



## Chief FOIA Officer Report

U.S. Railroad Retirement Board  
844 North Rush Street  
Chicago Illinois, 60611-2092

Phone: (312) 751-7139  
TTY: (312) 751-4701  
Web: <http://www.rrb.gov>

### **FY 2010 Chief FOIA Officer Report for the U.S. Railroad Retirement Board (RRB)**

The RRB submits this report for FY 2010 in response to the request in the United States Department of Justice Office of Information Policy FOIA Post, "Guidelines for 2011 Chief FOIA Officer Reports to the Department of Justice, Pursuant to Attorney General Holder's FOIA Guidelines." The report has been prepared by Steven A. Bartholow, General Counsel/Chief FOIA Officer, RRB.

#### I. Steps Taken to Apply the Presumption of Openness.

##### 1. Description

The RRB is a small, independent agency in the Executive Branch of the Federal government. As the RRB's General Counsel/Chief FOIA Officer, I am responsible for the RRB's overall FOIA program. I have made certain that all FOIA staff are properly trained concerning the President's FOIA memorandum and the Attorney General's FOIA guidelines and are responsible in carrying out those responsibilities as they respond to all FOIA requests. We continue to make discretionary releases when possible and have taken actions to make additional proactive disclosures, such as posting additional financial and statistical information relating to the RRB's core mission of paying benefits, on both the RRB's agency and FOIA websites.

##### 2. Disclosure Comparisons

The number of full grants to requests has continued to increase since FY 2007 to the present, i.e., from 34 in FY 2007 to 53 in FY 2009. In FY 2008, the agency released 48 full grants and 5 partial grants. In FY 2009, the agency released 55 full grants and 15 partial grants. In FY 2010, the agency released 62 full grants and 4 partial grants.

#### II. Steps Taken to Ensure that the RRB has an Effective System for Responding to Requests.

The RRB's system for responding to requests is set forth in some detail below. Because of the average number of requests received annually, we believe this centralized process is the most effective FOIA-administration structure. We continue to monitor and assess our information technology to ensure that FOIA professionals have sufficient information technology support to perform their required functions.

#### III. Steps Taken to Increase Proactive Disclosures.



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The RRB reviewed and upgraded the FOIA web pages as part of the agency's website redesign in 2005. We continue to monitor FOIA webpage content to

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make sure it remains timely and consistent with current law. FOIA staff have the responsibility and authority to update the RRB website as necessary. The website offers access to copies of the agency's procedure manuals, final decisions of the three-member Board which heads the agency, rulings of the Board and legal opinions. Other information is available to the public without filing a FOIA request in the Federal Register and the RRB Group Information Locator System (GILS) website. An example of additional material provided since the issuance of the new FOIA Guidelines include a more comprehensive list of the agency's procedural manuals. Additionally, five data sets of statistical information have been added to the RRB's Open Government Initiative located at <http://www.rrb.gov/open/default.asp>.

### High-Value Data Sets

The RRB identified and published online in an open format five high-value data sets and registered those data sets via Data.gov. Going forward, the RRB will consider existing published data for conversion to open format for publication to Data.gov.



## High Value Information and Data Set Inventory

The RRB High-Value Information and Data Set Inventory details the underlying data sets that are in an open format and accessible directly via Data.gov.

High-Value Information and Data Set Inventory		
Information/Data Set Name	Description	URL
Active Employees and Railroad Retirement Act Beneficiaries by State, 2008	A breakdown of Active Employees and Railroad Retirement Act Beneficiaries by State	<a href="http://www.data.gov/details/1331">http://www.data.gov/details/1331</a>
Longevity of Railroad Retirement Beneficiaries	Calculations of life expectancies of Railroad Retirement beneficiaries.	<a href="http://www.data.gov/details/1332">http://www.data.gov/details/1332</a>
Railroad Retirement Act Annuitants and Active Railroad Employees by Congressional District	A breakdown of Railroad Retirement Act Annuitants and Active Railroad Employees by Congressional District.	<a href="http://www.data.gov/details/1330">http://www.data.gov/details/1330</a>
Total Number of Railroad Employees by State and Last Railroad Employer, 2007	A breakdown of Railroad employees by State and Last Railroad Employer.	<a href="http://www.data.gov/details/455">http://www.data.gov/details/455</a>
Total Railroad Employment by State and County, 2007	A breakdown of Railroad employees by State and County.	<a href="http://www.data.gov/details/456">http://www.data.gov/details/456</a>

## Open Government Webpage

The RRB's Open Government Webpage ([www.rrb.gov/open](http://www.rrb.gov/open)) serves as the gateway for agency activities related to the Open Government Directive. The site allows the public to provide input about the agency's Open Government Plan, give feedback regarding the quality of published information, and provide input about what information should be prioritized for publication to RRB staff via E-mail.



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### Transparency

The RRB's long history of transparency is evident by the extensive amount of information frequently published on its website ([www.rrb.gov](http://www.rrb.gov)). To uphold and advance this strong commitment to transparency in the future, the RRB will continue to publish information in support of its mission to administer retirement/survivor and unemployment/sickness insurance benefit programs for railway workers and their families under the Railroad Retirement Act and the Railroad Unemployment Insurance Act.

### Agency Plans, Management and Reports

The RRB Strategic Plan details the RRB's long and distinguished history of excellent customer service and the continuation of that tradition by calling for the attainment and maintenance of high levels of accuracy and timeliness in paying retirement, survivor, unemployment and sickness insurance benefits. The Agency Management and Reports webpage provides information on the RRB's structure, responsibilities to the public, and communication methods. The RRB Annual Report provides information on agency operations that are distributed to officials of railway management and labor, members of Congress, officials of the Federal Government, and requesting libraries

[http://www.rrb.gov/general/plan\\_rpt\\_inv.asp#fair](http://www.rrb.gov/general/plan_rpt_inv.asp#fair)  
[http://www.rrb.gov/mep/agency\\_mgt.asp](http://www.rrb.gov/mep/agency_mgt.asp)  
[http://www.rrb.gov/opa/AnnualRprt/Ann\\_Rpt\\_toc.asp](http://www.rrb.gov/opa/AnnualRprt/Ann_Rpt_toc.asp)

### Agency Procedure Manuals

The Agency Procedure Manuals webpage is an index of the chapters in the various manuals used by the RRB in the processing of claims under either the Railroad Retirement or Railroad Unemployment Insurance Acts.

[http://www.rrb.gov/general/admin\\_manuals\\_index.asp](http://www.rrb.gov/general/admin_manuals_index.asp)

### Board Coverage Decisions

Board Coverage Decisions are the determinations of the three-member Board as to the status of various companies or persons with respect to coverage as employers or employees under the Railroad Retirement and Railroad Unemployment Insurance Acts.



[http://www.rrb.gov/blaw/bcd/cov\\_introduction.asp](http://www.rrb.gov/blaw/bcd/cov_introduction.asp)

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### Congressional Requests

The Congressional Inquiry Section of the RRB's Office of Administration is responsible for responding to all inquiries from congressional offices concerning constituents, benefit claims or applications filed with the agency.

Questions about proposed railroad retirement legislation, the status of pending legislation, or congressional schedules, hearings or committee jurisdiction should be directed to the Office of Legislative Affairs ([ola@rrb.gov](mailto:ola@rrb.gov)).

[http://www.rrb.gov/opa/rrbcongress\\_contacts.asp](http://www.rrb.gov/opa/rrbcongress_contacts.asp)

### Federal Register

The Federal Register is the official daily publication for rules, proposed rules, and notices of Federal agencies and organizations, as well as executive orders and other presidential documents. Descriptions of agency organization, procedures for the public to obtain information, statements of agency function, rules of procedure, descriptions of agency forms, substantive rules of general applicability and statements of general policy, and any changes in material required to be published are available through the Office of the Federal Register, National Archives and Records Administration (NARA).

<http://www.gpoaccess.gov/fr/index.html>

[http://www.rrb.gov/irm/fedreg\\_notices.asp](http://www.rrb.gov/irm/fedreg_notices.asp)

[http://www.rrb.gov/irm/fedreg\\_regs.asp](http://www.rrb.gov/irm/fedreg_regs.asp)

### Financial, Actuarial and Statistical Data

The RRB Financial, Actuarial and Statistical Data webpage consists of the following sections:

Annual Railroad Retirement Act and Railroad Unemployment Insurance Act Data

Budget and Financial Reports: Current and Projected

Earnings Limits, Tax Rates and COLA's



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### Monthly and Quarterly Railroad Retirement Act and Railroad Unemployment Insurance Act Data

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#### Performance and Accountability Reports

[http://www.rrb.gov/mep/fin\\_act\\_stat.asp](http://www.rrb.gov/mep/fin_act_stat.asp)

#### Forms and Publications

The Railroad Retirement Handbook provides a comprehensive single source of authoritative information on the development and character of the railroad retirement and railroad unemployment insurance systems. The Benefit Forms and Publications webpage provides information on Unemployment & Sickness Benefits, Retirement & Survivor Benefits, Medicare, Income Tax, Protests and Appeals, and Work/Earnings. The Employer Forms and Publications webpage provides content from the Exhibits Section of the Labor Reporting, Employer Reporting and Sickness Reporting Instructions, and publications in the format of Employer Exchange Newsletters and Office of the Labor Member Questions and Answers.

<http://www.rrb.gov/general/handbook/toc.asp>

[http://www.rrb.gov/mep/ben\\_forms.asp](http://www.rrb.gov/mep/ben_forms.asp)

[http://www.rrb.gov/mmo/rail\\_forms.asp](http://www.rrb.gov/mmo/rail_forms.asp)

#### Freedom of Information Act (FOIA)

The RRB is required under the Freedom of Information Act (FOIA) to disclose records requested in writing by any person. However, we may withhold information under certain exemptions and exclusions provided by the statute. In addition, the Railroad Retirement Act, the Railroad Unemployment Insurance Act, and the Privacy Act restrict disclosure of information about individuals.

<http://www.rrb.gov/blaw/foia/foia.asp>

#### Information Dissemination

In accordance with Section 3506(d) of the Paperwork Reduction Act and Section 515 of Public Law 106-554 the RRB has developed a procedure to allow one to



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seek and obtain correction of certain information RRB maintains and disseminates. Procedures to seek correction of information under section 515 do not replace other established procedures for challenges to disseminated information. Challenges to information disseminated in the course of rulemaking should be made through the channels established for that purpose.

<http://www.rrb.gov/bis/section515/introduction.asp>

<http://www.rrb.gov/bis/section515/guidelines.asp>

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<http://www.rrb.gov/bis/section515/correct.asp>

### IMPAC Credit Card Holders List

The RRB receives frequent requests under the Freedom of Information Act for a list of the IMPAC credit card holders at the agency. In accord with section 4 of the Electronic Freedom of Information Act Amendments of 1996 (P.L. 104-231), the RRB posts the list of credit card holders.

<http://www.rrb.gov/general/impac.asp>

### News Releases

The RRB News webpage provides access to periodic news releases distributed to editors of railway publications and major newspapers, officials of railway management and labor, and requesting agencies and organizations in and outside of the Federal Government.

[http://www.rrb.gov/mep/news\\_releases.asp](http://www.rrb.gov/mep/news_releases.asp)

### Paperwork Reduction Act

The RRB is essentially compliant with the information dissemination requirements of the PRA.

### Privacy Act - Privacy Act Systems of Records

The RRB Privacy Act webpage provides information on one's right to records which the RRB maintains about individuals, including individuals in the railroad industry. The text of all of the RRB's Privacy Act Systems of Records, as published in the Federal Register, are available for study.



[http://www.rrb.gov/bis/privacy\\_act/introduction.asp](http://www.rrb.gov/bis/privacy_act/introduction.asp)  
[http://www.rrb.gov/bis/privacy\\_act/SORNList.asp](http://www.rrb.gov/bis/privacy_act/SORNList.asp)

### Records Management

The RRB records schedules are in transition. We will post updated RRB records schedules to [www.rrb.gov](http://www.rrb.gov) upon completion of all remaining NARA Bulletin 2006-02-related RRB/NARA appraisal work later in FY 2010.

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### RRBVision

The RRBVision service allows users to view video presentations with accompanying training materials, such as PowerPoint presentations or online screens. Presentations can be viewed in real time or saved for later viewing. These presentations covered instructions in filing for sickness and unemployment benefits under the Railroad Unemployment Insurance Act, filing for retirement benefits under the Railroad Retirement Act, completing a variety of compensation-reporting forms and navigating the Board's Web site.

[http://www.rrb.gov/rrbvision/video\\_library.asp](http://www.rrb.gov/rrbvision/video_library.asp)

#### IV. Steps Taken to Greater utilize Technology.

##### 1.) Electronic receipt of FOIA receipts:

Yes, the RRB receives requests electronically via mail, fax and email through its E-FOIA system created by the RRB's Bureau of Information Services.

##### 2.) Electronic tracking of FOIA requests:

The RRB tracks requests electronically through its E-FOIA system created by the RRB's Bureau of Information Services and the Office of General Counsel's assignment control log.

##### 3.) Electronic processing of FOIA requests:





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Currently, the RRB does not use technology to process requests. Due to the average number of requests received within a given year, currently around 100, the RRB has determined that utilizing an electronic system for responding to requests is unnecessary at this time. We will continue to evaluate this option. However, to the extent practical and subject to valid restrictions, the RRB will continue to use its website to disseminate useful information, rather than waiting for specific requests under FOIA.

#### 4.) Electronic preparation of your Annual FOIA Report:

No, the RRB does not use technology to prepare its Annual FOIA Report. We currently utilize an off-the-shelf data-processing system to prepare our annual report. We do not currently see a need for the use of additional automated processing technologies.

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Due to the average number of requests received within a given year, currently around 100, the RRB has determined that utilizing technology in preparing its Annual FOIA Report is unnecessary and would not be cost-effective. We will continue to monitor this process to provide effective and efficient processing of FOIA requests.

#### V. Steps Taken to Reduce Backlogs and Improve Timeliness of Responding to Requests.

##### 1. Agency Backlog

At the close of FY 2010, the RRB had a backlog of one pending request. At the close of FY 2010, the RRB did not have any pending appeals. In FY 2008, the RRB had a backlog of 5 requests. In FY 2009, the RRB did not have a backlog of requests or appeals.

##### 2. Reduction in Agency Backlog

The one pending request at the close of FY 2010 is due to the complexity of the request received concerning a request for access to the agency's entire travel database.

##### 3. Improving Timeliness

To improve timeliness, the RRB will reach out to requesters to narrow the scope of overbroad requests and if necessary, develop alternative timeframes for processing of complex requests. etc.



### Spotlight on Success

#### Flagship Initiative - American Customer Satisfaction Index Web-Based Survey

Starting in May 2010, working in collaboration with Foresee Results and the Federal Consulting Group, the Railroad Retirement Board will be participating in the American Customer Satisfaction Index survey of visitors to the agency's website. The survey will specifically measure the visitors' perception of "Online Transparency" among other things. Unlike previous ACSI surveys the agency has conducted at a single point in time, this survey will be ongoing for at least a year. Each month, the survey questions can be adjusted to obtain customer feedback on potential enhancements thus providing a vehicle for customer participation. Each quarter we will receive an analytical report which will help us determine which website improvements will yield the greatest return on satisfaction and on our investment. This approach will also allow us to determine the importance of website elements to our customers—based on their input—so we can make informed decisions about website improvements and other online investments. The

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ability to adjust both the survey and the website along the way provides an ongoing measure of improved transparency and effectiveness. Depending on the level of public participation, funding availability, and the RRB's ability to respond to the feedback, we will consider extending the survey for another year or more, and/or obtaining additional analytical services to further improve website performance and openness, and ultimately efficiency and effectiveness of operations, as well as customer satisfaction.



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ADDENDUM BY THE  
RAILROAD RETIREMENT BOARD  
GENERAL COUNSEL  
(AGENCY CHIEF FOIA OFFICER)

At the RRB, we are committed to more than just compliance with both President Obama's FOIA Memorandum and Attorney General Holder's FOIA Guidelines Order, as well as any other law applicable to the FOIA. Among other things:

- We are committed to working with our FOIA requesters, and the public in general, to continuously improve our FOIA operations;
- We are committed to processing FOIA requests in an efficient, timely, and appropriate manner and to continuously achieving tangible, measurable improvements in FOIA processing;
- We are committed to responding to, and servicing, our FOIA requesters in a courteous, polite, and respectful manner;
- We are committed to providing FOIA requesters, and the public in general, with citizen-centered ways to learn about the FOIA process;



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- We are committed to providing FOIA requesters, and the public in general, with timely information about agency records that are publicly available;
- We are committed to providing FOIA requesters, and the public in general, with timely information and about the status of an individual's FOIA request and appropriate information about the agency's response;
- We are committed to substantially increasing the number of agency documents, particularly those that are frequently-requested, made available on our website so that the public does not need to resort to a FOIA request to gain access to these agency documents and to making those documents available in an organized and intelligible manner;
- We are committed to a proactive and thoughtful approach to information disclosure;
- We are committed to the use of technology to track, and expedite the processing of, FOIA requests;
- We are committed to utilizing creative and innovative approaches to substantially reduce any future backlog of FOIA requests;



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- We are committed to improving communication with our FOIA requesters and to more proactively understanding and clarifying FOIA requests; and
- We are committed to a citizen-centered and results-oriented approach.

As the designated Chief FOIA Officer for the RRB, I am pleased to submit this report, which includes the commitments listed above and presents the review of the RRB's current FOIA operations. This report is directed to ensuring that the RRB's administration of the FOIA is not only, at a minimum, in compliance with the law and the policies set forth in the President's Memorandum, but also that the RRB strives to continuously improve its FOIA operations and exceed the expectations of its FOIA requesters.

/s/ Steven A. Bartholow  
RRB General Counsel/Chief FOIA Officer



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### Overall Nature of RRB's FOIA Operations

In the 1930's, Congress established the RRB as an independent agency in the executive branch of the federal government. The primary duty of the RRB is to administer retirement/survivor and unemployment/sickness insurance benefit programs under the Railroad Retirement Act and the Railroad Unemployment Insurance Act. These programs provide income protection during old age and in the event of disability, death or temporary unemployment and sickness. The RRB also administers aspects of the Medicare program and has administrative responsibilities under the Social Security Act and the Internal Revenue Code.

During fiscal year 2010, retirement-survivor benefits of some \$10.8 billion were paid to about 582,000 beneficiaries, while net unemployment-sickness benefits of \$160 million, including over \$20 million in temporary extended unemployment benefits under the American Recovery and Reinvestment Act of 2009 and the Worker, Homeownership, and Business Assistance Act of 2009, were paid to more than 38,000 claimants. At the end of fiscal year 2010, the average annuity paid to retired rail employees was some \$2,215 a month, spouse benefits averaged \$815 a month, and benefits for aged widow(er)s averaged \$1,330 a month. The maximum biweekly rate for unemployment and sickness benefits was \$660.

The RRB staff currently includes approximately 969 employees as of December 31, 2010. The agency's headquarters is located at 844 North Rush Street, Chicago, Illinois 60611-2092 and the agency has 53 field offices nationwide. The agency's small size and concise mission result in on average around 100 FOIA requests annually. Our average processing time for FOIA requests last year was around 12.14 days. In 2005, the RRB launched a redesigned website ([www.rrb.gov](http://www.rrb.gov)) that is more user-friendly and makes publicly available many of the categories of documents that used to result in FOIA requests.

Internet availability of these documents has reduced the number of FOIA requests. This allows us to focus on the remaining requests, which tend to be somewhat more complex. Information available from the RRB under the FOIA includes the agency's procedure manuals, final decisions of the three-member Board which heads the agency, rulings of the Board and legal opinions. Legal opinions since 1997 and Board Coverage Decisions are periodically posted to the RRB web site and available without a request under the Freedom of Information Act.

Because the RRB administers a comprehensive program of railroad retirement, unemployment, and sickness benefits for railroad workers, it also maintains information about individuals which may not be disclosed in response to a FOIA request. The



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Railroad Retirement Act, the Railroad Unemployment Insurance Act, and the Privacy Act restrict the disclosure of information about individuals. If a request is made for

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information about an individual, as a general rule, the requester must provide the RRB a written authorization signed by the individual who is the subject of that record.

RRB's FOIA operations are centralized in the RRB's headquarters location. The RRB officials who have primary responsibility for the administration of program areas are located at RRB Headquarters in Chicago, Illinois. Numerous programs, however, are administered at the local level through 12 Networks, headed by Network Managers who oversee the operation of all RRB program areas in their jurisdiction. RRB's primary FOIA operation is located in the FOIA Requester Service Center located within the Office of General Counsel (OGC). The OGC is comprised of ten attorneys (a General Counsel, an Assistant General Counsel, an Assistant to the General Counsel and 7 staff attorneys), a paralegal specialist, and three administrative support personnel. One General Attorney is primarily responsible for reviewing incoming FOIA requests, providing the requestor with an acknowledgment of the request, determining whether documents are likely to be located at Headquarters, and either initiating a search at RRB Headquarters' program offices or refer the request to a Network Manager, or non-Headquarters program-specific office, as appropriate. The General Attorney is also responsible for reviewing the program office's recommendation concerning the releasability of documents, redacting material subject to FOIA exemptions, and preparing a draft response letter to the requester for the General Counsel/Chief FOIA Officer. Two additional General Attorney's have secondary responsibility to provide back-up assistance to the primary General Attorney for FOIA requests. The three support staff personnel at Headquarters are responsible for logging in the average 100 or so FOIA requests received at Headquarters annually, including inputting pertinent information into an electronic tracking system. Support staff also perform ancillary functions, such as filing, record archiving, and time and attendance.

The Headquarters primary FOIA attorney handles all legal issues related to Headquarters FOIA requests, including researching and reviewing issues related to the applicability of exemptions, resolving fee waiver determinations, deciding requests for news media status, and responding to questions from Headquarters program staff. The primary FOIA attorney is responsible for resolving all issues that arise within Headquarters regarding responsiveness and adequacy of search by Headquarters offices. In addition, the Headquarters FOIA legal staff serves in an advisory role to the over 53 decentralized RRB offices, responding to challenging questions on processing, applicability of exemptions, interpretation of the FOIA, and the handling of non-routine FOIA requests. The Headquarters FOIA attorneys are also responsible for supervising the Headquarters FOIA Specialist processing staff, including the review and editing of all of the approximately 100 plus FOIA response letters sent by Headquarters annually. All FOIA



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responses are signed by the General Counsel/Chief FOIA Officer of the OGC. Supervisory duties performed by one attorney in the Headquarters FOIA Requester Service Center include assignment of cases to the FOIA attorneys, preparation of performance appraisals, progress reviews and all other personnel functions related to supervision of the non-attorneys in the FOIA Requester Service Center.

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RRB's FOIA operations outside of Headquarters are administered or supervised by OGC. Each Network Manager has responsibility to forward all FOIA requests related to documents physically located within either the Network Office or district field offices within the Network Manager's jurisdiction.

It should also be noted that due to the independent nature of the RRB's Office of Inspector General (OIG), handling and reporting statistics concerning FOIA requests received by that office, is the responsibility of the OIG. However, those statistics are reflected herein for purposes of this report.