

Volume and Frequency Recommendations and Justifications

The Volume and Frequency Subcommittee's purpose was to examine the challenges FOIA professionals face due to the increasing volume and complexity of requests while also identifying strategies and best practices to effectively manage them. Although the subcommittee faced delays due to the turbulent FOIA landscape during FOIA staff turnovers and layoffs, it fielded an online survey that evaluated FOIA professionals' perceptions of the effects of unduly burdensome or vexatious requests for information and potential solutions for them. The committee also explored the how FOIA professionals' awareness of and experiences with AI-generated requests.

The subcommittee fielded the online survey from January until March 2026 to FOIA professionals who were either currently working in the field, or who had left service within the previous three years. Within that time, 211 responded to the survey, and 193 of those were eligible to complete it. The questions were primarily open-ended, which allowed participants to share detailed perspectives and experiences.

As a result of the subcommittee's information gathering, it proposes the following recommendation:

Recommendation VF-01

Federal agencies should align standard staffing levels and technological resources to meet the increasing levels of FOIA requests by analyzing existing backlogs, the volume and complexity of requests, and the workload assigned to employees. Specifically, agencies should consider the total work that includes requests and backlog and the capacity for employees to respond to these requests.

This recommendation is intended as a parallel effort with Recommendation 2026-03 from the Statutory Reform Subcommittee, which encourages Congress to provide sufficient funding for the FOIA process (<https://www.archives.gov/files/ogis/documents/draft-statutory-reform-recommendation-sr-2-funding-foia-v.-3-april-2026.pdf>). This current recommendation from the Volume and Frequency Subcommittee is focused on *agency* analysis and alignment of their staffing and technological resources to ensure a realistic and supported recognition of resource needs and allocation.

In all, we surveyed 193 federal records professionals from a broad array of agency types and sizes. The survey was comprised primarily of open-ended questions, allowing participants to deeply explain their experiences. A common refrain among respondents was that the growing number and complexity of requests could be addressed through increased staffing, more efficient technology, and more time to complete their work. By

focusing on appropriate levels of staffing and technological resources, FOIA professionals will gain the time they need to respond to requests.

Participants said that one of the most successful outcomes of hiring more staff and engaging contractors was the ability to manage the strain of excessively challenging requests.

Most participants said they were concerned with the volume of records their agencies process—just 7% said they were not concerned. Although participants were frustrated by unduly burdensome requests, especially those that were broad, voluminous, or vague, having appropriate resources to respond to requests would give FOIA professionals the bandwidth to respond to challenging requests.

Participants said the most common success strategy for managing frustrating requests was to work directly with requesters on managing the scope of their requests. Other participants said that having more time to devote to responding would mean more opportunities to engage with requesters.

When asked for solutions for managing frustrating requests, participants said they wanted access to more effective technology to assist with automated review, workflows, processing and release.

The reductions in force and the loss of FOIA professionals during the past year will further impact backlogs and delays. Participants said that a lack of resources to respond to requests has meant that more requests are entering the backlog with no options or strategies for managing them. This was underscored by recent the OGIS Freedom of Information Act Ombudsman [2026 Report for Fiscal Year 2025](#), in which agencies analyzed lost up to 54% of their FOIA teams, and backlogs have increased to 27% across agencies.

In analyzing technology needs, agencies should not only consider what may provide avenues for efficiencies, but also to ensure that the software currently being used provides all of the capabilities and responds to all of the needs of the employees using it.

As agencies are seeing an increase in requests, including complex requests and those that are generated by artificial intelligence, participants said they need more technological resources to keep up.

Throughout the data, participants called for increased resources to help mitigate FOIA backlogs and to improve processing efficiencies. Most agencies' capacities do not meet the levels of requests they receive. FOIA professionals are experiencing an operational burden that is not likely to abate. Requests outpace existing resources and infrastructure.