Consultation on IMF's Revised Draft of the Fiscal Transparency Code: Feedback from OpenSpending

This document is submitted by OpenSpending, a project of the Open Knowledge Foundation in response to the IMF consultation with deadline August 30th.

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Summary of recommendations

The OpenSpending community applauds the IMF's decision to refocus the Fiscal Transparency Code on the quality of reported outputs. We have several concrete suggestions for how IMF data could make their data available as open, accessible and reusable data.

Our suggestions are of a legal and technical character, and are essential for promoting improved access to and reuse of data from IMF. They are of central importance for fiscal transparency. We wish to highlight that the World Bank as well as several UN bodies such as UNDP have initiated ambitious changes in data policies in order to embrace the principles of open data [1]. We also believe that IMF should seek guidance in the Open Data Charter, which was signed by G8 leaders to promote transparency, innovation and accountability in June 2013 [2].

We believe that it is necessary to take the steps we outline below if fiscal transparency is to be translated into real accountability. The review of the IMF Fiscal Transparency Code offers an important opportunity to implement changes towards open data.

Data should be machine-readable

The Fiscal Transparency Code should explicitly recommend that all fiscal data are published in a machine-readable format. Publishing data in non-machine readable formats or through proprietary applications prevents reusability from users and results in decreased transparency. Making machine-readable data formats standard in fiscal reporting would therefore be an important step forward for the usability and accessibility of financial data. Formats such as CSV or XML can be defined as "machine-readable", while non-machine readable formats are

designed for printing or on-screen display rather than computation. Non-machine readable data formats include PDF and Microsoft Word's .doc(x) format.

In practise substantial time and effort are spent making non-machine readable data useful for analysis. For academics, students and journalists with limited time available this in reality will appear as a restriction on access to the data from IMF. Processing non-machine readable data and extracting data from non-machine-readable documents, can mean that a simple model or visualisation will take days rather than a few minutes.

By recommending that fiscal reporters avoid non-machine readable formats in favour of machine-readable ones, the Code can make a substantial improvement of IMFs data in terms of reusability and transparency.

Data should be openly licensed

The current draft of the Fiscal Transparency Code does not include any description of the license under which IMFs fiscal reports and data is published. We believe that IMF should release data under an open license. Fiscal transparency requires the publication of fiscal data under an open and permissive license. The Code should recognize that restrictive licenses limits reuse of the data.

Fiscal data can help inform academics as well as the wider public and contribute to effective policy-making as empirical basis. Analyses which cannot be reproduced or otherwise verified are an unsound basis for policy. If analyses are based on fiscal data which are not publicly available, cannot be republished or otherwise made available for inspection, their premisses, methodologies and claims cannot be directly examined by the public, and policies based on such analyses therefore do not stand on firm ground. As open data enables the wider public to use and analyse the data, the feedback to the data publisher will also help improve the quality of the data.

We recommend IMF as a publisher of fiscal data to adopt a license which accords with the Open Definition.

Data should be downloadable in bulk

The Fiscal Transparency Code should recommend that fiscal data be made available as bulk download. Web applications that hide data behind an interactive interface hinder the unrestricted use of the data. Mediated access to data can be useful for dissemination and explanation purposes, as long deprecated in favour of direct bulk download. It is however important to state that enabling bulk download of IMF's data, would not render visualisations or applications from IMF obsolete. Merely we wish to address that data should as a minimum be available as bulk download.

Data which is not made available as bulk download, but only presented in an interactive interface (e.g. a Flash or Silverlight application) is not immediately available to further

processing and analysis. Such data must be transcribed or extracted, both of which are time-consuming and error-prone processes.

Data should be downloadable in bulk. File naming conventions should be consistently applied to make bulk downloading as easy as possible. Frequently updated data should be made available via an API in addition to bulk download.

Data should be granular

The Fiscal Transparency Guide should recommend granularity as a principle of fiscal data publication and recommend that raw data is released in a disaggregated form.

Aggregate data are considerably more difficult to use to effectively examine loan tranches, payments, and obligations. Allow us to illustrate this with an example. If the IMF has provided a loan which has been paid in 5 tranches to some country, it is less useful to know the aggregate portfolio than to know the amounts and time of each tranche payment. Releasing granular transactional data is therefore essential to financial accountability.

Other issues

Clear metadata. Data should be published with metadata, which provides clear guidance as for how to successfully interpret it. The metadata should include the dates of the time period covered by the dataset; units of measurement; countries involved in the data; versioning information; and author information.

Timeliness. Data should be published within a time period that would allow it to have a meaningful impact. Having access to old or obsolete data renders a barrier for the users and in reality constitutes a lack of transparency.

Persistence. Data storage is so inexpensive that any data published should be made permanently available. In the case that it is absolutely necessary to remove data after some period of time, publishers should specify at the time of publication the date and time when the data will be removed.

Notes:

[1] http://data.worldbank.org/about/open-government-data-toolkit/knowledge-repository
[2] https://www.gov.uk/government/publications/open-data-charter/g8-open-data-charter-and-technical-annex