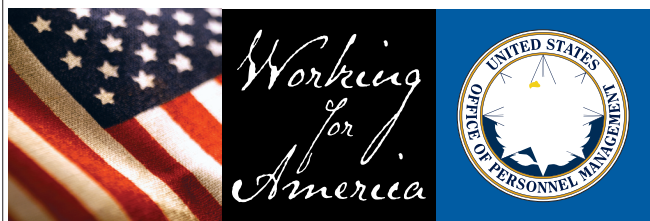


# Freedom of Information Act Report

October 1, 2006  
through  
September 30, 2007

February 2008

UNITED STATES OFFICE OF PERSONNEL MANAGEMENT



U.S. Office of Personnel Management  
Annual Freedom of Information Act Report  
FY 2007

The following information is submitted to the U.S. Department of Justice by the U.S. Office of Personnel Management (OPM) in accordance with the requirements of the Freedom of Information Act (U.S.C. § 552(e)) (FOIA), as amended.

**I. Basic Information Regarding Report**

*A. Name, Title, Address, and Telephone Number*

The contact person for the U.S. Office of Personnel Management is:  
Margaret A. Miller  
FOIA Public Liaison  
U.S. Office of Personnel Management (OPM)  
Center for Information Services/Plans and  
Policies Group  
Room 5415  
1900 E Street NW  
Washington, DC 20415-7900  
Tel: 202-606-2150  
FAX: 202-418-3251

*B. Electronic Address for report on the Internet*

The electronic address for this report on OPM's World Wide Web site:  
[www.opm.gov/efoia](http://www.opm.gov/efoia)

*C. How to obtain a copy in paper form*

A paper copy of this report may be obtained from the address listed above.

**II. How to Make a FOIA Request**

Our *FOIA Reference Guide* (located at [www.opm.gov/efoia/foiagide.asp](http://www.opm.gov/efoia/foiagide.asp)) includes information regarding how to make a FOIA request to OPM.

**III. Definition of Terms and Acronyms Used in This Report**

*A. Agency-specific acronyms*

1. OPM – Office of Personnel Management
2. CIS – Center for Information Services

*B. Basic terms, expressed in common terminology*

1. **FOIA/PA request** - Freedom of Information Act/Privacy Act request. A FOIA request is generally a request for access to records concerning a third party, an organization or a particular topic of interest. A Privacy Act request is a request for records concerning oneself; such requests are also treated as FOIA requests. **(All FOIA and Privacy Act requests for access to records, regardless of which law is cited by the requester, are included in this report.)**

U.S. Office of Personnel Management  
Annual Freedom of Information Act Report  
FY 2007

2. **Initial request** - the first request to a Federal agency for access to records under the Freedom of Information Act or the Privacy Act.
3. **Appeal** - a request to a designated individual or office within a Federal agency asking that it review at a higher administrative level a full denial or partial denial of access to records under FOIA/PA, or any other FOIA/PA determination such as a matter pertaining to fees.
4. **Processed request or appeal** - a request or appeal for which an agency has provided an initial response to the request or a decision in response to an appeal.
5. **Expedited processing** - an agency will process a FOIA/PA request on an expedited basis when a requester has shown an exceptional need or urgency for the records that warrants prioritization of his or her request over other requests made earlier.
6. **Grant** - an agency decision to disclose all records in response to a FOIA/PA request.
7. **Partial grant** - an agency decision to disclose some of a record or records response to a FOIA/PA, but withhold some of the requested information determined to be exempt under one or more of the FOIA or PA exemptions.
8. **Denial** - an agency decision not to release a record or records in response to a FOIA/PA request because of its determination the information is exempt under one or more of the FOIA or PA exemptions, or for other reason (such as no responsive records located).
9. **Time limits** - the time period in the FOIA for an agency to respond to a FOIA/PA request (ordinarily 20 working days from proper receipt of a perfected FOIA/PA request).
10. **Perfected request** - a FOIA/PA request for records adequately describing the records sought, received by the FOIA/PA office of the agency or agency component in possession of the records, and for which there are no remaining issues about the payment of applicable fees.
11. **Median number** - the middle, not average number. For example, of 3, 7, and 14, the median number is 7.
12. **Average number** - the number obtained by dividing the sum of a group of numbers by the quantity of numbers in the group. For example, of 3, 7 and 14, the average number is 8.

#### IV. Exemption 3 Statutes

OPM did not rely on any Exemption 3 statutes during this reporting period.

U.S. Office of Personnel Management  
Annual Freedom of Information Act Report  
FY 2007

**V. Initial FOIA/PA Access Requests**

**A. Number of Initial Complex Requests**

1. Pending at the end of FY 2006	925
2. Received during FY 2007	14,459
3. Processed during FY 2007	14,398*
4. Pending at the end of FY 2007	986

*\*Due to a weakness in our FOIA tracking system, we are unable to include the disposition of 695 records in the numbers below. We are working to correct this problem for future reporting.*

**B. Disposition of Initial Complex Requests**

1. Number of total grants	10,460
2. Number of partial grants	2,757
3. Number of denials	106

**Number of times each FOIA exemption was used**

(1) Exemption 1	15
(2) Exemption 2	72
(3) Exemption 3	0
(4) Exemption 4	6
(5) Exemption 5	15
(6) Exemption 6	2,142
(7) Exemption 7(A)	1
(8) Exemption 7(B)	0
(9) Exemption 7(C)	2,096
(10) Exemption 7(D)	21
(11) Exemption 7(E)	67
(12) Exemption 7(F)	1
(13) Exemption 8	0
(14) Exemption 9	0

4. Other reasons for nondisclosure (total)	380
a. No records	223
b. Referrals	78
c. Request withdrawn	9
d. Fee-related reason	2
e. Records not reasonably described	4

U.S. Office of Personnel Management  
Annual Freedom of Information Act Report  
FY 2007

f. Not a proper FOIA request for some other reason	18
g. Not an agency record	20
h. Duplicate request	17
i. Other (specify) - Denials to Amendments of Records	9

**VI. Appeals of Initial Denials of FOIA/PA Requests**

**A. Number of Appeals**

1. Number of appeals received during FY 2007	22
2. Number of appeals processed during FY 2007	22

**B. Disposition of Appeals**

1. Number completely upheld	13
2. Number partially reversed	2
3. Number completely reversed	3
4. Other reasons for nondisclosure	4

Number of times each FOIA exemption used (counting each exemption once per appeal)

(1) Exemption 1	0
(2) Exemption 2	5
(3) Exemption 3	0
(4) Exemption 4	0
(5) Exemption 5	6
(6) Exemption 6	2
(7) Exemption 7(A)	0
(8) Exemption 7(B)	0
(9) Exemption 7(C)	1
(10) Exemption 7(D)	0
(11) Exemption 7(E)	1
(12) Exemption 7(F)	0
(13) Exemption 8	0
(14) Exemption 9	0

4. Other reasons for nondisclosure (total)	4
a. No records	2
b. Referrals	1
c. Request withdrawn	0
d. Fee-related reason	0
e. Records not reasonably described	0
f. Not a proper FOIA request for some other reason	0
g. Not an agency record	0
h. Duplicate request	1
i. Other (specify)	0

U.S. Office of Personnel Management  
Annual Freedom of Information Act Report  
FY 2007

**VII. Compliance with Time Limits/Status of Pending Requests**

**A. Median Processing Time for Complex Requests Processed During the Year**

1. a. Number of requests processed	14,398
b. Median number of days to process	15
2. a. Requests approved for expedited processing	0
b. Median number of days to process	0

**B. Status of Pending Requests**

1. Number of requests pending at the end of FY 2007 (Enter the number from Section V, Part A, Line 4, above.)	986
2. Median number of days requests were pending as of 9/30/2007	41

**VIII. Comparisons with Previous Year**

**A. Comparison of Number of Complex Requests Received**

<i>FY 2006</i>	12,528
<i>FY 2007</i>	14,459
<i>Percent of change</i>	+15%

**B. Comparison of Number of Complex Requests Processed**

<i>FY 2006</i>	16,267
<i>FY 2007</i>	14,398
<i>Percent of change</i>	-12%

**C. Other Significant Statistics - Processing Costs**

<i>FY 2006 (est.)</i>	\$2,005,292.00
<i>FY 2007 (est.)</i>	\$1,875,833.00
<i>Percent of change</i>	-7%

**D. Other Significant Statistics – Requests for Expedited Processing**

<i>FY 2007 received</i>	0
<i>FY 2007 granted</i>	0

U.S. Office of Personnel Management  
Annual Freedom of Information Act Report  
FY 2007

**IX. Costs/FOIA Staffing**

**A. Staffing levels**

1. Number of full-time FOIA personnel	21
2. Number of personnel with part-time or occasional FOIA duties (est. in total work-years)	20.63
3. Total number of personnel (in work years)	41.63

**B. Total Costs**

1. FOIA processing (including appeals)	\$1,875,833.00
2. Litigation-related activities (estimated)	\$31,207.00
3. Total costs	\$1,907,040.00

**X. Fees**

A. Total amount of fees collected by agency for processing requests	\$4,750.00
B. Percentage of total costs	Less than 1%

**XI. FOIA Regulations (Including Fee Schedule)**

OPM's regulations (5 CFR 294) are available through [www.gpoaccess.gov/cfr/index.html](http://www.gpoaccess.gov/cfr/index.html).

Our fee schedule is explained in our FOIA reference guide at [www.opm.gov/efoia](http://www.opm.gov/efoia).

**XII. Report on FOIA Executive Order Implementation**

**A. Description of supplementation/modification of agency improvement plan (if applicable) – Not applicable.**

**B. Report on agency implementation of its plan, including its performance in meeting milestones, with respect to each improvement area:**

OPM has met all but one of its goals and milestones established in its FOIA Improvement Plan, which was submitted in June 2006, in response to Executive Order 13392, that were to be completed by December 31, 2007.

Below, you will see a more complete description of the progress OPM has made since its last annual FOIA report. Attainment of these goals and milestones has improved the FOIA operation significantly over the last year. Most notably, we have increased the public's, as well as OPM FOIA points of contacts', awareness and understanding of the FOIA, specifically processing timelines, and application of statutory exemptions.

U.S. Office of Personnel Management  
Annual Freedom of Information Act Report  
FY 2007

Name of Improvement Area	Brief Statement of Goal(s)/Objective(s)	Distinct steps planned to be taken	Milestone Dates	Performance Measures	Status
*4. Improvement of agency's FOIA Reference Guide	Annually review and update OPM's FOIA Reference Guide as needed	Update OPM's FOIA Reference Guide which includes instructions for submitting FOIA and Privacy Act requests and information about contacting the FOIA Requester Service Center for status	12/31/2007	Verify the FOIA Reference Guide has been reviewed and updated	Completed. Coordinated with OPM Program Office FOIA Contacts for comments, recommendations, and suggestions.  Updated Reference Guide and posted to agency website
*11. Expedited processing	Document handling procedures for expedited processing of FOIA requests in FOIA Reference Guide	Remind Program Office FOIA contacts about requirements of expedited FOIA processing by sharing the updated FOIA Reference Guide with them.  Implement updated FOIA Tracking System with built-in expedited request alert reminders	12/31/2007	Verify the FOIA Reference Guide is updated and shared with Program Office FOIA contacts	Completed. Coordinated with OPM Program Office FOIA Contacts for comments, recommendations, and suggestions
*14. Forms of communication with requesters	Improve the quality of denial letters	Emphasize the need to include appeal rights in all full and partial denial letters to Program Office FOIA contacts	12/31/2007	Periodically review sample of denial letters for completeness and monitor trends	Completed. Emphasized the need to include appeal rights in all full and partial denial letters to Program Office FOIA contacts
*20 Additional training needed (formal and/or on-the-job)	Increase FOIA and Privacy Act knowledge of the OPM Program Office FOIA contacts	Recommend to Program Office managers to send employees involved in FOIA operations to a	12/31/2007	Count the number of people who attend FOIA training courses and	Completed. Gathered written documentation and assembled FY2007 FOIA-related training statistics and conducted trend



U.S. Office of Personnel Management  
Annual Freedom of Information Act Report  
FY 2007

		<p>training course available from the Department of Justice or the American Society of Access Professionals</p> <p>Require proof of attendance from Program Office FOIA contacts by their submission of copies of training certificates</p>		monitor trends	analysis
28. Development of OPM FOIA Regulations	Update OPM FOIA Regulations	Address each requirement of the FOIA specifically in OPM regulations	12/31/2007	Verify regulations are complete and have been published	In clearance. OPM's FOIA regulations are currently going through an internal review and approval process. This includes reviewing for consistency with the OPEN Government Act of 2007. We will publish the approved regulations in FY 2008.

**C. Identification and discussion of any deficiency in meeting plan milestones**

1. FOIA Improve Plan area to which the deficient milestone relates.

Milestone # 28 – Development of OPM FOIA Regulations

2. Deficient milestone and the original target date for the FOIA Improvement Plan.

Milestone # 28 – Update OPM FOIA Regulations – 12/31/2007

3. Steps taken to correct the deficiency and the dates by which the steps were completed.

OPM's FOIA regulations are currently going through an internal review and approval process. This includes reviewing for consistency with the OPEN Government Act of 2007.

U.S. Office of Personnel Management  
Annual Freedom of Information Act Report  
FY 2007

4. Future remedial steps and the dates by which the steps will be completed.

We will publish the regulations in FY 2008.

**D. Additional narrative statement regarding other executive order-related activities (optional) – Not applicable.**

**E. Concise descriptions of FOIA Exemptions**

1. Classified information for national defense or foreign policy: Exemption 1 was used 15 times in FY 2007.
2. Internal personnel rules and practices: Exemption 2 was used 72 times in FY 2007.
3. Information exempt under other laws: Exemption 3 was used 0 times in FY 2007.
4. Trade secrets and confidential business information: Exemption 4 was used 6 times in FY 2007.
5. Inter-agency or intra-agency memoranda or letters protected by privileges: Exemption 5 was used 15 times in FY 2007.
6. Personnel and medical files: Exemption 6 was used 2,142 times in FY2007.
7. Law enforcement records or information: Exemption 7 was used 2,186 times in FY 2007.
8. Information concerning bank supervision: Exemption 8 was used 0 times in FY 2007.
9. Geological and geophysical information: Exemption 9 was used 0 times in FY 2007.

U.S. Office of Personnel Management  
Annual Freedom of Information Act Report  
FY 2007

**F. Additional statistics**

**1. Ten Oldest Pending FOIA Requests**

OPM's list of ten oldest pending FOIAs was a part of the agency's response to GAO Study Number 310788 submitted to GAO in September 2007.

Calendar Year	2000	2001	2002	2003	2004	2005	2006	2007
Requests							Feb 7 Feb 20 Apr 10 Jul 18 Jul 26 Jul 31 Aug 9 Aug 25 Aug 28 Sept 5	

**2. Consultations**

At this time, the agency's tracking system is unable to capture this information.

**G. Attachment Agency Improvement Plan (in its current form).**



*UNITED STATES  
OFFICE OF PERSONNEL MANAGEMENT*

**IMPROVEMENT PLAN UNDER  
EXECUTIVE ORDER 13392:  
IMPROVING AGENCY  
DISCLOSURE OF INFORMATION**

UNITED STATES OFFICE OF PERSONNEL MANAGEMENT



**June 2006**

## Revision History

<b>Revision Number</b>	<b>Revision Date</b>	<b>Revision Summary</b>	<b>Authoring Office</b>
1.1	May 12, 2006	Initial Draft Release	MSD/CIS/PPG
1.2	May 16, 2006	Revised Draft Release	MSD/CIS/PPG
1.3	May 18, 2006	Revised Draft Release	MSD/CIS/PPG
1.4	May 18, 2006	Revised Draft Release	MSD/CIS/PPG
1.5	May 19, 2006	Revised Draft Release	MSD/CIS/PPG
1.6	May 23, 2006	Final	MSD/CIS/PPG

## Table of Contents

	Page
A. Nature of U.S. Office of Personnel Management’s FOIA operations .....	4
B. Areas selected for review .....	4
C. Summary of review results .....	5
D. Improvement areas for agency plan .....	6
E. Improvement areas.....	6
F. Action plan:.....	10
1. Areas anticipated to be completed by December 31, 2006 .....	10
2. Areas anticipated to be completed by December 31, 2007 .....	10
3. Areas anticipated to be completed after December 31, 2007 .....	11

## **U.S. Office of Personnel Management Improvement Plan Under Executive Order 13392: Improving Agency Disclosure of Information**

In accordance with Executive Order 13392: Improving Agency Disclosure of Information and related guidance from the U.S. Department of Justice, the U.S. Office of Personnel Management (OPM) has performed a review of its Freedom of Information Act (FOIA) operations and provides the following information and action plan.

### **A. Nature of the U.S. Office of Personnel Management's FOIA operations**

OPM receives and processes a significant number of FOIA requests each year. The largest number of FOIA requests are related to OPM contracts, civilian employment statistics, and personnel actions. In FY 2005, OPM received 4,594 FOIA requests, processed 4,518 within the statutory time limit, and has a backlog of 107 requests from FY 2005 which the agency is addressing.

OPM's FOIA Requester Service Center has one full-time FOIA coordinator working with 19 decentralized Program Office FOIA contacts who perform FOIA functions as a collateral duty. The FOIA coordinator manages the agency's new and outstanding FOIA requests and coordinates improvement plans for OPM's FOIA operations with the agency's Chief FOIA Officer and the 19 Program Office FOIA contacts throughout the agency. This arrangement is considered to be high-risk with regard to customer response times. Actions to address this risk are included in the following action plan.

### **B. Areas selected for review**

OPM selected all 27 areas recommended for review by the Department of Justice and added two improvement areas for developing this plan, as follows:

1. Affirmative disclosure under section (a)(2) of the FOIA
2. Proactive disclosure of information
3. Overall FOIA Web site improvement
4. Improvement of agency's FOIA Reference Guide
5. Automated tracking capabilities
6. Electronic FOIA – automated processing
7. Electronic FOIA – receiving/responding to requests electronically.
8. Multi-track processing
9. Troubleshooting of any existing problems (even minor ones) with existing request tracking
10. Case-by-case problem identification
11. Expedited processing
12. Backlog reduction/elimination
13. Politeness/courtesy
14. Forms of communication with requesters
15. Acknowledgement letters

16. System of handling referrals
17. System of handling consultations
18. Process by which necessary cooperation is obtained from agency "program personnel"
19. Improvement ideas from field office personnel (where applicable)
20. Additional training needed (formal and/or on-the-job)
21. In-house training on "safeguarding label"/FOIA exemption distinctions
22. Increased staffing (where applicable)
23. Changes to personnel practices (job series, grades, etc.) needed
24. Contracting out/hiring of contract employees
25. Purchase of new equipment needed
26. Centralization/decentralization
27. Recycling of improvement information gleaned from FOIA Requester Service Centers
28. Updating OPM FOIA regulations
29. Improved internal communication within OPM about FOIA responsibilities

### **C. Summary of review results**

OPM's initial review of the improvement areas mentioned above showed a need for improvement in 18 areas. The highest priority areas for improvement are:

- Affirmative disclosure under section (a)(2)
- Proactive disclosure of information
- Automated tracking capabilities
- Electronic FOIA – automated processing
- Expedited processing
- Backlog reduction/elimination
- Politeness/courtesy
- Acknowledgement letters
- Increased staffing
- Improved internal communications within OPM about FOIA responsibilities

The agency's action plan for improving these areas is provided in Section E, below, and includes such actions as increasing information on the OPM web site, improving the agency's outdated FOIA tracking system, increasing training for all Program Office FOIA contacts, and improving workflow for processing FOIA requests.

OPM was one of the first federal agencies to implement electronic FOIA processing which it initiated in 1999. Since then the agency has received 1,000 FOIA requests electronically. OPM plans to build on its success in processing FOIA requests electronically by adding the capability to scan incoming paper requests as noted in the action plan below.



## D. Improvement areas chosen for agency plan

OPM selected the following areas for improvement after conducting a review of the agency's FOIA processes. The list below reflects the Department of Justice Executive Order 13392 Implementation Guide numbering scheme and includes the two additional improvement areas mentioned above that have been identified by OPM.

1. Affirmative disclosure under section (a)(2) of the FOIA
2. Proactive disclosure of information
3. Overall FOIA Web site improvement
4. Improvement of agency's FOIA Reference Guide
5. Automated tracking capabilities
6. Electronic FOIA – automated processing
9. Troubleshooting of any existing problems (even minor ones) with existing request tracking
11. Expedited processing
12. Backlog reduction/elimination
13. Politeness/courtesy
14. Forms of communication with requesters
15. Acknowledgement letters
19. Improvement ideas from field office personnel (where applicable)
20. Additional training needed (formal and/or on-the-job)
21. In-house training on "safeguarding label"/FOIA exemption distinctions
22. Increased staffing (where applicable)
27. Recycling of improvement information gleaned from FOIA Requester Service Centers
28. Development of OPM FOIA regulations
29. Improved internal communications within OPM about FOIA responsibilities

## E. Improvement areas and improvement plan:

Name of improvement area	Brief statement of goal(s)/ objective(s)	Distinct steps planned to be taken	Time milestones	Means of measurement of success
*1. Affirmative disclosure under subsection (a)(2) of the FOIA	Increase the amount of information disclosed on the OPM web site: www.opm.gov	Increase the disclosure of frequently requested OPM records on the agency's web site such as policy statements, staff manuals and instructions to staff, and final agency opinions	12/31/2006	Verify that frequently requested OPM records such as policy statements, staff manuals and instructions, and final agency opinions have been disclosed on the agency's web site.

\* Denotes improvement area derived from the Executive Order itself

Name of improvement area	Brief statement of goal(s)/ objective(s)	Distinct steps planned to be taken	Time milestones	Means of measurement of success
*2. Proactive disclosure of information	Strengthen OPM's FOIA processes for posting the most frequently requested records in OPM's electronic Reading Room	Increase the amount of information in OPM's electronic Reading Room to include the records most frequently requested under FOIA in the preceding fiscal year (FY)	Annually beginning 12/31/2006	Verify that the records most frequently requested under FOIA in the preceding fiscal year have been posted
3. Overall FOIA Web site improvement	Publish OPM's updated FOIA Reference Guide on the agency's FOIA website	Revise OPM's FOIA web pages to include the updated FOIA Reference Guide	12/31/2008	Verify that the updated FOIA Reference Guide has been published on the agency's FOIA website
*4. Improvement of the agency's FOIA Reference Guide	Annually review and update OPM's FOIA Reference Guide as needed	Update OPM's FOIA Reference Guide which includes instructions for submitting FOIA and Privacy Act requests and information about contacting the FOIA Requester Service Center for status	12/31/2007	Verify that the FOIA Reference Guide has been reviewed and updated
*5. Automated tracking capabilities	Improve workflow of FOIA requests	Replace outdated FOIA Tracking System with streamlined FOIA Tracking System for use by the OPM Program Office FOIA contacts and the FOIA Requester Service Center	12/31/2006	Verify that the streamlined FOIA Tracking System is operating
*6. Electronic FOIA -- automated processing	Develop the capability to produce electronic versions of mailed and faxed FOIA requests	Purchase a document scanner for use by the FOIA Requester Service Center. Begin using it to convert paper FOIA requests to	12/31/2006	Verify that the scanner is installed and is being used to convert paper FOIA requests to electronic form.

Name of improvement area	Brief statement of goal(s)/ objective(s)	Distinct steps planned to be taken	Time milestones	Means of measurement of success
		electronic form.		
*9. Troubleshooting of any existing problems (even minor ones) with existing request tracking	Improve the security of the FOIA requests received at OPM	Develop a proposed solution for linking secure faxes to the FOIA email system	12/31/2008	Verify that alternative solutions have been evaluated and submitted for budget consideration
*11. Expedited processing	Document handling procedures for expedited processing of FOIA requests in FOIA Reference Guide	Remind Program Office FOIA contacts about requirements of expedited FOIA processing by sharing the updated FOIA Reference Guide with them.  Implement updated FOIA Tracking System with built-in expedited request alert reminders	12/31/2007  12/31/2006	Verify that the FOIA Reference Guide is updated and shared with Program Office FOIA contacts.
*12. Backlog Reduction/Elimination	Eliminate present FOIA backlog	Distribute lists of outstanding FOIA requests to Program Office FOIA contacts for reconciliation of backlog  Implement updated FOIA Tracking System	12/31/2006  12/31/2006	Record percentage of requests completed on time and monitor trends
*13. Politeness/courtesy	Improve politeness and courtesy to FOIA requesters	Recommend customer service training for Program Office FOIA contacts	12/31/2006	Record the number of complaints received in the FOIA Requester Service Center about politeness of OPM staff and monitor trends
*14. Forms of communication with requesters	Improve the quality of denial letters	Emphasize the need to include appeal rights in all full and partial denial letters to Program Office FOIA contacts	12/31/2007	Periodically review sample of denial letters for completeness and monitor trends

Name of improvement area	Brief statement of goal(s)/ objective(s)	Distinct steps planned to be taken	Time milestones	Means of measurement of success
15. Acknowledgment letters	Send acknowledgement letters to all requesters regardless of method of receipt of FOIA requests	Respond via email or mail to requesters who mail or fax their requests	12/31/2006	Verify that the OPM Service Center has begun sending acknowledgement emails or letters to all requesters
19. Improvement ideas from field office personnel (where applicable)	Conduct annual meetings with Program Office FOIA contacts to discuss ideas and suggestions to improve FOIA processes.	Hold annual FOIA meetings with all Program Offices including field locations	12/31/2008	Verify that annual meeting has been held
20. Additional training needed (formal and/or on-the-job)	Increase FOIA and Privacy Act knowledge of the OPM Program Office FOIA contacts	<p>Recommend to Program Office managers to send employees involved in FOIA operations to a training course available from the Department of Justice or the American Society of Access Professionals</p> <p>Require proof of attendance from Program Office FOIA contacts by their submission of copies of training certificates</p>	<p>12/31/2007</p> <p>12/31/2007</p>	Count the number of people who attend FOIA training courses and monitor trends
21. In-house training on "safeguarding label"/FOIA exemption distinctions	Include safeguarding and labeling procedures for FOIA information in OPM's policy on Safeguarding Sensitive But Unclassified Information and include them in the FOIA Reference Guide	Update the FOIA Reference Guide to include the procedures	12/31/2008	Verify that the updated FOIA Reference Guide includes the procedures and is published

<b>Name of improvement area</b>	<b>Brief statement of goal(s)/ objective(s)</b>	<b>Distinct steps planned to be taken</b>	<b>Time milestones</b>	<b>Means of measurement of success</b>
22. Increased staffing (where applicable)	Increase FOIA Service Center staff	Recruit specialist to evaluate and support FOIA processes	12/31/06	Verify that employee is hired
*27. Recycling of improvement information gleaned from FOIA Requester Service Centers	In annual meetings with Program Office FOIA contacts ask for suggestions for improving the agency's FOIA program	Hold annual FOIA meetings with all Program Offices and request suggestions	12/31/2008	Verify that minutes of the meetings include Program Office suggestions for improving the agency's FOIA program
28. Development of OPM FOIA Regulations	Update OPM FOIA regulations	Address each requirement of the FOIA specifically in OPM regulations	12/31/2007	Verify that regulations are complete and have been published
29. Improved internal communications within OPM about FOIA responsibilities	Send semi-annual FOIA status report to OPM office heads	Develop report format  Create reports and send them	12/31/2006	Verify that report format has been developed and reports have been sent

## **F. Action plan:**

### **1. Areas anticipated to be completed by December 31, 2006**

1. Affirmative disclosure under section (a)(2) of the FOIA
2. Proactive disclosure of information
5. Automated tracking capabilities
6. Electronic FOIA – automated processing
11. Expedited processing
12. Backlog reduction/elimination
13. Politeness/courtesy
15. Acknowledgement letters
22. Increased staffing
29. Improved internal communications within OPM about FOIA responsibilities

### **2. Areas anticipated to be completed by December 31, 2007**

4. Improvement of agency's FOIA Reference Guide
14. Forms of communication with requesters
20. Additional training needed (formal and/or on-the-job)
28. Development of OPM FOIA regulations

### **3. Areas anticipated to be completed after December 31, 2007**

- 3. Overall FOIA Web site improvement
- 9. Troubleshooting of any existing problems (even minor ones) with existing request tracking
- 19. Improvement ideas from field office personnel (where applicable)
- 21. In-house training on “safeguarding label”/FOIA exemption distinctions
- 27. Recycling of improvement information gleaned from FOIA Requester Service Centers