Secretariat, all of which the Executive Office of the President's Office of Science and Technology Policy (OSTP) fully implemented, per the Secretariat's status tracker and accompanying evidence.¹¹

As part of the first sub-commitment, all agencies with over \$100 million in annual research and development budgets coordinated with the Subcommittee on Open Science of the National Science and Technology Council (NSTC) to develop their updated public access to research plans. Examples include the National Institutes of Health (NIH), the National Aeronautics and Space Administration (NASA), and the Department of Energy (DOE).¹² While the public access plans were made available on the open.science.gov portal during the implementation period, they were no longer available on the site as of June 2025. There is also evidence of two workshops promoting public access to federally funded research.¹³

The second sub-commitment led to the publication of guidance for federal agencies to allow researchers to include reasonable costs associated with publication, submission, curation, management of data, and special handling instructions as allowable expenses in all research budgets.¹⁴ The third sub-commitment launched the 2023 Year of Open Science, which included activities to engage early-stage researchers and researchers from historically excluded backgrounds, including listening sessions.¹⁵ It also included a NASA open science training curriculum, open science mentorship programs at NASA, the Environmental Protection Agency

(EPA), and the National Marine Fisheries Service (NMFS), and support for proposals advancing training opportunities.¹⁶ The fourth sub-commitment led to the Year of Open Science Recognition Challenge, which promoted success stories of federally supported open science.¹⁷

Although the Open Government Secretariat reported all milestones to be completed, the action plan lacked clear and measurable milestones. This makes it difficult to objectively assess the level of completion. Nevertheless, the actions taken so far represented meaningful changes to U.S. federal agencies' practices in making federally funded research more accessible.

Civil society members, such as the Association of Research Libraries, were pleased with the 2022 OSTP Guidance on public access to federally funded research and opposed Congressional attempts to block the use of federal funds for expanded access in 2023.¹⁸ One civil society representative commended the efforts to build on existing momentum but noted that the initiative could have been more effective if the OSTP had led the legislation drafting, presented it to Congress, and advocated for its passage to promote institutionalization and sustainability of open science practices.¹⁹

Looking Ahead

An August 2022 directive gives agencies until the end of 2025 to update public access policies and ensure the public availability of federally funded research data.²⁰ A review of select research library and federal agency websites indicated that parties continue to make progress on this commitment.²¹ However, the open.science.gov portal that previously consolidated over 20 agencies' public access plans had become unavailable as of June 2025. While key agencies, such as the NIH, have already begun implementing updated policies,²² the second Trump administration announced plans to review all policies that were not yet in effect. This leaves it unclear whether the directive will move forward as planned, be rolled back, or replaced with new guidance.²³

Moving forward, the OSTP could consider re-establishing a central repository for agencies' public access to federally funded research plans. In the longer term, the OSTP would benefit from collaborating with civil society in further advancing the framework for publicly funded research.

Commitment 27: Access to government information through FOIA (US0139)

Implementer: Office of Information Policy (OIP) of the U.S. Department of Justice (DOJ).

Context and Objectives

This commitment aimed to strengthen the implementation of the Freedom of Information Act (FOIA) through issuance of an updated FOIA Self-Assessment Toolkit, convening a Chief FOIA Officers Council working group to develop shared business standards, and developing a tool for citizens to locate records or submit requests on FOIA.gov more easily. Building on the Attorney General's guidance from March 2022, this commitment intended to help agencies respond to over 800,000 information requests they receive annually and address some of the longstanding civil society demands for FOIA reform.²⁴

Early Results: Moderate

This commitment had moderate early results as it improved access to government-held information through updated agency FOIA guidelines and an improved public-facing FOIA portal. However, the sub-commitment on shared FOIA business standards was not completed. Meanwhile, civil society and the FOIA advisory committee proposed several actions to further strengthen FOIA in practice, such as expanding public engagement activities focused on improving the overall FOIA process.²⁵

The Open Government Secretariat identified three sub-commitments, two of which they reported as completed and one substantially completed.²⁶ As part of the first sub-commitment, the Office of Information Policy (OIP) updated the FOIA Self-Assessment Toolkit in March 2023, including two new modules covering proactive disclosures and administrative appeals—revising milestones throughout all modules to address the use of technology, allocation of resources, and use of data—and providing fillable spreadsheets for agencies to facilitate progress tracking toward

achieving milestones.²⁷ The toolkit was an upgrade to the prior 2017 version and reflected the 2022 guidance to, among other things, act with presumption of openness and remove barriers to access when applying FOIA.²⁸ The third sub-commitment led to the release of FOIA Wizard, a new search tool, in October 2023. It aimed to aid citizens to locate records of interest or submit their FOIA request to the appropriate agency.²⁹ The commitment also included a sub-commitment to issue shared FOIA business standards, which was substantially completed. The Chief FOIA Officer Council working group drafted baseline FOIA standards and released it for public comment, but the final version was not finalized during the implementation period.³⁰ As of December 2024, the OIP anticipated publishing the standards “in the coming months” and reported that public feedback had been incorporated.³¹

In March 2025, the OIP announced that the FOIA Wizard had received nearly 200,000 queries and received an upgrade incorporating machine learning—suggesting that investments in it may continue.³² However, recent reports of FOIA staff terminations across agencies have raised concerns among the media, civil society, and members of the Congress, which indicate that the current administration has deprioritized implementing FOIA.³³

Looking Ahead

As of June 2025, the shared FOIA business standards remained unpublished. It is unclear whether the current administration plans to publish these standards.

To strengthen FOIA implementation, the OIP could finalize and publish the shared FOIA business standards. It could also determine the appropriate channels for implementing longstanding civil society recommendations e.g., through the FOIA advisory committee or in a role similar to the Blueprint for Accountability, which may include incorporating them in other strategic frameworks.

⁸ Open Government Partnership, Independent Reporting Mechanism, Action Plan Review: United States 2022–2024, 22 May 2024, <https://www.opengovpartnership.org/documents/united-states-action-plan-review-2022-2024>

⁹ Open Government Partnership, Independent Reporting Mechanism, Action Plan Review: United States 2022–2024; The White House, Office of Science & Technology Policy, 2022 OSTP Public Access Memo, August 2022, <https://bidenwhitehouse.archives.gov/wp-content/uploads/2022/08/08-2022-OSTP-Public-Access-Memo.pdf>

¹⁰ Open Government Partnership, Independent Reporting Mechanism, Action Plan Review: United States 2022–2024.

¹¹ U.S. General Services Administration, Broaden public access to federally-funded research findings and data, accessed 23 April 2025, <https://www.gsa.gov/governmentwide-initiatives/us-open-government/resources/fifth-us-open-government-national-action-plan/track-our-progress/theme-1#tab-US0116>

¹² See the Public Access Plans of the NIH, <https://grants.nih.gov/grants/guide/notice-files/NOT-OD-23-091.html>; NASA, <https://www.nasa.gov/wp-content/uploads/2021/12/nasa-ocs-public-access-plan-may-2023.pdf>; and Department of Energy, <https://www.energy.gov/doe-public-access-plan>

¹³ The White House, Office of Science & Technology Policy, Biden-Harris Administration Marks the Anniversary of OSTP’s Year of Open Science, 31 January 2024, <https://bidenwhitehouse.archives.gov/ostp/news-updates/2024/01/31/fact-sheet-biden-harris-administration-marks-the-anniversary-of-ostps-year-of-open-science>

¹⁴ The White House, 2022 OSTP Public Access Memo; U.S. General Services Administration, Broaden public access to federally-funded research findings and data.

¹⁵ The White House, Biden-Harris Administration Marks the Anniversary of OSTP’s Year of Open Science.

¹⁶ National Aeronautics and Space Administration, New Course from NASA Helps Build Open, Inclusive Science Community, 6 December 2023, <https://www.nasa.gov/news-release/new-course-from-nasa-helps-build-open-inclusive-science-community>; National Aeronautics and Space Administration, NASA OpenScapes, GitHub, <https://nasa-openscapes.github.io>; National Marine Fisheries Service, “NMFS OpenScapes,” GitHub, <https://nmfs-openscapes.github.io>; Environmental Protection Agency, EPA OpenScapes, GitHub, <https://openscapes.github.io/2024-epa>

¹⁷ The White House, The White House Office of Science & Technology Policy Open Science Recognition Challenge, 2024, <https://www.challenge.gov/?challenge=ostp-year-of-open-science-recognition-challenge>; The White House, White House Office of Science & Technology Policy Announces Year of Open Science Recognition Challenge Winners, 21 March 2024, <https://bidenwhitehouse.archives.gov/ostp/news-updates/2024/03/21/white-house-office-of-science-technology-policy-announces-year-of-open-science-recognition-challenge-winners>

¹⁸ The White House, Office of Science & Technology Policy, What They Are Saying: White House Federally Funded Research Guidance Hailed as a Win for Innovation and Equity, 31 August 2022, <https://bidenwhitehouse.archives.gov/ostp/news-updates/2022/08/31/what-they-are-saying-white-house-federally-funded-research-guidance-hailed-as-a-win-for-innovation-and-equity>; Association of Research Libraries, Open Access Working Group Letter on Public Access, 3 November 2023, <https://www.arl.org/public-access-policies>

¹⁹ Alex Howard, interview by the IRM, 4 February 2025.

²⁰ The White House, Office of Science & Technology Policy, Ensuring Free, Immediate, and Equitable Access to Federally Funded Research, August 2022, <https://bidenwhitehouse.archives.gov/wp-content/uploads/2022/08/08-2022-OSTP-Public-Access-Memo.pdf>

²¹ For example, see: Iowa State University Library, Upcoming public access requirements for federally funded publications and data, 4 April 2025, <https://www.lib.iastate.edu/news/upcoming-public-access-requirements-federally-funded-publications-and-data>; National Science Foundation, NSF Public Access Initiative, accessed 30 June 2025, <https://www.nsf.gov/public-access>

²² Vanderbilt University Medical Center, Scholarly Publishing Information Hub, Public Access Policy Changes Implemented Impacting Federally Funded Research, accessed 18 September 2025, <https://spi-hub.app.vumc.org/fed-funded-research-policies>

²³ Vanderbilt University Medical Center, Scholarly Publishing Information Hub, Public Access Policy Changes Implemented Impacting Federally Funded Research.

²⁴ U.S. General Services Administration, Strengthen implementation of FOIA, accessed 23 April 2025, <https://www.gsa.gov/governmentwide-initiatives/us-open-government/resources/fifth-us-open-government-national-action-plan/track-our-progress/theme-4#tab--US0139>; U.S. General Services Administration, Fifth U.S. Open Government National Action Plan, December 2022, https://www.gsa.gov/system/files/NAP5-fifth-open-government-national-action-plan_0.pdf; Open the Government, Blueprint for Accountability, <https://blueprintforaccountability.us>

²⁵ U.S. National Archives, FOIA Advisory Committee Recommendations Dashboard, accessed 1 July 2025, <https://www.archives.gov/ogis/foia-advisory-committee/dashboard>; Project on Government Oversight, Public Comment for Sixth Open Government National Action Plan, 7 November 2024, <https://www.pogo.org/public-comments/public-comment-for-sixth-open-government-national-action-plan>; Open the Government, Accountability 2021: Recommendations for restoring accountability in the federal government, November 2020, <https://www.openthegovernment.org/wp-content/uploads/2020/11/Accountability-2021-Agenda.pdf>; E Pluribus Unum, The Department of Justice's 'FOIA Wizard' isn't a magical solution for White House strategic silence on open government, 16 October 2023.

²⁶ U.S. General Services Administration, Strengthen implementation of FOIA.

²⁷ Department of Justice, Office of Information Policy, Updated FOIA Self-Assessment Toolkit Now Available, 9 March 2023, <https://www.justice.gov/oip/blog/updated-foia-self-assessment-toolkit-now-available>

²⁸ Department of Justice, Office of Information Policy, Updated FOIA Self-Assessment Toolkit Now Available.

²⁹ Department of Justice, Office of Information Policy, New Search Tool Improves FOIA.gov User Experience, 24 October 2023, <https://www.justice.gov/oip/blog/new-search-tool-improves-foiagov-user-experience>

³⁰ U.S. General Services Administration, Strengthen implementation of FOIA.

³¹ U.S. Federal Register, Request for Information Regarding Federal Integrated Business Framework Standards, 18 March 2024, <https://www.federalregister.gov/documents/2024/03/18/2024-05663/request-for-information-regarding-federal-integrated-business-framework-standards>

³² Department of Justice, Office of Information Policy, Upgraded FOIA.gov Search Tool Delivers Improved Results, 17 March 2025, <https://www.justice.gov/oip/blog/upgraded-foiagov-search-tool-delivers-improved-results>

³³ Poynter, Firing of FOIA officers leaves experts worried about public records access under Trump, 21 February 2025, <https://www.poynter.org/reporting-editing/2025/public-records-requests-trump-administration-federal-government-foia>; Federal News Network, Top House Dem seeks details on FOIA staffing amid agency firings, 20 March 2025, <https://federalnewsnetwork.com/agency-oversight/2025/03/top-house-dem-seeks-details-on-foia-staffing-amid-agency-firings>

Section III. Participation and Co-Creation

The fifth U.S. Open Government National Action Plan was developed primarily through a top-down approach during the Biden administration. The establishment of a new Open Government Secretariat led to dedicated funding, a public repository, and a new federal advisory committee that included stakeholders from civil society. However, this new structure did not fully repair civil society's strong skepticism of U.S. open government processes. Moreover, the second Trump administration has not sustained this new structure.

OGP in the United States

Oversight for the U.S. OGP process was split between two government bodies during implementation of the action plan. From action plan submission in December 2022 until September 2023, the White House was responsible for oversight of the OGP process and action plan implementation. Starting in September 2023 and until the end of the action plan cycle in December 2024, the newly created Open Government Secretariat within the U.S. General Services Administration (GSA) assumed oversight with a dedicated \$1 million annual budget.³⁴

In mid-2024, toward the end of the action plan cycle, the Secretariat set up the Open Government Federal Advisory Committee (OG FAC) to advise the GSA on open government issues and public engagement efforts,³⁵ which responds to an IRM recommendation.³⁶ Officials from the Secretariat viewed the OG FAC as the closest approximation to a multi-stakeholder forum allowed by the U.S. regulatory system.³⁷ The Secretariat itself also plays an important role in outreach to stakeholders through meetings, briefings, and notices for public comment.³⁸

In April 2024, the GSA issued a public call for applications for the OG FAC, seeking to select a wide variety of members from civil society and government with relevant expertise.³⁹ According to an interview with Secretariat staff, this call led to nearly 100 applications for membership.⁴⁰ To select the final members, appointed by the GSA, the group looked for a balance of experience and location. The final 15-person OG FAC consisted of 4 federal employees and 11 non-federal members, which included 2 local government officials, public policy professors, and civil society representatives.⁴¹ In October 2024, the OG FAC held its first meeting on administrative matters and approved its bylaws,⁴² which were made available online during the implementation period along with a charter and membership balance plan developed by the GSA.⁴³ The OG FAC held two subsequent public meetings in October and December 2024.

The OG FAC met again in January 2025, with its February 2025 meeting being cancelled after the start of the new administration and no further meetings being planned. Videos, slides, and transcripts for all meetings were publicly available during the implementation period via the U.S. Open Government website, although the Federal Advisory Committee resources were no longer available as of April 2025. The videos remain available on YouTube.⁴⁴

Action Plan Co-Creation

In 2022, an Open Government Working Group—comprised of officials from the U.S. General Services Administration, the Executive Office of the President, the U.S. Department of State, and the U.S. Agency for International Development—led co-creation of the fifth action plan. The group solicited input and feedback from agencies and selected commitments for inclusion in the plan. Civil society had limited opportunities to engage as they participated mainly through public requests for information and virtual listening sessions hosted in late 2022. The U.S. General Services Administration publicized these opportunities on the open government website, open.usa.gov, and through the "US Open Government" Google Group, which includes more than 500 members from government and civil society.⁴⁵

Individuals in civil society working on transparency and public participation expressed dissatisfaction as they had no influence over the selection of commitments and their objectives, scope, and milestones. They also criticized the quality of the reasoned responses to their input during the co-creation process. These responses include a list of comments received during the

co-creation process. These responses include a list of comments received during the co-creation process, a summary of the input received, and the Fifth U.S. Open Government National Action Plan Reasoned Response.⁴⁶ Some civil society representatives do not perceive the action plan as a product of genuine co-creation.⁴⁷ They characterized the process as inherently opaque, and the plan as guided by the priorities of the administration; reflecting ongoing programs and statutory requirements rather than civil society contributions. From their perspective, this explains why the action plan contains some commitments lacking open government lens, verifiable activities, or a high level of ambition. As shown in Table 2 below, the co-creation process did not meet the minimum requirements of OGP’s Participation and Co-creation Standards.⁴⁸ As these standards went into effect in January 2022 with a 24-month grace period applied to all members of OGP, the United States is not considered to have acted contrary to process.⁴⁹

In its mid-term self-assessment, the GSA acknowledged that the action plan’s co-creation process “fell short in fully meeting the spirit of co-creation with civil society” and identified five lessons learned, including the importance of inclusive stakeholder engagement. A GSA representative also noted that in addition to its own outreach during co-creation, the Federal Government drew from recommendations submitted through multiple government-wide Requests for Information when identifying commitments for the fifth action plan.⁵⁰ The GSA further underlined the creation of OG FAC and its online dashboard as well as the designation of a lead for each commitment as direct responses to IRM recommendations in the Action Plan Review.⁵¹

Participation during Implementation

Implementation of the action plan began in January 2023. Alongside the Office of Management and Budget (OMB), the GSA held four public outreach meetings between July and August 2023. Following its creation in September 2023, the Open Government Secretariat took several steps to further strengthen outreach to non-government actors. For example, it held several meetings on commitment implementation around themes such as freedom of information, anti-corruption, and open data. Joined by federal government officials and non-government actors, these meetings provided updates on commitment implementation and collection of feedback from civil society.⁵² The GSA also established an “Open Government Playlist” on YouTube to make open government meetings more publicly available, along with an open government mailing list and a LinkedIn page.⁵³ The OG FAC also began meeting during implementation, although the committee was charged with providing advice for the development of the upcoming sixth national action plan and was not involved with the fifth plan’s implementation.⁵⁴

These efforts represented real progress toward improving participatory elements compared to the co-creation process. The Secretariat also took further steps to seed the open government environment of governmental actors. For example, it re-established the Federal Open Government Community of Practice, reportedly having around 900 members from state, local, and tribal government officials.⁵⁵ In the states of Washington and Texas, it held public engagement meetings on open government themes at the local level.⁵⁶ Secretariat officials stated that these steps were taken thoughtfully, recognizing the need to rebuild trust through legitimate co-creation.⁵⁷ It also started soliciting public comment for the next action plan.⁵⁸ In general, civil society actors that were critical of the U.S. open government efforts and fifth action plan praised the work of the Secretariat and the establishment of the OG FAC.

Alas, a number of civil society actors already stated that the OGP process was no longer a major focus of their time and efforts. As of mid-2025, it also remained unclear whether the positive steps taken by the Secretariat and the GSA would be sustained as they have not been fully institutionalized and are subject to reversal. The dismissal of the OG FAC⁵⁹ as part of the second Trump administration’s broader changes to federal government priorities is one such indication.⁶⁰

Table 2. Compliance with Minimum Requirements

Minimum requirement	Co-creation	Implementation
1.1 Space for dialogue: The GSA held meetings with government and civil society stakeholders to discuss implementation, broader open government topics, and co-creation of the sixth action plan in July,	No	Yes

August, September, and November 2023, and in February, April, May, July, September, October, November, and December 2024. ⁶¹ The Open Government Federal Advisory Committee (OG FAC) also held three meetings in October and December of 2024. The OG FAC's Charter, Bylaws, and Membership Balance Plan were made available online during the implementation period. ⁶²		
2.1 OGP website: The government maintained a page dedicated to the country's OGP process within the GSA website. The page contains all past action plans, IRM reports, and co-creation information. ⁶³	Yes	Yes
2.2 Repository: The U.S. Open Government Secretariat established a public repository that includes information on action plan implementation through its summary of progress, which was updated at least twice a year. ⁶⁴ The website also includes information on the Secretariat's public engagement efforts.	Yes	Yes
3.1 Advanced notice: See the Action Plan Review. ⁶⁵	Yes	Not applicable
3.2 Outreach: See the Action Plan Review. ⁶⁶	Yes	Not applicable
3.3 Feedback mechanism: See the Action Plan Review. ⁶⁷	Yes	Not applicable
4.1 Reasoned response: See the Action Plan Review. ⁶⁸	Yes	Not applicable
5.1 Open implementation: The GSA held virtual meetings with government and civil society stakeholders to discuss action plan implementation in July, August, September, and November 2023, as well as February and September 2024. ⁶⁹	Not applicable	Yes

³⁴ U.S. General Services Administration, U.S. General Services Administrator Robin Carnahan leads delegation to Open Government Partnership Global Summit in Estonia, 5 September 2023, <https://www.gsa.gov/about-us/newsroom/news-releases/us-general-services-administrator-robin-carnahan-leads-delegation-to-open-government-partnership-global-summit-in-estonia-09052023>

³⁵ U.S. Open Government Secretariat, Year One In Review, accessed 11 April 2025, <https://www.gsa.gov/system/files/Open-Government-Secretariat--Year-End-in-Review.pdf>

³⁶ Open Government Partnership, Independent Reporting Mechanism, Action Plan Review: United States 2022–2024, 22 May 2024, <https://www.opengovpartnership.org/documents/united-states-action-plan-review-2022-2024>; U.S. Open Government Secretariat, 5th Open Government National Action Plan Mid-Term Self-Assessment Report 2022–2024, 2024, <https://www.gsa.gov/system/files/NAP%205%20Mid-Term%20Self%20Assessment%202024.pdf>

³⁷ U.S. Open Government Secretariat officials, interview by the IRM, 5 February 2025.

³⁸ U.S. Open Government Secretariat officials, interview by the IRM, 14 February 2025.

³⁹ U.S. General Services Administration, GSA launches Open Government Federal Advisory Committee to advise on governmentwide transparency efforts, 26 April 2024, <https://www.gsa.gov/about-us/newsroom/news-releases/gsa-launches-open-government-federal-advisory-committee-to-advise-on-governmentwide-transparency-efforts-04262024>

⁴⁰ U.S. Open Government Secretariat officials, interview by the IRM, 14 February 2025.

⁴¹ U.S. General Services Administration, Open Government National Action Plan Mid-Term Self-Assessment Report 2022–2024, 2024, <https://web.archive.org/web/20250108132657/https://www.gsa.gov/governmentwide-initiatives/us-open-government/open-government-federal-advisory-committee#tab--Committee-charter-and-members>

⁴² U.S. Federal Register, Notice of Establishment of a Federal Advisory Committee, 28 June 2024, <https://www.federalregister.gov/documents/2024/06/28/2024-14259/notice-of-establishment-of-a-federal-advisory-committee>

⁴³ U.S. General Services Administration, Open Government Federal Advisory Committee.

⁴⁴ U.S. General Services Administration, Open Government Federal Advisory Committee; U.S. General Services Administration, Open Government Playlist, YouTube, accessed 11 April 2025, <https://www.youtube.com/playlist?list=PLvdwyPqXnxxUZ9uzcRN7M32TvlOZYNF2S>

⁴⁵ US Open Government Google Group, [Google.com](https://groups.google.com/g/us-open-government?pli=1), accessed 31 October 2025, <https://groups.google.com/g/us-open-government?pli=1>

⁴⁶ “Fifth U.S. Open Government National Action Plan Reasoned Response,” U.S. General Services Administration, December 2022, <https://www.gsa.gov/system/files/Reasoned-Response-Fifth-US-Open-Government-National-Action-Plan-2025.pdf>; “Fifth U.S. Open Government National Action Plan: Reasoned Response” U.S. General Services Administration, December 2022, https://www.gsa.gov/system/files/NAP%205%20Making%20Government%20More%20Inclusive%20and%20Responsive_0.pdf

⁴⁷ U.S. General Services Administration, Fifth U.S. Open Government National Action Plan, December 2022, https://www.gsa.gov/system/files/NAP5-fifth-open-government-national-action-plan_0.pdf

⁴⁸ Open Government Partnership, Independent Reporting Mechanism, Action Plan Review: United States 2022–2024.

⁴⁹ Open Government Partnership, United States – Process Update Letter (September 2024), 1 September 2024, https://www.opengovpartnership.org/wp-content/uploads/2024/11/United-States_Process-Update-Letter_20240901.pdf

⁵⁰ U.S. Open Government Secretariat officials, discussion with IRM staff, 2 December 2025. Although these input-gathering activities were not part of the formal co-creation process, the Action Plan includes commitments that incorporated recommendations from multiple government-wide RFI—including the Government-wide Equity RFI,

which received over 700 public responses, the Federal Evidence Agenda on LGBTQI+ Equity RFI, and OSTP's call for input on community data partnerships. Office of Science and Technology Policy, "Request for Information; Federal Evidence Agenda on LGBTQI+ Equity," *Federal Register* 87, no. 163 (August 24, 2022): 52083–52084; Office of Management and Budget. "Methods and Leading Practices for Advancing Equity and Support for Underserved Communities through Government: Summary of Stakeholder Responses to the OMB Request for Information (RFI)," Performance.gov (archived), last modified August 6, 2021, <https://bidenadministration.archives.performance.gov/equity/rfi-summary/>.

⁵¹ U.S. Open Government Secretariat, 5th Open Government National Action Plan Mid-Term Self-Assessment Report 2022–2024.

⁵² U.S. General Services Administration, U.S. Open Government Public Engagement, accessed 11 April 2025,

<https://www.gsa.gov/governmentwide-initiatives/us-open-government/public-engagement>

⁵³ U.S. General Services Administration, Open Government Playlist, YouTube; U.S. Open Government Secretariat, U.S. Open Government Secretariat, LinkedIn, accessed 11 April 2025, <https://www.linkedin.com/showcase/usopengovsec>

⁵⁴ U.S. Open Government Secretariat officials, interview by the IRM, 5 February 2025.

⁵⁵ U.S. Open Government Secretariat officials, interview by the IRM, 19 December 2024.

⁵⁶ U.S. General Services Administration, U.S. Open Government Public Engagement.

⁵⁷ U.S. Open Government Secretariat officials, interview by the IRM, 14 February 2025.

⁵⁸ U.S. Federal Register, Seeking Public Input for the 6th U.S. Open Government National Action Plan, 12 September 2024, <https://www.federalregister.gov/documents/2024/09/12/2024-20702/seeking-public-input-for-the-6th-us-open-government-national-action-plan>

⁵⁹ Sean Michael Newhouse, Advisory government transparency committee terminated, Government Executive, 25 February 2025, <https://www.govexec.com/transition/2025/02/advisory-government-transparency-committee-terminated/403275>;

Caroline Nihill, GSA terminates Open Government Federal Advisory Committee, Fed Scoop, 25 February 2025,

<https://fedscoop.com/gsa-terminates-open-government-federal-advisory-committee>; Daniel Schuman, Statement on

Termination of Open Government Federal Advisory Committee, American Governance Institute, 25 February 2025, <https://americalabs.org/2025/02/25/statement-on-termination-of-open-government-federal-advisory-committee>

⁶⁰ Donald J. Trump, Commencing the Reduction of the Federal Bureaucracy, U.S. White House, 19 February 2025,

<https://www.whitehouse.gov/presidential-actions/2025/02/commencing-the-reduction-of-the-federal-bureaucracy>

⁶¹ Newhouse, Advisory government transparency committee terminated, Government Executive; Nihill, GSA terminates Open Government Federal Advisory Committee, Fed Scoop; Schuman, Statement on Termination of Open Government Federal Advisory Committee, American Governance Institute.

⁶² Newhouse, Advisory government transparency committee terminated, Government Executive; Nihill, GSA terminates Open Government Federal Advisory Committee, Fed Scoop; Schuman, Statement on Termination of Open Government Federal Advisory Committee, American Governance Institute.

⁶³ U.S. Open Government Secretariat, National Action Plans, <https://www.gsa.gov/governmentwide-initiatives/us-open-government/resources#tab--National-Action-Plans>

⁶⁴ U.S. General Services Administration, U.S. Open Government Initiative, accessed 30 June 2025,

<https://www.gsa.gov/governmentwide-initiatives/us-open-government>

⁶⁵ See Open Government Partnership, Independent Reporting Mechanism, Action Plan Review: United States 2022–2024.

⁶⁶ See Open Government Partnership, Independent Reporting Mechanism, Action Plan Review: United States 2022–2024.

⁶⁷ See Open Government Partnership, Independent Reporting Mechanism, Action Plan Review: United States 2022–2024.

⁶⁸ See Open Government Partnership, Independent Reporting Mechanism, Action Plan Review: United States 2022–2024.

⁶⁹ U.S. General Services Administration, U.S. Open Government Public Engagement.

Section IV. Methodology

This report supports countries' accountability and learning through assessment of the action plan's level of completion and early results. The report provides in-depth analysis of commitments or clusters that achieved the strongest early results in the action plan. It also assesses the country's participation and co-creation practices throughout the action plan cycle.⁷⁰

The IRM products provided during a national action plan cycle include:

- **Co-Creation Brief:** A concise brief that highlights lessons from previous IRM reports to support a country's OGP process, action plan design, and overall learning.
- **Action Plan Review:** A technical review of the characteristics of the action plan and the strengths and challenges the IRM identifies to inform a stronger implementation process.
- **Midterm Review:** A review for four-year action plans after a refresh at the midpoint. The review assesses new or significantly amended commitments in the refreshed action plan, compliance with OGP rules, and provides an informal update on implementation progress.
- **Results Report:** An overall implementation assessment that focuses on policy-level results and how changes happen. It also checks compliance with OGP rules and informs accountability and longer-term learning.

In Results Reports, the IRM assesses commitments using two indicators:

Completion

The IRM assesses the level of completion for each commitment in the action plan, including commitments clustered in the Action Plan Review.⁷¹ The level of completion for all commitments is assessed as one of the following:

- No Evidence Available
- Not Started
- Limited
- Substantial
- Complete

Early Results

The IRM assesses the level of early results from implementation for each commitment or cluster. To do so, the IRM considers commitments' objective, the country context, the policy area, and the evidence of changes. The Early Results indicator is determined by the depth of change that occurred and the evidence of whether the change will be sustained in time. The early results indicator establishes three levels of results:

- **No Notable Results:** According to the evidence collected (through desk research, interviews, etc.), the implementation of the open government commitment led to little or no positive results. After assessing the activities carried forward during the period of implementation and its outcomes (if any), the IRM did not find meaningful changes toward:
 - improving practices, policies, or institutions governing a policy area or within the public sector, or
 - enhancing the enabling environment to build trust between citizens and the state.
- **Moderate Results:** According to the evidence collected (through desk research, interviews, etc.) the implementation of the open government commitment led to positive results. After assessing the activities carried forward during the period of implementation and its outcomes, the IRM found meaningful changes toward:
 - improving practices, policies, or institutions governing a policy area or within the public sector, or
 - enhancing the enabling environment to build trust between citizens and the state.

- **Significant Results:** According to the evidence collected (through desk research, interviews, etc.) the implementation of the open government commitment led to significant positive results. After assessing the activities carried forward during the period of implementation and its outcomes, the IRM found meaningful changes toward:
 - improving practices, policies, or institutions governing a policy area or within the public sector, or
 - enhancing the enabling environment to build trust between citizens and the state.

Significant positive results show clear expectations for these changes (as defined above) will be sustainable in time.

This report was prepared by the IRM in collaboration with Brian Wanlass and was reviewed by Andy McDevitt, IRM external expert. The IRM methodology, quality of IRM products, and review process are overseen by the IRM’s International Experts Panel (IEP).⁷² For more information, refer to the IRM webpage⁷³ or the glossary of IRM and OGP terms.⁷⁴

⁷⁰ For definitions of OGP terms, such as co-creation and promising commitments, see Open Government Partnership, OGP Glossary, accessed 1 June 2025, <https://www.opengovpartnership.org/glossary>

⁷¹ The IRM clusters commitments that share a common policy objective during the Action Plan Review process. In these instances, the IRM assesses “Potential for Results” and “Early Results” at the cluster level. The level of completion is assessed at the commitment level. For more information on how the IRM clusters commitments, see Section IV on Methodology in the Action Plan Review.

⁷² Open Government Partnership, International Experts Panel, <https://www.opengovpartnership.org/about/who-we-are/international-experts-panel>

⁷³ Open Government Partnership, IRM Overview, <https://www.opengovpartnership.org/irm-guidance-overview>

⁷⁴ Open Government Partnership, OGP Glossary.

Annex I. Commitment Data⁷⁵

Commitment 1: Production, dissemination, and use of equitable data (US0113)⁷⁶

- | | |
|---|--|
| <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Substantial | <ul style="list-style-type: none"> • Completion: Substantial • Early results: Moderate |
|---|--|

This commitment sought to implement recommendations of the Equitable Data Working Group from 2022, which outline five key actions around the production, dissemination, and use of equitable data.⁷⁷ It was assessed as promising in the Action Plan Review. During implementation, the Open Government Secretariat identified seven sub-commitments, with six of those to be completed by the Office of Science and Technology Policy and the other by the Office of Management and Budget.⁷⁸ As of the Secretariat's August 2024 status update, all sub-commitments were reportedly completed,⁷⁹ leading to the revision of federal data standards to better represent diverse communities, using existing data systems for more detailed analysis of underrepresented groups, and strengthening federal capacity through hiring, training, and collaboration.⁸⁰ However, the evidence indicated some sub-commitments were still in progress and it remained unclear how these results will be sustained going forward as Executive Order 13985, which is the basis for establishing the Equitable Data Working Group, was revoked on the first day of President Trump's administration.⁸¹

Commitment 2: Standards for collecting data and reporting on race and ethnicity (US0114)

- | | |
|--|---|
| <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Modest | <ul style="list-style-type: none"> • Completion: Complete • Early results: Moderate |
|--|---|

This commitment aimed to implement a formal review of Statistical Policy Directive No. 15 (SPD 15) on Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity.⁸² This initiative had already begun implementation prior to the adoption of the action plan. To arrive at the revision, the U.S. Chief Statistician convened a Federal Interagency Technical Working Group to provide recommendations, set up a dedicated public-facing website related to the revision, held listening sessions, and solicited public comment via the Federal Register—among other actions.⁸³ The revised SPD 15 was released in March 2024, marking the first revision of these standards since 1997 and signifying an important improvement on the governance of the standards.⁸⁴ Government agencies now have until March 2026 to devise respective action plans to comply with the new standards within five years by March 2029.⁸⁵

Commitment 3: Transparency in federal procurement (US0115)

- | | |
|--|--|
| <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Modest | <ul style="list-style-type: none"> • Completion: Substantial • Early results: No notable results |
|--|--|

The Office of Management and Budget committed to expanding the types of agency waiver requests published on the “Made in America” website to include those granted on the basis of public interest and unreasonable cost⁸⁶ while also aimed at improving the site's search functionality.⁸⁷ As of July 2025, information on public interest waivers is available, but data on unreasonable cost waivers had not been published, while the site remains active and in use.⁸⁸ The vast majority of waivers also appear to be granted due to the “non-availability” of the procured goods. Aside from a slight increase in publicly available data, it remains unclear how the publication of this information contributes to broader open government objectives.

Commitment 4: Public access to federally funded research (US0116)

- | | |
|---|---|
| <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Substantial | <ul style="list-style-type: none"> • Completion: Complete • Early results: Moderate |
|---|---|

This commitment is assessed in Section II.⁸⁹

Commitment 5: Researcher access to confidential federal data (US0117)

- | | |
|---|---|
| <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Unclear | <ul style="list-style-type: none"> • Completion: Complete • Early results: No Notable Results |
|---|---|

This commitment sought to implement a standard application process for identifying and requesting data from statistical agencies for evidence building, as required by the Foundations for Evidence-Based Policymaking Act of 2018.⁹⁰ However, it was already completed prior to the adoption of the action plan,⁹¹ and thus cannot be attributed to the plan.

Commitment 6: Online access to the National Archives (US0118)

- | | |
|--|--|
| <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Modest | <ul style="list-style-type: none"> • Completion: Substantial • Early results: Moderate |
|--|--|

For this commitment, the Open Government Secretariat identified three sub-commitments. The National Archives and Records Administration (NARA) was designated to be responsible for improving access to the National Archives Catalog, updating its website with human-centered design, and engaging with underserved communities to identify and prioritize important records for those communities.⁹² By December 2024, two of the three sub-commitments had been completed. NARA also improved accessibility through some search enhancements and optical character recognition for its catalog.⁹³ Additionally, NARA secured funding to redesign [archives.gov](https://www.archives.gov) in 2024, which is not expected to be completed until mid-2026, and began prioritizing access to records of Puerto Rican and African-American patriots, which remain active until the production of this report.⁹⁴

Commitment 7: Federal sustainability goals (US0119)

- | | |
|--|---|
| <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Modest | <ul style="list-style-type: none"> • Completion: Complete • Early results: Moderate |
|--|---|

This commitment sought to implement Executive Order 14057 for Catalyzing Clean Energy Industries and Jobs through Federal Sustainability, which was signed in 2021 before the action plan was adopted. The Executive Order committed major federal agencies to set targets and produce annual reports related to government-wide goals for net-zero emissions.⁹⁵ The Council on Environmental Quality and Office of Management and Budget (OMB) published these reports for 30 government departments and agencies on [sustainability.gov](https://www.sustainability.gov) along with associated data and scorecards for each agency.⁹⁶ As of December 2024, these plans and scorecards were available, but these practices do not appear to be sustained.⁹⁷ As of June 2025, the scorecards were no longer available, with a notice saying “FY 2024 OMB Federal Sustainability Scorecards are currently under development” published on the website.⁹⁸ The second Trump administration revoked Executive Order 14057 in January 2025.⁹⁹

Commitment 8: Data for environmental justice (US0120)

- | | |
|---|---|
| <ul style="list-style-type: none"> ● Verifiable: Yes ● Does it have an open government lens? Yes ● Potential for results: Substantial | <ul style="list-style-type: none"> ● Completion: Complete ● Early results: Moderate |
|---|---|

This commitment implemented Executive Order 14008 on Tackling the Climate Crisis at Home and Abroad, signed in January 2021, which required the development of an interagency council for environmental justice and the development of annual public performance scorecards for the agencies.¹⁰⁰ The Office of Management and Budget and the Council on Environmental Quality set up a dedicated Environmental Justice Scorecard website and published scorecards for two consecutive years in April 2023 and July 2024.¹⁰¹ It does not appear that these efforts will be sustained, as the Environmental Justice Scorecard website that was live as of December 2024 had become unavailable at the time of writing this report.¹⁰² The second Trump administration revoked Executive Order 14008 in January 2025.¹⁰³

Commitment 9: Public engagement on agency regulatory actions (US0121)

- | | |
|---|---|
| <ul style="list-style-type: none"> ● Verifiable: No* ● Does it have an open government lens? Yes ● Potential for results: Unclear | <ul style="list-style-type: none"> ● Completion: Complete ● Early results: Moderate |
|---|---|

Building on efforts from prior administrations, this commitment sought to improve and modernize regulatory review, particularly by strengthening public engagement. Although the commitment lacked specificity and was not fully verifiable when submitted to OGP, the Executive Office of the President completed the milestone that the General Services Administration clarified during implementation. The Office of Management and Budget (OMB) and its Office of Information and Regulatory Affairs (OIRA) were tasked with carrying out the 2021 White House Memorandum on Improving Public Engagement in Regulatory Actions.¹⁰⁴ The OIRA enhanced public engagement by publishing findings and recommendations on broadening participation in the federal regulatory process, holding listening sessions, and identifying best practices. It also issued draft guidance, invited public comment, and published final guidance on how agencies can better solicit and incorporate stakeholder feedback.¹⁰⁵

*Although the IRM assessed this commitment as not verifiable in the Action Plan Review, the Executive Office of the President ultimately completed the milestone that the General Services Administration later clarified during implementation, as described above.

Commitment 10: Community engagement in Agency Equity Action Plans (US0122)

- | | |
|---|--|
| <ul style="list-style-type: none"> ● Verifiable: No* ● Does it have an open government lens? Yes ● Potential for results: Unclear | <ul style="list-style-type: none"> ● Completion: Substantial ● Early results: Moderate |
|---|--|

This commitment sought to encourage public engagement throughout the implementation of agencies' equity action plan. The Biden administration issued Executive Order 13985 on its first day in office, which, in part, required the development of agency equity action plans that summarize challenges faced by underserved communities in accessing benefits, services, and contracting opportunities.¹⁰⁶ With government support,¹⁰⁷ a number of agencies took steps toward greater involvement in the implementation of the plans as described in progress reports.¹⁰⁸ For example, in response to a 2024 request for input, the Office of Management and Budget (OMB) gathered feedback on how to improve public participation in federal decision-making. Key suggestions included clearer communication, more accessible engagement options, and stronger feedback mechanisms. Based on this input, OMB released guidance and a toolkit in January 2025 to help agencies promote more inclusive and effective public

engagement.¹⁰⁹ However, the second Trump administration has announced plans to roll back these actions and revoked Executive Order 13985.¹¹⁰

*Although the IRM assessed this commitment as not verifiable in the Action Plan Review, its implementation included verifiable actions as described above.

Commitment 11: Public participation in science (US0123)

- | | |
|--|--|
| <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Modest | <ul style="list-style-type: none"> • Completion: Substantial • Early results: No Notable Results |
|--|--|

This commitment continued ongoing agency efforts to encourage public participation in science through mechanisms such as prize competitions, challenges, and crowdsourcing.¹¹¹ During implementation, a number of agencies took steps to further public participation in science.¹¹² For example, the General Services Administration hosted the ‘Public Engagement with Science Summit: Strategies for Federal Implementation’ conference in April 2024 that brought together representatives from 16 federal agencies to share strategies for engaging the public in science and technology.¹¹³ While verifiable, this commitment lacked clear milestones, and has thus been coded as having no notable results in opening government.

Commitment 12: Public engagement in federal procurement policy-making (US0124)

- | | |
|---|---|
| <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Unclear | <ul style="list-style-type: none"> • Completion: Complete • Early results: No Notable Results |
|---|---|

This commitment supported ongoing efforts to use open innovation and crowdsourcing techniques to gather wider input on federal procurement.¹¹⁴ These continued throughout implementation, with the General Services Administration pointing to three challenges as evidence for completion of this commitment. In May 2023, the Office of Federal Procurement Policy launched the “Navigating Supply Chain Challenges: Tell us Your Toughest Sourcing Challenge” related to procuring products and services.¹¹⁵ However, the results of these challenges, which engaged various stakeholders, were not published and instead intended to inform federal agency ‘forecasts’.

Commitment 13: Rebuilding trust in government (US0125)

- | | |
|---|--|
| <ul style="list-style-type: none"> • Verifiable: No* • Does it have an open government lens? Yes • Potential for results: Unclear | <ul style="list-style-type: none"> • Completion: Substantial • Early results: No Notable Results |
|---|--|

This commitment continued the implementation of Executive Order 14058 on Transforming Federal Customer Experience and Service Delivery to Rebuild Trust in Government,¹¹⁶ which was signed in December 2021.¹¹⁷ A centerpiece of these efforts was the “Life Experiences” framework, which identifies significant life events or transitions such as childbirth and retirement and seeks to improve how people interact with government during those times. Fourteen federal agencies implemented service improvements under this framework. In 2023, the Department of Homeland Security launched a streamlined online disaster assistance application.¹¹⁸ Although the commitment alluded to public engagement to inform these improvements, in practice the focus was largely on service delivery modifications; without a clear open government process or measurable open government results.

*Although the IRM assessed this commitment as not verifiable in the Action Plan Review, its implementation included verifiable actions as described above

Commitment 14: Accountability of high impact service providers (US0126)	
<ul style="list-style-type: none"> ● Verifiable: Yes ● Does it have an open government lens? Yes ● Potential for results: Modest 	<ul style="list-style-type: none"> ● Completion: Complete ● Early results: Moderate
<p>This commitment continued efforts to improve service delivery by high impact service providers (HISPs), comprising over 35 government agencies that provide significant public services.¹¹⁹ During implementation, the government surveyed customers of these service providers and set up a dashboard to measure the levels of trust for meeting public needs.¹²⁰ In some cases, this led to changes in agency implementation. For example, the Bureau of Consular Affairs updated its online passport renewal system in 2023, based in part on customer feedback.¹²¹</p>	
Commitment 15: Reduction of administrative burdens (US0127)	
<ul style="list-style-type: none"> ● Verifiable: Yes ● Does it have an open government lens? Yes ● Potential for results: Modest 	<ul style="list-style-type: none"> ● Completion: Complete ● Early results: Moderate
<p>This commitment centered on federal agencies' ongoing efforts to reduce public burdens under the Paperwork Reduction Act.¹²² The Open Government Secretariat listed three sub-commitments, all of which were completed.¹²³ In July 2023, the Office of Management and Budget released a report on "Tackling the Time Tax: How the Federal Government Is Reducing Burdens to Accessing Critical Benefits and Services" while the Internal Revenue Service created a pilot program called Direct File to allow people to file their taxes directly with the government.¹²⁴ The third sub-commitment, which was the only one with an open government lens, called for engaging civil society through the Legal Aid Interagency Roundtable to help identify programs where administrative burdens could be reduced. Stakeholder meetings and listening sessions informed proposals for policy changes, including a proposed rule published by the Social Security¹²⁵ which led to the revision and streamlining of the Work History Report (Form SSA-3369-BK)—used for disability determination—to make disability applications simpler for applicants and reduce the time needed to review lengthy work histories.¹²⁶</p>	
Commitment 16: Agency Equity Action Plans (US0128)	
<ul style="list-style-type: none"> ● Verifiable: No* ● Does it have an open government lens? Yes ● Potential for results: Unclear 	<ul style="list-style-type: none"> ● Completion: Limited ● Early results: No notable results
<p>This commitment sought to support ongoing efforts to implement agency equity plans.¹²⁷ In February 2024, all Cabinet-level agencies released their second round of Equity Action Plans, and the White House published a progress report on the agency implementation of prior plans.¹²⁸ While these reports were released, they do not reflect substantive changes on open government. Looking ahead, it appears unlikely that these efforts will continue, as the second Trump administration has announced plans to roll them back.¹²⁹</p> <p>*Although the IRM assessed this commitment as not verifiable in the Action Plan Review, its implementation included verifiable actions as described above</p>	
Commitment 17: Public engagement with policy and program implementation (US0129)	
<ul style="list-style-type: none"> ● Verifiable: Yes ● Does it have an open government lens? Yes ● Potential for results: Unclear 	<ul style="list-style-type: none"> ● Completion: Limited ● Early results: No Notable Results

With this commitment, the General Services Administration (GSA) committed to working with civil society and scenario planning experts to create a challenge and prize competition to engage the public in imagining future challenges and opportunities. According to the Open Government Secretariat, the GSA Technology Transformation Services met with relevant experts and identified some next steps, such as an initial challenge design and schedule, but ultimately determined there was insufficient interest from stakeholders to move forward.¹³⁰

Commitment 18: Government-wide anti-corruption strategy (US0130)

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| <ul style="list-style-type: none"> ● Verifiable: Yes ● Does it have an open government lens? Yes ● Potential for results: Substantial | <ul style="list-style-type: none"> ● Completion: Substantial ● Early results: Moderate |
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The commitment focused on implementing the open government components of the U.S. Government's Strategy on Countering Corruption, launched in December 2021, including continuing to build toward beneficial ownership reporting and working with international partners to combat illicit finance.¹³¹ It is broken down into two sub-commitments which saw substantial progress by the end of the implementation period.¹³² By the end of 2024, the U.S. Department of Treasury and the Financial Crimes Enforcement Network had begun processing filings from affected companies and held over 170 public engagements to socialize the new beneficial ownership reporting requirements.¹³³ To further international partnerships in combating illicit finance, the U.S. took a number of steps, such as sending delegations to the International Anti-Corruption Conference.¹³⁴ While promising, efforts to enact beneficial ownership registry and further international cooperation were not yet completed by December 2024. In March 2025, the second Trump administration announced plans to stop enforcing certain beneficial ownership requirements,¹³⁵ a reversal that was condemned by civil society actors.¹³⁶ Since then, the U.S. Treasury Department's Financial Crimes Enforcement Network has said it expects to delete ownership information of U.S. companies from the register.¹³⁷

Commitment 19: Responsible business conduct (US0131)

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| <ul style="list-style-type: none"> ● Verifiable: No* ● Does it have an open government lens? Yes ● Potential for results: Unclear | <ul style="list-style-type: none"> ● Completion: Substantial ● Early results: Moderate |
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This commitment sought to further a more transparent, less corrupt financial environment to support global anti-corruption efforts by updating and implementing the U.S. National Action Plan on Responsible Business Conduct (RBC).¹³⁸ Its primary results involved the publication of the updated action plan in March 2024, which was shaped through consultations with a broad range of stakeholders, including civil society, labor unions, communities, academia, and the private sector¹³⁹ on top of government efforts to conduct public outreach.¹⁴⁰ To provide recommendations to the Department of State, an RBC federal advisory committee with diverse membership from business and civil society convened for the first time in November 2024.¹⁴¹ However, it is unclear whether these initiatives will continue.

*Although the IRM assessed this commitment as not verifiable in the Action Plan Review, its implementation resulted in an updated action plan that demonstrates concrete progress. For example, the Financial Crimes Enforcement Network launched its beneficial ownership filing system on January 1, 2024, as part of the plan.¹⁴²

Commitment 20: Scientific integrity and evidence-based policy-making (US0132)

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| <ul style="list-style-type: none"> ● Verifiable: No* ● Does it have an open government lens? Yes ● Potential for results: Unclear | <ul style="list-style-type: none"> ● Completion: Substantial ● Early results: Moderate |
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This commitment sought to ensure scientific integrity to enhance public trust through, among other things, evidence-based policy-making and objective communications. The commitment's implementation included 0 sub-commitments.¹⁴³ The first continued the implementation of a Presidential Memorandum establishing a Task Force on Scientific Integrity.¹⁴⁴ The second committed agencies to engaging a diverse group of stakeholders as they develop Learning Agendas and Annual Evaluation Plans, with the goal of using evidence in decision-making and building evidence where it is needed. During implementation, the Office of Science and Technology Policy developed a framework for agencies to build scientific integrity into their activities. By September 2024, it reported that 19 agencies had improved or updated scientific integrity plans.¹⁴⁵ A new executive order in May 2025 shifted many requirements by instructing agencies to update their scientific integrity policies to align with a new framework focused on "Gold Standard Science," also shifting scientific oversight from independent processes to political appointees within agencies.¹⁴⁶

*While the IRM assessed this commitment as not verifiable in the Action Plan Review, the Open Government Secretariat identified 2 verifiable sub-commitments during implementation as described above.¹⁴⁷

Commitment 21: Independence of federal statistical agencies (US0133)

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| <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Unclear | <ul style="list-style-type: none"> • Completion: Complete • Early results: Moderate |
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This commitment aimed to implement a requirement of the Confidential Information Protection and Statistical Efficiency Act (CIPSEA; Public Law 115-435) for the Office of Management and Budget (OMB) to develop regulations that strengthen trust in statistical information. To develop this guidance, named the Fundamental Responsibilities of Recognized Statistical Agencies and Units, OMB's Office of the Chief Statistician issued a Notice of Proposed Rulemaking in August 2023 and a draft final rule in June 2024, both open to public input.¹⁴⁸ The final rule was published in October 2024 and took effect in December 2024. While the responsibilities outlined in the regulation reflect longstanding OMB, federal, and international policies, the framework provides the clear standards needed to ensure statistical agencies consistently produce relevant, timely, accurate, and objective data.¹⁴⁹

Commitment 22: Federal payment integrity (US0134)

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| <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? No* • Potential for results: Unclear | <ul style="list-style-type: none"> • Completion: Substantial • Early results: Moderate |
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This commitment further implemented efforts to prevent and reduce improper payments by balancing efforts to reduce waste, fraud, and abuse while maintaining mission integrity. Although the commitment lacked an open government lens as written, the Open Government Secretariat established four respective sub-commitments during implementation, some of which included open government components, which were under way as of December 2024.¹⁵⁰ Among its progress, the Office of Management and Budget (OMB) and the Office of Federal Financial Management launched a Payment Integrity & Fraud Symposium, which held at least nine events in 2023–2024 convening government leadership and non-government stakeholders on strengthening payment integrity.¹⁵¹ The OMB also supported the Joint Financial Management Improvement Program fraud symposiums and annual conference, although the subsequent March 2025 conference was postponed.¹⁵² Importantly, the Biden administration enhanced public reporting on improper payments by, for example, introducing scorecard reporting on high-priority programs and improving readability and user experience on [PaymentAccuracy.gov](https://www.paymentaccuracy.gov).¹⁵³ Moving forward, it remains unclear whether these reporting improvements will be sustained.

*While the IRM assessed this commitment as not having an open government lens in the Action Plan Review, its implementation included actions with a clear open government lens as described above.

Commitment 23: Accountable federal funding management (US0135)

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| <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Modest | <ul style="list-style-type: none"> • Completion: Complete • Early results: Moderate |
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The implementation of a federal program inventory through a single website containing information on all federal programs has been a longstanding goal of multiple administrations.¹⁵⁴ Through this commitment, the Biden administration committed to further this ongoing goal.¹⁵⁵ In February 2024, the Federal Program Inventory (FPI) was launched by the Office of Management and Budget.¹⁵⁶ Civil society stakeholders interviewed by the IRM stated that this progress was commendable given the longstanding demand for this. However, according to them, the FPI was not widely publicized by the government after its release, was tied to ongoing initiatives that were not specific to action plan efforts, duplicated other data sources, and still presented limited or flawed information.¹⁵⁷

Commitment 24: Independence of Federal Inspectors General (US0136)

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| <ul style="list-style-type: none"> • Verifiable: No • Does it have an open government lens? No • Potential for results: Unclear | <ul style="list-style-type: none"> • Completion: Limited • Early results: No Notable Results |
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This commitment aimed to continue implementing the Office of Management and Budget's December 2021 guidance for agencies to maintain cooperative relationships with Inspectors General (IGs).¹⁵⁸ The Biden administration took some steps to further these practices, such as holding a meeting with multiple IGs to discuss and receive feedback on the guidance in December 2023.¹⁵⁹ While these steps were positive, the commitment did not have an open government lens, and is therefore assessed as having no notable results in opening government.¹⁶⁰

*Although the IRM assessed this commitment as not verifiable and lacking a clear open government lens in the Action Plan Review, during the commitment's implementation the Open Government Secretariat reported on verifiable milestones intended to support the IGs' work to prevent and detect waste, fraud, and abuse.

Commitment 25: Collaboration with Inspectors General and oversight community (US0137)

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| <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Unclear | <ul style="list-style-type: none"> • Completion: Substantial • Early results: Moderate |
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With this commitment, the Biden Administration pledged to collaborate with Inspectors General (IGs) and the oversight community throughout the implementation of the Bipartisan Infrastructure Law (BIL).¹⁶¹ Although the commitment, as submitted to OGP, initially lacked specificity, the open government lens became more evident as implementation progressed through actions that enhanced transparency and accountability, such as OMB's collaboration with the Office of Science and Technology Policy to ensure that comprehensive information on BIL awards was publicly available on USASpending.gov. The commitment built on preexisting oversight efforts, improving access to information and fostering greater transparency in infrastructure spending.

Commitment 26: Whistleblower protections (US0138)

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| <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Unclear | <ul style="list-style-type: none"> • Completion: Substantial • Early results: Moderate |
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This commitment aimed to improve whistleblower rights and protection through enhanced guidance and training built on efforts predating the action plan cycle.¹⁶² In April 2024, the Office of Management and Budget released the new Guidance for Federal Financial Assistance that included updated information on whistleblower protections. These improvements include requiring recipients and subrecipients to safeguard employees from retaliation, inform them of their rights in writing, and protect disclosures to federal agencies, Inspectors General, or pass-through entities—promoting safe and accountable reporting of fraud, waste, abuse, or legal violations.¹⁶³ As it went into effect in October 2024, it is too early to evaluate whether this has led to significant changes, whereas it is unclear if the associated trainings have been delivered.

Commitment 27: Access to government information through FOIA (US0139)

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| <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Modest | <ul style="list-style-type: none"> • Completion: Substantial • Early results: Moderate |
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This commitment is assessed in Section II.¹⁶⁴

Commitment 28: Transparency and accountability of federal officials (US0140)

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| <ul style="list-style-type: none"> • Verifiable: No* • Does it have an open government lens? Yes • Potential for results: Unclear | <ul style="list-style-type: none"> • Completion: Complete • Early results: No notable results |
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With this commitment, the Biden administration pledged to continue ongoing efforts to improve the public accountability of administration officials by publishing public financial disclosure forms, ethics pledge waivers, White House visitor logs, and the tax returns of the President and Vice President.¹⁶⁵ While the administration carried out this pledge,¹⁶⁶ the practices were limited in scope and represented a continuation of existing efforts that had been suspended under the previous administration. Furthermore, there is no indication that these practices will be sustained going forward under Trump..

*While the IRM assessed this commitment as not verifiable in the Action Plan Review, its implementation led to verifiable outputs as described above.

Commitment 29: Agency procurement forecasts (US0141)

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| <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Modest | <ul style="list-style-type: none"> • Completion: Complete • Early results: No Notable Results |
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This commitment aimed to support ongoing efforts to make federal contract opportunities more transparent and accessible with the provision of more timely and searchable information that will benefit small businesses and underserved communities.¹⁶⁷ The Office of Small and Disadvantaged Business Utilization's Forecast of Contracting Opportunities Tool, which provides a nationwide dashboard of projected federal procurements, was implemented and used by seven federal agencies but it remains unclear to what extent businesses have used it. While the data supported planning, it does not guarantee future purchases and remains

uncertain if it will be sustained going forward. The commitment is thus assessed as having no notable results.

Commitment 30: Presidential initiative for democratic renewal (US0142)

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| <ul style="list-style-type: none"> ● Verifiable: No* ● Does it have an open government lens? No ● Potential for results: Unclear | <ul style="list-style-type: none"> ● Completion: Limited ● Early results: No Notable Results |
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This commitment aimed to continue implementing the Biden administration's Presidential Initiative for Democratic Renewal. The initiative centered on five themes: (1) supporting free and independent media, (2) fighting corruption, (3) bolstering democratic reforms, (4) advancing technology for democracy, and (5) defending free and fair elections and political processes.¹⁶⁸ Progress was made on these areas, for example by hosting and attending a series of Summits for Democracy. This included attending the third Summit for Democracy in South Korea in 2024, with hundreds of leaders from government, civil society, and the private sector.¹⁶⁹ As the commitment's open government lens did not become evident during implementation, the commitment is assessed as having no notable results in opening government. Given the commitment's notability as a signature agenda of the previous administration, officials interviewed by the IRM indicated that it is not likely to be sustained going forward.¹⁷⁰

*Although the IRM assessed this commitment as not verifiable in the Action Plan Review, its implementation included verifiable activities as described above.

Commitment 31: Community violence intervention (US0143)

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| <ul style="list-style-type: none"> ● Verifiable: No* ● Does it have an open government lens? Yes ● Potential for results: Modest | <ul style="list-style-type: none"> ● Completion: Limited ● Early results: No Notable Results |
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This commitment centered on targeting governmental resources on those most likely to either engage in or be affected by gun violence. During implementation, the Open Government Secretariat included four sub-commitments covering public health interventions, mental health infrastructure expansion, criminal justice reform, and increased transparency in law enforcement data.¹⁷¹ Among its achievements, the government was able to fund 264 grants across more than 40 states to increase the availability of school-based mental health professionals and expand access to medications for Opioid Use Disorder. As written, the commitment alluded to potential opportunities of partnering with civil society and trusted community-based organizations to develop public interventions. However, this collaborative approach did not materialize. Instead, implementation focused on internal improvements to service delivery without clear open government processes or open government results.

*Although the IRM assessed this commitment as not verifiable in the Action Plan Review, its implementation included verifiable achievements as described above.

Commitment 32: Sentencing and confinement conditions (US0144)

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| <ul style="list-style-type: none"> ● Verifiable: No* ● Does it have an open government lens? No ● Potential for results: Unclear | <ul style="list-style-type: none"> ● Completion: Complete ● Early results: No Notable Results |
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This commitment aimed to continue implementing rules to allow incarcerated individuals to earn credits for good conduct and participating in recidivism reduction programming. Several steps have been implemented, such as a new recidivism tool and needs assessment, and plans have been made to sustain these efforts at the Department of Justice and Federal Bureau of Prisons.¹⁷² While this commitment represents a positive initiative, its open government lens did

not become clear during implementation, and has therefore been assessed as having no notable results in opening the government.

*Although the IRM assessed this commitment as not verifiable in the Action Plan Review, its implementation included verifiable activities as described above.

Commitment 33: Support for justice-impacted individuals (US0145)

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| <ul style="list-style-type: none"> • Verifiable: No* • Does it have an open government lens? No • Potential for results: Unclear | <ul style="list-style-type: none"> • Completion: Complete • Early results: No Notable Results |
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This commitment sought to improve opportunities for re-entering society after incarceration. During implementation, the Open Government Secretariat identified three sub-commitments, all of which were completed.¹⁷³ In July 2023, applications for federal student aid funding for incarcerated individuals were reinstated in correctional facilities.¹⁷⁴ Meanwhile, the Department of Housing and Urban Development conducted a comprehensive review of regulations pertaining to exclusionary housing actions for those with criminal backgrounds and expanded access to high-speed internet service for incarcerated individuals.¹⁷⁵ While positive, the commitment lacked an open government lens and is assessed as having no notable results in opening government.

*Although the IRM assessed this commitment as not verifiable in the Action Plan Review, its implementation included verifiable activities as described above.

Commitment 34: Marijuana-related federal offense (US0146)

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| <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Modest | <ul style="list-style-type: none"> • Completion: Complete • Early results: Moderate |
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This commitment sought to implement pardons for individuals convicted of simple marijuana possession. As lead implementing agency, the Domestic Policy Council completed all three sub-commitments.¹⁷⁶ The Biden administration launched a portal for pardoned individuals to apply for a certificate confirming their new legal status, initiated a review of marijuana scheduling, and encouraged governors to issue pardons for certain state-level offenses.¹⁷⁷ The commitment is assessed as having moderate results although its open government lens rested on the government's responsibility to ensure accountability by protecting the rights of those pardoned through clemency. It is unclear if the federal government's encouragement for governors to reconsider state-level offenses would be sustained over time.

Commitment 35: Effective and accountable policing and criminal justice (US0147)

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| <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Modest | <ul style="list-style-type: none"> • Completion: Complete • Early results: Moderate |
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This commitment aimed to restore public trust in the criminal justice system by creating a centralized database of law enforcement misconduct and enhancing transparency around law enforcement data.¹⁷⁸ The Open Government Secretariat reported the commitment as completed. In December 2023, the Department of Justice launched the National Law Enforcement Accountability Database (NLEAD).¹⁷⁹ A year later, the Bureau of Justice Statistics published its first report of misconduct records from 2018–2023 and database usage during 2024. Despite restricted access only for federal agencies and anonymized data, NLEAD has been actively used in hiring decisions. Usage increased steadily, with 30 percent of all 2024 searches occurring in August alone.¹⁸⁰ Additional milestones included forming the Criminal

Justice Statistics Interagency Working Group in January 2023 and releasing a public information request shortly after. In May 2023, the group published a report outlining recommendations to improve data collection, use, and transparency across agencies.¹⁸¹ However, NLEAD remains publicly inaccessible despite support from civil society due to political and structural barriers,¹⁸² effectively limiting transparency. In January 2025, the second Trump administration revoked the executive order authorizing NLEAD—halting federal-level progress and drawing criticism from civil society stakeholders.¹⁸³ Although the federal initiative has ended, the state-level National Decertification Index mechanism remains in place, which enables participating jurisdictions to check disciplinary records of law enforcement officers across state lines.¹⁸⁴

Commitment 36: Access to justice (US0148)

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| <ul style="list-style-type: none"> ● Verifiable: Yes ● Does it have an open government lens? Yes ● Potential for results: Unclear | <ul style="list-style-type: none"> ● Completion: Complete ● Early results: Moderate |
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This commitment aimed to improve access to justice for individuals through, for example, legal aid.¹⁸⁵ A number of steps were taken to support this effort, such as organizing the White House Legal Aid Interagency Roundtable, which helped to increase transparency by developing a resource to consolidate information on federal funding opportunities for legal aid, and hosting an April 2024 webinar with members of civil society to discuss these opportunities.¹⁸⁶

⁷⁵ Editorial notes:

1. Commitments' short titles may have been edited for brevity. For the complete text of commitments, see: U.S. General Services Administration, Fifth U.S. Open Government National Action Plan, December 2022, https://www.gsa.gov/system/files/NAP5-fifth-open-government-national-action-plan_0.pdf
2. For more information on the assessment of the commitments' design, see Open Government Partnership, Independent Reporting Mechanism, Action Plan Review: United States 2022–2024, 22 May 2024, <https://www.opengovpartnership.org/documents/united-states-action-plan-review-2022-2024>

⁷⁶ The numbering system used by the GSA to track commitments differs from that used by OGP, so both are provided.

⁷⁷ The White House, A Vision for Equitable Data: Recommendations from the Equitable Data Working Group, April 2022, <https://bidenwhitehouse.archives.gov/wp-content/uploads/2022/04/eo13985-vision-for-equitable-data.pdf>

⁷⁸ When the Open Government Secretariat was established, one of its first actions was to further clarify commitments by identifying sub-commitments and responsible agencies.

⁷⁹ U.S. General Services Administration, Expand the production, dissemination and use of equitable data, accessed 23 April 2025, <https://www.gsa.gov/governmentwide-initiatives/us-open-government/resources/fifth-us-open-government-national-action-plan/track-our-progress/theme-1#tab--US0113>

⁸⁰ The White House, Office of Science and Technology Policy, U.S. 2023. Progress on Implementation of the Recommendations of the Equitable Data Working Group, March 2023, <https://bidenwhitehouse.archives.gov/wp-content/uploads/2023/03/Progress-on-Equitable-Data-Mar2023.pdf>

⁸¹ The White House, Initial Rescissions of Harmful Executive Orders and Actions, 20 January 2025, <https://www.whitehouse.gov/presidential-actions/2025/01/initial-rescissions-of-harmful-executive-orders-and-actions>

⁸² The White House, Karin Orvis, Reviewing and Revising Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity, 15 June 2022, <https://web.archive.org/web/20250109050821/https://www.whitehouse.gov/omb/briefing-room/2022/06/15/reviewing-and-revising-standards-for-maintaining-collecting-and-presenting-federal-data-on-race-and-ethnicity>

⁸³ U.S. Office of Management and Budget, Updated Statistical Policy Directive No. 15 Released by OMB, accessed 23 April 2025, <https://spd15revision.gov>; U.S. General Services Administration, Revise the federal standards for collecting and reporting race and ethnicity, accessed 23 April 2025, <https://www.gsa.gov/governmentwide-initiatives/us-open-government/resources/fifth-us-open-government-national-action-plan/track-our-progress/theme-1#tab--US0114>

⁸⁴ U.S. Office of Management and Budget, OMB Statistical Policy Directive 15 on Race and Ethnicity Data Standards, 2024, <https://spd15revision.gov/content/spd15revision/en/2024-spd15.html#:~:text=15%3A%20Standards%20for%20Maintaining%2C%20Collecting,programs%20serve%20a%20diverse%20America>

⁸⁵ SPD15Revision.gov, Revisions to OMB's Statistical Policy Directive No. 15: Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity, Office of Management and Budget. Extension of Timelines for Implementation of Statistical Policy Directive No. 15, News bulletin, 26 September 2025, accessed 3 November 2025, <https://spd15revision.gov/content/spd15revision/en/news/2025-09-26-bulletin.html>

⁸⁶ U.S. General Services Administration, Fifth U.S. Open Government National Action Plan, p. 5.

- ⁸⁷ U.S. General Services Administration, Ensure transparency in federal procurement through Made in America waivers,” accessed 23 April 2025, <https://www.gsa.gov/governmentwide-initiatives/us-open-government/resources/fifth-us-open-government-national-action-plan/track-our-progress/theme-1#tab--US0115>
- ⁸⁸ Made in America, Waivers, accessed 2 July 2025, <https://www.madeinamerica.gov/waivers>
- ⁸⁹ U.S. General Services Administration, Broaden public access to federally-funded research findings and data, accessed 23 April 2025, <https://www.gsa.gov/governmentwide-initiatives/us-open-government/resources/fifth-us-open-government-national-action-plan/track-our-progress/theme-1#tab--US0116>
- ⁹⁰ U.S. Congress, Foundations for Evidence-Based Policymaking Act of 2018, 14 January 2019, <https://www.congress.gov/115/plaws/publ435/PLAW-115publ435.pdf>
- ⁹¹ As stated in the action plan; U.S. General Services Administration, Streamline researcher access to confidential federal data for evidence building, accessed 23 April 2025, <https://www.gsa.gov/governmentwide-initiatives/us-open-government/resources/fifth-us-open-government-national-action-plan/track-our-progress/theme-1#tab--US0117>; National Center for Science and Engineering Statistics, Standard Application Process, National Science Foundation, <https://ncses.nsf.gov/initiatives/standard-application-process>
- ⁹² U.S. General Services Administration, Expand online access to the National Archives, including for underserved communities, accessed 23 April 2025, <https://www.gsa.gov/governmentwide-initiatives/us-open-government/resources/fifth-us-open-government-national-action-plan/track-our-progress/theme-1#tab--US0118>
- ⁹³ U.S. National Archives and Records Administration, National Archives Catalog Enhancements, accessed 23 April 2025, <https://www.archives.gov/research/catalog/ngc-preview>; U.S. National Archives and Records Administration, Catalog, accessed 23 April 2025, <https://catalog.archives.gov>
- ⁹⁴ U.S. National Archives and Records Administration, Digitizing Puerto Rico’s Historical Records, last modified 24 July 2023, <https://www.archives.gov/news/articles/puerto-rico-records-digitization>; U.S. National Archives and Records Administration, National Archives Catalog (item AA-15RW), accessed July 2025, <https://catalog.archives.gov/search?contributionType=tag&contribution=AA-15RW>
- ⁹⁵ U.S. Federal Register, Executive Order 14057: Catalyzing Clean Energy Industries and Jobs Through Federal Sustainability, 8 December 2021, <https://www.federalregister.gov/documents/2021/12/13/2021-27114/catalyzing-clean-energy-industries-and-jobs-through-federal-sustainability>
- ⁹⁶ U.S. General Services Administration, Set government-wide federal sustainability goals and establish agency plans, targets, and reporting, accessed 23 April 2025, <https://www.gsa.gov/governmentwide-initiatives/us-open-government/resources/fifth-us-open-government-national-action-plan/track-our-progress/theme-1#tab--US0119>
- ⁹⁷ U.S. Office of Federal Sustainability, Federal Government-Wide Progress on Sustainability Goals, archived December 2024, <https://web.archive.org/web/20241219034319/https://www.sustainability.gov/progress.html#>
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