U. S. DEPARTMENT OF INTERIOR
FREEDOM OF INFORMATION ACT (FOIA)
REPORT AND IMPROVEMENT PLAN

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PREFACE

The Department of Interior (DOI) Freedom of Information Act (FOIA) Plan provides a roadmap for improving administration of the FOIA within the Department of the Interior. The plan, consistent with Executive Order 13392, dated December 14, 2005, addresses key aspects of the Department's FOIA and is intended to provide a citizen-centered, results-oriented approach while strengthening compliance with the FOIA. The Executive Order states that agencies must:

1) Designate a Chief FOIA Officer,
2) Complete the Review and Plan, and Reporting
   - By June 14, 2006, send a report containing a summary of the review and agency's FOIA improvement plan to DOJ (with a copy to Office of Management and Budget) and post it to the agency's website
   - In the agency's FY 06 and FY 07 FOIA report to DOJ (the annual report to DOJ), the agency shall include information on the agency's performance in meeting the milestones of its FOIA improvement plan
3) Establish a FOIA Requester Service Center
4) Designate Public Liaisons

This plan is presented on behalf of the Department of the Interior to fulfill these requirements. Furthermore, this plan is in alignment with the Interior Information Technology (IT) Strategic Plan and the overall mission and vision of our FOIA program. Successful and full implementation of the plan requires full commitment by Interior employees and the efficient use of resources.

DOI MISSION AND VISION FOR FOIA

Mission
To provide access to Department of the Interior documents through a citizen-centered services and a results-oriented Freedom of Information Act services program.

Vision
The vision of the Department of the Interior's Freedom of Information Act program is to create an effective knowledge-sharing environment while safeguarding sensitive information in accordance with Federal laws and regulations.

We want to acknowledge the following individuals in completion of this effort: Alexandra Mallus, Department of the Interior FOIA Officer; Miriam Lam, Department of the Interior Senior FOIA Program Officer; Ann Sulkovsky, Office of the Chief Information Officer, and Alyson Pridgen, Office of the Chief Information Officer. Additionally, we would like to acknowledge the core members of the Department of the Interior Freedom of Information Act Implementation Team: Sue Ellen Sloca, FOIA Officer, Office of the Secretary; Linda Thomas, Office of the Secretary, FOIA Office; Ginny Morgan, FOIA Officer, Minerals Management Service; John Kuhn, Minerals Management Service, FOIA Office; and Robin Friedman, Acting Assistant Solicitor – General Legal Services, Division of General Law, SOL.

A – CHARACTERIZATION OF OVERALL NATURE OF DOI FOIA OPERATIONS

The Department's broad, multi-faceted mission and geographically dispersed services and programs are responsible for maintaining and improving the Nation's natural and cultural resources, economic vitality, and community well being. The Department's 70,000 employees and 200,000 volunteers live and work in the communities, large and small, that they serve. They deliver programs through partnerships and cooperative relationships that engage and invite citizens, groups, and businesses to participate. This citizen-centered approach leverages the Department's activities, which include:

- Managing one in every five acres of land in the United States.
- Operating 388 national parks and 545 national wildlife refuges.
- Managing lands and waters that generate one-third of the Nation's domestic energy supply.
- Operating over 800 dams and irrigation facilities.
- Serving American Indians, Alaska natives, and affiliated island communities.
- Providing scientific information to advance knowledge of our surroundings.
- Working with States to restore abandoned mine land sites and protect communities.

The core responsibility of the Department is to maintain the resources in its charge and to provide services to those who use or rely on them, such as: park visitors, wildlife watchers and hunters, stockmen and miners, Tribes and individual Indians, farmers and electric power users. While the Department is committed to ensuring the public has access to the information it is entitled to under the law, we have an obligation to protect the Nation's resources in accordance with our mission.

In the performance of our duties, the Department receives a significant number of Freedom of Information Act (FOIA) requests from a vast array of requesters. The FOIA challenges are immense in this environment. The FOIA program is staffed at the Department level, as well as in each bureau/office. The Department has designated the Chief Information Officer as the Chief FOIA Officer. Under his purview, responsibility of the FOIA is administered. The Departmental FOIA program is located in the Information Management Division (IMD), under the Office of the Chief Information Officer (OCIO). The OCIO is responsible for developing regulations, guidelines, procedures, and standards for the Department's FOIA program; providing program oversight, technical assistance, and training to employees to ensure compliance with the Act. In addition, each bureau and office has a designated FOIA Officer responsible for implementing the program within their respective bureaus and offices. The Office of the Solicitor (SOL) is responsible for making legal interpretations of the Act and providing guidance to bureaus and offices. The SOL is also responsible for administering the FOIA appeals program, which includes making decisions on FOIA appeals. The Department is committed to being responsive to the customer, while endeavoring to address developing FOIA concerns.

In 2002, the Department faced a significant litigation challenge in *Cobell v Norton*, which had a drastic impact on the FOIA program, whereby connectivity became an issue. As a result, the Department developed procedures to ensure that vital information was captured and maintained. At this time, some offices within the Department do not have access to the Internet. Those include the Office of the Solicitor and the Bureau of Indian Affairs. They continue to manage their FOIA requests manually, which provides an additional challenge to sharing information and managing the FOIA program Department-wide. The following goals, not listed in any specific order, have been identified as areas for improvement.

The Department believes that providing quality customer service is extremely important to achieve a successful FOIA program. To provide the most satisfactory customer service, the Department recognizes the importance of electronic services and the need to address the current status of FOIA websites. The FOIA websites within DOI bureaus and offices are not consistently maintained and updated as appropriate. Plans are to review each bureau/office FOIA website and work with FOIA Officers to ensure websites are customer-friendly, contain current and accurate information, and are consistent with the FOIA and the Executive Order. The DOI on-line customer feedback box is no longer active due to system upgrades. The DOI FOIA Officer has been working with the Department's Webmaster to address these issues and ensure that on-line customer feedback will be available as soon as possible. Once the on-line service has been restored, customer comments will be directed to the FOIA web-box. In addition to the use of customer-friendly electronic services, the Department is using bureau and Departmental FOIA liaisons to assist customers with FOIA inquiries.

Various bureaus and offices within DOI have considerable FOIA backlogs. As a result, a major focus of this plan is to address the overall FOIA backlog and pinpoint specific areas for improvement. Some of the backlog is fluid and in some cases is due to highly visible events in the news. DOI continues to provide assistance to bureaus by: reviewing the reasons for backlogs; providing a streamlined process to eliminate cases that are pending approval; posting additional documents to Internet sites; and ensuring multi-track processing is used to eliminate delays in the requests that may be processed more readily.

Adequate staffing and training of FOIA personnel are long-term, continual issues faced by the Department. There is a recognized need to properly staff and train FOIA personnel to achieve a more citizen-centric, customer friendly program. This plan reflects an aggressive approach to this challenge. These issues include challenges such as the FOIA officers performing FOIA as a collateral duty. In reviewing the Human Resources issues, we are also reviewing core competencies to adequately ensure that FOIA personnel have the skills and knowledge to carry out their FOIA duties. The Chief FOIA Officer recognizes the funding challenges that currently face the FOIA community. As a result, the Department is working toward addressing this in a viable manner.

FOIA processing evidences another challenge for the Department. The Departmental FOIA Handbook (383 Departmental Manual 15) currently provides policies, procedures, and guidance for administering and implementing the FOIA program throughout the Department of the Interior. Our review of DOI's FOIA operations, required by the Executive Order, identified

additional areas for possible improvement with regard to FOIA processing. The proposed initiatives are aimed at following up on these areas to improve and streamline the overall FOIA process in DOI.

One of the major challenges facing the FOIA community is communication, in particular, maintaining effective communication among the FOIA staff and between FOIA staff and the SOL. The wide geographical areas that the Department encompasses as well as the various regional organizational structures within each bureau create additional communication challenges. All bureaus/offices within the Department do not have Internet service. This poses a challenge for effective and responsive communication. The collaborative effort proposed in the plan is designed to improve communication and provide enhanced consistency to the FOIA process and procedures. The extensive development and use of a FOIA Intranet site will ensure that all FOIA personnel have access to program guidance and policy decisions.

The Department faces many challenges which we believe may be attributed to the current structural organization of the FOIA program within the bureaus. Problems such as inconsistent responses to customers, delays in processing, and a lack of information sharing may be linked to the organizational structure, which ultimately may result in additional appeals and litigation. To address this issue, plans are to have each bureau/office conduct a review of their FOIA program to determine the optimal organizational structure for their bureau or office FOIA program that will allow the program to operate more effectively and ultimately provide better service to our customers.

In 2001, DOI began development of a centralized web-based electronic FOIA tracking system that would allow all bureaus and offices to track and manage their FOIA requests. The tracking system, implemented in 2002, was designed to increase participation in information-sharing throughout the DOI FOIA program, along with providing greater accountability for the program. The web-based system allows offices that may only receive a small number of FOIA requests throughout the year to effectively participate in the program without paying a monthly fee, in turn providing a cost-savings to the agency. The system was also designed to accommodate enhancements. The Department is committed to examining additional technological solutions for the FOIA program.

In identifying the major challenges described above, we convened a number of meetings with the FOIA Officers and key program staff. A team was established to oversee the project and provide bureau/office-level implementation guidance. Once the initial areas were determined, meetings were held with the IT Management Council, which is comprised of the bureau and office Chief Information Officers, representatives from the Office of the Solicitor, other senior level officials, and with the Chief FOIA Officer. The Chief FOIA Officer, in turn, issued guidance and provided direction concerning development of the FOIA Plan. The team designed and developed a survey to gather additional information regarding the bureau and office FOIA programs to determine areas for improvement. Based on the survey results, and consequent meetings, the FOIA Plan and Report contain the major areas identified for improvement, along with the specific steps designed to improve the Department of the Interior's FOIA program and ultimately customer service.

The Department of the Interior strives to meet the mission and vision of the FOIA program. In adapting the DOJ guidance, we have identified each key area as a major goal. Successful and full implementation of the plan requires full commitment by Interior employees and the efficient use of resources.

B – Areas Selected for Review

The Department of the Interior FOIA Implementation Team (FIT) identified the following areas to be included in the April 2006 FOIA operational assessment data call survey of the DOI bureaus and offices:

1. FOIA Training and Human Resources
2. FOIA Customer Service
3. FOIA and Records Management Integration
4. FOIA Backlog Processing
5. FOIA Processing Problems
6. FOIA Technology
7. FOIA Resources
8. Structural and Organizational Framework

C – NARRATIVE STATEMENT SUMMARIZING RESULTS OF REVIEW

Background

In response to Executive Order 13392, the Department established a Freedom of Information Act (FOIA) Implementation Team (FIT) to assist in the planning stages and policy formulation for implementation of the Executive Order. The FIT conducted an in-depth review of DOI's FOIA operations consistent with the Order. The FIT, consisting of bureau/office FOIA Officers and other Departmental stakeholders, began the review process by defining FOIA issues and challenges and drafting focus area questions for the FOIA operational assessment. This review was conducted through the use of an electronic survey, with questions, multiple choice answers, and optional narrative answers.

The survey was sent to the bureau/office FOIA Officers and filtered down to the regional FOIA contacts and coordinators. Among the areas of consideration included in the survey were: FOIA Training and Human Resources; FOIA Customer Service; Backlog Reduction; Records Management; Customer Service; Technology; FOIA Resources; and the Structural/ Organizational Framework (of the FOIA program). The FIT Team met with the attorneys in the Office of the Solicitor, Branch of General Legal Services, Division of General Law, who provide legal assistance and guidance on FOIA, and their staff, to discuss improving the FOIA program. The FIT Team also met with the Department's FOIA Appeals Officer to discuss ways to improve the program. The Chief Freedom of Information Officer (CFO) requested that each bureau/office review their FOIA websites, certifying they are up to date and in compliance with current requirements. Bureaus and offices were also directed by the CFO to review and report on the status of any existing FOIA backlog.

On April 27, 2006, following the completion of the survey by FOIA and staff personnel, the DOI received additional guidance issued by DOJ. This guidance contained 27 potential improvement areas that agencies could consider in the development of their improvement plans. The DOI FIT team reviewed these 27 categories and determined that the appropriate areas for improving the DOI FOIA program were covered in the survey.

Based on those meetings and the results of the survey, the FOIA Improvement Plan focuses on seven areas for improvement. Among these are: Improve Customer Service; Eliminate FOIA Backlogs; Build and Retain a Highly Skilled FOIA Workforce; Improve and Streamline FOIA Processing; Improve Departmental Communication and Consistency; Optimize FOIA Structural Organization; and Employ Viable Technical Solutions. Each area of focus lends itself to improvement in short and long-term goals and is an inter-related component of the overall program. The mission of the Department, along with bureau missions, adds additional challenges to meeting all the proposed goals. As was noted in conversations with key FOIA staff, any event that has an impact on natural resources or Federal lands could create a spike in FOIA requests, ultimately creating a "backlog" in FOIA processing. An example of this is the events surrounding the recent natural disaster, Hurricane Katrina, which generated a sizable

number of FOIA requests and created a short-term backlog. The following goals are the result of our review.

Improve Customer Service

Providing first-rate customer service, while complying with all laws and regulations and the Department's mission, is the goal of the Department. We focused a number of solutions in our goals to comport with our E-Government initiatives. In order to improve service, the Department is developing an electronic customer comment forum that will be directed to the FOIA web-box. This comment forum will be available for bureau/office FOIA Officers to read and respond to when appropriate. This service will be extended to include development of an on-line FOIA request form directed to the FOIA web-box for processing. The Office of the Secretary's FOIA Office has been identified as a best practices office and the Department intends to leverage this and the processing knowledge and techniques to improve overall customer service throughout the FOIA program. The Department also realizes the importance of the customers and customer-service, and is providing FOIA Liaisons at both the Department and bureau level.

Eliminate FOIA Backlogs

The next area identified for improvement is the elimination of FOIA backlogs. The review indicated that three bureaus/offices have substantial backlogs. The reasons for the backlogs vary and highlight the need to provide follow-up in FOIA processing; to implement quarterly reviews and remedial actions to alleviate both short and long-term backlogs; and to work more closely with FOIA attorneys to make determinations regarding releasibility. As previously discussed, natural disasters and other events could cause significant spikes in FOIA requests, which cannot be pre-determined nor can the agency disregard the law in order to process requests more quickly. The survey indicated that there is a lack of adequate, experienced FOIA personnel to process FOIA requests, particularly in the field. This can be tied to the high turnover rate of FOIA personnel; FOIA as a collateral duty; and the lack of capable FOIA personnel to process FOIA requests, which contribute to DOI's FOIA backlog. The backlog is also a result of the number of complex requests bureaus/offices receive regarding agency mission information, i.e., natural disasters and environmental issues. Furthermore, the plan ties backlog concerns and issues to FOIA processing and the organizational structure.

Build and Retain a Highly Skilled FOIA Workforce

In the area of Human Resources, the results of the survey indicated that 79% of the FOIA personnel responding to the survey performed this programmatic duty as a collateral duty. The results of the survey also indicate that there is a high turnover of FOIA staff, over 60% in the last five years. These two issues combined create concerns regarding why the rate of turnover is high, and if training needs to be conducted more often. Based on discussions with FOIA staff and key personnel, the bureaus and offices do not have standards for FOIA personnel, i.e., grade levels, career ladders, position descriptions, and performance criteria. DOI plans to develop common standards, which can be flexible, for all FOIA personnel. The Department envisions having a "pipeline of talent" with institutional memory to take over as personnel leave and/or retire. Based on our analysis, well-trained and knowledgeable FOIA personnel will transition out of the FOIA program when it remains a collateral duty with no promotion potential. This becomes a productivity issue, cost issue, and eventually can lead to program deterioration due to

a lack of cohesive program support. The plan includes annual FOIA training. In order to assist in training FOIA personnel, the Department is developing a computer-based training course, which will provide an additional tool for the FOIA personnel to use as a refresher when funding is not available for travel to training sessions and conferences. The Department will also establish an electronic training library of FOIA materials for availability on the DOI Intranet. Together, these issues elucidate areas of focus for the Department to address in order to achieve successful implementation of the Executive Order.

Human resource issues also include the lack of standard position descriptions for FOIA personnel, along with adequate, qualified, full-time, permanent employees solely dedicated to work in the FOIA program has a direct impact on the success of the program. The Department is intent on working with the DOI Human Resources Office to develop a career ladder for the FOIA personnel. The Department believes that the attrition rate of personnel who are currently in the FOIA program, and who are considered "experts" in their field, will have a significant impact on the future success of the program.

Improve and Streamline FOIA Processing

In addressing FOIA processing, several components of the process were scrutinized and proposed alternative solutions developed. Our review indicated that the approval process, or signature authority, is one area that tends to slow processing down. Each bureau/office has their own signature line of authority, and in some cases, the approving authority is not familiar with the program. This issue will be addressed in more defined guidance from the Department. Multi-track processing, currently optional, will become mandatory. This will assist FOIA staff in recognizing those requests that can be processed in a timelier manner. A "lessons learned" category of information (a toolbox of helpful hints) will be included on the DOI FOIA Intranet homepage. This will be designed to provide FOIA staff with helpful processing information and tips. Designed to eliminate processing delays in the Solicitor's office, the FOIA staff will work more closely with the Solicitor's Office to develop a checklist for bureaus to use before submitting the FOIA package for surname.

Improve Departmental Communication and Consistency

The review indicated communication among the FOIA staff, along with communication between the FOIA staff and SOL, are at a disadvantage due to lack of an avenue for streamlined communication. The wide geographical areas that the Department encompasses as well as the various regional organizational structures within each bureau create additional communication challenges. Additionally, because of the high turnover rate in human resources, the bureaus/offices need a more reliable avenue for better communication. All bureaus/offices within the Department do not have Internet service, which poses a challenge for effective and responsive communication. The plan is to develop formal and informal communication mechanisms for FOIA Officers, attorneys, and program staff, which will also include upper management. The collaborative effort within the FOIA community improves communication and provides enhanced consistency to the FOIA process and procedures. Procedures issued by the Departmental FOIA Officer are not consistently implemented by the FOIA offices/bureaus and are sometimes not communicated down to FOIA personnel in the field locations. To address this issue, the Department will disseminate updates and information along with electronic correspondence templates on the DOI Intranet aimed at providing additional assistance and

guidance to the FOIA staff. The extensive development and use of a FOIA Intranet site will ensure that all FOIA personnel have access to program guidance and policy decisions.

Optimize FOIA Structural Organization

The structure of the Department's FOIA program is decentralized, creating complications both in communication and in processing. Part of this problem was addressed when the Department stood-up the Electronic FOIA Tracking System (EFTS). The EFTS created a hierarchical processing database for all bureaus and offices to use to track and manage their FOIA requests. However, it did not alleviate the entire problem. The survey indicated that staff felt decentralization within the bureaus and offices continues to add to increased time to process FOIA requests. Additionally, due to the variance in organizational structures, FOIA staff felt they are not included in pertinent FOIA communications, training is not promoted at their level, nor is funding at all levels of the FOIA organization a key concern to management. The survey indicated that the decentralized FOIA organization caused a "ripple effect" in specific areas, including processing and training. To address this issue, plans are to have each bureau/office conduct a review of their FOIA program to determine the optimal organizational structure for their bureau or office that will allow the program to operate more effectively and ultimately provide better service to our customers.

Employ Viable Technical Solutions

Technology remains a key component of FOIA processing throughout the Department. Currently, all bureaus/offices with Internet access, with the exception of the Office of Inspector General, are using the Department's EFTS. The EFTS will be migrated to the DOI Intranet, providing access to the system for all FOIA personnel. The Department continues to support enhancements to the EFTS. However, we continue to conduct market research for commercial-off-the-shelf (COTS) products either to enhance the EFTS or replace the system. Plans are also to include an appeals and litigation module, allowing more communication and sharing of information throughout the FOIA staff. The survey indicated that many of the FOIA personnel are not taking advantage of or using technology to process FOIA packages, i.e., they are using manual redaction techniques, which can be time consuming, and are not scanning documents. The Department is also going to develop standards for the use of scanning and redaction equipment for FOIA processors. This will ensure that the documents are available electronically, and will encourage the FOIA processors to post documents to the Frequently Requested Documents page on a more frequent basis. It will also ensure that redaction is thorough, and information that is determined to be exempt from release, will remain exempt.

Questions in the survey were specifically developed to glean information from the bureaus and offices and their field components, which would assist in the development of a strategy for a stronger, more citizen-centric improved FOIA program. Other categories for improvement outside of normal FOIA processing were included to find out how various aspects of programs directly affected the FOIA program. The Department continues to work with the bureaus and offices to establish a clear method to achieve success in all areas of the plan that have been identified for improvement. As the Department moves forward in implementing its FOIA plan, the agency will work with the stakeholders to continue to improve the program.

D – Areas Chosen as Improvement Areas For Agency Plan

As a result of the survey, the following areas were chosen as areas for improvement in the plan:

1. Improve Customer Service
2. Eliminate FOIA Backlogs
3. Build and Retain a Highly Skilled Freedom of Information Act (FOIA) Workforce
4. Improve and Streamline FOIA Processing
5. Improve Departmental Communication and Consistency
6. Optimize FOIA Structural Organization
7. Technology - Employ viable technology solutions

E- IMPROVEMENT AREA SPECIFICS

GOAL I
IMPROVE CUSTOMER SERVICE

Objective 1

Ensure FOIA web sites are in compliance, accurate, up to date, and functional, employing user-friendly formats with easy, consistent and logical navigation.

FOIA websites within DOI offices and bureaus are not consistently maintained and updated as appropriate. Plans are to review each bureau/office FOIA website and work with FOIA Officers to ensure websites are customer-friendly, contain current and accurate information, and are consistent with the FOIA and the Executive Order. Successful and full implementation of the plan requires full commitment by Interior employees and the efficient use of resources.

Step	Measure	FY06 Milestone	FY07 Milestone	FY08 Milestone
1) Monitor and improve DOI/bureau FOIA web sites using customer feedback	**80% FOIA websites maintained and updated using best practices and customer feedback as appropriate**			**02/22/08**
- Benchmark FOIA web site best practices	- Select applicable best practices identified by FIT team	09/30/06		
- Review, update and redesign web sites in accordance with DOI and the bureaus' standards	- DOI FOIA web site redesigned as appropriate		06/29/07	
- Monitor and continue to improve web sites based on customer feedback	- Bureaus sites have been inspected and 75% meet improvement recommendations		09/30/07	
2) Revise DOI Reference Guide in accordance with EO, and DOI regulations	**Revision completed and posted to DOI FOIA web site**		**04/01/07**	
3) Develop guidance for compliance of FOIA web sites	**Audit reveals 80% web sites meet DOI FOIA standards**			**02/22/08**
- Develop audit guidance	- Guidance published		12/29/06	
- Conduct annual audit of all DOI FOIA web sites	- Audit conducted			10/19/07

Goal I
IMPROVE CUSTOMER SERVICE

Objective 2

Improve customer service using customer feedback where appropriate

The DOI on-line customer feedback box is no longer active due to system upgrades. In order to improve customer service on a frequent basis, the Department is developing an electronic customer comment forum that will be directed to the FOIA web-box and available for bureau/office FOIA Officers to read. This service will be extended to include on-line FOIA request forms directed to the FOIA web-box for processing. The Office of the Secretary's FOIA Office has been identified as a best practices office. The Department intends to leverage this and the processing knowledge and techniques to improve overall customer service throughout the FOIA program. Comments will be considered in DOI FOIA program decisions where appropriate. On-line feedback will provide a more customer-friendly, user-friendly avenue to communicate directly with program manager. Successful and full implementation of the plan requires full commitment by Interior employees and the efficient use of resources.

Step	Measure	FY06 Milestone	FY07 Milestone	FY08 Milestone
1) Develop on-line form for requestors to submit requests with return receipt	**On-line request form available with return receipt for use by the public**		**02/23/07**	
- Research availability of existing forms and best practices	- Research conducted	09/30/06		
- Develop request form	- Forms for use on bureau websites		12/15/06	
- Require all bureaus have electronic FOIA mailboxes	- Electronic FOIA mailboxes established by bureaus	09/30/06		
2) Develop DOI on-line customer comment forum	**Customer comment forum completed and available to the public for suggesting improvements to FOIA program**			**08/29/08**
- Analyze feedback from customer comments	- Issue guidance to improve program based on customer comments as appropriate			On-going

3) Develop frequently asked questions (FAQS) and responses	**Responses to FAQs developed and available to the public via DOI/bureau FOIA web sites**		**03/30/07**	
4) Provide toll free FOIA number for requesters when available	**Toll free number in service**		**12/29/06**	
5) Initiate a customer feedback survey given appropriate funding/ resource	**Survey initiated**			09/30/08

GOAL II
ELIMINATE FOIA BACKLOGS

Objective 1

Reduce and or eliminate FOIA backlogs in compliance with FOIA and Executive Order 13392

Various bureaus and offices within DOI have considerable FOIA backlogs. Some of the backlog is fluid and in some cases is due to highly visible events in the news. DOI plans to provide assistance to bureaus in reviewing reasons for backlogs; providing a streamlined avenue to eliminate cases that are pending approval; posting additional documents to Internet sites; and ensuring multi-track processing is used to eliminate delays in the requests that may be processed more readily. To alleviate their current backlogs, the three bureaus/offices identified below have agreed to acquire additional support. Successful and full implementation of the plan requires full commitment by Interior employees and the efficient use of resources.

Step	Measure	FY06 Milestone	FY07 Milestone	FY08/09 Milestone
1) Develop bureau backlog reduction plans	**- Proposed plans eliminate backlog by FY 08**			
- Bureau of Indian Affairs **- Fish and Wildlife Service** **- Office of Inspector General**	**(Percentage is based on per year reduction of existing backlog)**	**0%** **34%** **25%**	**40%** **67%** **50%**	**40%/100%** **100%** **100%**
- Conduct reviews to identify backlog areas	-Backlogs identified	05/05/06		
- Meet w/ bureaus having large backlogs and require their submission of an elimination/reduction plan	-Meetings held	05/05/06		
- Review causes of FOIA backlogs and identify ways to eliminate or reduce	- Backlog reviews completed and bureaus with large backlogs submit elimination plans	06/15/06		
2) Monitor bureau backlogs quarterly and develop remedial actions if needed	**Initiate quarterly remedial actions**	**09/30/06**		
	- Quarterly reviews completed - Additional Bureau	On-going On-	On-going On-	On-going On-going

	plans for backlog reduction if needed	going	going	
3) Eliminate or reduce the FOIA appeals backlog	**Backlog elimination or reduction achieved**	**0% by 09/30/06**	**30% by 09/30/07**	**63% by 09/30/08**

GOAL III
BUILD AND RETAIN A
HIGHLY SKILLED FOIA WORKFORCE

Objective 1

Apply consistent personnel standards for FOIA Officers/Coordinators and Designated FOIA Attorneys, and provide a DOI-wide recognition program.

Currently, the FOIA program in DOI is highly decentralized. There are no standards for FOIA personnel with regard to grade levels, career ladders, position descriptions, and performance criteria. Additionally, bureaus should consider other alternatives to assigning FOIA processing as a collateral duty. Successful and full implementation of the plan requires full commitment by Interior employees and the efficient use of resources.

Step	Measure	FY06 Milestone	FY07 Milestone	FY08/09 Milestone
1) Develop consistent FOIA personnel standards	**FOIA personnel standards and guidance issued and implemented**			**12/01/08**
- Establish team to review personnel issues and identify best practices	- Team established	07/14/06		
- Establish core competencies for FOIA processors linked to FOIA processor grade structure standards, performance evaluations and career ladders	- Core competency analysis completed	09/20/06		
	- FOIA processing grade structure and career ladders developed		05/31/07	
	- Standard PD developed		02/23/07	
	- FOIA processors' performance standards developed		11/30/06	
	- Guidance for implementation issued by DOI		07/12/07	
	- Guidance implemented by bureaus			11/01/08

- Establish model FOIA performance standards for other individuals, (e.g., supervisors of FOIA processors).	- Performance standards developed - Guidance for implementation issued by DOI - Guidance implemented by bureaus		06/14/07 09/17/07	01/01/08
- Establish workload guidance for supervisors of FOIA processors and managers of FOIA programs for staffing purposes to include collateral duty issues as they pertain to FOIA personnel.	- Research conducted and data gathered - Workload guidance developed - Workload guidance issued by DOI - Guidance implemented by bureaus	09/20/06	02/23/07 07/12/07	11/01/08
2) Establish FOIA recognition program	**First recognition awards issued**			**10/01/08**
3) Establish FOIA Certification Program	**Complete certification of first group of FOIA personnel**			**03/01/08**
- Develop core competencies and training required for FOIA Coordinators, including criteria required for various levels of proficiency	- List of core competencies, knowledge, and training required	09/20/06		
- Develop procedures and guidance for program implementation	- Procedures and guidance for program implementation issued		07/12/07	
- Implementation and monitoring	- First group of FOIA personnel certified			03/01/08

GOAL III
BUILD AND RETAIN A
HIGHLY SKILLED FOIA WORKFORCE

Objective 2

Develop a comprehensive FOIA training and awareness program to meet the needs of all DOI-FOIA employees, at various levels of proficiency, using different media to accommodate personnel located in headquarters and the field. The objective is to assist FOIA employees in acquiring and having access to the knowledge and skills they need to perform their jobs effectively, emphasizing the importance of customer service, and ensuring statutory and regulatory compliance.

DOI conducts annual FOIA training in at least two locations (DC and Albuquerque). Plans are to incorporate a broader range of FOIA personnel at various proficiency levels. Additionally, annual online training will be mandatory for all employees. Successful and full implementation of the plan requires full commitment by Interior employees and the efficient use of resources.

Step	Measure	FY06	FY07	FY08/09
		Milestone	Milestone	Milestone
1) Conduct required annual DOI-wide FOIA training to include session on improving customer service	**DOI training to confer and network with FOIA Officers/Coordinators and attorneys held - objectives fully met**		**06/29/07**	**05/25/08**
- Identify training and networking sessions for next FY as resources allow		09/15/06	09/15/07	09/15/08
-Propose agenda items for training and networking		09/15/06	09/15/07	09/15/08
- Evaluate Feedback from training			08/01/07	08/01/08
2) Develop online computer based training (CBT) for FOIA	**Online training fully developed and implemented with pilot roll out to 50% of defined audience 1st year; pass rate of 80% 1st year**			**09/30/08**
- Identify training needs and targeted audience			07/20/07	
- Define requirements			08/17/07	

- Research availability of existing training materials - Issue RFP and evaluate proposals - Award contract - Develop training module - Implement and monitor training			08/17/07 09/30/07	 12/01/08 04/30/08 09/30/08
3) Establish DOI approved electronic library of training materials - Issue guidance requiring that all training materials be approved by Department - Establish procedures for posting and maintaining approved training materials to DOI Intranet	**Library of DOI approved training materials published on Intranet for training and knowledge management** - Guidance approved and issued - Procedures in place to ensure training materials are accurate, up-to-date, and consistent with all laws and regulations	 09/30/06	 03/30/07	**11/30/07**
4) Establish in-house FOIA training and networking program - Write syllabus - Establish administrative vehicle for payment through DOI University - Develop training materials - Announce availability of training	**In-house FOIA training and networking program is functional** - Syllabus completed - Agreements established - Training materials completed and available for use - Training announcements issued	 09/22/06 09/22/06 09/22/06 09/22/06	**03/30/07**	

GOAL IV
IMPROVE AND STREAMLINE FOIA PROCESSING

Objective

Identify solutions to improve and streamline FOIA processing by evaluating the human resource management, training, communication and technology relationships and other sources of processing obstacles.

The Departmental FOIA Handbook (383 DM 15) currently provides policies, procedures, and guidance for administering and implementing the FOIA program in the Department of the Interior. The Review of DOI's FOIA operations required by the EO identified additional areas for possible improvement regarding FOIA processing. The initiatives proposed below are aimed at improving and streamlining the overall FOIA process in DOI. Successful and full implementation of the plan requires full commitment by Interior employees and the efficient use of resources.

Step	Measure	FY06 Milestone	FY07 Milestone	FY08 Milestone
1) Develop recommendations for streamlining approval process and signatory authority for FOIA responses while ensuring compliance	**Implementation of streamlined approval process in practice** - Position paper issued - Guidance issued		**08/30/07** 12/01/06 08/30/07	
2) Make multi-track processing mandatory	**DOI guidance updated and issued to require multi-track processing**		**11/01/06**	
3) Communicate "Lessons Learned" (LL) to FOIA staff	**- Initiate LL and integrate with training** **- Update guidance with LL** **- FOIA Tool Box with LL established for FOIA processors and made available electronically**		**04/30/07** **09/30/07** **09/30/07**	
4) Explore options for streamlining SOL reviews for certain categories of information/documents	**Implementation of streamlined SOL reviews in practice**		**09/30/07**	

	- Options discussed - Decision made - Guidance issued		11/15/06 06/24/07 03/28/07	
5) Develop SOL checklist of steps necessary before submitting package for SOL review	**Checklist posted to FOIA Intranet web** - SOL Checklist distributed to all FOIA Officers		**04/18/07** 04/25/07	

GOAL V
IMPROVE DEPARTMENTAL COMMUNICATION AND CONSISTENCY

Objective 1

Enhance effective FOIA stakeholder collaboration considering challenges faced by the Office of the Chief Information Officer (OCIO), Solicitor's Office (SOL), bureaus/offices, and upper management.

DOI communications between FOIA staff and SOL are handicapped due to lack of an avenue for streamlined communication. All bureaus/offices within the Department do not have Internet service, which poses a challenge for effective and responsive communication. Plans are to develop a strategy that will allow a working collaborative effort within the FOIA community and incorporate SOL and upper management. Development of a FOIA Intranet site will ensure all FOIA personnel have access to program guidance and policy decisions. Ultimately, improved communication will provide enhanced consistency to the FOIA process and procedures. Successful and full implementation of the plan requires full commitment by Interior employees and the efficient use of resources.

Step	Measure	FY06 Milestone	FY07 Milestone	FY08 Milestone
1) Ensure effective communication mechanisms for FOIA Officers, attorneys, program staff, and upper management to process FOIA in accordance with the law	**Effective communication mechanisms fully functional across Department**			**12/01/07**
- Establish DOI FOIA team to promote collaborative effort (policy, procedures, training) OCIO, bureau FOIA & SOL staff offices	- Team established	08/08/06		
- Conduct briefings for upper management periodically to improve visibility of FOIA program	- Briefings/meetings held as needed		01/26/07	
- Develop FOIA Intranet site	- FOIA Intranet site available to FOIA personnel		12/29/06	
- Establish mailbox whereby FOIA personnel can request guidance on specific topics	- Mailbox operational		02/01/07	
- Develop centralized FOIA	- Mailing list developed	09/22/06		

mailing list (direct line of communication) - Identify points of contact for primary program areas/offices in each bureau - Publish Information Management Newsletter to include FOIA updates	and used to distribute guidance and information to FOIA personnel - List of contacts posted on Intranet w/ ongoing updates - Issuance of newsletter/update memorandum	09/26/06	06/30/07	

GOAL V
IMPROVE DEPARTMENTAL COMMUNICATION AND CONSISTENCY

Objective 2

Provide consistent Department-wide FOIA policy, guidance, and standards to facilitate compliance and accountability, and improve customer service.

Procedures issued by the Departmental FOIA Officer are not consistently implemented by the FOIA bureaus/offices. Following the revision of DOI's FOIA regulations and updated guidance, plans are to disseminate electronic correspondence templates that will provide assistance and guidance to FOIA personnel throughout the Department. DOI will maintain a database of pertinent and useful information for use by FOIA personnel to enhance knowledge-base and lead to more accurate and uniform FOIA processing. Successful and full implementation of the plan requires full commitment by Interior employees and the efficient use of resources.

Step	Measure	FY06 Milestone	FY07 Milestone	FY08 Milestone
1) Update DOI's FOIA regulations to include EO mandates and other required changes	**Final rule published in the Federal Register**			**09/28/08**
- Issue proposed rule	- Proposed Rule Issued		09/28/07	
2) Revise DOI FOIA Handbook to include EO mandates (with particular emphasis on providing good customer service) and other required changes	**Revised Handbook posted to Intranet**		**09/28/07**	
3) Develop electronic correspondence templates, including acknowledgment letters to assist in processing with emphasis on enhancing service to the public	**FOIA Officers & Coordinators have full access to electronic templates**		**12/29/06**	
- Review and update letters in DOI FOIA Handbook, supplement where necessary	- Post to DOI Intranet		12/29/06	

4) Develop highlights on DOI FOIA litigation and update on continual basis	**FOIA litigation highlights distributed to bureau FOIA personnel and attorneys and posted on DOI Intranet for training and knowledge management**		**03/01/07**	

GOAL V
IMPROVE DEPARTMENTAL COMMUNICATION AND CONSISTENCY

Objective 3

Develop quality assurance procedures to ensure Department-wide compliance with FOIA requirements.

The current DOI FOIA program is highly-decentralized. Plans are to provide more stringent guidance to bureaus to enable a decentralized yet uniform approach to FOIA procedures that will ultimately enable Department-wide compliance with FOIA and EO requirements. Successful and full implementation of the plan requires full commitment by Interior employees and the efficient use of resources.

Step	Measure	FY06 Milestone	FY07 Milestone	FY08 Milestone
1) Develop procedures to evaluate Departmental FOIA program to ensure compliance	**Compliance program fully functional**			**09/30/08**
- Plan and develop program; Implement procedures	- Additional chapter in DOI FOIA Handbook documents new compliance procedures			12/29/07
- Develop viable schedule and checklist for conducting program compliance audits	- Regular audits conducted			09/30/08

GOAL VI
OPTIMIZE FOIA STRUCTURAL ORGANIZATION

Objective
Adopt the most appropriate DOI FOIA structural organization

DOI's FOIA program is highly decentralized providing variance in responses to customers. A review of the structural nature of the FOIA program will be undertaken to determine how to optimize capabilities within the organization. Restructuring the FOIA programs may also include additional FTE FOIA positions at several levels throughout the Department. Bureaus/offices may also restructure to support future plans for a DOI FOIA Requester Service Center. Successful and full implementation of the plan requires full commitment by Interior employees and the efficient use of resources.

Step	Measure	FY06	FY07	FY08
		Milestone	Milestone	Milestone
1) Bureaus conduct reviews to determine optimal organizational structure for program effectiveness, may include: **- identification of alternative structural organization** **- evaluation of associated costs** **- development of a cost-effective organizational recommendation which meets the needs of the DOI** **- feasibility of multi-bureau processing centers (changes can be made bureau by bureau)**	**Reviews completed and report issued by bureaus to Chief FOIA Officer with recommendations (Methodology for completing analytical program analysis is included in the Report)**		**09/29/07**	
- DOI FOIA Office issues guidance to bureaus/offices for conducting reviews of FOIA office structure	- Bureaus begin reviews		02/23/07	
- Implement changes to bureau FOIA program structures as appropriate	- Bureau directives updated as appropriate - Departmental Manual revised as appropriate			06/20/08 08/29/08
2) Define responsibilities of and determine final organizational	**FOIA Requester Service Centers and Public**	**06/02/06**		

structure for Requester Service Center and Public Liaison organization within DOI -Establish bureau/office FRSCs and Public Liaisons - Develop plan and submit to obtain budget approval - Provide training to FRCs and liaisons - Develop log for tracking incoming calls from requesters - Develop Secretarial Order (SO)/ Departmental Manual (DM) change implementing OCIO FOIA structural change	**Liaisons established and contact information posted to FOIA website** -Bureau and office FRSCs and Public Liaisons established and posted to the FOIA website -Approved plan for DOI Customer Service Center, funding and implementation - Guidance on roles and responsibilities issued - Bureaus using logs - SO/DM issued	 06/02/06 09/29/06 09/29/06 09/29/06 09/29/06		
3) Bureaus identify and define strategies for dealing with unexpected/unplanned FOIA workloads - Define strategies - Submit action plan to DOI FOIA Office that outlines strategies	**Strategies approved and ready for action as needed** - Action plan presented to DOI Chief FOIA Officer			**10/30/08** 08/29/08

GOAL VII
EMPLOY VIABLE TECHNICAL SOLUTIONS

Objective

Apply appropriate technology to scan, redact, and streamline the FOIA process and improve quality control.

Currently, all bureaus and offices with Internet access (except the Office of Inspector General) are using the Department's electronic FOIA tracking system (EFTS) to track and manage their requests (implemented in FY 2003). Across the Department, there is a lack of advanced technology being used in the FOIA process. Plans are to upgrade the existing EFTS or migrate to a COTS product. Additionally the Department intends to oversee the deployment of document scanning and redaction software to be used in processing FOIA requests and responses. We also plan to add an appeals and litigation module. Overall, all upgrades and future plans are intended to enhance customer service. Successful and full implementation of the plan requires full commitment by Interior employees and the efficient use of resources.

Step	Measure	FY06 Milestone	FY07 Milestone	FY08 Milestone
1) Implement technology solution based on cost benefit analysis conducted	**Enhanced EFTS or COTS technology is deployed**		**08/29/07**	
- Conduct cost benefit analysis	- Recommendations issued	09/08/06		
- Make decision Re: best tracking system solution	- Decision made	09/29/06		
- Implement solution in 2007	- Implementation of selected technology solution begins		04/25/07	
2) Establish standards for electronic redaction processing	**Standards in place**			**02/01/08**
- Issue DOI directive including the use of scanning and electronic redaction technology	- Directive issued (cut down redaction time through technological use; ultimately more efficient processing)		09/30/07	
- Bureaus comply with technology guidance	- Bureaus in compliance			02/01/08
3) Deploy desired new FOIA technology functionality for	**Solution deployed**			**04/25/08**

BIA and SOL - Develop recommendations for technical solution that would enable BIA and SOL to track requests electronically	- Recommendations issued - Decision made - Implementation begins			11/30/07 12/28/07 04/25/08
4) Make standard form letters available to FOIA personnel electronically (templates) - Review and update standard letters in DOI FOIA Handbook - Post standard letters to DOI Intranet and/or Internet 5) **Complete enhancement to EFTS to facilitate bureau/office preparation of the annual report**	**Form letters available electronically to FOIA personnel** - Standard letters revised as necessary - Completed and in use	 09/30/06 07/20/06	**04/18/07** 04/18/07	

F- Improvement Area Time Periods

Although milestones are reflected throughout the plan across each area, the "overall areas" we have targeted for program improvement are anticipated to be completed after December 31, 2007, as follows:

1. Improve Customer Service
2. Eliminate FOIA Backlogs
3. Build and Retain a Highly Skilled Freedom of Information Act (FOIA) Workforce
4. Improve and Streamline FOIA Processing
5. Improve Departmental Communication and Consistency
6. Optimize FOIA Structural Organization
7. Technology - Employ viable technology solutions