

**2024-2026 Volume and Frequency Subcommittee Final Report and
Recommendations to the 2024-2026 FOIA Advisory Committee
June 8, 2026**

The capacity of FOIA professionals to respond to increasing numbers of complex requests is a perennial topic of study. However, this term of the FOIA Advisory Committee was met with new urgencies. Six months into its term, a new presidential administration took its place, bringing with it new ideas for managing governance with fewer government employees.

This issue was particularly salient given significant reductions in force and loss of FOIA professionals across the federal landscape in the past year. The Office of Government Information Services found deep cuts in staffing in 15 cabinet-level agencies and increases in backlogs of 27%, as shown in its [Freedom of Information Act Ombudsman 2026 Report for Fiscal Year 2025](#). The report showed that the Department of Education lost 54% of its FOIA staff, the Department of Treasury lost 39%, and there was a 39% loss in the FOIA team at the Department of Veterans Affairs. Additionally, analysis of backlog data on FOIA.gov showed that the Department of Veterans Affairs reported a 131% increase in backlogs in 2025, at 3,549 from 1,539 in 2024. FOIA.gov data also indicated that backlogs increased 27% across agencies.

The Volume and Frequency Subcommittee was charged with exploring how best to manage the challenges of the increasing volume of FOIA requests received by federal agencies. Specifically, it focused on unduly burdensome or vexatious requests and their effects, as well as the effects of artificial intelligence on the production of requests with the intention that if it deeply understood some of the most frustrating and overwhelming forms of requests, then it could provide guidance on how to manage them.

Volume and Frequency Subcommittee Mission Statement

Purpose

The Volume and Frequency Subcommittee is tasked with examining the challenges that arise from the increasing volume and complexity of Freedom of Information Act (FOIA) requests. As the demand for government transparency grows, agencies receive increased quantities of requests that often involve extensive and diverse data sets. This places significant pressure on FOIA processing and response capabilities.

Goal

The Subcommittee aims to identify strategies and best practices to help agencies more efficiently manage the volume and frequency of FOIA requests. This includes exploring technological solutions, procedural improvements, regulatory/statutory changes, and resource allocation strategies to streamline FOIA processes and reduce backlogs. The goal ultimately includes maintaining high standards of transparency and accountability in the administration of FOIA.

Volume and Frequency Subcommittee Members

Co-Chairs

Nieva M. S. Brock, Department of War, Defense Intelligence Agency
Nicholas Wittenberg, representing the interests of requesters in the "commercial" FOIA fee category

Members

David Cuillier, University of Florida
Shelley Kimball, Johns Hopkins University

Recommendation in Brief

As a result of the Subcommittee's information gathering throughout its term, it proposes one recommendation and advances future areas for consideration by later terms of the FOIA Advisory Committee, each of which will be discussed in further detail below. These recommendations and the justifications for them will be described in more detail later in this Subcommittee report.

Recommendation VF-01

Federal agencies should regularly assess whether their FOIA programs have sufficient staffing, contractor support, technology resources, and organizational support to meet current and anticipated workload demands. In conducting these assessments, agencies should consider request volume, backlog trends, workforce capacity (including the workloads assigned to employees), request complexity, and the effectiveness of existing FOIA processing technologies, and use the results to identify opportunities to improved FOIA operations and reduce backlogs.

Data Collection Methods

As part of the first wave of information gathering, the Subcommittee invited guest speakers to share their experiences, and members of the Subcommittee presented their own research on vexatious requests to the full committee. The Subcommittee determined that the next course of action should be to learn from FOIA professionals directly through an online survey.

The Subcommittee originally planned to begin fielding the survey in May 2025 during the American Society of Access Professionals' (ASAP) national training conference. However, the conference was canceled due to the limited abilities for federal workers to travel in the wake of the government reductions in force and restructuring of federal government programs in early 2025.

The Subcommittee also held the survey back during the restructuring in hopes that stability in the federal workforce would return. Unfortunately, that was followed by a

series of government shutdowns in late 2025 and early 2026, preventing Subcommittee work.

The Subcommittee finally fielded the online survey in January 2026 until March 2026 to FOIA professionals who were either currently working in the field, or who had left service within the previous three years, the only eligibility requirements. Within that time, 211 responded to the survey, and 193 of those were eligible to complete it. No identifying information was collected from participants, and any identifying information they may have inadvertently supplied in open-ended questions has remained confidential. Recruitment began through the membership of ASAP and then expanded to agency FOIA representatives listed in FOIA.gov. All agency sizes by number of requests they receive were represented by participants:

Table 1

Participants by Requests Agencies Receive Per Year

Requests per year	Percent of participants
49 or fewer	4%
50 to 5,000	55%
5,001 to 25,000	26%
25,001 to 99,999	10%
100,000 or more	5%

Results: Managing Unduly Burdensome Requests

The questions focused primarily on perceptions and management of unduly burdensome or vexatious requests and AI-generated requests for information. The questions were almost completely open-ended (Appendix A).

The open-ended questions were coded structurally, by question. Within each question response block, the qualitative responses were first coded descriptively by labeling themes and ideas within every written answer in the survey. This process fractures the data into small ideas and details from what participants explained in their answers. Then, in what is referred to as axial coding, those themes were reorganized and reassembled into larger concepts that enveloped the smaller themes. As often as possible, descriptive and axial themes were *in vivo*, or in the words and language used by participants. The larger concepts that are shown here are the ultimate axial themes, and they will be defined by explaining the detailed ideas that appeared in the descriptive, open coding.

FOIA Professionals' Concerns About Requests

Most participants, 67%, said they are moderately to extremely concerned about the volume of requests they receive. Just 7% said they are not at all concerned.

Table 2

Concern for the Volume of Requests for Agency Information

Levels of concern	Response percentages
Extremely concerned	38%
Moderately concerned	29%
Neutral	7%
Slightly concerned	17%
Not at all concerned	7%

In an open-ended question about the most significantly challenging forms of requests, particularly in terms of resource allocation and maintaining response times, seven primary axial codes emerged, listed in order of most to least common.

1. **Specific records that are difficult to process:** Participants most commonly listed specific forms of records that were difficult to process, such as contracts or investigative records. However, the most difficult records to process were requests for emails. Participants also listed forms of records that are difficult to process, and videos, text messages, and team chats were at the top of the list.
2. **Vague and overbroad:** Participants said they have difficulty responding to requests that are vague and overbroad. Some of the common conditions they described were requests for “any and all” records of a particular type, requests for the search for any documents with particular keywords in them, and fishing expeditions in which requesters were purposely vague to capture all possible responsive records.
3. **Voluminous:** Requests for large swaths of records are challenging to fill, according to participants. They said that records have become more voluminous in recent years generally, but that requesters are also requesting large amounts of records at once. Participants said often, throughout the questions, that they don’t think that requesters understand what it is like for them to try to fill such large requests. One participant said, “There is no regard from the requester community about how much time and manpower it takes to compile thousands of records.”
4. **Not in good faith:** Participants said they received requests they believed were not intended for the higher Democratic values the FOIA provides, but instead for reasons not in the public interest, purposely intended to increase agency workloads, or simply nonsense. One participant described them as, “Some examples are like ‘hello.’ That’s the entire request. Another example is ‘winning grants.’ Sometimes going through these takes up time we don’t have. The foia.gov portal should have a filter to weed out these.” Another described them as, “Nuisance requesters affiliated with the Heritage Foundation or other ‘right leaning’ organizations sending in voluminous emails-based requests.” Another said, “Crank requests that make no sense - honestly, borderline gibberish - but still need to be acknowledged and closed (and again, these have increased quite a bit since the foia.gov portal was created).”

5. **Lack of resources to respond:** Participants said that an aggravating factor in responding to requests was not only the requests themselves, but the lack of the internal resources necessary to supply the records. The three most needed resources, they said, were staffing, technology, and time. They said that without the proper resources, they can't meet their statutory deadlines, and they cannot manage the backlog of requests.
6. **Complex:** Complex requests were those that may be specific, but they take time and effort to fill, such as those that are multipart, lengthy and technical, or those that take more time than usual to search review for and redactions.
7. **Mass requests:** Mass requests were either those that are batch submissions from one requester that appeared within 12 to 24 hours, or requests from multiple requesters for the same documents in quick succession. These were also requests described as being submitted en masse through artificial intelligence or automation, or requests they considered "spam."

Next, the participants were asked to describe the qualities of the most frustrating forms of requests. These were requests that rose above generally challenging requests, but they moved into the realm of unduly burdensome or vexatious.

At the very top of the list among the most common were requests that were broad in scope, voluminous, and vague. These three also made up the most common cluster of responses, meaning that most participants named all three together. They also said that vexatious requests were those that included multiple agencies for responses and/or those with multiple custodians. Next were those requests with expansive time frames surrounding the records being requested, as described by one participant as, "unreasonable timeframes such as 15-year span or records dating back 20 years."

The larger themes that emerged to describe vexatious requests were requests that are complex, multi-part, or otherwise a processing burden. Respondents also described duplicative requests, and requests that were part of organized request campaigns. And, again, much like generally difficult requests, participants said that those who requested with bad faith behavior rose to the level of vexatious, but they also added requesters who were noncooperative in some way. Examples of the lack of cooperation were refusing to limit the scope of requests or being unwilling to communicate with records custodians to understand what they were looking for.

Strategies for Managing Difficult Requests and Strain

Participants were asked to describe both strategies for responding to difficult requests, but also how to manage the personal strain of excessively challenging requests. For both questions, internal agency efficiencies played a large role in their strategies, as did communicating with requesters to clarify their needs and limit the scope.

Ensuring Difficult Requests Do Not Cause Delays

Participants said that when considering the strategies, procedures, technologies, or collaborative approaches they use to ensure that difficult requests do not delay straightforward or urgent ones, they most often employ internal triage processes. The

procedures were unique to the needs of the agency. Some of the triage processes they reported were the multi-track approach, meaning they move requests through the process at different rates based on their complexity, the number of agencies involved, and the accessibility of the responsive requests. Some offices simplify the triage by using easy and complex tags. Some participants said they move what they call “super simples” through the system quickly to get them filled and closed out. Other agencies said they adopt a “first in, first out” approach, and others reported their own specific internal office rules for managing the requests. One participant said, “Common sense, I guess. I don't hold up ones that are quick to process because I'm bogged down in more complex or high-volume requests.”

Participants also said that they use technology to quickly and efficiently search and review, such as e-discovery platforms, electronic searching, deduplication tools and deadline alerts. However, in later questions participants said they wish they had more functional technology to increase processing efficiencies.

Many participants said they try to work directly with requesters to clarify their requests or to narrow the scope by calling them or emailing them. They might confirm what the requester needs, redirect them if the records are with another agency, help to perfect a request that is not reasonably described, or help them narrow the scope of the request.

Some participants said they and their agencies have no plans, strategies, or solutions for managing the order of requests. The context of many of these responses was either that they are desperate for resources, or they would appreciate learning more about best practices from others. One participant said, “If you figure this one out, please share with the class,” and another said, “We don't [have any strategies]. We are drowning and the struggle is to keep our head above water.”

The final common theme for this question was the need for staffing management techniques to work through the variety of requests. These techniques included employing contractors, sending complex requests to senior analysts or other internal experts, reassigning requests, or finding backup assistance in other offices.

Managing the Strain of Excessively Challenging Requests

The strain of unduly burdensome requests can be overwhelming, especially during this time with fewer staff members and an increasing volume of requests. Participants' responses ranged from internal best practices to the need for resources, guidance, and support.

Internal Best Practices. These responses were similar to those for the strategies to ensure that difficult requests don't hold up more straightforward ones, but they were colored by the emotional impacts of managing difficult requests and backlogs.

- **Working with requesters:** At the top of the list of strategies was working directly with requesters. Participants said that not only does this prove to be an efficiency, but it also provides an opportunity to speak with requesters on a human level, and to remind both sides of the interaction that this does not have to be adversarial. One participant said, “I try to ask the requester to narrow their search. I explain the types of unhelpful responses they would get if we searched

using their overly broad terms. Sometimes, their requests amount to nothing short of an improper fishing expedition.”

- **Proven strategies:** These were strategies they have found work best in their individual agencies, such as trying to do the best they can with the limited resources they have, hiring more staff and contractors, strategizing with other offices and agencies, and being supported by leadership that is realistic about the FOIA landscape in their agencies.
- **Internal streamlining:** These responses were again specific to agency processes, but participants said that these strategies streamlined their ability to respond to requests. They included aggregating requests when allowable, being precise with search terms, perfecting requests, and proactively disclosing records. They also said that rolling releases, in which they provide some of the documents requested while working on the rest in the request, has helped.
- **Triage and tracking:** Again, triaging and tracking requests provided a control mechanism to manage the strain of difficult requests.

Need for resources: Many of the respondents to this question recognized that they needed resources to manage the strain of difficult requests, a common theme throughout all of the responses on the survey. Many said their work has become impossible without additional staffing and technology. One participant said: “We have not received a FOIA request since February 2025 after our FOIA coordination team where the requests come in was laid off. So, I guess our agency has dealt with the strain by firing the FOIA central leadership staff so that we no longer do it.” Another said: “My agency has limited options to deal with this, and we have not received additional resources to properly address the strain, despite requesting resources multiple times over the past three years. Currently, we inform FOIA requesters in our Acknowledgment letters that we need 12 months to respond to requests.”

- **Let it fall into the backlog:** Many respondents in this section said it is impossible to keep abreast of the volume of requests with limited staffing, resources, and support. They know that every day that they can’t keep up means a growing backlog, and they can’t stop it. One participant said, “The backlog simply grows and grows, resulting in a steady litigation caseload.”
- **No strategies:** Participants in this category said that their agencies and offices have not adopted any strategies for managing the strain or backlog. One participant said, “We don’t have a strategic plan. Some of [the requests] have aged so much the requester no longer cares.”
- **Staff is struggling:** FOIA professionals said they are struggling to respond to requests in a timely fashion. Participants said they are burning out and looking for other work. They try to keep their morale up and keep processing requests. One participant said, “There isn’t an easy button, so you work on keeping the staff motivation high as you just keep your head down and chip away at the requests.” Some participants said they are working overtime or beyond their paid

hours to try to respond to requests. One participant said: “They said I needed to go faster. I sometimes took leave to do the cases and catch up.”

- **Lack of leadership support:** Throughout the survey, participants said that supportive leadership made their work much more effective, and out-of-touch or unrealistic leaders increased their strain. One participant said: “I don't think upper management understands FOIA or appreciates the daily challenges involved at our agency. Thus, other than being familiar with our quarterly reports or the annual report, upper management is not aware of any FOIA that occurs between the reports.”

Solutions for Managing Unduly Burdensome Requests

Participants shared their ideal solutions to mitigate the burden of overly challenging requests, all of which followed from the experiences they shared in previous questions. There were eight primary axial codes, which will be shared below with descriptive codes to elaborate. Those primary themes in order of commonality were: obtaining better technology, updating the FOIA statute, providing training and guidance for requesters, increasing fees, increasing staffing, providing official FOIA guidance, limiting vexatious requests, and augmenting internal processes.

It is also important to note that though they were fewer in number, there were some participants whose solutions tended toward the more punitive end of the spectrum to manage frustrating requests. These participants suggested classifying certain requesters as vexatious, making it possible to hold them accountable for their burdensome requests. They would support banning them, denying their requests, and charging them fees for abusing the system. One participant also suggested placing one particularly frustrating organization in the nonmedia requester category so that they no longer received the benefits of media classification.

Better Technology

Participants said they needed increased and more effective technology to be more efficient in responding to requests. Specifically, they are looking for advanced e-discovery tools, automation, and the ability to filter or block certain requests deemed to be vague, duplicative, voluminous, or unduly burdensome. Participants would like artificial intelligence to be harnessed to assist in review and redaction. One participant said, “there needs to be rapid adaptability to keep up with moving thresholds of search technology (just because it exists doesn't mean we have it or should be using it).”

Update the FOIA Statute

FOIA professionals said that they would support Congress amending the FOIA, modernizing it to reflect the changes in technology and volume of complex requests. They would like time limits to be increased. One participant said: “Updated standards for the assessment of fees and/or processing timeline. In 1967, there was no way they could have known about electronic records and the volume that could be quickly retrieved (search time) but not quickly reviewed and released.” Participants are seeking a clearer statute with more defined terms. Respondents also said they would like the

statute to limit large requests, vague requests, the number of requests, the scope and complexity of requests, and vexatious requests.

Train and Guide Requesters

Throughout the survey, participants who said they work directly with requesters to provide guidance and help them with their requests said they had positive results, both in terms of easing the search burden and alleviating some of the emotional strain. One participant said working with requesters should be a priority:

Conversations with requesters is a key solution. The requester community values these conversations. No one wants to wait more than 20 days to get the records they seek, and agencies want to move requests as soon as practicable. The solution is in a system that encourages dialogue and transparency on what is available, how long it might take, and offers interim responses when requests will take an excessive period to satisfy.

Participants said they would encourage training to help requesters clarify and define their requests, and to limit the scope. They would also like to see training that shows requesters the effects on agencies when they file requests, and they want requesters to know that FOIA professionals are not hiding information.

Increase Fees

Survey participants recommended that agencies increase their use of fees when responding to requests, including charging the media for their documents. Two participants suggested charging a nominal fee to submit a request as a way to prevent repeated, rapid-fire requests. Some participants also suggested increased fees for voluminous and complex requests.

Hire More Staff

The participants in this survey faced unprecedented losses in the federal workforce. They said they needed staffing to increase to the appropriate levels to be able to meet the statutory requirements of their jobs. They said that the staffing levels must increase to meet the consistently rising levels of requests and backlogs. One participant said: "Additional staffing to better manage our current volume of requests. Specifically, we need more staff to handle the increasing number of (complex) requests we are receiving. Having an appropriate number of staff dedicated to processing would greatly improve our efficiency, overall workflow, and the amount of records that are released." Another participant said: "We need more staff. Even newly hired staff would help with simpler requests to free up more senior staff to finish up the older requests."

Provide Official Guidance

Regular official guidance on best practices for responding to requests would help improve FOIA processing. Participants said they would appreciate clarity on less defined concepts, like what constitutes a reasonable search or an unduly burdensome request. They would also like standardized responses for issues like limiting abuse and disrespect. One participant said they wanted "A supported, legally defensible, and agency backed definition of unreasonable and overburdensome FOIA requests."

Another said, “Direct guidance noting certain approaches are authorized and defensible would be helpful.”

Limit and isolate vexatious requests

These respondents wanted to find a way to adjust their responses to requests they saw as vexatious or unduly burdensome. Some suggested isolating these categories of requests to process on another track, or putting them at the end of the line of requests. Others wanted to limit the ways the public can request information to avoid them becoming a burden, such as rationing the number of requests, limiting the amount of information requested, making it harder to send requests to multiple agencies, especially through an electronic portal, or evaluating personal reasons for filing requests.

Augment Internal Processes

There were a variety of disparate ideas for ways to improve processing, such as developing a records disposition schedules, providing more resources for processing general and complex requests, using FOIA reading rooms more consistently, organizing records management, and digitizing paper records.

Results: Requests Generated by Artificial Intelligence

The second half of the survey focused on FOIA professionals’ perceptions of AI-generated requests. This was limited to the receipt of requests -- the questions did not explore using artificial intelligence to process requests. Evaluating the receipt of AI-generated requests was especially interesting because it may be difficult to tell how requests were written and sent. For example, generative AI can write FOIA requests for requesters, but so can other FOIA letter generator software programs, which have been in existence for decades. Additionally, while artificial intelligence might have the capacity to write and send FOIA requests faster than humanly possible, this is also true of program scripts that have been used to request information for years. In the end, it may not be artificial intelligence that is at issue, but the volume and frequency of requests for information that technology affords generally.

The first question in the section addressed whether participants had received AI-generated requests, which helped not only evaluate the frequency of determining such requests, but also allowed the survey to then provide specific questions to those who have received them. About half of the participants said they had received AI-generated requests, and those requests made up a small amount of the request received.

Table 3

Have you received requests that have been AI generated?

Received AI-generated requests	Percent
Yes	46%
No	4%

I don't know

50%

The logic in the survey then only provided the descriptive questions about AI-generated requests to those who said affirmatively that they had received them; those who said they had not, or were not sure, did not receive the questions (Appendix A).

Those who said they had received them were then asked to approximate the percentage of requests that were generated by AI. More than half said AI-generated requests represented fewer than 10% of requests, and when combined, most participants said AI-generated requests were fewer than 25% of the requests they received.

Table 4

What percentage of the requests you receive do you perceive to be AI generated?

Percentage of AI requests	Responses
10% or fewer	58%
11% to 25%	26%
26% to 50%	10%
51% to 75%	6%
76% to 100%	0

This then begged the question: How does one know if a request is AI generated? This can be difficult, as other forms of technology can also mimic these functions. There were four primary indicators of AI generation, according to participants:

1. **Language:** The language used in the request was the tell, according to participants. They said that the language was nearly identical to others, the tone “seemed” to come from AI, and it was formal. The language was also nonsensical jargon, or the wording of the request was odd or overly complex.
2. **Speed and timing:** These requests arrive too quickly and repetitively. The receipt times are seconds apart, and it is not humanly possible to develop and submit them so quickly. For example, one participant said they receive 50 to 100 requests in a matter of minutes, and another said they get 100 within seconds.
3. **Formatting:** The requests are of poor quality with the same process requested for filling them. They are not specific, there is no scope, and they are unclear about what they are requesting. They are also riddled with errors that are repeated, they use somewhat (but not quite) correct legal citations, or contain odd letter and number strings in them.
4. **Requesters’ reputations:** Participants said there are a few requesters and one particular organization who have reputations for AI-generated bulk requests.

In one case, a participant said they ran the request through AI detection software, and in another case the requester said it was AI generated.

Participants were concerned with the expected increase in the volume of requests due to the convenience of AI generation and submission. Their suggestions for managing the requests involved a combination of both human and technological interventions along with foundational FOIA amendments.

- **Ban them:** Participants would like to find ways to eliminate AI-generated requests, specifically finding ways for technology to screen them out of the request pool and delete them.
- **Require humans:** Participants said they would require proof that the requesters were human through some form of authentication, including technology like Captcha, and through a statutory amendment.
- **Internal processing:** Participants recommended bundling and aggregating AI-generated requests from the same requesters and handling them en masse. They also suggested working directly with the requesters to find the best way to manage the requests.
- **FOIA amendments:** Participants said they would like the statute to clarify and strengthen the requirement that requesters are human. They would also like the FOIA to limit the number of requests per requester by time and/or volume. Participants said the statute should also be amended to increase efficiency processes and to be more realistic about the time it takes to respond to requests.

Recommendations for Managing the Volume and Frequency of Requests

The survey participants provided rich, specific, valuable information about the FOIA process within their agencies. This Subcommittee therefore offers the following recommendation and suggestions for future analysis.

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](https://www.archives.gov/files/oqis/documents/draft-statutory-reform-recommendation-sr-2-funding-foia-v.-3-april-2026.pdf) from the Statutory Reform Subcommittee, which encourages Congress to provide sufficient funding for the FOIA process (<https://www.archives.gov/files/oqis/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.

Future Areas for FOIA Advisory Committee Consideration

The survey and focus-group efforts undertaken during the 2024–2026 Committee term produced a substantial body of qualitative information from FOIA professionals across the federal government. This information provides valuable insight into the operational challenges facing FOIA programs and will serve as an important resource for future FOIA Advisory Committee work.

The survey and focus group data identified several issues that warrant continued examination by future Committee terms. As noted earlier, participants consistently highlighted challenges related to workforce capacity, technology, leadership support for FOIA programs, increasing volumes of electronic records, and the growing use of AI in both the submission and processing of FOIA requests. Taken together, the survey and focus-group findings suggest that many agencies are confronting a growing gap between FOIA workload demands and the resources, tools, and organizational support available to meet those demands.

The data also identified opportunities for further exploration of effective requester engagement and request-scoping practices, strategies for managing high-volume and complex requests, the acquisition, implementation, and effective use of technologies that support FOIA administration, and potential statutory, regulatory, or policy changes to address evolving records environments and workload demands.

In addition, the survey highlighted several questions that may benefit from further study, including how agencies can balance timely responses with increasingly complex requests; how emerging technologies can improve efficiency while maintaining accuracy, transparency, and accountability; how agencies can effectively manage increasing volumes of electronic records; and how FOIA programs can sustain operations in the face of changing workforce and resource constraints.

One of the unique aspects of this report is not merely the topics identified, but the context in which the information was collected. Both the survey and focus-group data captured the perspectives of FOIA professionals during a period of significant change affecting FOIA programs across the federal government. As agencies continue to adapt to evolving workforce, technology, and records management environments, the observations and experiences shared by participants provide a valuable foundation for future examination of these issues. Future terms of the FOIA Advisory Committee should build upon this body of work to identify best practices, evaluate emerging challenges and opportunities, and explore ways to strengthen FOIA administration while supporting timely public access to government information.

Conclusion

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.

FOIA professionals cannot manage the increasing volume of complex requests in a vacuum. The priority resources are staffing, technology, time, and leadership support.

They are also calling for systemic improvements in the FOIA to recognize modern obstacles for responding to requests. It will take a holistic approach to address the growing gap between request demands and agency capacity that includes an institutional culture of valuing the FOIA process, better tools, and more resources to protect the public's right to timely access to government information.

Appendix A: FOIA Professionals Survey Questions

A subcommittee of the federal FOIA Advisory Committee is trying to learn more about your experiences managing requests. The following information will explain some of the background on this survey. There is a blue arrow button at the bottom to get started with the questions. We will use the responses to this survey to better understand the difficulties federal access professionals face due to the volume and frequency of public records requests, and to form recommendations to alleviate those difficulties. Your input is incredibly valuable to us. To be eligible to participate, you must be at least 18 years old, and in the past three years, worked for a federal government agency and responded to public records requests as part of your duties. (It is fine if you have left service within the past three years.) This survey will take approximately 10 minutes or fewer to complete. Participants' identities will not be collected, nor will their specific agency affiliations. This is completely voluntary, and survey participants can discontinue the survey at any time. There are no benefits for participating in this study, other than providing information that may help improve the federal FOIA process. (And please take care not to reveal privileged information in the open-ended questions.) The results of the information collected, without identifying information about participants, will be shared with the members of the federal Freedom of Information Advisory Committee and published in a report that will also present potential solutions and support. If you have any questions or concerns about this survey or the information being collected, please contact Shelley Kimball, Ph.D., Johns Hopkins University, at kimball@jhu.edu. You can also use the same contact information to request a final report about the survey results.

End of Block: Block 3

Start of Block: Block 3

This section will just make sure you are eligible to take the survey.

Q1 Are you at least 18 years old?

- No (1)
- Yes (2)

Skip To: End of Survey If Are you at least 18 years old? = No

Q2 Have you worked at a federal government agency sometime during the past three years and filled or responded to public records requests as part of your duties?

- No (1)
- Yes (2)

Skip To: End of Survey If Have you worked at a federal government agency sometime during the past three years and filled... = No

End of Block: Block 3

Start of Block: Default Question Block

Q3 Thinking about the agency for which you work now or have most recently worked, approximately how many public records requests does your agency manage per year?

- 49 or fewer (1)
 - 50 to 5,000 (2)
 - 5,001 to 25,000 (3)
 - 25,001 to 99,999 (4)
 - 100,000 or more (5)
-

The following set of questions will explore FOIA requests that are challenging to fill.

End of Block: Default Question Block

Start of Block: Managing requests

Q4 Do you have concerns about the volume of records requests your agency processes?

- I am not at all concerned (1)
 - I am slightly concerned (2)
 - I am neutral (3)
 - I am moderately concerned (4)
 - I am extremely concerned (5)
-

Q5 What are the most significantly challenging forms of FOIA requests your agency faces, particularly in terms of resource allocation and maintaining response timelines? (Please share up to three.)

Q6 What are the qualities found in requests that reach the level of vexatious or unduly burdensome?

Q7 How does your agency address the strain caused by excessively challenging FOIA requests?

Q8 What specific strategies, procedures, technologies, policies, or collaborative approaches have you implemented to ensure these requests don't delay the processing of more straightforward or urgent ones?

Q9 What solutions would you like to see for managing such challenging requests?

Q10 What are your experiences with proactive disclosures or automated systems to release documents in FOIA requests?

The next section will explore AI-generated requests.

Q11 Have you received requests that have been AI generated?

- No (1)
- I don't know (2)
- Yes (3)

Skip To: End of Block If Have you received requests that have been AI generated? = No

Skip To: End of Block If Have you received requests that have been AI generated? = I don't know

Q12 What percentage of the requests you receive do you perceive to be AI-generated?

- 10 percent or less (1)
- 11 percent to 25 percent (2)
- 26 percent to 50 percent (3)
- 51% to 75% (4)
- 76% to 99% (5)
- 100% (6)

Q13 Please describe any AI generated requests you have received, including the sources of the requests and the content they are requesting.

Q14 What indicated to you that the requests were generated by AI?

Q15 How would you prefer to manage AI-generated requests? What strategies or policies would you like to see in place?

End of Block: Managing requests

Start of Block: Block 4

Q16 Before we end this survey, is there any additional information you would like to share about managing the volume and frequency of public records requests or AI-generated requests?
