



NATIONAL ARCHIVES *and* RECORDS ADMINISTRATION  
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December 22, 2017—sent via email

Ms. Raynell Lazier  
FOIA Manager  
Consumer Financial Protection Bureau  
1700 G Street, NW  
Washington, DC 20552  
[raynell.lazier@cfpb.gov](mailto:raynell.lazier@cfpb.gov)

Dear Ms. Lazier:

We again thank you for the Consumer Financial Protection Bureau's (CFPB) willingness to participate in a compliance assessment of the agency's Freedom of Information Act (FOIA) program by our office.

As noted in our transmittal letter and in our report, the Office of Government Information Services (OGIS) follows up with agencies 120 days after the assessment report is published. The goal of following up with you is to understand what actions the agency has taken to address our recommendations for improving the office's administration of FOIA, and close out recommendations as warranted.

Attached is a response form listing OGIS's recommendations to the CFPB. Please provide us with your response within 60 business days from the date of this letter. The response will be posted on the OGIS website.

We are, of course, available to discuss the follow-up questions and we welcome your comments.

We hope this follow-up will assist CFPB in improving aspects of its FOIA program. If you have any questions, please do not hesitate to contact Kirsten Mitchell at 202-741-5775 or at [kirsten.mitchell@nara.gov](mailto:kirsten.mitchell@nara.gov).

Sincerely,

ALINA M. SEMO  
Director

Enclosure



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## **Follow-up to Compliance Assessment of the Freedom of Information Act (FOIA) program at the Consumer Financial Protection Bureau (CFPB)**

Date: December 22, 2017

Date Report Issued: August 14, 2017

The Office of Government Information Services (OGIS), which Congress established as part of the OPEN Government Act amendments to the Freedom of Information Act (FOIA), 5 U.S.C. § 552(h), is statutorily required to “review policies and procedures of administrative agencies ... review compliance ... by administrative agencies; and identify procedures and methods for improving compliance ...” 5 U.S.C. § 552(h)(2)(A)-(C). As you will recall, we assessed the FOIA program at the Consumer Financial Protection Bureau (CFPB) and issued a report on August 14, 2017. As part of our compliance assessment process, we follow up with agencies 120 days later to understand what actions the agency took to address our recommendations for improving the administration of FOIA.

### **Finding 1: CFPB faces management challenges to maintain its current responsiveness to FOIA**

*Recommendation: Continue to engage high-level CFPB officials and highlight the importance of compliance with FOIA and a high degree of cooperation between staff in the FOIA office and the program offices.*

#### **Agency Response:**

*Recommendation: Keep CFPB leadership apprised of the need for any additional FOIA assistance to keep up with growing workload.*

#### **Agency Response:**

**Finding 2: CFPB's investments in technologies improve the FOIA process.**

*Recommendation: Comply with Department of Justice guidance encouraging agencies to use a FOIA metadata tag for all posted records released under FOIA.*

**Agency Response:**

**Finding 3: CFPB communicates well with requesters.**

*Recommendation: Create a formal feedback loop to ensure requests are properly processed at the initial request stage and to reduce the number of appeals remanded for further processing.*

**Agency Response:**