



## **Inter-American Foundation**

An Independent Agency of the U.S. Government

### **2019 CHIEF FOIA OFFICER REPORT**

#### **Inter-American Foundation**

#### **Introduction**

Based on the guidance issued on September 21, 2018 by the Department of Justice, Office of Information Policy, the Inter-American Foundation (IAF) falls within the definition of a "Small Volume Agency" because it received fewer than 50 Freedom of Information Act (FOIA) requests in FY 2018.

Accordingly, it has prepared this narrative as its 2019 Chief FOIA Officer Report.

During FY 2018, the IAF fully implemented FOIA policy guidance, including the Department of Justice 2009 FOIA Guidelines, applying the presumption of openness, ensuring an effective system for timely and accurately responding to FOIA requests, increasing proactive disclosures, and using technology. These efforts are detailed below.

#### **Presumption of Openness**

The IAF applies the presumption of openness to all the requests. In FY 2018, the IAF received eleven FOIA requests, of which five generated "no responsive records" responses. Of the remaining six received, three resulted in the release in full of all responsive documents; two contained personal information that was redacted under exemption (b)(6); and the last one contained one page out of 101 with partial (b)(5) redactions.

#### **Ensuring an Effective System**

The IAF posts information on how to submit a FOIA request on its public website, along with the names and contact information for both its Chief FOIA Officer and FOIA Public Liaison. The most common method of making a FOIA request is through an email inquiry to a FOIA e-mail address that is regularly checked by the Associate General Counsel, who also serves as the Assistant Chief FOIA Officer. All incoming FOIA requests are initially reviewed by the Associate General Counsel. These requests are all logged and assigned a tracking number. The Associate General Counsel usually replies to the FOIA requester within twenty-four hours, acknowledging receipt and providing the FOIA tracking number

assigned to the request. The Associate General Counsel, acting under the supervision of the IAF Chief FOIA Officer, who also serves as the General Counsel, coordinates with relevant members of the IAF staff to conduct a search for responsive agency records. The IAF administers the FOIA in a “spirit of cooperation” through updates to requesters when necessary. When requesters have questions, they are answered in a timely and respectful manner.

The Associate General Counsel then compiles the responsive documents, follows up as appropriate, and drafts a response letter that is reviewed and signed by the General Counsel. The General Counsel is a member of the IAF senior staff and the principal legal advisor to the IAF's President and Chief Executive Officer, who serves as the head of agency. The General Counsel also makes recommendations on proactive disclosure to the agency head, and ensures broader agency compliance with the FOIA.

One key indicator of the effectiveness of the IAF's system is the average number of days it takes to effectively close a FOIA request. In FY 2018, the IAF's average was 7 days for those requests that were not backlogged.

### **Proactive Disclosures**

In FY 2018, the IAF implemented the principal of proactive disclosure by posting almost 100 agency documents to its public website. These documents included grant public statements, agency reports, and publications. The IAF posts the minutes of the meetings of its Board of Directors. The IAF also maintains a blog on its public website in order to offer insight into the communities we serve and amplify the voices and experiences of our grassroots partners.

### **Technology**

In FY 2018, the IAF received virtually all FOIA requests electronically, and it processed all FOIA responses electronically.

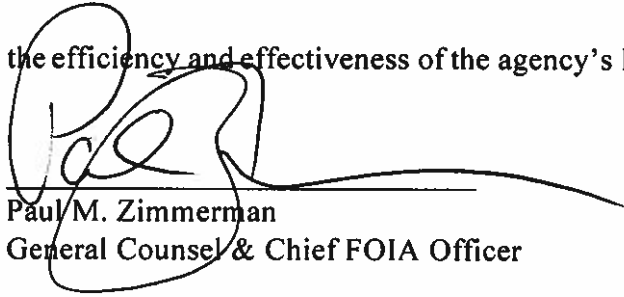
### **Reducing Any Backlogs**

The IAF works diligently to reduce any backlogs, especially requests that were backlogged from the previous fiscal year. During FY18 three requests became backlogged, but the IAF made sure to focus on those and by the end of the fiscal year all three were closed. We currently have one request backlogged, but that is because it is part of an inter-agency deliberation.

### **Conclusion**

As is evident by this Report, the IAF takes its FOIA responsibilities seriously. As the Chief FOIA Officer, I am committed to continuously reviewing and improving

the efficiency and effectiveness of the agency's FOIA program.



Paul M. Zimmerman  
General Counsel & Chief FOIA Officer

Dated: February 6, 2019