

# Assessing Freedom of Information Act Compliance through the National Archives and Records Administration's 2025 Records Management Self- Assessment

## **What NARA Collected**

Each year, the Chief Records Officer (CRO) for the U.S. Government at the National Archives and Records Administration (NARA) assesses whether federal agencies are complying with statutory and regulatory records management requirements. The Records Management Self-Assessment (RMSA) data collection includes several questions about the administration of the Freedom of Information Act (FOIA). The data collection ran from March 9, 2026 to May 15, 2026, with a response rate of 98%.

## **Why OGIS Included FOIA Questions**

A strong records management program—which allows agencies to find records responsive to FOIA requests—is essential to a successful FOIA program. Data collected in the RMSA helps OGIS fulfill its statutory mandate to review agency compliance with FOIA and complements the observations OGIS makes as the FOIA Ombuds, working to improve the FOIA process for all.

## **Key Results: FOIA Compliance through the 2025 RMSA**

|                                |                                                                                                                                                                                                                                 |
|--------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Artificial Intelligence</b> | One in five federal agencies reported using artificial intelligence (AI) to assist the FOIA process, a slight uptick from 2024.                                                                                                 |
| <b>FOIA Search</b>             | The use of e-discovery tools by government agencies to conduct FOIA searches has trended upward over the past five years, from 72 percent of respondents who reported doing so on the 2020 RMSA to 80 percent on the 2025 RMSA. |
|                                | More than two in five federal agencies reported finding records responsive to a FOIA request that had already reached their approved disposition date—a records management challenge affecting FOIA administration.             |
|                                | Nearly half of Agency Records Officers and Chief FOIA Officers work together to identify programs or offices most likely to have responsive records and collaborate on high-profile or complex FOIA requests.                   |
| <b>FOIA Training</b>           | Four in five federal agencies reported their Agency Records Officer or records management staff received some FOIA training.                                                                                                    |

# Background

Since the 2016 Records Management Self-Assessment (RMSA), the Office of Government Information Services (OGIS) has worked with the Chief Records Officer (CRO) for the U.S. Government at the National Archives and Records Administration (NARA) to ask federal agencies questions related to Freedom of Information Act (FOIA) administration. The CRO has administered the RMSA since 2009 to assess whether agencies are complying with statutory and regulatory records management requirements. Inclusion of FOIA questions allows OGIS to collect government-wide information, helping to fulfill OGIS's statutory mandate to review agency FOIA compliance, 5 U.S.C. § 552 (h)(2)(B). It is a natural fit for OGIS to include FOIA questions in the RMSA data collection because a strong records management program—which allows agencies to find records responsive to a FOIA request—is essential to a successful FOIA program.

Working with the CRO, OGIS has leveraged investments by NARA in survey technology and the CRO's expertise in collecting self-reported compliance information. In addition to fulfilling OGIS's statutory compliance role, participating in the RMSA data collection helps OGIS better understand FOIA administration across the government and complements the observations OGIS makes through its other activities as the FOIA Ombuds, including providing dispute resolution services to requesters and agencies and leading the Chief FOIA Officers Council and the federal FOIA Advisory Committee. Since Calendar Year (CY) 2018, the RMSA response rates have been at or above 95 percent, falling below—to 92 percent—only in CY 2020, when the self-assessment coincided with the start of the COVID-19 pandemic. The response rate for the 2024 RMSA was 99 percent, and this year's is 98 percent. The CRO administers the RMSA early in the CY for the previous CY.

The 2025 RMSA included seven questions regarding FOIA administration, all repeated from the 2024 RMSA, to gauge how FOIA programs were adapting during a period of significant change across the federal government. As OGIS noted in its [Annual Report](#) to Congress, between FY 2024 and FY 2025, the number of full-time FOIA staff at all 15 Cabinet-level departments and 10 independent agencies decreased 16 percent while backlogs across those agencies increased by 27 percent.<sup>1</sup>

The seven questions on the 2025 RMSA:

1. a question regarding agency use of artificial intelligence (AI) and machine learning in FOIA searches.

---

<sup>1</sup> As reported to the U.S. Department of Justice (DOJ) Office of Information Policy (OIP) and OGIS by the 24 Chief Financial Officer Act agencies plus NARA, 5 U.S.C. § 552(e)(1). OGIS compiled this [data](#) before all other agencies had reported their FY 2025 data.

2. a question (repeated from the 2020 and 2022 RMSAs) asked about the agency's use of electronic discovery (e-discovery);
3. for respondents who answered "yes" to the question regarding the agency's use of e-discovery, a new question asked about how their offices obtained licenses for e-discovery tools;
4. for respondents who answered "no" to the e-discovery question, the next question (repeated from the 2020 and 2022 RMSA) asked why their agency does not use e-discovery tools;
5. a question regarding the incidence of records responsive to FOIA requests that had already surpassed their NARA-approved retention period;
6. a question (included in the RMSA in 2020, 2021, and 2022) asked about the working relationship between the Agency Records Officer and the Chief FOIA Officer; and
7. a question (originally included on the 2019 RMSA) sought to survey Agency Records Officers (or records management staff) about the nature of FOIA training they receive.

The 2025 RMSA received a total of 276 responses. These came from all Cabinet-level departments, departmental components, and independent agencies subject to both the Federal Records Act (FRA) and FOIA, as well as judicial branch entities subject to the FRA but not to FOIA. Not all respondents answered all seven FOIA questions; some agencies may have skipped certain questions, or they determined the questions did not apply. The 12 judicial branch respondents are not included in the statistics for this report.

A complete list of the seven 2025 RMSA questions—each of which is discussed in detail below—is available in the Methodology section.

## Discussion of results

### Artificial Intelligence (AI)

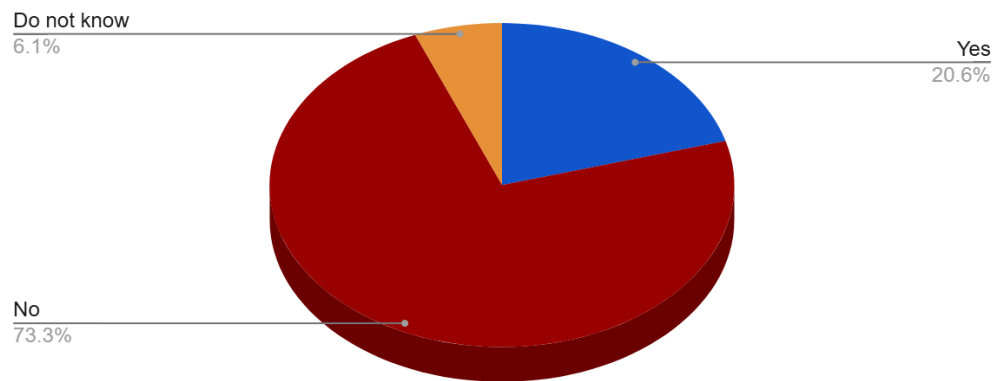
One in five federal agencies reported using artificial intelligence (AI) to assist in the FOIA process in 2025, a modest increase from 2024. Adoption remains limited, however: nearly three out of four reported no use of AI or machine learning as part of their FOIA process. Adoption remains limited, however: nearly three out of four reported no use of AI or machine learning as part of their FOIA process.

Q49. Does your agency use artificial intelligence and/or machine learning to index/catalog/organize records to aid in searching for and retrieving records responsive to FOIA requests?

On the 2025 RMSA:

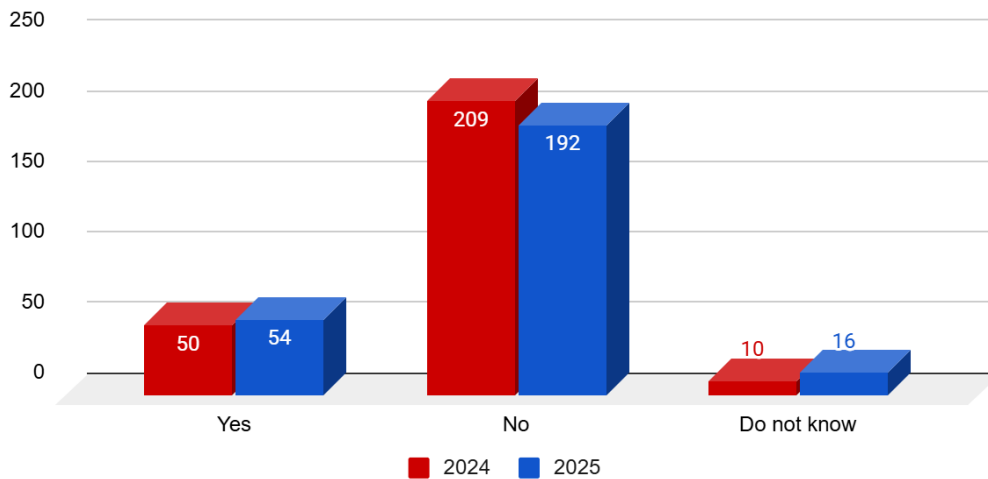
- 20.6 percent used artificial intelligence (AI) and/or machine learning to aid in searching and retrieving records responsive to FOIA requests
- 73.3 percent reported **not** using AI or machine learning to conduct FOIA searches
- 6.1 percent answered “do not know”

Q.49 Does your agency use artificial intelligence and/or machine learning to index/catalog/organize records to aid in searching for and retrieving records responsive to FOIA requests?



**Figure 1** 2025 RMSA Responses to Question 49 “Does your agency use artificial intelligence and/or machine learning to index/catalog/organize records to aid in searching for and retrieving records responsive to FOIA requests?”

Q49. Does your agency use artificial intelligence and/or machine learning to index/catalog/organize records to aid in searching for and retrieving records responsive to FOIA requests?



**Figure 2** Responses to the 2024 and 2025 RMSAs' question "Does your agency use artificial intelligence and/or machine learning to index/catalog/organize records to aid in searching for and retrieving records responsive to FOIA requests?"

The 2022-2024 term of the FOIA Advisory Committee examined potential areas where FOIA processing could benefit from AI and machine-learning tools. Recognizing that agencies would benefit from proactively seeking industry input, the Committee recommended that "the Chief FOIA Officers Council Technology Committee and interested agencies publish requests for information (RFIs) on the subject of artificial intelligence (AI) tools and techniques as an aid to FOIA processing." (Recommendation [2024-12](#)). The Technology Committee, with support from OGIS and DOJ OIP, issued an RFI for the NexGen FOIA Tech Showcase 3.0, which was held virtually from May 11–14, 2026. The RFI focused on identifying AI and advanced technology solutions for federal agencies in response to existing FOIA case processing and backlog challenges

### Observations

The slight uptick in agencies reporting the use of AI or machine learning for FOIA searches from 2024 to 2025 is encouraging.

While the majority of FOIA offices have yet to deploy this technology, the early adopters are demonstrating the ability of AI to identify potentially exempt information, providing examples for other agencies to follow.

AI and machine learning are not a substitute for the judgment of FOIA professionals with regard to application of exemptions and foreseeable harm. However, agencies should assess whether AI and/or machine learning tools can reduce manual work, improve search and review efficiency, and help address processing delays.

## Use of e-Discovery Tools

The use of e-discovery tools by government agencies to conduct FOIA searches has trended upward over the past five years, from 72 percent of respondents who reported doing so on the 2020 RMSA to 80 percent on the 2025 RMSA.

In 2020, the FOIA Advisory Committee recommended that OIP provide guidance to agencies on the use of e-discovery tools to assist agencies in their searches of electronic records in response to FOIA requests. (Recommendation [2020-11](#)). Agencies continue to report annually in their Chief FOIA Officer (CFO) Reports on their efforts to leverage e-discovery and other tools, and OIP continues to encourage agencies to leverage technology for greater efficiency. Moreover, the CFO Council's Technology Committee continues to study ways e-discovery can improve FOIA processing.

The 2024 RMSA included questions about e-discovery to assess the current landscape across FOIA programs governmentwide. The three questions on this topic asked agencies whether they used e-discovery tools, then, depending on their answer, either how they manage licenses or their reasons for not using e-discovery.

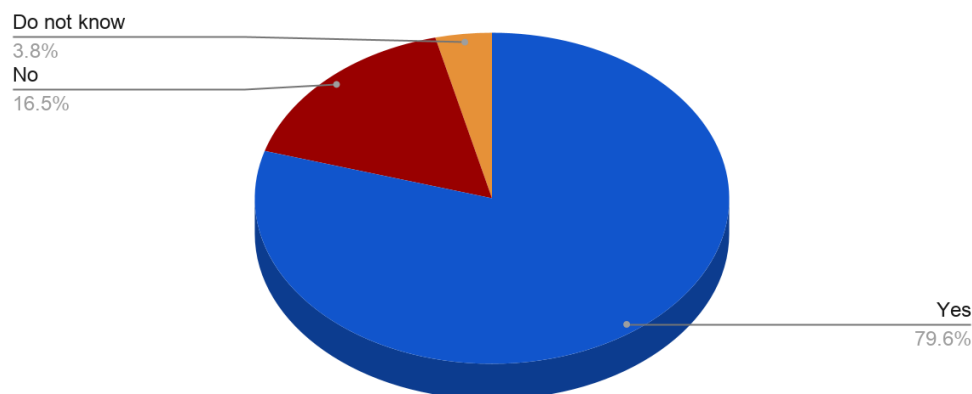
The 2025 RMSA shows that e-discovery is now a mainstream search tool for both FOIA and legal discovery: 79.6 percent of respondents reported using it. The follow-up responses also show that more than half of agencies have access by sharing licenses rather than purchasing FOIA-specific tools. Among the minority that do not use e-discovery, however, availability and cost remain significant barriers.

### Q50. Does your agency use e-discovery tools to search for records when responding to FOIA requests and/or Legal Discovery?

The second FOIA question in the 2025 RMSA is repeated from the 2020, 2022, and 2024 RMSAs and asked about the use of e-discovery tools to search for records in response to FOIA requests and/or legal discovery. In 2025, of the agencies subject to FOIA:

- 79.6 percent reported using e-discovery for FOIA or legal discovery
- 16.5 percent reported not using e-discovery
- 3.8 percent of respondents answered "do not know."

Q.50 Does your agency use e-discovery tools to search for records when responding to FOIA requests and/or Legal Discovery?



**Figure 3** 2025 RMSA Responses to Question 50 “Does your agency use e-discovery tools to search for records when responding to FOIA requests and/or Legal Discovery?”

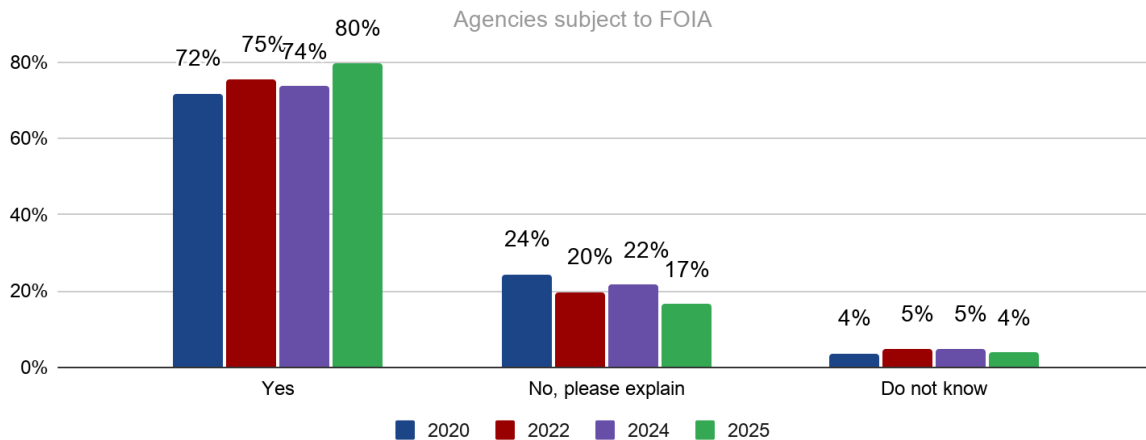
The 2025 RMSA showed an uptick in the percentage of respondents who report using e-discovery tools to search for records responsive to FOIA requests. The 2025 RMSA saw the highest percentage of respondents reporting using e-discovery for FOIA searches of any RMSA where this question has appeared, with a six-percentage point increase from the 2024 RMSA.<sup>2</sup> In the 2020 RMSA, with 266 respondents to this question who were subject to FOIA, 72 percent answered “yes.” In 2022, with 253 respondents subject to FOIA, 75 percent of respondents subject to FOIA answered “yes.” In 2024, with 269 respondents subject to FOIA, 74 percent answered “yes.” In 2025, with 260 respondents subject to FOIA, 80 percent answered “yes.”

On the 2024 and 2025 RMSAs, unlike in previous years, no respondents stated in the comments that they did not know what e-discovery is.

---

<sup>2</sup> On the 2024 RMSA, 73.6 percent of respondents reported using e-discovery tools for FOIA searches.

**Q50. Does your agency use e-Discovery tools to search for records when responding to FOIA and/or Legal Discovery?**



**Figure 4** Responses to the 2020-2025 RMSAs' question "Does your agency use e-discovery tools to search for records when responding to FOIA requests and/or Legal Discovery?" (Answers are rounded up.)

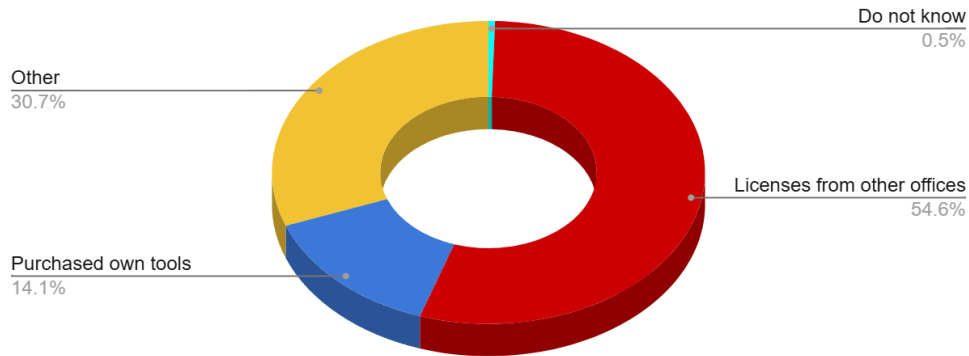
**Q51. If yes: Which of the following applies?**

This question, which received 205 responses, asked agencies that use e-discovery how they obtain the licenses:

- 54.6 percent reported that the FOIA office is using existing licenses or tools from other offices
- 14.1 percent reported that the FOIA office purchased its own office-specific tools
- 30.7 percent selected "other" and provided an explanation
- 0.5 percent answered "do not know"<sup>3</sup>

<sup>3</sup> Since this question applied only to respondents who answered yes to Q50, there were no respondents for whom this was not applicable.

Q51. If respondent answered that their agency uses e-discovery tools to search for records when responding to FOIA requests and/or Legal Discovery, which of the following applies?



**Figure 5** 2025 RMSA Responses to Question 51: for agencies that use e-discovery tools to search for records when responding to FOIA requests and/or Legal Discovery “Which of the following applies?”

| Theme                               | Selected Agency Comments                                                                                                                                                  |
|-------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Borrows licenses from other offices | “E-discovery tools are managed and employed at [an] enterprise-wide level.”                                                                                               |
|                                     | “Component offices using existing licenses or tools from other offices in my agency.”                                                                                     |
| Uses FOIA-specific search tool      | “Our FOIA office is currently purchasing new FOIA specific software from [a vendor].”                                                                                     |
|                                     | “Agency Counsel uses e-discovery tools to support litigation discovery, while the FOIA program utilizes a tool optimized for responding to administrative FOIA requests.” |

|                                      |                                                                                                                                                                                            |
|--------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Uses tool included in software suite | “With complex FOIA cases over time (such as Capstone requests), [the agency] will utilize eDiscovery processes via administrative tools on the back end of [the commercial email system].” |
|                                      | “[The agency] uses [a commercial unified data governance platform] to search for responsive [cloud email] content. Other records are self-collected by record custodians.”                 |
|                                      | “E-discovery is available to the FOIA/Records Manager as part of tools purchased by the IT department.”                                                                                    |

**Table 1** Selected data from 2025 RMSA “Other, please explain,” Responses to Question 51: for agencies that use e-discovery tools to search for records when responding to FOIA requests and/or Legal Discovery “Which of the following applies?”

Q52. If No: Why are e-discovery tools not used to search for records? (Choose all that apply)

This question, repeated from the 2020, 2022, and 2024 RMSAs, was only posed to the 43 respondents who answered "no" on question 50. Because in previous years, large numbers of respondents selected "other, please explain" and offered the explanation that their agencies did not conduct enough searches to justify the acquisition of e-discovery tools, OGIS added this as a response option on the 2025 RMSA.

The question asking for reasons why e-discovery is not used to search for records allowed respondents to select more than one choice<sup>4</sup> and got a total of 65 responses on the 2025 RMSA.

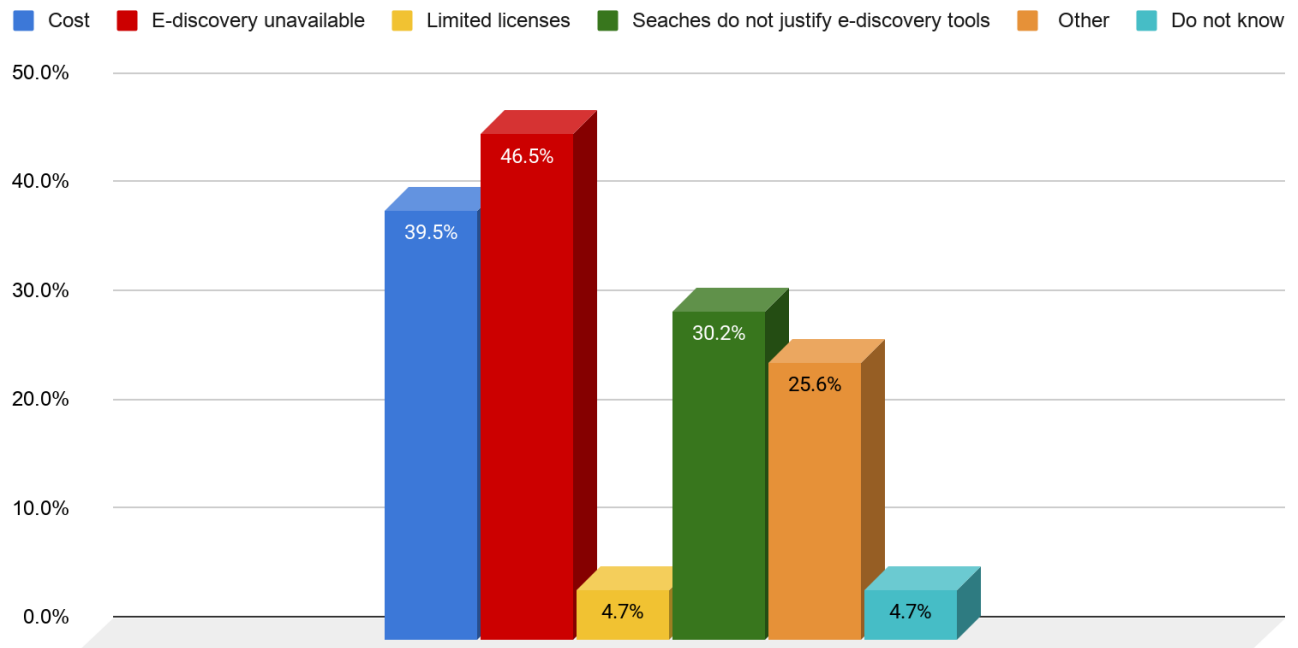
- 46.5 percent reported that the e-discovery tools are not available at their agency
- 39.5 percent responded that cost was a reason they did not use e-discovery tools
- 30.2 percent reported that their agencies do not conduct enough searches to justify e-discovery tools
- 4.7 percent reported that they did not use e-discovery tools because of a limited number of licenses available
- 25.6 percent selected “other” with an explanation
- 4.7 percent answered “do not know”

---

<sup>4</sup> Since respondents were able to select all applicable answers, the responses do not add up to 100 percent.

### Q52. Why are e-discovery tools not used at your agency?

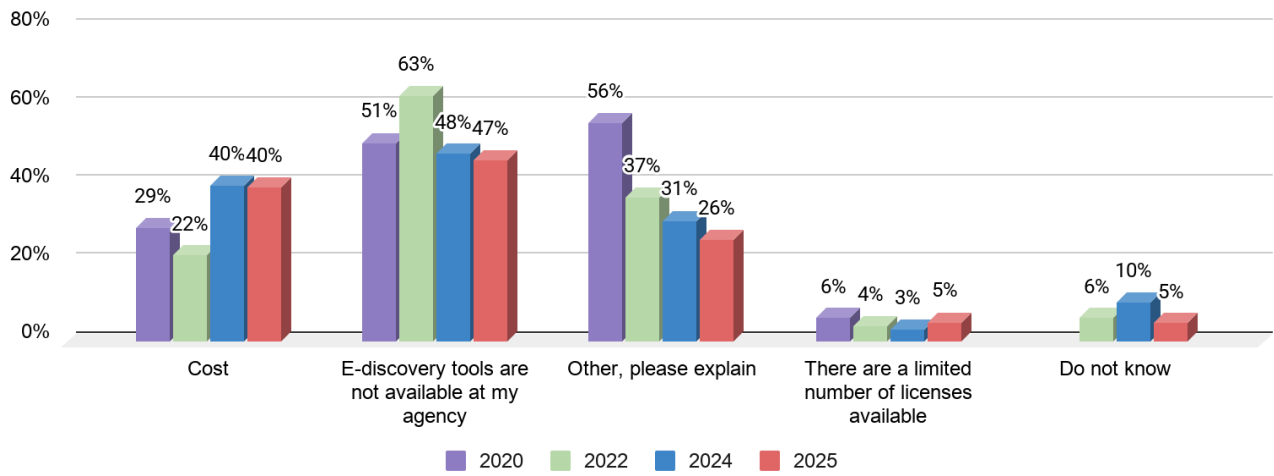
(Choose all that apply)



**Figure 6** 2025 RMSA Responses to Question 52 “Why are e-discovery tools not used to search for records?”

In comparing responses to Q52 from the 2020, 2022, and 2024 RMSAs, the data indicates that many respondents who do not use e-discovery tools have gained an awareness of the tools over time. Unlike in previous years, no respondent commented on *not* knowing what e-discovery is. The percentage of respondents who selected “other” declined from 2020 to 2026. In the 2020 RMSA, 56 percent of respondents selected “other, please explain,” dropping to 37 percent on the 2022 RMSA, and falling further to 26 percent on this year's RMSA.

**Q52. Please explain why e-Discovery tools are not used to search for records.**  
(Choose all that apply)



**Figure 7** RMSA Responses 2020-2025 to Question 52 “Why are e-discovery tools not used to search for records?” (Answers are rounded up.)

As shown in Table 2, below, the “Other, please explain” comments in the most recent RMSA show that many agencies that do not use e-discovery tools either do not need them because they receive so few FOIA requests so as to make e-discovery tools unnecessary or they are working to obtain this technology at their agency. Of the 11 respondents who gave an explanation, 50 percent cited the small size of their agency or small number of FOIA requests as a reason for not using e-discovery tools.

| Theme                                          | Selected Agency Comments                                                                                                      |
|------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------|
| Agencies setting up e-discovery                | “The agency is finalizing an official process to use the eDiscovery tool to search for records in response to FOIA requests.” |
|                                                | “We are currently implementing a new e-discovery tool.”                                                                       |
| E-discovery unnecessary at some small agencies | “[Existing Software] has a search tool that is sufficient [...] Records can easily be searched.”                              |

|  |                                                                                                                                                   |
|--|---------------------------------------------------------------------------------------------------------------------------------------------------|
|  | <p>“Searches are not extensive enough to warrant using e-discovery tools to search. E-discovery tools are used for other purposes as needed.”</p> |
|--|---------------------------------------------------------------------------------------------------------------------------------------------------|

**Table 2** Selected Data from 2025 RMSA “Other, please explain,” Responses to Question 52 “Why are e-discovery tools not used to search for records. (Choose all that apply)”

### Observations

The data indicates that e-discovery tools are widely used across government agencies to conduct FOIA searches, a situation which has trended upward over the past five years. Seventy-two percent of respondents reported using e-discovery for FOIA on the 2020 RMSA, 73 percent of respondents reported doing so on the 2022 RMSA, 74 percent reported using such tools on the 2024 RMSA, and 80 percent reported using them on the 2025 RMSA.

More than half of FOIA offices using e-discovery (54.6 percent) rely on existing licenses or tools from other offices. That finding underscores the value of agency-wide access and inter-office coordination: agencies can expand FOIA search capacity without requiring individual FOIA offices to procure a separate tool. For agencies that still lack access, the reported barriers of availability and cost warrant attention.

### Records Retention Schedules and FOIA

More than two in five federal agencies reported finding records responsive to FOIA requests that had already reached their approved disposition date—a persistent records management challenge affecting FOIA administration.

By law, all federal records must be covered by a NARA-approved records schedule,<sup>5</sup> and agencies must not destroy records until they are approved for destruction in accordance with an approved records schedule. An approved records schedule is the legal authority that identifies records for disposal and allows an agency to dispose of them. When NARA approves a records schedule, it considers how long a type of record will be valuable and determines whether those records have enough value to warrant permanent preservation or how long they should be retained before being destroyed. (44 U.S.C. §§ 3303 and 3303a.) Agencies may only

<sup>5</sup> Scheduling Records, National Archives and Records Administration, <https://www.archives.gov/records-mgmt/scheduling/sch-records>. See 44 U.S.C. § 3314.

destroy those records that do not appear to have sufficient administrative, legal, research or other value following a specific retention period laid out in a NARA-approved records schedule.

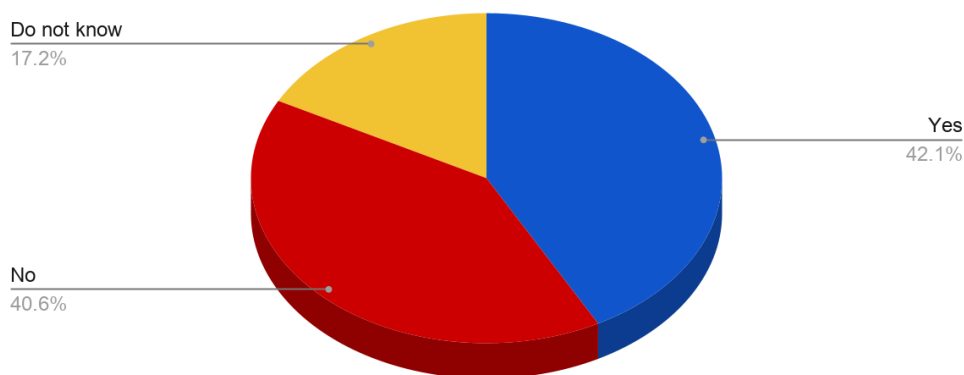
An agency's implementation of a records schedule is mandatory for legal compliance and good records management. Timely disposition reduces storage and review burdens and prevents both premature and delayed destruction.<sup>6</sup> At the same time, if an agency has retained a record beyond its approved disposition date and the record is responsive to a FOIA request, the agency must process it and preserve it through the entire FOIA administrative and judicial process.

Q53. Has your agency found records responsive to FOIA requests that had already met their approved retention period (i.e., the records should have already been disposed of under your agency's NARA-approved records schedules)?

On the 2025 RMSA, this question received 261 responses:

- 42.1 percent reported finding records responsive to a FOIA request that were beyond their retention period
- 40.6 percent reported not finding records that had surpassed their retention period
- 17.2 percent answered "do not know"

Q53. Has your agency found records responsive to FOIA requests that had already met their approved retention period?



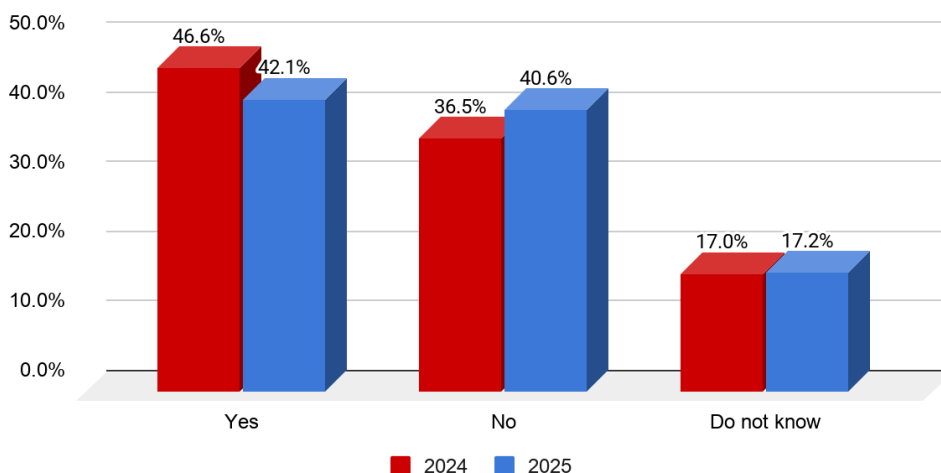
**Figure 8** 2025 RMSA Responses to Question 53 “Has your agency found records responsive to FOIA requests that had already met their approved retention period (i.e., the records should have already been disposed of under your agency’s NARA-approved records schedules)?”

---

<sup>6</sup> *Id.*

In the 2024 RMSA, this question received 275 responses and in the 2025 RMSA, it received 261 responses. There was a 4.5-percentage point decrease in agencies reporting having found records responsive to FOIA requests that had already met their approved retention period. There was a 4.1-percentage point increase in agencies reporting not having found such records. The percentage of agencies who did not know was almost the same, with a 0.2 percentage-point increase from 2024 to 2025.

Q53. Has your agency found records responsive to FOIA requests that had already met their approved retention period?



**Figure 9** Responses to the 2024 and 2025 RMSAs question “Has your agency found records responsive to FOIA requests that had already met their approved retention period (*i.e.*, the records should have already been disposed of under your agency’s NARA-approved records schedules)?”

### Observations

This data highlights a continuing issue with records management compliance. Although the reporting of over-retained responsive records declined from 46.6 percent in 2024 to 42.1 percent in 2025, more agencies still reported finding such records than reported not finding them. And 17.2 percent did not know whether this occurred. Records retained beyond their approved disposition date increase storage costs and can expand the universe of material FOIA staff must search and review, contributing to delays. Agencies should strengthen disposition controls, identify the causes of over-retention, and ensure that records are disposed of when legally authorized—while preserving any records subject to FOIA-related hold controls.

## Agency Records Officers and Chief FOIA Officers

Fewer than half of respondents reported that Agency Records Officers and Chief FOIA Officers work together to identify programs or offices most likely to have responsive records and collaborate on high-profile or complex FOIA requests. Given the interdependence of records management and FOIA, these results leave significant room for stronger, routine coordination.

OGIS has long been interested in the relationship between Agency Records Officers (AROs), and Chief FOIA Officers (CFOs), who are mandated by statute to ensure compliance with the FRA and FOIA, respectively. AROs are senior officials within each agency whose responsibilities include oversight of records management, and CFOs are senior officials within each agency whose responsibilities include “efficient and appropriate compliance” with FOIA and recommending FOIA improvements to the head of the agency.

Q54. Which of the following describes the working relationship between the Agency Records Officer and the Chief FOIA Officer?

This question asked respondents to describe the working relationship between the ARO and CFO at their agency by choosing all statements that applied.<sup>7</sup> The question about the relationship between the two is repeated from the 2020, 2021, 2022, and 2024 RMSAs. Additionally, the 2017 RMSA asked how closely the ARO and the CFO worked together.

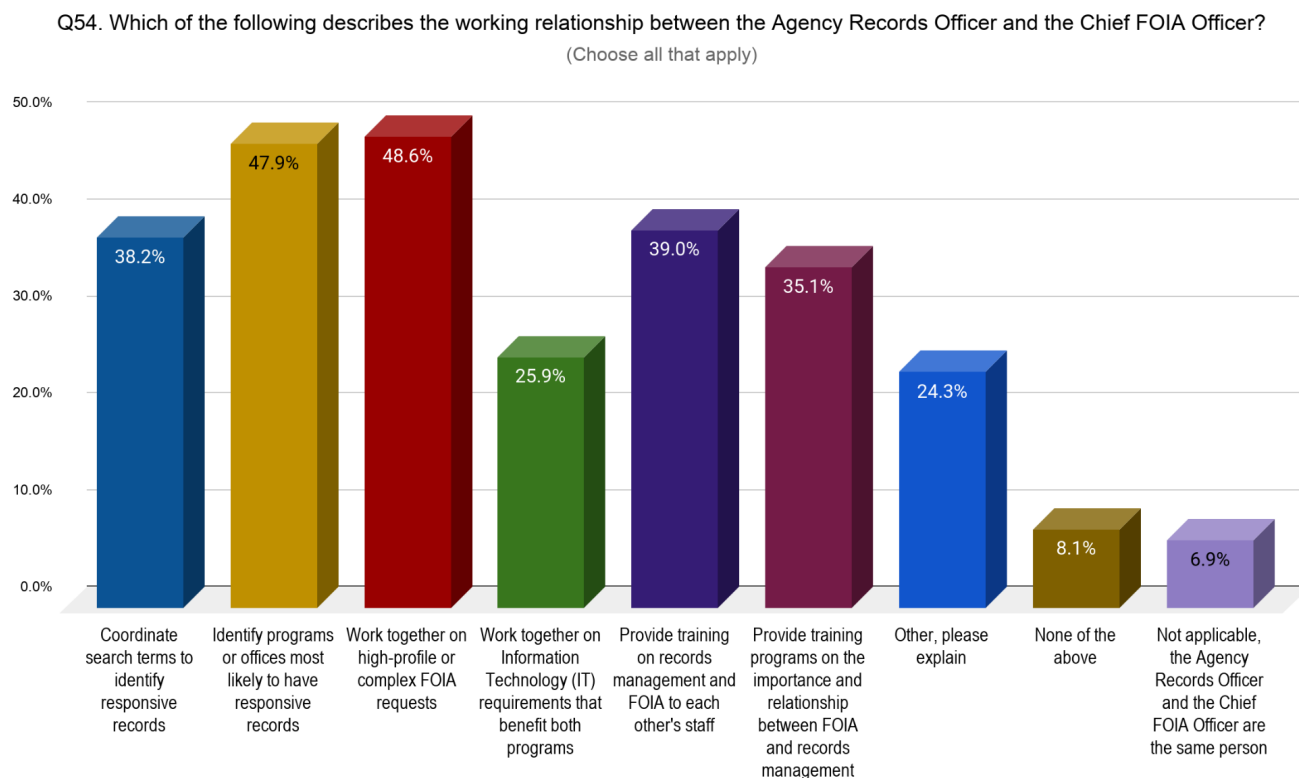
The responses on the 2025 RMSA include:

- 38.2 percent said that the ARO and CFO coordinate search terms to identify responsive records
- 47.9 percent reported that the two work together to identify programs or offices most likely to have responsive records
- 48.6 percent reported that the two work together on high-profile or complex FOIA requests
- 25.9 percent reported working together on information technology (IT) requirements that will benefit both programs
- 39.0 percent reported providing training on records management and FOIA to each other's staff
- 35.1 percent reported providing training programs on the importance and relationship between FOIA and records management
- 24.3 percent responded “Other, please explain”
- 8.1 percent answered, “None of the above” and

---

<sup>7</sup> On the 2025 RMSA, this question had 259 respondents subject to FOIA. Since respondents were able to select all applicable answers, the responses do not add up to 100 percent.

- 6.9 percent of respondents reported that the ARO and the CFO are the same person.

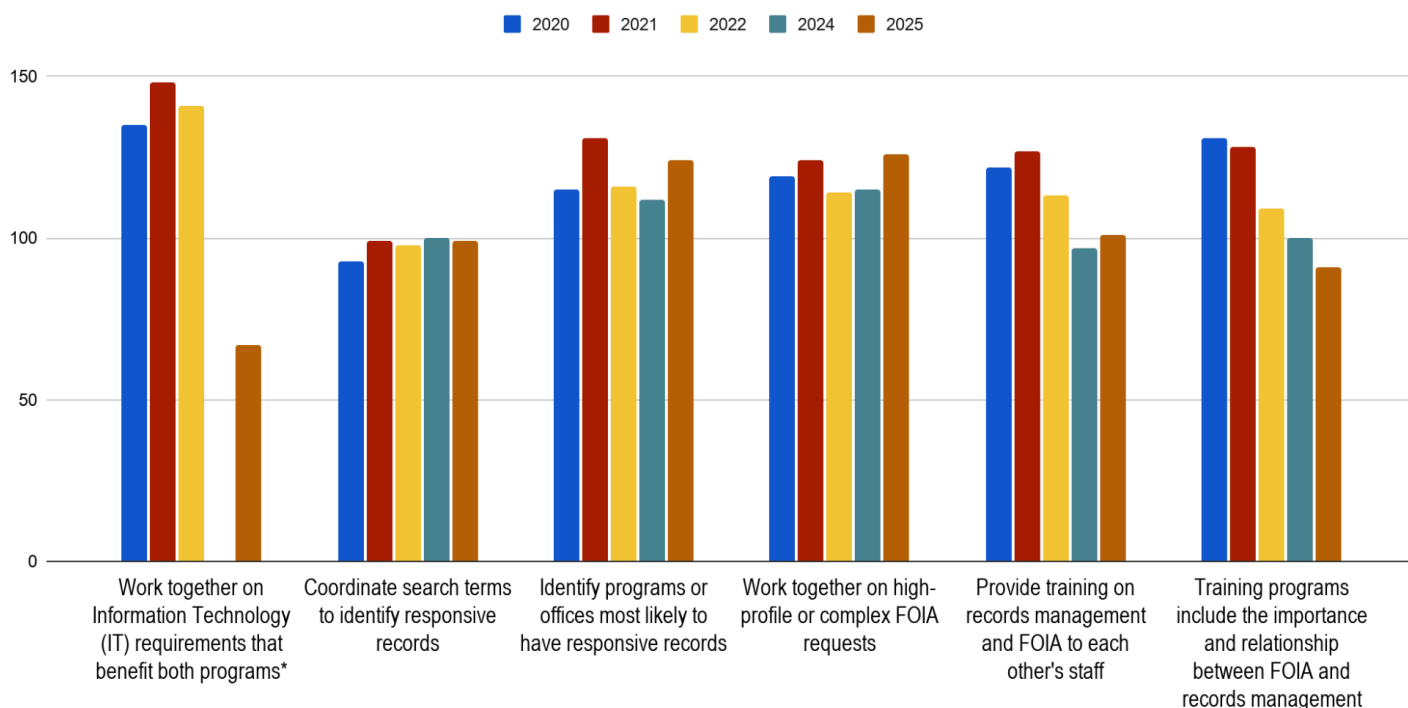


**Figure 10** 2025 RMSA Responses to Question 58 “Which of the following describes the working relationship between the Agency Records Officer and the Chief FOIA Officer?”

The responses provided over several years of RMSAs show two main trends. First, the responses are consistent over the span of several years that the ARO and CFO coordinate search terms to identify responsive records and that the two work together on high-profile or complex FOIA requests. Second, there is a downward trend in training on the importance and relationship between FOIA and records management. This option has been selected by fewer respondents in each of the past four RMSAs that included this question. The 2025 increase in respondents reporting training for each other’s staff is a positive development, but it does not erase the broader need for more systemic collaboration and cross-training.<sup>8</sup>

<sup>8</sup> The 2020 RMSA did not include a selection choice for agencies where the ARO and the CFO are the same person. This was a frequent explanation given in response to “other,” and was included in subsequent RMSAs.

**Q54. Which of the following describes the working relationship between the Agency Records Officer and the Chief FOIA Officer? (Choose all that apply)**



\*The 2024 RMSA left off the selection choice for working together on IT requirements that benefit both programs.

**Figure 11** Responses to the 2020-2025 RMSAs question “Which of the following describes the working relationship between the Agency Records Officer and the Chief FOIA Officer?”

### Observations

The 2025 results show that meaningful ARO-CFO collaboration exists, but it is not yet routine across government. Only 38.2 percent reported coordinating search terms, 47.9 percent reported working together to identify likely records locations, and 48.6 percent reported collaborating on high-profile or complex FOIA requests. In a year when full-time FOIA staffing fell 16 percent and many officials were new in their positions, agencies should treat stronger ARO-CFO coordination as an operational necessity, not an optional practice.<sup>9</sup>

<sup>9</sup> As reported to DOJ OIP and OGIS by the 24 Chief Financial Officer Act agencies plus NARA, 5 U.S.C. § 552(e)(1). OGIS compiled this [data](#) before all other agencies had reported their FY 2025 data.

The clearest area for improvement is cross-training. Only 35.1 percent reported training on the importance and relationship between FOIA and records management, continuing a multi-year decline. CFOs and AROs should establish recurring cross-training so that FOIA and records management staff understand each program’s legal obligations, workflows, and role in locating and managing responsive records.

## FOIA Training for Agency Records Officers and Records Management Staff

More than three quarters of respondents reported that their ARO or records management staff received some FOIA training, and less than one quarter reported no training at all.

The FOIA statute requires CFOs, subject to the authority of the head of the agency, to offer training to agency staff regarding their responsibilities under FOIA, 5 U.S.C. § 552(j)(2)(F). In addition, two prior terms of the FOIA Advisory Committee have issued two recommendations regarding training: one recommending that NARA and OIP create training modules mainly directed at FOIA officers and FOIA Public Liaisons that include records management ([2020-04](#)); and another recommendation to provide FOIA training for all agency staff ([2024-04](#)).

Recommendation 2024-04 states that “the Department of Justice Office of Information Policy (OIP) should issue guidance to all Chief FOIA Officers outlining the minimum requirements for training to agency staff, including non-FOIA professionals.” The Department of Justice Office of Information Policy subsequently issued guidance on FOIA training and the role of the CFO.<sup>10</sup>

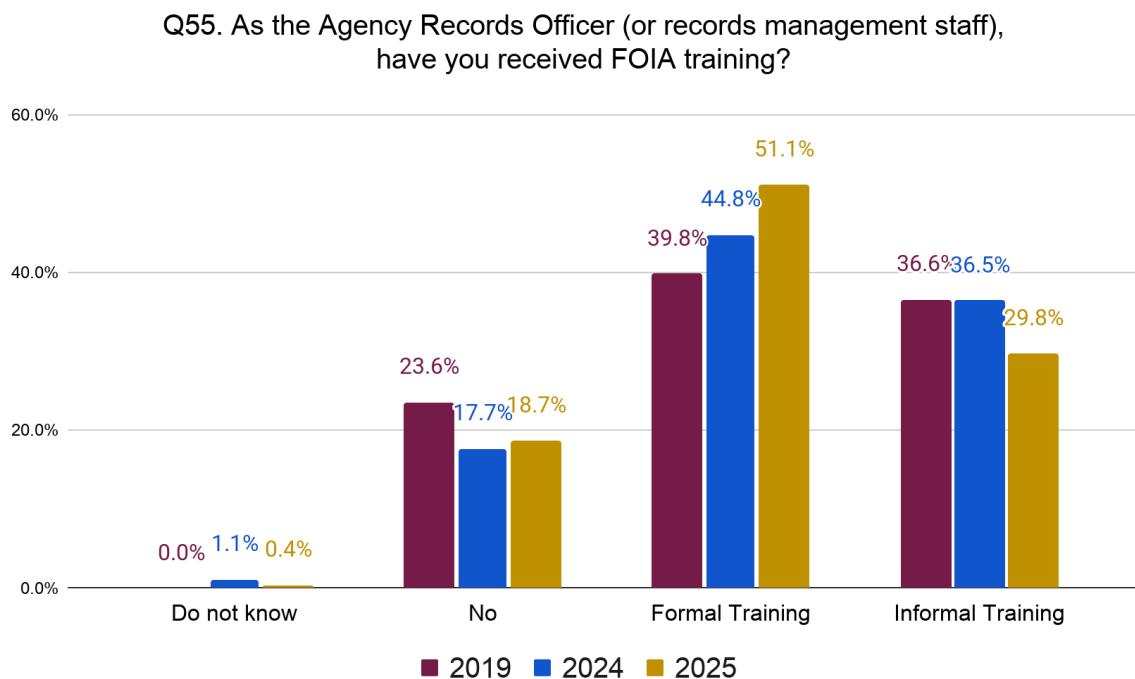
### Q55. As the Agency Records Officer (or records management staff), have you received FOIA training?

This question, which asked if the ARO or RM staff received FOIA training, was repeated from the 2019 and 2024 RMSAs. It received 262 responses in 2025:

- 51.1 percent said that their ARO or RM staff received formal FOIA training such as online training or in-person instructor-led training
- 29.8 percent said that they received informal FOIA training such as a briefing or as part of their agency’s employee orientation process
- 18.7 percent said that their ARO or RM staff did not receive any FOIA training
- 0.4 percent responded “do not know.”

---

<sup>10</sup> [Summary](#) of Agency Chief FOIA Officer Reports for 2024 and Assessment of Agency Progress in FOIA Administration with OIP Guidance for Further Improvement at 17.



**Figure 12** Responses to 2019, 2024, and 2025 RMSAs question “As the Agency Records Officer (or records management staff), have you received FOIA training?”

There was a 6.3-percentage point increase in respondents who reported receiving formal training between the 2024 and 2025 RMSA. The percentage of respondents reporting informal training dropped by 6.7-percentage points. On the 2025 RMSA, 80.9 percent of respondents reported receiving some FOIA training—either formal or informal.

### Observations

While there was a shift toward formal FOIA training between 2024 and 2025, 18.7 percent of respondents reported receiving no training. Additionally, the 6.3-percentage point increase in AROs who reported receiving formal FOIA training indicates that the FOIA Advisory Committee's recommendation seeking FOIA training for all agency staff (2024-04) may be bearing fruit. But agencies should close the remaining training gap, particularly for records management personnel whose work directly affects FOIA searches and preservation.

There does not appear to be a pattern of agencies reporting informal versus formal training, and different agencies within the same cabinet-level department reporting differently. It is possible that informal training, or on the job training on an individual-to-individual level, is more efficient or valuable than the formal training conducted via an online module or large seminar, and thus top-of-mind for respondents. Agencies should ensure that, whatever the

format, training is regular, substantive, and sufficient for records management staff to understand their FOIA responsibilities.

Agencies should provide recurring, cross-program FOIA and records management training. Effective FOIA administration depends on professionals in both fields understanding each other's legal obligations, systems and workflows.

## Conclusion

Records management and FOIA are both essential to government transparency and central to ensuring a responsive and efficient government. As OGIS often notes, strong records management programs support effective FOIA programs by helping to identify and locate requested records quickly and efficiently.

The 2025 RMSA identifies both measurable progress and significant gaps. E-discovery use reached its highest reported level, and formal FOIA training for records personnel increased. At the same time, AI adoption remains limited; more than two in five respondents reported finding FOIA-responsive records past their approved disposition date; fewer than half reported several key forms of ARO-CFO collaboration; and nearly one in five reported no FOIA training for ARO or records management staff. These findings call for concrete action: agencies should strengthen records disposition controls, make ARO-CFO coordination routine, close training gaps, and evaluate technology—including AI—where it can demonstrably improve search and review without displacing legal judgment.

OGIS's continued participation in the CRO's annual RMSA helps OGIS fulfill its statutory mission to review FOIA compliance and complements the observations OGIS makes as the FOIA Ombuds, working to improve the FOIA process for all, and OGIS expresses its gratitude to the CRO for its sustained collaboration. The 2025 RMSA gives OGIS, the Chief FOIA Officers Council, and the FOIA Advisory Committee a government-wide evidence base for targeting improvements and advancing a FOIA process that is more timely, efficient, and effective for requesters and agencies alike.

## Methodology

The CRO's office opened the 2025 RMSA on March 9, 2026, and closed it on May 15, 2026. The CRO's office conducts the RMSA via an online survey tool that creates a unique link used to submit responses in accordance with NARA's responsibility to report on the state of federal records management. Each year, federal agencies are required by statute to conduct an RMSA and submit their findings to NARA. Ninety-eight percent of agencies that received the 2025

RMSA link completed the assessment. The goal of the self-assessment is to determine whether federal agencies comply with statutory and regulatory records management requirements.

A total of 276 agencies responded to the RMSA, but not all respondents answered the FOIA questions. (Questions 49–55 pertained to FOIA.) The respondents included records officers at all Cabinet-level departments, departmental components, and independent agencies. CRO instructed agency RMs to consult with their agency FOIA Officers to answer the FOIA-related questions. Twelve non-executive branch agencies that are not subject to FOIA (but are subject to records management requirements) took part in the assessment.

Percentages are rounded up and, for some questions may not equal 100 percent, particularly where respondents could select more than one answer.

The full 2025 RMSA report is one of three reports required by the CRO, the results of which are included in the Federal Agency Records Management Annual Report to Congress, published on NARA’s website on the CRO’s RMSA web page.

## List of Statistical Results from 2025 RMSA FOIA questions

| <b>Q49. Does your agency use artificial intelligence and/or machine learning to index/catalog/organize records to aid in searching for and retrieving records responsive to FOIA requests?</b> |                         |                            |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|----------------------------|
| Answer Option                                                                                                                                                                                  | Count per answer option | Percentage subject to FOIA |
| Yes, please describe:                                                                                                                                                                          | 54                      | 20.6%                      |
| No                                                                                                                                                                                             | 192                     | 73.3%                      |
| Do not know                                                                                                                                                                                    | 16                      | 6.1%                       |
| Not applicable, my agency is exempt from FOIA                                                                                                                                                  | 13                      | N/A                        |
| <b>Q50. Does your agency use e-discovery tools to search for records when responding to FOIA requests and/or Legal Discovery?</b>                                                              |                         |                            |
| Answer Option                                                                                                                                                                                  | Count per answer option | Percentage subject to FOIA |
| Yes                                                                                                                                                                                            | 207                     | 79.6%                      |
| No                                                                                                                                                                                             | 43                      | 16.5%                      |

|                                                                                                                                                                                                                                          |                         |                                                                                 |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|---------------------------------------------------------------------------------|
| Do not know                                                                                                                                                                                                                              | 10                      | 3.8%                                                                            |
| Not applicable, my agency is exempt from FOIA                                                                                                                                                                                            | 14                      | N/A                                                                             |
| <b>Q51. If yes on 50: Which of the following applies?</b>                                                                                                                                                                                |                         |                                                                                 |
| Answer Option                                                                                                                                                                                                                            | Count per answer option | Percentage from the respondents who answered “yes” on Q50.                      |
| FOIA office purchased its own office-specific tools                                                                                                                                                                                      | 29                      | 14.1%                                                                           |
| FOIA office is using existing licenses or tools from other offices in my agency                                                                                                                                                          | 112                     | 54.6%                                                                           |
| Other, please explain                                                                                                                                                                                                                    | 63                      | 30.7%                                                                           |
| Do not know                                                                                                                                                                                                                              | 1                       | 0.5%                                                                            |
| <b>Q52. If No: Why are e-discovery tools not used to search for records? (Choose all that apply)</b>                                                                                                                                     |                         |                                                                                 |
| Answer Option                                                                                                                                                                                                                            | Count per answer option | Percentage selecting each response of the respondents who answered “no” on Q50. |
| Cost                                                                                                                                                                                                                                     | 17                      | 39.5%                                                                           |
| E-discovery tools are not available at my agency                                                                                                                                                                                         | 20                      | 46.5%                                                                           |
| There are limited number of licenses available                                                                                                                                                                                           | 2                       | 4.7%                                                                            |
| Searches are not extensive enough to justify e-discovery tools                                                                                                                                                                           | 13                      | 30.2%                                                                           |
| Other, please be specific:                                                                                                                                                                                                               | 11                      | 25.6%                                                                           |
| Do not know                                                                                                                                                                                                                              | 2                       | 4.7%                                                                            |
| <b>Q53. Has your agency found records responsive to FOIA requests that had already met their approved retention period (i.e., the records should have already been disposed of under your agency’s NARA-approved records schedules)?</b> |                         |                                                                                 |
| Answer Option                                                                                                                                                                                                                            | Count per answer option | Percentage subject to FOIA                                                      |

|                                                                                                                                      |                         |                            |
|--------------------------------------------------------------------------------------------------------------------------------------|-------------------------|----------------------------|
| Yes                                                                                                                                  | 110                     | 42.1%                      |
| No                                                                                                                                   | 106                     | 40.6%                      |
| Do not know                                                                                                                          | 45                      | 17.2%                      |
| <b>Q54. Which of the following describes the working relationship between the Agency Records Officer and the Chief FOIA Officer?</b> |                         |                            |
| Answer Option                                                                                                                        | Count per answer option | Percentage subject to FOIA |
| Coordinate search terms to identify responsive records                                                                               | 99                      | 38.2%                      |
| Identify programs or offices most likely to have responsive records                                                                  | 124                     | 47.9%                      |
| Work together on high-profile or complex FOIA requests                                                                               | 126                     | 48.6%                      |
| Work together on information technology (IT) requirements that will benefit both programs;                                           | 67                      | 25.9%                      |
| Provide training on records management and FOIA to each other's staff                                                                | 101                     | 39.0%                      |
| Provide training programs on the importance and relationship between FOIA and records management                                     | 91                      | 35.1%                      |
| Other, please explain                                                                                                                | 63                      | 24.3%                      |
| None of the above                                                                                                                    | 21                      | 8.1%                       |
| Not applicable, the Agency Records Officer and the Chief FOIA Officer are the same person                                            | 18                      | 6.9%                       |
| Not applicable, my agency is exempt from FOIA                                                                                        | 15                      | N/A                        |
| <b>Q55. As the Agency Records Officer (or records management staff), have you received FOIA training?</b>                            |                         |                            |
| Answer Option                                                                                                                        | Count per answer option | Percentage subject to FOIA |

|                                                                                                                |     |       |
|----------------------------------------------------------------------------------------------------------------|-----|-------|
| Yes, I have received informal FOIA training (briefed by a colleague or as part of agency employee orientation) | 78  | 29.8% |
| Yes, I have received formal FOIA training (online or in-person instructor-led session)                         | 134 | 51.1% |
| No                                                                                                             | 49  | 18.7% |
| Do not know                                                                                                    | 1   | 0.4%  |