

**Freedom of Information Act (FOIA) Plan  
Institute of Museum and Library Services (IMLS)  
FY2006**

**I. Background**

In accordance with Executive Order 13,392 (December 14, 2005), entitled “Improving Agency Disclosure of Information,” the Institute of Museum and Library Services (IMLS) is committed to ensuring that the agency’s FOIA operation and processes are efficiently managed and responsive to its customers. For the past several years, the Institute has noticed a steady rise in the amount of FOIA requests submitted to the agency; however, to date, the increase has not hindered the agency’s ability to respond to FOIA request in a timely manner. Our assessment of the Institute’s FOIA operations is outlined as follows:

A. **Overall Characterization of FOIA Operation:** The IMLS General Counsel serves and the Chief FOIA Compliance Officer for the agency and is responsible for review, maintenance and compliance with all FOIA policy, processes and systems relating to the agency’s FOIA program. Within IMLS, the agency’s FOIA Processor is located with the Office of General Counsel (OGC) and is responsible for processing all incoming FOIA requests. As such, any staff member who receives a FOIA request or a request for agency documents not distributed in the agency’s day-to-day business from any outside entity, refers the request (i.e., letter, fax or e-mail) to the OGC for processing. Once the OGC has officially recorded the request, it is processed by IMLS FOIA personnel in the following manner:

**FOIA PROCESSOR (PUBLIC LIAISON)** – Records, reviews, and monitors FOIA requests to ensure completeness and compliance with applicable FOIA rules and agency guidelines. The FOIA Processor is also responsible for forwarding all correspondence and releasable documents to the FOIA requestor once signed and approved by the FOIA Officer. The OGC assigns incoming FOIA request to the appropriate action office (e.g., OLS, OMS, etc.) and directs that applicable records be made available within a designated timeframe. Once the requested records are received from the action office, they are forwarded to the FOIA Officer.

**FOIA OFFICER (PUBLIC LIAISON)** –The FOIA Officer reviews requests for information under FOIA and decides if a information provided within a given record will be disclosed, denied or partially withheld from the requestor. The FOIA Officer also approves extensions or non-disclosures and signs notices of such determinations; consults with the General Counsel on FOIA requests; and develops and maintains an electronic reading room of FOIA materials in consultation with the Office of General Counsel.

**Challenges:** The agency does not have personnel solely dedicated to administering the agency FOIA operation. Each individual who is designated to jointly administer FOIA

operations within the IMLS works diligently to ensure that activities associated with monitoring the FOIA process and responding to FOIA request are handled appropriately.

B. **Areas Selected for Review:** In 2003, the Institute performed a comprehensive internal review of its FOIA operations. Following our internal review, several enhancements were made to our agency guidelines that improve our FOIA process overall. These improvements in FOIA processing have enabled the agency, as a whole, to be more responsive to FOIA requestors.

In light of the requirements outlined in Executive Order 13,392 (December 14, 2005), however, the Institute has again reviewed its overall FOIA operation in an effort to identify which processes or systems should be targeted for additional improvement. Because our initial assessment of FOIA operations revealed that the IMLS does not have concerns with regard to timely responses to FOIA requestors, our main efforts are focused on ways by which the IMLS can streamline its current FOIA processing activities and/or implement new steps or processes that could possibly reduce the amount of requests received each year or further decrease the average amount of days the agency currently takes in responding to its clients. As such, the three areas that were selected are:

1. Develop Automated FOIA Request Form
2. Redesign FOIA Database
3. Enhance Electronic Reading Room

C. **Results of Review:** Upon thorough review of the above selected areas, the agency identified that through use of available technology, it can make several improvements to ways in which IMLS makes information available to the public; facilitate timely submissions and improve public access to the agency's FOIA process; and better track each FOIA requests once it has been submitted to IMLS.

D. **Improvement Areas for Agency Plan:** Because the agency has not identified any major challenges to administering FOIA operations within the IMLS, the agency has determined that all areas originally selected for review would be targeted for improvement.

E. **Improvement Areas:**

1. **Develop Automated FOIA Request Form**

(a) Statement of Goals/Objectives – The goal of instituting an Automated FOIA Request Form is to facilitate the FOIA request process for both the agency and the public. Our objective for this initiative is to cut down the time expended by agency personnel in contacting requestors for critical information which is was left out of their written, faxed or e-mail requests (i.e., address, organization, etc.); and also eliminate time delays in providing requested information to a requestor due to insufficient information received from the public.

(b) Planned Steps –

(1) Review FOIA guidelines and agency FOIA policy to determine the format and required information to be included on the Automated FOIA Request Form.

(2) Work with Information Technology System Administrator to ensure that information gathered from Automated FOIA Request Form will be integrated into the current FOIA database.

(c) Time Milestones -

(1) Development of Automated FOIA Request Form should be accomplished by July 30, 2006

(2) FOIA database integration should be accomplished on or before November 30, 2006.

(d) Success Measurement – Successful accomplishment of the Automated FOIA Request Form initiative will be measured when IMLS’ can receive FOIA requests electronically.

## **2. Redesign FOIA Database**

(a) Statement of Goals/Objectives – The goal of redesigning the FOIA database is enhancing IMLS’ ability to provide more accurate and timely information in the areas of agency reporting and public response. The objective is to redesign the current database to integrate information received from the agency’s Automated FOIA Request Form and also provide better information to customers who request access to copies of information contained in our FOIA Request Database.

(b) Planned Steps –

(1) Work with IMLS Information Technology Section to ensure that information obtained from the Automated FOIA Request Form can be successfully integrated into our current FOIA Request Database.

(2) Coordinate with IMLS Information Technology Section to make clarifying improvements to the current database design which will make it easier for FOIA requestors to understand information contained in the FOIA Request Database when asked to provide this information during the FOIA process.

(c) Time Milestones –

(1) The ability to integrate information received

from the Automated FOIA Request Form into the FOIA Request Database should be completed on or before November 30, 2006.

(2) Total redesign of the FOIA Request Database to ensure better clarity of information requested during the FOIA process should be accomplished by December 31, 2006.

(d) Success Measurement – Successful accomplishment of the FOIA Request Database redesign initiative will be measured if the information received from Automated FOIA Request Form is successfully consolidated and accurately recorded in the FOIA Request Database. It will also be measured in the agency's ability to redesign our current FOIA Request Database in a manner that will provide more accurate and clear information from our database to FOIA requestors, if asked.

### **3. Enhance Electronic Reading Room**

(a) Statement of Goals/Objectives – To limit the amount of personnel and material resources needed in responding to standard or basic agency FOIA requests. The objective is to make available on-line all known releasable agency information which is of continuing interest to FOIA requestors.

#### **(b) Planned Steps –**

(1) Review information currently agency information that is available electronically to determine what improvements are needed.

(2) Review FOIA Request over the past five (5) years to determine what information is most requested.

(3) Solicit input from agency staff to determine what information not currently available on-line would be most beneficial to their clients.

(4) Gather documents and information agency-wide which were selected and approved for placement on-line.

(5) Ensure a thorough review of document has been conducted by the FOIA Officer and OGC prior to placing documents on-line.

(6) Placement of approved documents in agency Electronic Reading Room.

#### **(c) Time Milestones –**

(1) Review of current electronic information performed by September 30, 2006.

(2) Review of FOIA Request for the past five (5) years completed by January 31, 2007.

(3) Receive input from agency staff by March 31, 2007.

(4) Documents gathered agency-wide by June 30, 2007.

(5) FOIA Officer and OGC Review completed by September 30, 2007.

(6) New documents added to Electronic Reading Room by December 31, 2007.

(d) Success Measurement – The success of this project will be measured in two ways: first, by the agency’s ability to make more agency-related documents available to the general public; second, by the increase in the use of the agency’s electronic reading room.

F. **Improvement Area Time Periods:**

(a) **Areas designated for completion by December 31, 2006**

(1) *Automate FOIA Request Form*

(2) *Redesign FOIA Database*

(b) **Area designated for completion by December 31, 2007**

(1) *Implement FOIA Reading Room*