



The Freedom of Information Act Ombudsman 2025 REPORT FOR FISCAL YEAR 2024

Office of Government Information Services The Freedom of Information Act Ombudsman 2025 Report for Fiscal Year 2024

Message from the Director*

Congress established the Office of Government Information Services (OGIS) to serve as a neutral, independent resource for the public and federal agencies navigating the Freedom of Information Act (FOIA). As the federal FOIA Ombuds, our mission is rooted in both service and oversight: resolving disputes through impartial assistance and reviewing agency FOIA practices to identify opportunities for systemic improvement.

In fiscal year (FY) 2024, OGIS continued to fulfill this dual mandate with dedication and purpose. We responded to more than 6,000 requests for assistance, provided training to FOIA professionals across multiple agencies, published analysis on critical FOIA issues, and chaired the fifth term of the FOIA Advisory Committee, which concluded with 16 thoughtful recommendations to improve the administration of FOIA.

We continued our vigorous public engagement through events such as Sunshine Week and the OGIS Annual Open Meeting, and strengthened interagency collaboration via the Chief FOIA Officers Council and our ongoing partnership with the National Archives' Office of the Chief Records Officer. These efforts help us stay attuned to the evolving FOIA landscape and ensure that our work is both responsive and forward-looking.

We are proud to present our FY 2024 Annual Report to the House Committee on Oversight and Government Reform, the Senate Committee on the Judiciary, and the President on our work, which demonstrates our ongoing commitment to improving the FOIA process and supporting the foundational principles of open government.¹

As we reflect on this year's accomplishments, I am proud of the steadfast commitment of the OGIS team. Through careful observation, constructive engagement, and a deep respect for

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¹ This report fulfills FOIA's mandate, 5 U.S.C. § 552(h)(4)(A), that we report on our activities and any recommendations we have to improve the FOIA process. We issued no advisory opinions in FY 2024 and have made no new legislative or regulatory recommendations. Appendix A documents the number of times each agency engaged in dispute resolution with the assistance of OGIS or the agency FOIA Public Liaison.

the principles of open government, we remain dedicated to fostering transparency, building trust, and ensuring that the FOIA system functions fairly and effectively for all stakeholders.

Sincerely,

Alina M. Semo, Director

Office of Government Information Services

^{* (}The views expressed in this report are those of the OGIS Director and do not necessarily represent the views of the President, 5 U.S.C. § 552(h)(4)(C).)

Executive Summary

In FY 2024, the Office of Government Information Services (OGIS) continued to thrive as the federal FOIA Ombuds, tackling its dual mandate of assisting customers and improving FOIA compliance across the federal landscape. As the federal FOIA Ombuds, we serve as a resource for information and assistance regarding the FOIA process. We are impartial in that we advocate for a fair and equitable FOIA administrative process rather than for the interests of either FOIA requesters or agencies. We are a trusted neutral third party and protect the identities of and communications with those who seek our assistance.

- → OGIS provided timely mediation and assistance, handling **6,057 cases** and closing **6,098** with **88.5% initiated in 10 days** and **98.9% resolved within 90 days**. Whether coaching first-timers or navigating thorny issues with seasoned pros, OGIS ensured that help was always within reach. These cases remain a vital source of insight into system-wide FOIA pain points.
- → Through **31 blog posts** and **214 X posts**, OGIS continued its online presence and sparked meaningful conversations. Public comments and open meetings provided vital feedback loops, helping shape the national FOIA dialogue.
- → From AI to accessibility, OGIS convened major events like the 2024 Sunshine Week Panel, the OGIS Annual Open Meeting, the NexGen FOIA Tech Showcase and multiple CFO Council and FOIA Advisory Committee meetings all aimed at empowering FOIA practitioners. These included robust discussions on the intersection of AI and FOIA, modernization, and public engagement —all aimed at tackling backlogs and streamlining case processing.
- → The FOIA Advisory Committee wrapped its fifth term with **16 recommendations** targeting staffing, technology, implementation, and proactive disclosure.
- → OGIS delivered targeted training to FOIA staff across multiple agencies, expanded outreach to professional organizations, and issued an Ombuds Observer demystifying **Glomar (Neither Confirm Nor Deny or NCND) responses**, helping requesters better understand when and why agencies "neither confirm nor deny" that records exist.
- → In FY 2024, OGIS reviewed **58 agency FOIA regulations** and conducted **16 compliance engagements**. Finally, through the **Records Management Self-Assessment**, to which **98%** of agencies responded, OGIS reported key insights: (1) pandemic impact on FOIA backlogs continues to decline; (2) **59%** of agencies reported proactively posting records on an ad-hoc basis; and (3) many FOIA websites still lack clarity and user-friendliness.





FOIA OMBUDS YEAR IN REVIEW FY 2024

COMMUNICATING WITH STAKEHOLDERS

31 blog posts

214 Twitter/X posts

Published Reports:

- 2024 Annual Report for Fiscal Year 2023
- 2022-2024 FOIA Advisory Committee Final Report
- Assessing Freedom of Information Act Compliance through the National Archives and Records Administration's 2023 Records Management Self-Assessment

Sunshine Week Activities

- Coordinated National Archives program on artificial intelligence and open government
- Participated in multiple agency events

SUPPORTING FOIA'S LEADERS

- 1 Open Government
 Presentation
- 2 Chief FOIA Officers Council Meetings
 - **5** Intro to OGIS Trainings
- **7** FOIA Negotiation Trainings

Conference Presentations:

- American Society of Access Professionals
- Council on Government Ethics Laws
- International Conference of Information Commissioners
- National Association of Government Archivists and Records Administrators

Provided feedback on US FOIA process to Victoria Parliament, Australia





FOIA OMBUDS YEAR IN REVIEW FY 2024

ASSISTING CUSTOMERS

6,057 requests for assistance opened

6,098 requests for assistance closed

88.5% of cases initiated or acknowledged within 10 days

98.9% of cases closed within 90 days

IDENTIFYING ISSUES

16 Compliance Engagements

16 FOIA Advisory Committee Recommendations

58 Regulations Reviewed

Assisting Customers

In 2007, Congress created OGIS to serve as the federal government's FOIA Ombudsman and directed us to review agencies' policies, procedures, and compliance with FOIA, and to offer mediation services to resolve disputes between FOIA requesters and agencies.²

Requesters and agencies contact OGIS for assistance at every stage in the FOIA process. We strive to meet requesters where they are in the process, whether clarifying the administrative path forward for an inexperienced requester or engaging in complex issues raised by a seasoned FOIA stakeholder. Our mediation cases serve as a barometer for the FOIA process governmentwide, and provide us with a valuable mechanism for listening to — and observing

² See S. Rep. 114-4 at 2 (2015).

the experiences of — FOIA requesters. This work is vital to our statutory mandate to identify procedures and methods to improve overall compliance with FOIA.

The FOIA statute mandates that OGIS "offer mediation services to resolve disputes between persons making [FOIA] requests ... and administrative agencies as a nonexclusive alternative to litigation." OGIS's mediation team was able to continue to keep up with the increased demand for our services in FY 2024:

- 6,057 requests for assistance received
- 6,098 requests for assistance closed
- 88.5% of requests initiated/acknowledged in 10 days
- 98.9% of requests closed within 90 days

Communication with Stakeholders

OGIS recognizes the significance of communicating with stakeholders; we strive to meet requesters where they are in the process and work to recognize trends and issues that affect agencies. We value hearing from stakeholders in the federal FOIA landscape, and written public comments are an important way for OGIS as well as the FOIA Advisory Committee and Chief FOIA Officers Council (which the OGIS Director chairs and co-chairs, respectively) to better understand the experiences of FOIA requesters.

OGIS continues to increase engagement with stakeholders through its social media presence. In FY 2024, OGIS published 31 blog posts and 214 social media posts. As a trusted neutral resource for FOIA stakeholders, OGIS uses these avenues for continued important conversations about FOIA.

Supporting FOIA's Leaders

OGIS recognizes the need to support FOIA's leaders in a variety of ways. In FY 2024, we offered a mix of public events and training to help meet this need. In addition, OGIS published several reports to supplement this work and provide tools to aid those who work in the FOIA environment.

3 5 U.S.C. § 552	(h)(3)

Public Events

The 2024 Sunshine Week event was offered in person at the William G. McGowan Theater at the National Archives in Washington, DC, and livestreamed on the National Archives YouTube Channel. The program consisted of a panel discussion on "Artificial Intelligence: The Intersection of Public Access and Open Government" and was moderated by Pamela Wright, NARA's former Chief Innovation Officer. A group of open government and transparency experts discussed artificial intelligence and how it intersects with FOIA and access to information. Panelists included Gulam Shakir, NARA's Chief Data Officer; Abigail Potter, Senior Innovation Specialist at the Library of Congress Digital Innovation Lab; Eric Stein, Deputy Assistant Secretary for the Office of Global Information Services at the U.S. Department of State; and Bobak Talebian, former Director of the Office of Information Policy of the U.S. Department of Justice. After the program, onsite attendees were able to view FOIA-related documents from NARA's historical holdings.

Our 2024 OGIS Annual Open Meeting allowed us to review the previous year's work in addition to moderating a discussion of the 2022-2024 FOIA Advisory Committee Final Report and Recommendations. Committee members Jason R. Baron (University of Maryland) and Patricia Weth (Pension Benefit Guaranty Corporation) discussed the recommendations made by the fifth term of the FOIA Federal Advisory Committee.

In FY 2024, we continued to host meetings of the Chief FOIA Officers Council and the FOIA Advisory Committee, which were held virtually and livestreamed on the <u>National Archives</u> <u>YouTube channel</u>.

Chief FOIA Officers Council

As Congress mandated with the passage of the FOIA Improvement Act of 2016,⁴ the Directors of OGIS and the Office of Information Policy (OIP) at the U.S. Department of Justice co-chair the Chief FOIA Officers (CFO) Council, and convened the Council, its two Committees, and working groups numerous times throughout FY 2024. This included hosting two public Council meetings, November 9, 2023, and April 17, 2024. At the November 2023 meeting, Eric Stein (U.S. Department of State) presented on "Artificial Intelligence Pilots for Declassification and FOIA" and at the April 2024 meeting Daniel York (General Services Administration) presented on the Open Government Secretariat.

⁴ 5 USC § 552(k).

FOIA Advisory Committee

The OGIS Director chairs the FOIA Advisory Committee, established by the Archivist of the United States in 2014 in accordance with the <u>U.S. Second Open Government National Action Plan</u>. The Committee's work helps us fulfill the directive in FOIA that OGIS "identify procedures and methods for improving compliance" with FOIA. The Committee comprises 20 members representing both the requester community and FOIA professionals from a range of federal departments and agencies who are appointed by the Archivist of the United States to study the FOIA landscape and make recommendations for improvements.

The fifth term of the Committee began its work in September 2022 and completed it in June 2024. During the fifth term, members established three subcommittees — Implementation, Modernization, and Resources. The Committee passed 15 recommendations in FY 2024 (and one in FY 2023) addressing processing improvements, staffing, public engagement, technology and implementation of past recommendations. (*See* Appendix B.)

Action on several Committee recommendations occurred in FY 2024, including that the Department of Justice Office of Information Policy (OIP) issued guidance on FOIA training and the role of the Chief FOIA Officer (Recommendation No. 2024-04). OIP asked agencies, in their 2025 Chief FOIA Officer Reports, to answer two questions pertaining to the FOIA Advisory Committee and its recommendations (Recommendation No. 2024-14). And the 2024-2026 term of the FOIA Advisory Committee created an Implementation Subcommittee in response to the prior term's recommendation to create a working group to study the implementation of past recommendations (Recommendation No. 2024-15).

Looking back to Recommendation No. 2021-01, in 2024, the U.S. Capitol Police began accepting requests for information under a FOIA-like process.

Providing Targeted Training

Our training outreach continues to grow. OGIS provided negotiation skills training to the Consumer Product Safety Commission, Department of Education, Department of Defense (Army Installation Management Command), Department of Health and Human Services (Food and Drug Administration), Department of Homeland Security, Federal Trade Commission, and the State Department. OGIS also provided five introduction-to-OGIS trainings in FY 2024 to a variety of outside organizations.

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⁵ 5 U.S.C. § 552(h)(2)(C).

OGIS was once again invited to present at the American Society of Access Professionals National Training Conference and at the Council on Governmental Ethics Laws annual conference. In addition, OGIS attended and participated in the International Conference of Information Commissioners (ICIC) in Tirania, Albania, providing a briefing to ICIC members on the state of the FOIA landscape in the United States and OGIS's work in FY 2024. We also presented for the first time at the National Association of Government Archivists and Records Administrators.

Additional Support to FOIA Leaders

In FY 2024, OGIS committed to participating in the <u>National Archives 6th National Action Plan</u> for Open Government (2025–2027) published on September 27, 2024. As noted in the plan, '[b]y FY 2026, OGIS and the Office of the Chief Records Officer (CRO) will partner on new asynchronous training that covers the crucial intersection of FOIA and records management. In addition to training, OGIS and CRO plan to partner on several public events on FOIA and records management."

Also in FY 2024, the Chief FOIA Officers Council Technology Working Group, OGIS and OIP hosted the NexGen FOIA Tech Showcase 2.0. The NexGen 2.0 Showcase facilitated the opportunity for private sector vendors to present their latest FOIA technology advancements in response to federal agencies' FOIA case processing and backlog challenges. Additionally, the event was intended to raise awareness within federal agencies of the different technology capabilities to consider for future case processing by leveraging advanced technology, including, but not limited to, artificial intelligence. Taking place virtually over the course of three days in May 2024, the event garnered over 300 attendees.

As a part of our dispute resolution services, OGIS often observes and examines interactions between requesters and agencies across the federal government, and notes common questions and issues that arise in the FOIA process. The *FOIA Ombuds Observer* addresses questions and issues frequently seen in our individual cases. Our goal is to increase efficiency and transparency in the FOIA process. In FY 2024, OGIS published one *FOIA Ombuds Observer* with the goal of explaining the process of how records are exempted as "neither confirmed nor denied" (NCND), also known as *Glomar*. OGIS published NCND/*Glomar*: When Agencies Neither Confirm Nor Deny the Existence of Records on March 29, 2024. In addition, OGIS published a blog post, What the FOIA is *Glomar*? on January 25, 2024, further explaining the history of how the term came into the FOIA lexicon.

Last, in FY 2024, OGIS continued its *ex officio* relationship with the Chief Data Officers (CDO) Council by participating in meetings throughout the year and also presenting CDOs with updates in the FOIA landscape.⁶

Identifying Issues

OGIS relies on several important channels of communication to identify and address systemic issues: these include our congressionally mandated compliance program, the CFO Council, and the FOIA Advisory Committee. While each is distinct, collectively they help OGIS identify broad issues.

Agency Communications and Engagements

In FY 2024, OGIS began reporting in its quarterly updates the number of times agency regulations were reviewed by OGIS staff and how many compliance communications/engagements occurred. For FY 2024, OGIS reviewed 58 proposed changes to FOIA regulations and other regulations referencing FOIA. In FY 2024, OGIS identified instances of systemic non-compliance through assisting FOIA requesters, and alerted agencies regarding instances of systemic non-compliance.

Records Management Self-Assessment

For the ninth consecutive year, we partnered with NARA colleagues in the CRO on the Records Management Self-Assessment (RMSA), an annual survey to determine whether federal agencies are complying with statutory and regulatory records management requirements. The 2023 RMSA survey, with a 98-percent response rate and administered to agency records officers from January 8 to March 8, 2024, included six questions relating to FOIA.

The ability to find records responsive to FOIA requests is essential to a successful FOIA program, and since 2016, OGIS has included questions on the RMSA to gather government-wide information about FOIA administration. The data 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 include:7

⁶ Both the Director of OGIS and the Director of OIP are *ex officio* members of the Chief Data Officers Council.

⁷ Percentages may not equal 100 percent due to rounding and/or "choose all that apply" questions.

- The 2023 data reflect a 5-percentage point increase in agency FOIA programs reporting minimal or no pandemic-related impact to the FOIA backlog (84 percent) over 2022 (79 percent). The number of agencies reporting a continuing moderate or significant negative impact to the backlog caused by the pandemic dropped 2percentage points from 2022 to 16 percent.
- A majority of agencies (59 percent) post records only on an ad-hoc basis ("as needed") when no FOIA request has been filed. Some respondents reported making proactive disclosures annually (9 percent), quarterly (8 percent) or monthly (8 percent).
- Comparing the 2023 data against data from the 2019 RMSA, it appears that federal
 agencies continue to struggle with providing FOIA information, context, and guidance
 to requesters on their FOIA websites. For example, there was a 3-percentage point
 drop in the four-year period in respondents selecting "Guide to accessing agency
 information."
- Almost half (48 percent) of respondents reported including language covering FOIA obligations in contracts for services and products.

Appendix A

FOIA requires OGIS to report "the number of times each agency engaged in dispute resolution with the assistance of [OGIS] or the FOIA Public Liaison," 5 U.S.C. § 552(h)(4)(A)(ii)(II). The chart below provides that information for fiscal year (FY) 2024.

The total number of OGIS cases does not equal the total number of cases OGIS handled in FY 2024 because some cases involved multiple agencies or requests. In other cases, mostly involving telephone calls, the name of the agency was not relevant to the issue, and OGIS did not note the agency name.

Department/Agency	No. of OGIS Cases in FY 2024	No. of times requesters sought assistance from the Agency FOIA Public Liaison in FY 2024*
Department of Homeland Security	1,453	45,393**
Department of Veterans Affairs	687	4,029
Department of Justice	676	110,748
Department of Defense	260	3,000
Department of Health and Human Services	165	2,141
Department of State	116	1,241
Department of the Treasury	73	1,798
Department of the Interior	70	113
Department of Labor	47	476
Department of Transportation	36	600
Department of Commerce	30	60
Department of Housing and Urban Development	25	5
Department of Agriculture	24	25
Department of Education	12	195

Department of Energy	9	98
Equal Employment Opportunity Commission	69	308
Central Intelligence Agency	52	0
U.S. Postal Service	41	520
Environmental Protection Agency	15	900
Social Security Administration	102	12,792
National Archives and Records Administration	99	1,039
Securities and Exchange Commission	37	10
Small Business Administration	35	2,600
Pension Benefit Guaranty Corporation	16	19
Federal Trade Commission	10	200
Office of Personnel Management	9	50
Consumer Finance Protection Bureau	8	8,560
General Services Administration	7	225
Office of the Director of National Intelligence	7	5
Federal Deposit Insurance Corporation	6	29
National Transportation Safety Board	6	0
National Science Foundation	5	3
Board of Governors of the Federal Reserve System	4	20
Office of Special Counsel	4	10
Tennessee Valley Authority	4	4
Merit Systems Protection Board	4	0
U.S. Agency for International Development	4	5
Federal Energy Regulatory Commission	2	120
U.S. Consumer Product Safety Commission	2	20
Farm Credit Administration	2	2
Federal Housing Finance Agency	2	2
Office of Science and Technology Policy	2	1
Office of Management and Budget	2	0

National Labor Relations Board Federal Communications Commission Council of Inspectors General on Integrity and Efficiency Amtrak 1 20 Peace Corps 1 1 U.S. Commission on Civil Rights 1 0 Armed Forces Retirement Home 1 n/a Executive Office of the President Federal Mediation and Conciliation Service 1 n/a National Capital Planning Commission 1 n/a Office of National Drug Control Policy 1 n/a U.S. Election Assistance Commission 1 n/a Marine Mammal Commission Committee for Purchase from People Who Are Blind or Severely Disabled Chemical Safety and Hazard Investigation Board Court Services and Offender Supervision Agency Commodity Futures Trading Commission National Endowment for the Arts 0 0 Export-Import Bank of the U.S. Occupational Safety and Health Review Commission U.S. Agency for Global Media 0 9	Federal Retirement Thrift Investment Board	2	Unknown
Federal Communications Commission Council of Inspectors General on Integrity and Efficiency Amtrak 1 20 Peace Corps 1 1 U.S. Commission on Civil Rights 1 0 Armed Forces Retirement Home 1 n/a Executive Office of the President 1 n/a Federal Mediation and Conciliation Service 1 n/a National Capital Planning Commission 1 n/a Office of National Drug Control Policy 1 n/a U.S. Election Assistance Commission 1 n/a Marine Mammal Commission 1 n/a Marine Mammal Commission Committee for Purchase from People Who Are Blind or Severely Disabled Chemical Safety and Hazard Investigation Board Court Services and Offender Supervision Agency Commodity Futures Trading Commission O 20 Council on Environmental Quality National Endowment for the Arts D 0 15 Occupational Safety and Health Review Commission O 3 United States International Boundary and Water Commission U.S. Agency for Global Media O 0ffice of Government Ethics O 0ffice of Government Ethics			
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National Capital Planning Commission 1	Executive Office of the President	1	n/a
Office of National Drug Control Policy U.S. Election Assistance Commission 1 n/a U.S. International Trade Commission 1 n/a Marine Mammal Commission 0 Unknown Committee for Purchase from People Who Are Blind or Severely Disabled Chemical Safety and Hazard Investigation Board 0 1 Court Services and Offender Supervision Agency 0 7 Commodity Futures Trading Commission 0 20 Council on Environmental Quality 0 20 National Endowment for the Arts 0 0 Export-Import Bank of the U.S. 0 15 Occupational Safety and Health Review Commission 0 0 United States International Boundary and Water Commission U.S. Agency for Global Media 0 9 Office of Government Ethics 0 7	Federal Mediation and Conciliation Service	1	n/a
U.S. Election Assistance Commission 1	National Capital Planning Commission	1	n/a
U.S. International Trade Commission Marine Mammal Commission Committee for Purchase from People Who Are Blind or Severely Disabled Chemical Safety and Hazard Investigation Board Court Services and Offender Supervision Agency Commodity Futures Trading Commission Council on Environmental Quality National Endowment for the Arts Export-Import Bank of the U.S. Occupational Safety and Health Review Commission United States International Boundary and Water Commission U.S. Agency for Global Media Office of Government Ethics	Office of National Drug Control Policy	1	n/a
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Commission U.S. Agency for Global Media Office of Government Ethics O 7	Occupational Safety and Health Review Commission	0	6
Office of Government Ethics 0 7	United States International Boundary and Water Commission	0	0
	U.S. Agency for Global Media	0	9
Surface Transportation Board 0 0	Office of Government Ethics	0	7
	Surface Transportation Board	0	0

National Aeronautics and Space Administration	0	4
National Credit Union Administration	0	4
Nuclear Regulatory Commission	0	2
Corporation for National and Community Service (operating as AmeriCorps)	0	0
Federal Election Commission	0	0
Federal Labor Relations Authority	0	2
Federal Mine Safety and Health Review Commission	0	0
Millennium Challenge Corporation	0	0
National Indian Gaming Commission	0	0
Office of United States Trade Representative	0	60
Postal Regulatory Commission	0	0
U.S. Railroad Retirement Board	0	0
Administrative Conference of the United States	0	n/a
Advisory Council on Historic Preservation	0	n/a
American Battle Monuments Commission	0	n/a
Appraisal Subcommittee	0	n/a
Commission of Fine Arts	0	n/a
Defense Nuclear Facilities Safety Board	0	n/a
Denali Commission	0	n/a
Farm Credit System Insurance Corporation	0	n/a
Federal Maritime Commission	0	n/a
Federal Open Market Committee	0	n/a
Gulf Coast Ecosystem Restoration Council	0	n/a
Harry S. Truman Scholarship Foundation	0	n/a
Institute of Museum and Library Services	0	n/a
Inter-American Foundation	0	n/a
James Madison Memorial Fellowship Foundation	0	n/a
Legal Services Corporation	0	n/a

Morris K. Udall Foundation	0	n/a
National Commission on Military, National, and Public Service	0	n/a
National Council on Disability	0	n/a
National Endowment for the Humanities	0	n/a
Neighborhood Reinvestment Corporation	0	n/a
Nuclear Waste Technical Review Board	0	n/a
Office of Navajo and Hopi Indian Relocation	0	n/a
Office of Special Counsel	0	n/a
Presidio Trust	0	n/a
Privacy and Civil Liberties Oversight Board	0	n/a
Social Security Advisory Board	0	n/a
Special Inspector General for Afghanistan Reconstruction	0	n/a
U.S. AbilityOne Commission	0	n/a
U.S. Access Board	0	n/a
U.S. African Development Foundation	0	n/a
U.S. Commission for the Preservation of America's National Heritage Abroad	0	n/a
U.S. Institute of Peace	0	n/a
U.S. Interagency Council on Homelessness	0	n/a
U.S. International Boundary and Water Commission	0	n/a
U.S. Trade and Development Agency	0	n/a

^{*}From <u>2025 Chief FOIA Officer Reports</u>. N/A means that the agency processed 50 or fewer requests in FY 2024 and this was not required to report on requesters seeking assistance from the FOIA Public Liaison. (*See Guidelines for 2025 Chief FOIA Officer Reports*.)

^{**}Preliminary number provided by the agency to OGIS.

FOIA Advisory Committee Recommendations to the Archivist — 2022-2024 Term ⁸		
Recommendation	Status as of May 2025	
No. 2023-01 The Department of Justice Office of Information Policy (OIP) should issue guidance stating that when agencies use FOIA Exemption 5 to withhold information they should identify the corresponding privilege(s) invoked (e.g., deliberative process, attorney-client, etc.) in redaction labels and, if the record is withheld in full, in its determination letter.	IN PROGRESS	
No. 2024-01 The Department of Justice Office of Information Policy (OIP) should publish the Committee's draft model determination letter as a best practices reference for agencies.	IN PROGRESS	
No. 2024-02 The Department of Justice Office of Information Policy (OIP) should issue guidance encouraging agencies to proactively offer requesters the opportunity to discuss their request with an agency representative.	IN PROGRESS	
No. 2024-03 The Department of Justice Office of Information Policy (OIP) should issue guidance encouraging agencies to provide requesters an interim response consisting of a small sample of documents found as the result of searches conducted and subsequently reviewed for partial or full withholding.	IN PROGRESS	
No. 2024-04 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.	COMPLETED OIP issued guidance on FOIA training and the role of the Chief FOIA Officer in its "Summary of Agency Chief FOIA Officer Reports for 2024 and Assessment of Agency Progress in FOIA Administration with OIP Guidance for Further Improvement."	

⁸ Please visit the FOIA Advisory Committee Recommendations Dashboard, https://www.archives.gov/ogis/foia-advisory-committee/dashboard, for a complete summary of all 67 Committee recommendations and their current status.

No. 2024-05 The Office of Personnel Management (OPM) should add the 0306 Government Information Specialist (GIS) Job Series to the direct hiring authority list.	PENDING
No. 2024-06 The Chief FOIA Officers Council, through its Committee on Cross-Agency Collaboration and Innovation (COCACI), should organize agencies to participate in a "talent pool" posting through OPM.	PENDING
No. 2024-07 The Chief FOIA Officers Council, through its Committee on Cross-Agency Collaboration and Innovation (COCACI), should create and maintain a database on its website of position descriptions in the Government Information Specialist (GIS) job series at various grades.	PENDING
No. 2024-08 The General Services Administration (GSA) should create a labor category on the GSA schedule specifically for FOIA contractors to facilitate efficient procurement if an agency determines it needs contractor support.	PENDING
No. 2024-09 Federal agencies should expand public engagement activities focused on improving all aspects of their FOIA process.	PENDING
No. 2024-10 The Archivist of the United States should propose that the Office of Management and Budget, the Office of Information Policy, and other agency participants in future U.S. National Action Plans for Open Government include new and continuing commitments to improving FOIA administration.	PENDING
No. 2024-11 The Chief FOIA Officers Council should form a working group to analyze the interest in and need for 1) a shared FOIA case management system and 2) a centralized records repository for use by federal agencies and the public.	COMPLETED The Chief FOIA Officers Council established the FOIA Case Systems Working Group which held its first meeting in January 2025.
No. 2024-12 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.	PENDING

No. 2024-13 The Office of Government Information Services (OGIS) and the Department of Justice Office of Information Policy (OIP) should follow up with selected agencies and other government entities in an effort to increase compliance with past recommendations of the FOIA Advisory Committee.	IN PROGRESS OIP, in its 2025 Chief FOIA Officer Report Guidelines, is asking agencies that received more than 50 requests in fiscal year 2024 to report on their familiarity with the FOIA Advisory Committee and its recommendations, and whether they have implemented any of the Committee's recommendations or found them to be helpful.
No. 2024-14 The Department of Justice Office of Information Policy (OIP) should include one or more specific questions in annual Chief FOIA Officer reports requesting agencies to report on activities that they have implemented consistent with selected FOIA Advisory Committee recommendations.	COMPLETED OIP, in its 2025 Chief FOIA Officer Report Guidelines, asked agencies that received more than 50 requests in fiscal year 2024, to answer several questions pertaining to the FOIA Advisory Committee and its recommendations.
No. 2024-15 The FOIA Advisory Committee should create a working group to study the implementation of past recommendations.	COMPLETED The 2024-2026 term of the FOIA Advisory Committee created an Implementation Subcommittee to increase the adoption and integration of past Committee recommendations, building on the work done by the 2022-2024 Implementation Subcommittee.



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