



Office of the Chief
Records Officer for the
U.S. Government

Sent Via Email. No Hard Copy to Follow.

September 16, 2025

Andrew Smith
Agency Records Officer
811 Vermont Avenue, NW
Washington, DC 20571

Dear Mr. Smith,

The National Archives and Records Administration (NARA) acknowledges receipt of the Export-Import Bank of the United States (EXIM) report regarding the potential unauthorized disposition of EXIM Freedom of Information Act (FOIA) data/records affected by OPEXUS' FOIAXpress February 18, 2025 system outage and data loss incident.

According to the report, EXIM uses FOIAXpress to track FOIA requests and the system contains some administrative tracking data, scheduled as temporary under General Records Schedule (GRS) 4.2, items 001 and 020. All other FOIA processing is performed on internal EXIM systems. As a result of the FOIAXpress incident, administrative tracking data for 12 EXIM FOIA requests were initially affected. OPEXUS was able to recover most of the data and sent EXIM the recovered data. EXIM's FOIA office was able to take the recovered data from OPEXUS and fill in any missing information from EXIM's internal systems to fully recover all administrative tracking data that was initially lost.

To prevent future loss of data, EXIM has reviewed the incident and assessed the agency's records management processes, procedures, and systems related to the event. The EXIM data stored in FOIAXpress is almost duplicative of data that is generated and stored within EXIM internal systems. As a result, EXIM can fully restore the FOIAXpress data by re-entering any lost data using the information generated and stored within EXIM's internal systems. EXIM has also communicated with OPEXUS regarding this incident and OPEXUS has assured EXIM that they have strengthened their security protocols and that "to prevent similar incidents, OPEXUS is enhancing its offboarding processes, improving access controls, and increasing monitoring measures."

Based on this information, the reporting requirements of 36 CFR 1230.14 have been met and NARA considers this matter closed. I appreciate your attention to this matter. If you have any questions or wish to discuss this further, please contact the Records Management Oversight and Reporting Program by email at UnauthorizedDisposition@nara.gov.

Sincerely,

A handwritten signature in black ink that reads "William Fischer". The script is cursive and fluid, with the first name "William" and last name "Fischer" clearly distinguishable.

WILLIAM FISCHER
Chief Records Officer
for the U.S. Government (Acting)