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Description of document:	International Trade Administration (ITA) Guide to Written Impact Narratives (WINS) for Global Markets Export Promotion 2021
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UNITED STATES DEPARTMENT OF COMMERCE
International Trade Administration
Washington, DC 20230

RE: DOC-ITA-2023-000110

This letter is in response to your Freedom of Information Act (FOIA) request submitted to the U.S. Department of Commerce (Department), International Trade Administration (ITA) on October 13, 2022. In your request you sought:

“A copy of the manual or handbook regarding “Written Impact Narratives”. A copy of a sample Written Impact Narrative. A copy of each listing of Written Impact Narrative at ITA. A copy of the administrative process for Written Impact Narratives.”

The request was amended on November 7, 2022, to seek “WIN’s specifically for GM Export Promotion.”

ITA began its search November 28, 2022. After a thorough search, ITA has located four (4) pages of responsive records to your request. Three (3) pages will be partially withheld as it contains redactions under Exemption 4 of the FOIA. 5 U.S.C. §§ 552(b)(4).

Exemption 4 allows the withholding of “trade secrets and commercial or financial information obtained from a person that is privileged or confidential.” 5 U.S.C. § 552(b)(4). The withheld information is commercial or financial information. The term “commercial” has been construed broadly to apply to both information that is “of a commercial nature” or “serves a commercial function.” The companies that supplied this information are considered persons, because the term “person,” as applied to Exemption 4, includes “an individual, partnership, corporation, association, or public or private organization other than an agency.”

ITA has determined that the commercial or financial information be treated as private and was submitted to ITA with the assurance of privacy. “Where commercial or financial information is both customarily and actually treated as private by its owner and provided to the government



under an assurance of privacy, the information is 'confidential' within the meaning of Exemption 4." See Food Marketing Institute v. Argus Leader Media, 139 S. Ct. 2356 (2019). The withheld information is also not customarily disclosed to the public and is treated as private by the submitter. For these reasons, the information is being withheld under Exemption 4 of the FOIA

If you have any questions or concerns or would like to discuss any aspect of your request, you may contact the analyst who processed your request, Kimberly Outlaw, at foia@trade.gov.

You may also contact ITA's FOIA Public Liaison, using the following information:

Mayank Bishnoi
Compliance and Regulatory Affairs, Chief
International Trade Administration
1401 Constitution Avenue, N.W., Room 40003
Washington, D.C. 20230
(202) 482-5435
Email: foia@trade.gov

Please refer to your FOIA request tracking number, DOC-ITA-2023-000110 when contacting ITA.

In addition, you may seek FOIA mediation services offered by the National Archives and Records Administration, Office of Government Information Services (OGIS). You may contact OGIS using the following information:

Office of Government Information Services
National Archives and Records Administration
8601 Adelphi Road-OGIS
College Park, MD 20740-6001
(202) 741-5770 or toll free, 1-877-684-6448
email: ogis@nara.gov

In accordance with 15 C.F.R. §§ 4.10(a) and (b), you have the right to appeal this determination within 90 calendar days from the date of this letter. The Department deems appeals arriving after normal business hours (8:30 a.m. to 5:00 p.m., Eastern Time, Monday through Friday) as received on the next normal business day. If the 90th calendar day for submitting an appeal falls on a Saturday, Sunday, or legal public holiday, an appeal received by 5:00 p.m., Eastern Time, the next business day will be deemed timely. The appeal should include a copy of the original request, this response, and a statement of the reasons why you consider the Department made this determination in error. Please mail written appeals to the below address:

Assistant General Counsel for Litigation,
Employment, and Oversight

U.S. Department of Commerce
1401 Constitution Avenue, N.W., Room 5896
Washington, D.C. 20230

You may send an appeal by e-mail to FOIAAppeals@doc.gov, or through FOIAonline at <https://www.foiaonline.gov/foiaonline/action/public/home> if you have a FOIAonline account. Clearly mark "Freedom of Information Act Appeal", in the e-mail subject line, or on both the appeal letter and envelope.

For the purpose of assessing fees, there are no billable fees for processing of this request.

Sincerely,

Mayank Bishnoi

Mayank Bishnoi
Compliance and Regulatory Affairs, Chief
International Trade Administration

Enclosure
Responsive Record

WRITTEN IMPACT NARRATIVES (WINS)



WHAT ARE THEY?

WINS are GM's most compelling reportable outcomes to Congress, OMB, and the public. They must demonstrate GM's substantive role leading to significant outcomes for U.S. exporters, industries, or the broader U.S. economic security interests.

WINS detail **mission-driven, substantive GM assistance** that **significantly impacts a client** and leads to a **positive and tangible result**.

WINS must embody GM's mission and are meant to bolster our public policy argument and value proposition. As such, GM's assistance must be clearly substantive, such that the client probably would not have achieved the same results without our help. If the U.S. client is not aware of GM and how we contributed to their success, a WIN should not be created.

There are four types of GM WINS as follows:

- **Export Promotion WINS:** Significant export-based outcomes resulting from substantial GM assistance to U.S. companies through GM's suite of free and/or [fee-based](#) export promotion services and events.
- **Commercial Diplomacy WINS:** Significant trade and non-trade barrier outcomes resulting from GM's engagements with a foreign government on behalf of U.S. companies, industries, or the broader U.S. economic security interests.
- **Advocacy WINS:** Foreign government procurement contracts signed with U.S. companies (or consortia of companies with U.S. participation) as a result of GM's Advocacy assistance.
- **Investment Promotion WINS:** New or increased foreign direct investments (FDI) in the U.S. or the implementation of new or enhanced U.S. investment attraction strategies or the removal of an investment obstacles resulting from GM's investment promotion assistance.

(b) (4)

WHAT ARE WINS? DETAILS BY WIN TYPE

Export Promotion WINS

Export Promotion WINS are significant export-based outcomes resulting from substantial GM assistance to U.S. companies through GM's suite of free and/or fee-based export promotion services and events.

Report When:

A U.S. export client confirms that GM's assistance (free and/or fee-based) contributed to one or more of the following business outcomes:

- 1) **Initial or increased sales of a U.S. product or service**² to a foreign entity³ and the product/service is of U.S. origin or meets the 51% U.S. content criteria; for definitions and examples, see [GM's Eligibility Policy](#).
- 2) **Signed commercial agreement** (distribution, wholesale, franchise, or joint venture) with a foreign entity to export U.S. products/services.
- 3) **Establishment of a physical presence overseas** (excluding manufacturing facilities) to export U.S. products/services.
- 4) **Avoidance of harm** – protecting a U.S. client from a deliberate fraudulent attempt by a foreign entity to embezzle funds from the client. Sometimes, U.S. clients seek our assistance to validate a business action they are about to take, and we counsel them not to, or are about to fall victim to a predatory money scam and we prevent it from happening. In such situations we rely on our collaborative due diligence, organizational experience, and foreign contacts to ascertain the legitimacy of a business venture and protect the U.S. client from harm, e.g., ABC client contacts the USEAC with a too good to be true deal in Atlantis; USEAC raises a flag and contacts Post; Post calls the Ministry of Public Works and confirms the scam.
 - When drafting 'avoidance of harm' WINs, please include any client-reported dollar values 'saved' in the description of the WIN result only, **not** in the designated dollar value fields.
 - Delivery of an ICP does **not** constitute an 'avoidance of harm' WIN – it is merely a service. For an ICP to be weaved into a WIN, the client must confirm that it was through the ICP service that GM helped them avoid harm to their business. An ICP, like all GM assistance, is a means to an end, not an end in-and-of itself.
- 5) **Securing foreign publicity**⁴ for a **U.S. travel & tourism client** that leads to increased tourism exports.
 - If the publicity treats several U.S. travel/tourism clients as a group, merely lists them, or at most provides cursory mention of each, then a WIN should **not** be claimed.
 - The impact of the publicity should be clearly significant as evidenced by the advertising equivalent value and one or both of the following: number of people who viewed or were exposed to the publicity, or a compelling quote from the U.S. client indicating how the publicity increased tourism.
 - Ultimately, the client must confirm that they've achieved increased tourism due in part to our assistance for a WIN to be reported. Ideally, the client would also provide a dollar value estimate from the increased tourism exports. Please note that the **advertising equivalent value** should be listed in the description of the impact, while **only** the dollar value of increased tourism should be included the designated dollar value fields.

² Service transactions include but are not limited to: travel and tourism, educational services purchased by non-U.S. students, financial, engineering, training, consulting, brokerage, and/or real estate services.

³ Excludes Advocacy sales (see Advocacy WINs section) but includes sales to a foreign government resulting from a procurement issued by the Millennium Challenge Account in that country.

⁴ Publicity includes but is not limited to media promotion/coverage in a: foreign journal, magazine, newspaper, blog, television program, and/or radio show

- ❖ **Major events or milestones for a U.S. travel & tourism client** that leads to increased tourism exports.
 - Must demonstrate a significant increase in the attractiveness of the U.S. as a tourist destination and consequent growth in U.S. travel and tourism exports.
 - To claim a WIN under this criterion, attached to the WIN should be client confirmation of how the event/milestone led to subsequent travel and tourism exports to a given market. The activities listed below could make the basis for a travel and tourism WINs pending client confirmation of business-significant outcomes:
 - *Organize and/or play a substantial role in promotional events* such as Familiarization Tours, Roadshows, Webinars in concert with Brand USA, Visit USA, or other stakeholders.
 - *A signed Memorandum of Intent (MOI) to directly promote/increase tourism* to the U.S.
- 6) **Cross-border exports from online sales channels and/or increased international website visitors** that transformed into interested foreign buyers. When reporting these results, it is suggested that the following key performance indicators be included to help capture the full scope and impact of CS counseling and services:
 - **Cross-border digital marketing return on investment (dmROI)**, illustrates the monetary gain to a business from its cross-border digital marketing efforts. The client tracks how much they spend on a digital marketing campaign and subtracts that from gains attributed to cross-border online sales for a given period. This figure is given to the Trade Specialist and clearly states the dollar value of the cross-border digital counseling received by the client.
 - ❖ **FORMULA: Total Cross-border Revenue Attributed to DM (-subtract) Total Cost of Cross-border DM (÷ by) Total Cost of Cross-border DM = Cross-border Digital Marketing ROI (dmROI).**
 - Cross-border online sales conversion rate, illustrates the effectiveness of cross-border digital marketing efforts by capturing the number of international website visitors that transform into interested foreign buyers, resulting in a percentage rate of this “conversion”. The client establishes “trackable sales touchpoints” (like our “activities & cases”) and divides that by their overall cross-border site visitors for a given period. This figure is given to the Trade Specialist, and when compared to the industry average of 1.5% helps to put a number figure to the effectiveness of the assistance provided in cross-border digital strategy counseling.
 - ❖ **FORMULA: Cross-border form submissions (+add) cross-border tracked calls (+add) cross-border tracked email (+by) Total cross-border website visitors = Conversion rate.**
 - ❖ **Note: The tracked items may vary from company to company depending on what the company deems relevant to their overall digital strategy around online sales**

7) **Other outcomes that directly contribute to increased export revenue, foreign market share, and attributable U.S. job creation.** (b) (6)

As the global economy evolves, U.S. companies innovate and adopt new business models to grow exports and increase foreign market share. Likewise, as an organization we seek to continuously improve our understanding of our clients' needs and how best to meet those in order to achieve client-beneficial export outcomes.

If you have an outcome that does not quite fit the previous 6 categories (falls outside the non-reportable WINs, see below) and you see significant client benefits resulting from GM's assistance, you may contact OSE to review and discuss the outcome with you. Please consult with your management and contact OSE/Chris Christov (b) (6) for review.

Report on behalf of:

A single U.S. business, U.S. educational institution, or U.S. tourism organization.

Export Promotion WINs should **not** be reported on behalf of a foreign entity. Results achieved when GM works **solely with a foreign buyer** to facilitate the purchase of U.S. goods and services should be captured in an export promotion case for the foreign buyer. Subsequently, if GM confirms the sale with the U.S. company, a WIN may be reported under the U.S. company.

Export Promotion WINs should **not** be reported on behalf of an **intermediary** such as an industry association or trade event organizer.

Allowable Reporting Period:

Within 12 months of the result and 24 months of last GM assistance related to the result.

Dollar Value and Jobs Created:

The EP WIN dollar value and jobs created fields are:

- **Actual Initial Value (Actual Initial Export Dollar Value [Client Verified])** – Actual export dollar value provided and verified by the client. These include actual sales, revenue, or other dollar value impact as a direct result of this WIN. This should **not** include any Advertising Equivalent Value (AEV). AEV can be recorded in the Impact/Results section instead.
- **Actual Follow-on Value (Actual Follow-on Export Dollar Value [Client Verified])** – Actual export follow-on dollar value provided and verified by the client. These include additional sales, revenue, or other dollar value impact not originally reported in the WIN. This should **not** include any Advertising Equivalent Value (AEV). AEV can be recorded in the Impact/Results section instead.
- **Number of Jobs Created (Client Provided)** – The number of jobs created as a direct result of the assistance associated with the WIN, provided and verified by the client.
- **Number of Jobs Supported (Client Provided)** – The number of jobs supported as a direct result of the assistance associated with the WIN, provided and verified by the client.