



Summary of Agency Chief FOIA Officer  
Reports for 2025  
*and*  
Assessment of Agency Progress in FOIA  
Administration  
*with*  
OIP Guidance for Further Improvement

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## Introduction

The Freedom of Information Act (FOIA) requires each agency Chief FOIA Officer to “review and report to the Attorney General, through the head of the agency, at such times and in such formats as the Attorney General may direct, on the agency's performance in implementing [the FOIA].”<sup>1</sup> Each year, the Department's Office of Information Policy (OIP) provides [guidance](#) to agencies on the content of these reports. As in prior years, after reviewing all agencies' [2025 Chief FOIA Officer Reports](#), as well as their [Fiscal Year \(FY\) 2024 Annual FOIA Reports](#), OIP has prepared a brief summary of agency progress over the past year.

Based on its review, OIP has also conducted a detailed assessment of all agencies subject to the FOIA that received more than 50 requests, scoring each one on multiple milestones. A visual snapshot of this assessment is provided in Figure 1 below. While all of these agencies had the same reporting guidelines, OIP continued to separately assess different milestones for the twenty-eight high-volume agencies receiving more than 1,000 requests and the forty-seven medium-volume agencies receiving between 51-1,000 requests.<sup>2</sup> Based on its review, OIP is also issuing guidance to agencies for continued improvement in the years ahead.

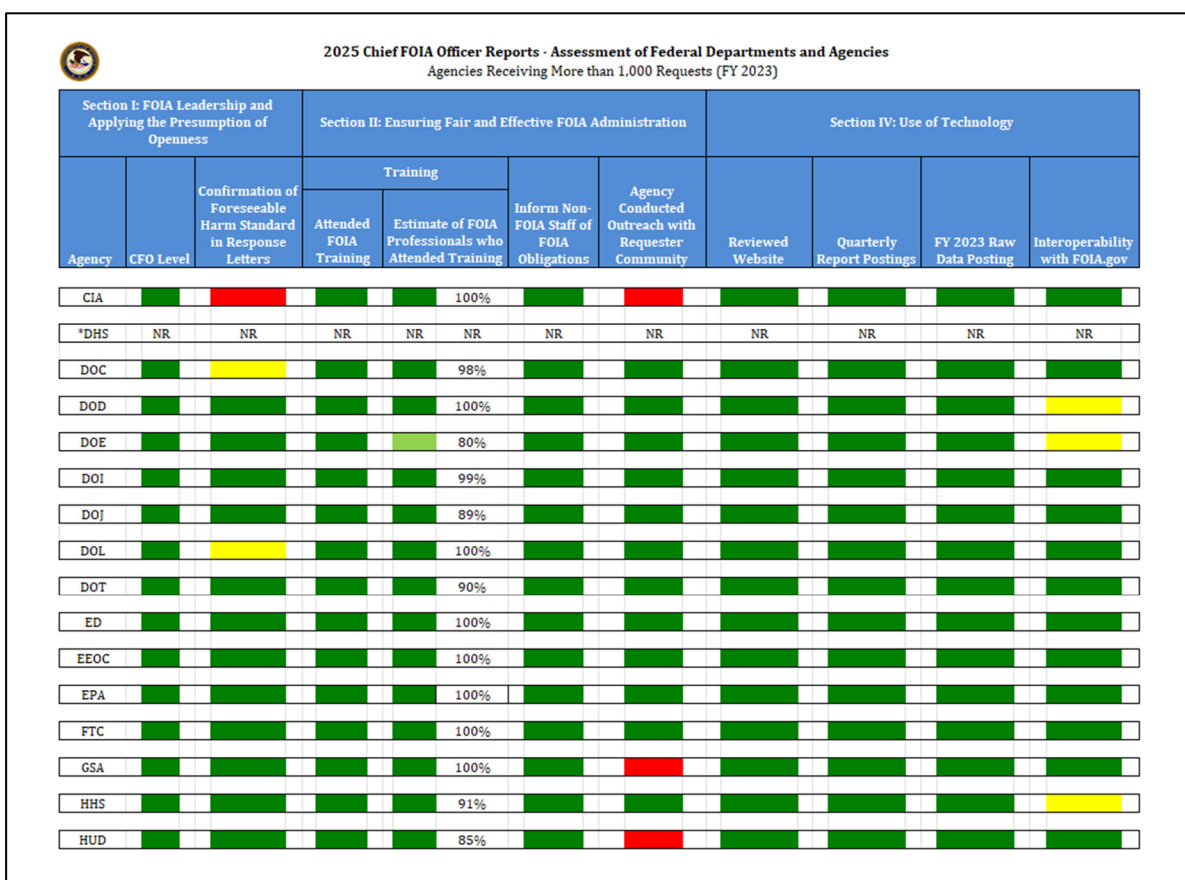


Figure 1: 2025 Chief FOIA Officer Reports - Assessment of Federal Departments and Agencies

<sup>1</sup> 5 U.S.C. § 552(j)(2)(D) (2018).

<sup>2</sup> OIP has assessed agencies with the data available from agency submitted Annual and CFO Reports. For questions where information was not reported by the agency, the assessment will reflect that the information was “Not Reported (NR).”

## Summary of Agency Progress Based on 2025 Chief FOIA Officer Reports

The [2025 Chief FOIA Officer Reports](#) address agency efforts to improve FOIA administration in five key areas derived from [DOJ's FOIA Guidelines](#): (1) FOIA leadership and applying the presumption of openness, (2) ensuring fair and effective FOIA administration, (3) proactive disclosures, (4) utilizing technology to improve efficiency, and (5) removing barriers to access, improving timeliness, and reducing backlogs. The summary below focuses on the successes achieved by agencies in each of these five key areas. Agencies and members of the public are encouraged to review the individual [2025 Chief FOIA Officer Reports](#) for even more detail on the successes achieved this past year. The Chief FOIA Officer Reports are accessible from the [Reports](#) page of OIP's website or from each agency's FOIA website.

### Section I: FOIA Leadership and Applying the Presumption of Openness

The first section of agencies' [2025 Chief FOIA Officer Reports](#) addresses the importance of agency leadership in ensuring effective FOIA administration and steps taken by agencies to apply a presumption of openness. Agencies described a wide range of efforts in this area, including senior level oversight by the agency's Chief FOIA Officer, providing substantive FOIA training to agency FOIA professionals, engaging in outreach with the requester community, and ensuring non-FOIA professionals are aware of their obligations under the FOIA.

#### *Chief FOIA Officer Designation*

The FOIA requires each agency to designate a Chief FOIA Officer (CFO) who is a senior official at the Assistant Secretary or equivalent level.<sup>3</sup> The Department of Justice (DOJ) reinforced this requirement in January 2019 by issuing a [memorandum](#) to all agency General Counsels and CFOs about the importance of designating CFOs at the appropriate level. The CFO is charged with "agency-wide responsibility for efficient and appropriate compliance" with the FOIA.<sup>4</sup>

"FOIA professionals deserve the full support of their Chief FOIA Officers and all their agency colleagues."

-- DOJ's FOIA Guidelines

In keeping with the FOIA's requirements, agencies reported, and were assessed, on whether their CFO is at the Assistant Secretary or equivalent level. All seventy-two agencies, that submitted CFO reports and received more than fifty requests, reported that their CFO was at the appropriate level.

#### *Incorporating FOIA Into Core Agency Mission*

OIP asked agencies to describe steps taken to incorporate FOIA into their core missions. Approximately sixty-eight agencies reported taking steps to do so. For example:

- The Council on Environmental Quality (CEQ) revised and modernized the regulations that implement the National Environmental Policy Act (NEPA), including to clarify the role of the FOIA in agencies' responsibilities under NEPA. CEQ also issued a Notice of Proposed Rulemaking to revise its FOIA regulations and is currently reviewing its FOIA operating procedures, including its practices with respect to proactive disclosures, and providing FOIA training for non-FOIA personnel.
- [Court Services and Offender Supervision Agency](#) (CSOSA) has incorporated FOIA milestones within the Agency's core mission by developing performance standards concerning

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<sup>3</sup> 5 U.S.C. § 552(j)(1) (2018).

<sup>4</sup> *Id.* at § 552(j)(2)(A).

program offices' obligations under the FOIA. The Agency's goal is to ensure that all FOIA requests are answered within the statutory time frame and that all FOIA requesters receive outstanding customer service.

- [The Department of Agriculture](#) (USDA)'s Food and Nutrition Consumer Services (FNCS) included FOIA in its internal Agency Priorities Planning System (APPS) Active Action Plan. This Plan details FNCS's priorities, goals, objectives, action plans, and special initiatives for the fiscal year as well as achievements to date. FNCS's progress against the Plan is tracked through monthly updates and reports. Three APPS goals relate to FOIA administration: reducing the backlog by 10%, closing the 10 oldest initial requests, and improving FNCS staff knowledge of FOIA requirements and processes through training and bulletins.
- [The Department of Education's](#) (ED) Strategic Plan establishes five strategic goals. In Strategic Goal 5, ED commits to "Enhance the Department's internal capacity to optimize the delivery of its mission" by managing technology, improving data access, recruiting/retaining/developing the workforce, and delivering mission outcomes through efficient acquisition management. By implementing these goals throughout the agency, the Chief FOIA Officer has been able to use ED's strategic plan as the foundation for building partnerships and coalitions among the FOIA Service Center, senior departmental leadership, and agency staff throughout ED.
- [The Department of Labor](#) (DOL) incorporated FOIA strategic milestones regarding timely FOIA processing and backlog reduction at the Departmental level and included the milestones in the FY2025 Agency Management Plan of the Office of the Solicitor to promote accountability and awareness for the Chief FOIA Officer. FOIA-related milestones are also tracked in the Department's Financial & Administrative Scorecard to promote visibility at the Secretary's level and for leadership within DOL's components.
- [The Department of the Treasury](#) (Treasury) incorporated transparency into its Strategic Plan for 2022-2026 by emphasizing transparency in the domestic and international financial system as an important tool for enhancing national security.
- [The Department of Transportation's](#) (DOT) Strategic Plan FY 2022-2026 includes as an objective to "[i]mprove transparency and promote data sharing by increasing public access to data and data analysis and visualization tools." DOT's Operating Administrations have taken many steps to incorporate FOIA into their core missions. For example, FAA has built business plan targets around backlog reduction and closing its ten oldest requests, ten oldest consultations, and ten oldest appeals.
- [The Federal Reserve System's](#) (FRB) Strategic Plan 2024-27 notes that the FRB prioritizes increasing transparency to ensure public access to relevant and understandable information about its policymaking approach and decisions. The plan states that the FRB meets this obligation by effectively communicating policy decisions, providing comprehensive reporting on its operations, and engaging with the public. In addition, the FRB's Annual Performance Plan 2024 reflects its commitment to increasing transparency and enhancing public understanding of its mission through compliance with FOIA.
- [The Merit Systems Protection Board's](#) (MSPB) Strategic Plan identifies "transparency" as an MSPB organizational value and states that the agency "will make our decisions, merit systems studies, and other materials easy to understand and widely available and accessible on our website."
- [The Office of Science and Technology Policy](#) (OSTP) has been heavily engaged in promoting policies that encourage openness in research, government operations, data, and

information. In particular, OSTP played a leading role in the issuance of the [Fifth U.S. Open Government National Action Plan](#), which included numerous commitments from across the Federal Government. Consistent with those commitments, OSTP has increased the number of records that it has publicly released and continues to explore a variety of mechanisms to expand its engagement with the public.

- A key element of the [Office of the United States Trade Representative's](#) (USTR) role in developing and coordinating U.S. trade policy and enforcing trade laws and agreements is outreach and communication with key stakeholders and the public. This outreach supports both the open and transparent development of policy and the building of public support for Administration trade policy goals. USTR's FY2022 – FY2026 Strategic Plan identifies timely responses to FOIA requests as a critical strategy for ensuring that the U.S. trade agenda and its supporting policies are broadly understood.
- [The Pension Benefit Guaranty Corporation's](#) (PBGC) Strategic Plan FY 2022-2026 includes a performance goal to “comply with all FOIA deadlines and maintain [a] model disclosure program” under the Strengthen Transparency, Disclosure, and Communication Strategy Objective.

#### *Foreseeable Harm Standard*

The [DOJ's FOIA Guidelines](#) provide that “agencies should confirm in response letters to FOIA requesters that they have considered the foreseeable harm standard when reviewing records and applying FOIA exemptions.” Accordingly, OIP asked agencies to confirm whether they provide this confirmation in response letters. Sixty-three agencies responded that they notified requesters that the agency considered the foreseeable harm standard in response letters. Four agencies reported that some, but not all, of their components notified requesters that they considered the foreseeable harm standard in response letters. Five agencies responded that they did not notify requesters that they considered the foreseeable harm standard in response letters. Three agencies did not report an answer to this question. OIP has advised all agencies that are not addressing the foreseeable harm standard in their response letters to do so as soon as possible.

#### *Glomar (Neither Confirm nor Deny) Responses*

For informational purposes, OIP asked agencies about their use and tracking of Glomar responses. If acknowledging the existence of records would harm an interest protected by a FOIA exemption, agencies may respond to a requester that it can neither confirm nor deny the existence of requested records. This is commonly referred to as a Glomar response. In 2025, forty-four medium and high-volume agencies reported that some or all of their components tracked Glomar responses. Agencies that track their use of Glomar responses reported issuing approximately 1,960 full or partial Glomar responses during the reporting period. Exemptions 3, 6, and 7(C) were among the most frequently cited exemptions.

## **Section II: Ensuring Fair and Effective FOIA Administration**

[DOJ's FOIA Guidelines](#) provide that “[e]nsuring fair and effective FOIA administration requires . . . proper training, and a full understanding of FOIA obligations by the entire agency workforce.” The Guidelines also reinforce longstanding guidance to “work with FOIA requesters in a spirit of cooperation.” The DOJ Guidelines also “urge agency Chief FOIA Officers to undertake comprehensive review of all aspects of their agency’s FOIA administration” as part of ensuring fair and effective FOIA administration. In their [2025 Chief FOIA Officer Reports](#), agencies provided details on various efforts related to FOIA training, outreach, and other initiatives, such as the allocation of agency resources to FOIA administration.



### *FOIA Training for FOIA Professionals*

A proper understanding of the FOIA, including the correct application of both FOIA law and policy, is a key element of applying a presumption of openness. Many agencies made significant efforts this past year to provide substantive FOIA training to their personnel. As in previous years, nearly all medium and high-volume agencies ensured that the majority of their FOIA staff received substantive FOIA training during the reporting period. Overall, twenty-six out of twenty-eight high-volume agencies scored dark green for reporting that more than 80% of their FOIA professionals attended substantive FOIA training. While this metric was not scored for medium-volume agencies, forty out of forty-seven medium-volume agencies reported that more than 80% of their FOIA professionals attended substantive FOIA training. Examples of the different types of training provided include:

- [The Chemical Safety and Hazard Investigation Board](#) (CSB) conducted an agency-wide FOIA training at its All-Hands meeting in the spring. In addition, members of the FOIA team provide periodic briefings to employees at staff meetings about responsibilities under the FOIA.
- Every quarter, the [Consumer Financial Protection Bureau](#) (CFPB) FOIA Team presents training to designated FOIA Points of Contact (“POCs”) and subject matter experts across CFPB. Additionally, the CFPB offers tailored training when a need arises. New FOIA staff are assigned a mentor and receive 1:1 tailored training for at least 90 days and the FOIA Team receives ad hoc training as needed.
- [The Department of the Interior](#) (DOI) FOIA office delivered in-person training to nearly 100 DOI FOIA professionals at various DOI facilities nationwide, launched a bi-weekly virtual FOIA training series accessible to all DOI personnel, and provided advanced training to the FOIA Officers who oversee the Department’s fourteen FOIA request processing offices.
- [The Department of Veterans Affairs](#) (VA) FOIA office has a multichannel, “meet them where they are” approach to FOIA training. This approach provides training resources that range from formal monthly “Coaching Calls,” to more informal “Lunch and Learns” where FOIA Officers can bring their specific case questions and get on the spot guidance to assist in moving their cases to completion. In addition to larger trainings, VA FOIA often provides 1-1 training for FOIA officers that may be new to the field or working through novel issues.
- [Export-Import Bank’s](#) (EXIM) FOIA Unit publishes and distributes to the workforce quarterly newsletters which highlight a relevant FOIA topic and “FOIA in the news.”
- [National Endowment for the Arts](#) (NEA) requires FOIA training as part of agency FOIA professionals’ Individual Development Plans each year. FOIA professionals and their supervisors actively discuss meeting this requirement to ensure adequate training.

In addition to agency-specific trainings, many agencies reported that their FOIA professionals attended government-wide FOIA training provided by DOJ. OIP continued to offer virtual courses to enable maximum attendance. OIP offered topical workshops several times throughout the year. The virtual setting offers expanded capacity for agency participation with respect to both the number and geographic location of attendees. Between March 2024 and March 2025, approximately 9,000 individuals registered to attend OIP-led virtual training sessions.

### *Efforts to Inform Non-FOIA Professionals of their FOIA Obligations*

DOJ's FOIA Guidelines emphasize the Department's longstanding declaration that "FOIA is everyone's responsibility." Support from agency leadership and all agency employees is indispensable to ensuring that FOIA professionals can efficiently process and respond to requests. Accordingly, OIP asked high and medium-volume agencies to include in their [2025 Chief FOIA Officer Reports](#) a description of their efforts to inform non-FOIA professionals of their obligations under the FOIA. Additionally, agencies were asked whether senior leaders were briefed on agency FOIA resources, obligations, and expectations. For 2025, all seventy-two responding agencies reported informing non-FOIA professionals of their obligations under the FOIA. Agencies provided a wide range of examples of their efforts to inform non-FOIA professionals of these obligations. For instance:

- Many agencies, such as the [Commodity Futures Trading Commission](#) (CFTC), [Department of Health and Human Services](#) (HHS), [Farm Credit Administration](#) (FCA), and [National Labor Relations Board](#) (NLRB) provided an overview of FOIA responsibilities during new employee training.
- [The USDA](#)/Farm Production and Conservation Business Center (FPAC-BC) FOIA office has developed Service Areas offices across the country with Government Information Specialists (GIS) who provide fundamental guidance and direction, when requested, as well as FOIA-specific trainings to all agency personnel within a state.
- [The Department of Energy](#) (DOE) provides targeted training to Human Resources staff, the staff most often tasked with collecting records for requests, and other organizations whose records are most frequently requested.
- [The Department of Housing and Urban Development's](#) (HUD) FOIA Office hosts monthly meetings with the Office of General Counsel and Regional Office points of contact on FOIA topics.
- [The United States Postal Service](#) (USPS) publishes "For the Record," a pamphlet distributed to all new employees that describes the FOIA and the Privacy Act and includes employees' rights and responsibilities under the Acts.

### *Outreach*

Agencies also described how they are engaging with requesters and civil society organizations to improve requester services and facilitate greater access to records. Twenty high-volume agencies conducted outreach that went beyond the regular communication that takes place within the FOIA request and appeal process. High and medium-volume agencies provided a range of examples, such as:

- [The Court Services and Offender Supervision Agency](#) (CSOSA)'s FOIA professionals engaged in dialogue and collaborated with its requester community by listening to the requesters' needs and concerns, addressing procedural questions, and providing templates to assist requesters in making perfected requests. These efforts resulted in fewer unperfected FOIA requests and minimized processing delays.
- [The Nuclear Regulatory Commission](#) (NRC) hosted its annual training event and conducted a 30-minute question and answer session with one of its frequent FOIA requesters. The NRC discussed transparency, good customer service, and requester expectations. As a result, the NRC staff is incorporating some of the requester's suggestions related to how the

NRC proactively discloses interim and final responses to make it easier for the public to locate documents in the NRC's public repository.

- [The Department of State's](#) (State) FOIA Public Liaison attended American Society of Access Professionals events, which provide opportunities to interact with the requester community. The Deputy Assistant Secretary for Shared Knowledge Services delivered a public presentation to the Public Interest Declassification Board ("PIDB"), an advisory committee mandated with promoting public access to significant U.S. national security decisions and activities. The PIDB presentation focused on projects using artificial intelligence (AI) applications for modernizing declassification and FOIA processing.
- Multiple representatives from various agencies served on the [Chief FOIA Officers Council's](#) two committees and the [FOIA Federal Advisory Committee](#), both of which provide opportunities for public engagement.

Additionally, OIP asked agencies whether, as part of the standard request process, their FOIA professionals proactively contacted requesters concerning complex or voluminous requests in an effort to clarify or narrow the scope of the request so requesters can receive responses more quickly. During the reporting period, all seventy-two responding agencies reported proactively contacting requesters as part of the standard request process concerning complex or voluminous requests.

### *Requester Services*

Agency FOIA Public Liaisons and FOIA Requester Service Centers assist requesters by informing them about how the FOIA process works and providing specific details on the handling of their individual requests. The FOIA also calls on agency FOIA Public Liaisons to assist requesters in resolving disputes and requires agencies to notify requesters about the services provided by each agency's FOIA Public Liaison in their response letters.

OIP asked agencies to provide estimates of how often requesters sought assistance from their FOIA Public Liaisons. As illustrated in Figure 2, of the seventy-five agencies receiving more than fifty requests, thirty-six received ten or fewer requester inquiries to their FOIA Public Liaison during the reporting period. Sixteen agencies received 11-100 inquiries, ten agencies received 101-1,000 inquiries, ten agencies received over 1,000 inquiries, and three agencies did not report their inquiries received.

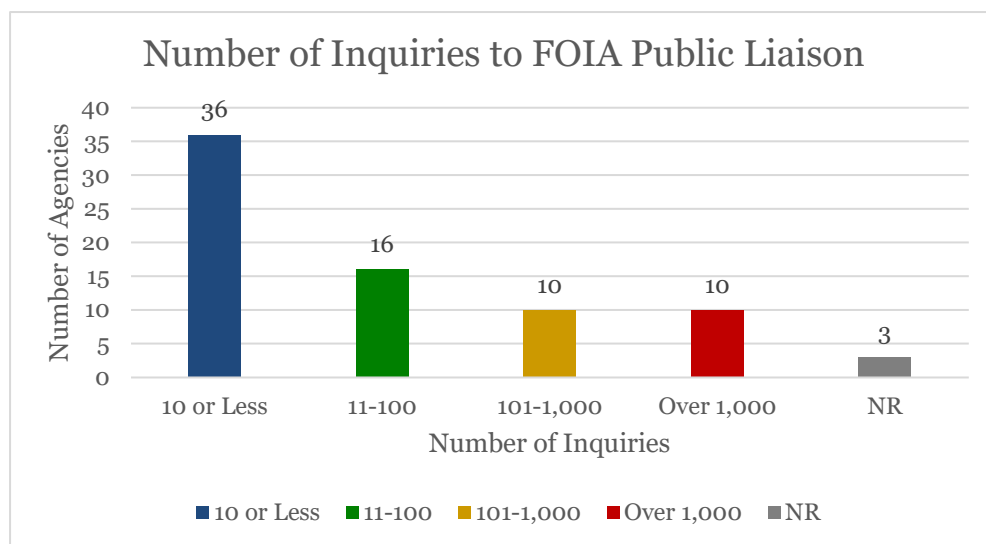


Figure 2: Number of Inquiries to FOIA Public Liaison



### *Allocation of FOIA Personnel Resources Required to Meet FOIA Demand*

For 2025, OIP asked agencies whether they evaluated the personnel resources needed to respond to current and anticipated FOIA demands. Agencies provided a variety of responses. For example:

- Various USDA FOIA offices found that their existing resources were insufficient to meet demand and hired additional employees to assist with the ever-increasing workload. The offices utilized different employment options depending on their needs, including full-time staff, temporary detailees, and part-time staff to enable existing GIS personnel to focus on processing requests, rather than administrative tasks, such as input and coordination tasks. In the FPAC-BC, this led to an 8.6% increase in processing requests.
- DOE conducted a review of its FOIA program and processes, which determined that additional staffing was necessary. A surge-capacity team was hired to assist with the increased number of FOIA requests. Additionally, an analysis of analysts' skill sets was completed to determine the best application of skills to meet needs.
- DOL operates a detail program where employees have an opportunity to work within other DOL agency components to gain experience, knowledge and training necessary to enhance their career paths. Several components have used this program to help meet their FOIA staffing needs.
- State's Bureau of Administration underwent a reorganization and modernization effort, establishing Shared Knowledge Services, the Department's new lead on information access and governance. This change will enhance the Department's management and responsiveness to requests, ensuring more efficient resource allocation and enhanced program performance. The FOIA office also reorganized its Case Processing staff into specialized teams after reviewing its staffing and workflows to identify resources needed to decrease FOIA backlogs and keep up with demands. Lastly, the Department will implement an updated backlog reduction/FOIA workplan for FY 2026-2029.

### *FOIA Data and Processing Metrics*

Finally, OIP asked agencies to describe how they used data or processing metrics to ensure efficient management of their FOIA workload. Among other things, data processing metrics can help identify areas for improvement and appropriate distribution of resources. For 2025, agency examples include:

- CFTC's FOIA Office analyzes its Annual Report to identify areas where workload management can be improved. In particular, FOIA staff identify where written guidance would be most likely to resolve inefficiencies. Regular monitoring of case management data keeps deadlines visible and attainable, and allows the FOIA Office to follow up with custodians to avoid undue delay. The CFTC FOIA Office produces a Weekly FOIA Report that summarizes data from the prior week, helping to keep all team members aware of the status of each request, allowing the team to prioritize processing tasks with maximum efficiency. The FOIA Office also utilizes OIP's CFO Report Assessment and Summary of Annual FOIA Reports to compare the CFTC FOIA Office's performance relative to other federal agencies.
- CEQ uses internal tracking tools to monitor the agency's FOIA workload. These tools are capable of generating statistical information on demand, including a list of open cases

sorted by date; lists of open cases assigned to a particular attorney or FOIA Specialist; lists of complex, simple, or expedited cases; and timelines of cases closed by disposition; among others. CEQ uses these tools to identify trends and manage workflow.

- USDA FOIA components use data or processing metrics to ensure efficient management. For example, Animal and Plant Health Inspection Service (APHIS) generates quarterly reports to document and reconcile outstanding record searches using data from USDA's enterprise wide FOIA tracking system. Most offices generate monthly reports detailing the number of cases received, closed, and backlogged, as well as the number of pages received and delivered. Using these metrics, offices create yearly employee performance metrics and tracks progress on the closure of its ten oldest requests, consultations, and appeals.
- Within the [Department of Defense](#) (DOD) several components engage in detailed data analysis to identify trends and bottlenecks. These components track patterns in FOIA requests to predict workload surges and adjust staffing accordingly as well as identify areas where additional resources may be required.
- [The Federal Deposit Insurance Corporation's](#) (FDIC) case management system's data visualization tools allow management to quickly review the workload of each government information specialist, the age of requests, and the status of requests, and to efficiently provide regular updates to agency stakeholders.

### Section III: Proactive Disclosures

DOJ's FOIA Guidelines emphasize that "proactive disclosure of information is . . . fundamental to the faithful application of the FOIA." The Guidelines explain that "[i]n making proactive disclosures, agencies should post records online as soon as feasible." "Agencies should also continue to maximize their efforts to post more records online quickly and systematically in advance of any public request." Finally, the Guidelines reiterate that agencies should post records "in the most useful, searchable, and open formats possible." In their [2025 Chief FOIA Officer Reports](#), agencies provided examples of material they proactively disclosed during the reporting period, including records requested and released three or more times in accordance with 5 U.S.C. § 552(a)(2)(D).

#### *Steps to Identify, Track, and Post (a)(2) Proactive Disclosures*

OIP asked agencies to describe the steps taken to identify, track, and post (a)(2) proactive disclosures. Agencies reported a variety of examples:

- Multiple agencies, including the [Central Intelligence Agency](#) (CIA), [Environmental Protection Agency](#) (EPA), Office of the Director of National Intelligence (ODNI), and [State](#) implement a "release to one, release to all" approach by proactively disclosing all records released under FOIA except for first-party requests.
- [The Federal Mine Safety and Health Review Commission](#) (FMSHRC) routinely publishes all final opinions and orders rendered in the adjudication of cases on its website. Once an adjudicatory opinion/order is issued, the docketing department forwards it to the website director for publication. When FMSHRC receives a request for records not usually requested, the agency automatically considers whether it is appropriate for proactive disclosure. The agency also preemptively identifies records that may be of significant public

interest. If the record is deemed suitable for proactive disclosure, it is published in the e-FOIA Library.

- [The National Aeronautics and Space Administration](#) (NASA)/Office of Communications (OCOMM) routinely releases information to the public, especially information that has the potential to generate significant media or public interest or other inquiries. The program offices regularly post documents related to mission updates, launches, etc., and this information is further publicized through social media, program-sponsored events, and interviews.

### *Timing of Posting Proactive Disclosures*

In 2025, OIP again asked agencies how long it takes them to post records online after identifying them for proactive disclosure. Nearly half of the assessed agencies indicated that it typically takes one week or less to post required proactive disclosures online after identifying the records for posting. Other agencies reported varied timeframes ranging from one week to, at times, several weeks or months. Various factors impact the time for publishing proactive disclosures, such as the complexity and size of records, coordination with other offices, decentralized posting processes, and remediation for compliance with Section 508 of the Rehabilitation Act.

### *Examples of Proactively Disclosed Material*

In 2025, OIP asked agencies to provide examples of any material that has been proactively disclosed during the past reporting year, including records that have been requested and released three or more times in accordance with 5 U.S.C. § 552(a)(2)(D). Agency examples include:

- DOD/National Security Agency (NSA) released a number of historical records, including [Rear Adm. Grace Hopper videos](#) on technological foundational principles and [Kennedy Assassination records](#).
- [Federal Election Commission](#) (FEC) proactively released [campaign finance data](#), [campaign information](#), and the [Presidential candidate map](#).
- General Services Administration (GSA) has released [presidential transition records](#).
- NLRB maintains a [case map](#), that details all labor cases and election-related data for the current fiscal year, divided by region.
- [National Science Foundation](#) (NSF) improved “[NSF by the Numbers](#),” a dashboard that provides and displays NSF award, proposal, and budget data in a searchable, easy-to-digest format. To make this database more useful to the public, views in the various data dashboards are interactive, and information can be sorted using global filters, by geographic area, NSF Directorate, type of academic institution, etc.
- National Transportation Safety Board (NTSB) developed a [Case Analysis and Reporting Online](#) (CAROL) query tool, which allows individuals to make comprehensive searches of surface modal accident data, aviation accident data and safety recommendation data. CAROL enables users to download data in JSON and CSV format. Both are open, machine-readable, and machine-actionable formats.
- In 2024, State continued its “release to one, release to all” policy of posting released documents to its FOIA Virtual Reading Room. In August 2024, the Department began posting to its Virtual Reading Room documents that were released under the FOIA between

1979 and 1996, which were previously available only on microfiche. These newly digitized documents can now be accessed by the public via the U.S. Department of State Microfiche Documents webpage. The Department also continued to release declassified cables from 1997 to its Virtual Reading Room that had been reviewed with the assistance of a machine learning technology. The Department will continue to post declassified cables online in advance of any public request as part of its monthly “release to one, release to all” FOIA posting. In FY 2024, the Department posted an additional 125,434 records to its Virtual Reading Room, making a total of 371,370 records available to the public through the Department’s transparency programs at the end of FY 2024.

### *Making Posted Information More Useful*

In March 2015, OIP issued [guidance for proactive disclosures](#) that details various methods for disclosure, including the importance of ensuring that information is posted in the most usable formats. In August 2022, OIP issued additional [guidance](#) to agencies on the timing and format of proactive disclosures, including encouraging agency FOIA offices to collaborate with their data, IT, and program office subject matter experts to post information in the most useful formats and locations on their websites. In 2025, nearly all agencies reported that they took steps to make posted information more useful to the public.

Agencies use different strategies for proactive disclosures tailored to serve the community of individuals who visit their websites most frequently. Some examples of steps agencies have taken to make information more useful include:

- Treasury posts records in commonly accessed formats, including Adobe Portable Document Format (PDF), Comma Separated Values format (CSV), and other popular Microsoft Office formats. Some documents contain added searchability features such as Optical Character Recognition. The Department makes every effort to ensure that documents are posted in compliance with Section 508 of the Rehabilitation Act. During the reporting period, the Bureau of Engraving and Printing’s (BEP) IT department developed new internal processes to assist programs with the conversion of file types to make them available in open, machine-readable, and machine-actionable formats. Alcohol and Tobacco Tax and Trade Bureau (TTB) reviewed its public data products for accessibility and usability and identified pages that could be improved by consolidating documents to a single file instead of having multiple listings in separate files divided by category.
- [The Federal Communications Commission](#) (FCC) has a sustained focus on making proactive disclosures more useful and accessible. The FCC’s policy on open data is showcased in an [“Open Government at the FCC”](#) webpage. The “Open Government at the FCC” webpage includes data underlying FCC regulatory proceedings and activities with a focus on improving quality, openness, accessibility and utility, including a link to several FCC datasets that can be downloaded.
- [The Federal Trade Commission’s](#) (FTC) FOIA Unit continues to provide information in various file formats to make the information more accessible and useful to the public. Using an Application Programming Interface (API), the agency identifies datasets that can be made available to users in a machine-readable format. This allows data users and developers to query, gather, and manipulate the FTC’s data. Providing data in this format facilitates broad dissemination of its content to the public, and it corresponds with the FTC’s Open Government Plan and Strategic Plan.
- In FY 2024, the [Surface Transportation Board](#) (STB) proposed updated [templates](#) for multiple collections to streamline data review and ensure that the format of files posted to

the web align with stakeholder needs. Additionally, as part of the Board's oversight efforts regarding urgent rail service issues, the Board has posted certain employment data.

### *Collaboration with Agency Staff Outside of FOIA Offices*

In 2025, OIP asked agencies whether their proactive disclosure process or system involved collaboration with agency staff outside the FOIA office, such as IT or data personnel. If so, OIP asked agencies to describe the interaction. Many agencies reported regularly collaborating with IT, public affairs, and general counsel staff to coordinate postings. Some specific examples of collaboration include:

- Various [Department of Commerce](#) (DOC) components collaborate with other offices and agencies to further disclosures. For example, in collaboration with the Office of the U.S. Trade Representative, the International Trade Administration (ITA) publishes text and datasets for important trade agreements that impact commercial industries. The National Oceanic and Atmospheric Administration's (NOAA) National Marine Fisheries Service identified an IT solution for proactively disclosing marine mammal inventory reports.
- GSA's FOIA Requester Service Center coordinates ongoing conversations with GSA's key business lines, program areas, and records management staff about information and data sets that could and/or should be proactively posted for public use and consumption. Discussions will usually be initiated as a result of issues in the media, legislation, or program changes. However, for new and evolving programs, the conversations tend to be progressive in nature and advance as requirements, data sets, and informational reporting mature.
- Multiple [Occupational Safety and Health Review Commission](#) (OSHRC) offices are individually responsible for specific types of proactive disclosures and coordinate regularly to ensure consistency and awareness. Additionally, representatives from several offices serve on OSHRC's website redesign committee and have collaborated on ways to post records more efficiently and expand the range of records available on the redesigned website.
- PBGC's proactive disclosure process system involves collaboration with agency staff outside of the Disclosure Division. The Disclosure Division partners with the Plan Compliance Department by reviewing and redacting Special Financial Assistance (SFA) applications prior to publication in the public domain. The FOIA professionals collaborate with other PBGC program offices to review material prior to public posting to ensure that no personally identifiable information or confidential commercial financial information is released.
- State continued its collaboration with the Office of Management Strategy and Solutions Center for Analytics, led by the Department's Chief Data and Artificial Intelligence Officer, to pilot machine learning software that accelerated the declassification review decisions for the previously mentioned cables that are now being systematically posted to its Virtual Reading Room.

## **Section IV: Utilizing Technology to Improve Efficiency**

Agencies continue to use advanced technology to make more information available online, improve their websites, and assist in their overall FOIA administration. Each year, OIP asks agencies to describe the steps they have taken to make greater use of technology in their FOIA administration. OIP refines the questions in this section as the use of technology evolves.

[DOJ's FOIA Guidelines](#) emphasize the importance of user friendly websites and compliance with



the [FOIA.gov](https://www.foia.gov) interoperability requirements as outlined in the [joint memorandum M-19-10](#) issued by the Office of Management and Budget and DOJ, which established the standards for the National FOIA Portal.

For 2025, agencies were asked to describe ways they leverage technology to facilitate efficiency in FOIA administration that they have not previously reported. Agencies were also asked to confirm that they had reviewed their FOIA websites to address elements noted in OIP [guidance](#) and to verify compliance with reporting and National FOIA Portal interoperability requirements.

### *FOIA-Related Technological Capabilities*

In 2025, OIP asked agencies to identify whether they had reviewed their FOIA-related technological capabilities to identify resources needed to respond to current and anticipated FOIA demands. All seventy-two agencies, that submitted CFO reports and received more than fifty requests, responded they had reviewed their FOIA-related technological capabilities.

### *Leveraging Technology to Facilitate Efficiency and Automate Record Processing*

Technological resources have long been a fundamental element of agencies' success in FOIA administration. In past Chief FOIA Officer Reports, agencies have reported on the use of new FOIA case management systems, advanced review and redaction tools, and collaborative tools. For 2025, many agencies reported using or exploring new and advanced types of technology to improve efficiency in FOIA processing. OIP also specifically asked whether agencies used any technology to automate record processing, such as machine learning, predictive coding, and technology assisted review. The use of artificial intelligence and machine learning has the potential to make the search and review of records more efficient and accurate, while accompanied by human monitoring and safeguards to ensure agencies' work is consistent with the FOIA. Below are some examples of how agencies are using technology to improve FOIA administration:

- The CFTC established an online portal dedicated to Requests for Confidential Treatment. This has allowed staff to prioritize responding to FOIA requests, while organizing Requests for Confidential Treatment in a central location. Automating this previously manual and time-consuming process saves the three-person FOIA Office valuable time they can devote to processing FOIA requests.
- HHS/Centers for Medicare and Medicaid Services (CMS) FOIA developed a new automated Smart Timer feature in its FOIA workload management system that tracks important FOIA milestones and deadlines. CMS FOIA used the new feature to significantly reduce the average time to adjudicate a fee waiver from 71 days in FY 2023 to 9 days in FY 2024.
- Treasury implemented two identity proofing software tools into the FOIA/Privacy Act process to meet compliance with the Creating Advanced Streamlined Electronic Services for Constituents Act of 2019 (CASES Act) and OMB Memorandum M-21-04, Modernizing Access to and Consent for Disclosure of Records Subject to the Privacy Act.

### *Review of Agency Websites*

In 2017, OIP issued [guidance](#) encouraging agencies to regularly review their FOIA websites to ensure they contain essential resources and are informative and user-friendly. In their [2025 Chief FOIA Officer Reports](#), all seventy-two agencies, that submitted CFO reports and received more than fifty requests, reported that they reviewed their websites for compliance with OIP Guidance.



### *Posting Quarterly FOIA Reports*

In FY 2024, 92% of responding agencies reported posting their Quarterly FOIA Reports successfully on FOIA.gov. Any agency that was unable to successfully provide all quarterly report data for display on FOIA.gov was required to provide a plan for ensuring that such reporting is successful in FY 2025. Given the importance of providing the public these key FOIA statistics during the course of the fiscal year, every agency should ensure that their quarterly FOIA reports are timely and properly posted in accordance with OIP's [guidance](#), so that they can be accessed through [FOIA.gov](#).

### *Posting Raw Data Used to Compile the Annual FOIA Report*

The *FOIA Improvement Act of 2016* amended the [FOIA](#) to require agencies to proactively make available in an electronic format the raw statistical data used to compile their Annual FOIA Report. OIP issued [guidance](#) to assist agencies in meeting this requirement, and [asked](#) agencies to provide links to their raw data postings for FY 2023 in their [2025 Chief FOIA Officer Reports](#). For this reporting period, 92% of agencies receiving more than fifty requests successfully posted the raw data used to compile their FY 2023 Annual FOIA Report. Several agencies have also already posted the raw data for their FY 2024 reports.

### *Interoperability with the National FOIA Portal*

In February 2019, DOJ and the Office of Management and Budget (OMB) issued [joint guidance](#) establishing interoperability standards to receive requests from the National FOIA Portal on FOIA.gov. For 2025, OIP asked agencies whether all their components were in compliance with the guidance, which requires agencies with automated case management systems to receive requests via application programming interface (API). For this reporting period, 89% of agencies receiving more than fifty requests confirmed that they were interoperable with the National FOIA Portal in line with the OMB/DOJ guidance. Another 7% of agencies receiving more than 50 requests answered that some, but not all, of their components were interoperable with the National FOIA Portal consistent with the guidance. The remaining 4% of agencies receiving more than 50 requests did not report an answer to this question.

### *Best Practices and Challenges with Technology*

Some agencies described best practices in the area of technology. Many agencies described best practices related to the use of e-discovery and deduplication tools to improve efficiency. DOI has developed a variety of resources, including short instructional videos, live demonstrations, checklists, guides, and handbooks to encourage widespread adoption of new technologies and maximize efficiency. FDIC's FOIA Group developed succinct reference guides, standard operating procedures, and frequently asked questions to serve as both training and instructional resources for the FDIC's FOIA case management system.

Agencies also provided examples of challenges they face related to technology. DOD noted its components face significant challenges in adopting and maintaining modern technology. These challenges are primarily driven by funding limitations, older systems, personnel shortages, and difficulties with interoperability between different agency platforms. Multiple other agencies also reported challenges with a lack of dedicated IT staff and FOIA professionals having varying levels of technological expertise and ability to adapt to new systems.

## Section V: Steps Taken to Remove Barriers to Access, Improve Timeliness, and Reduce Backlogs

For the [2025 Chief FOIA Officer Reports](#), OIP asked agencies to report in this section whether they provide alternative means of access to first-party requested records and to discuss any other efforts to reduce barriers to access. OIP also asked agencies to provide detailed information on the adjudication of requests seeking expedition, simple track processing times, and their efforts to reduce backlogs and close their ten oldest requests, appeals, and consultations. Agencies that had a request backlog of over 1,000 provided plans for achieving backlog reduction in the year ahead. Agencies that did not close their ten oldest requests, appeals, or consultations from FY 2023 during FY 2024 described their plans for closing those requests, appeals or consultations by the end of FY 2025. Finally, OIP asked agencies to describe the impact of any FOIA litigation on their overall FOIA administration.

### *Alternative Means of Access to First Party Requested Records*

In 2025, OIP asked agencies to report whether they provided alternative means of access to first-party requested records outside of the FOIA process, and if so, to provide examples. Multiple agencies reported providing alternative means of access for first-party requests. For example:

- The CFPB has a [portal](#), where individuals can access detailed information regarding first-party complaints to the CFPB's [Consumer Complaint Database](#) using a login and password that is created when the consumer submits the complaint. The CFPB also publishes a [Public Data Inventory](#) of open data assets for the public to access directly.
- DOC/United States Patent and Trademark Office (USPTO) posts most [trademark](#) and [patent](#) information on its website. Users can access their own trademark and patent applications (if not already public) via their [MyUSPTO](#) account. Additionally, parties before the [Patent Trial and Appeal Board](#) (PTAB) or the [Trademark Trial and Appeal Board](#) (TTAB) are able to access information about their cases through USPTO's [Patent Trial and Appeal Case Tracking System](#) (P-TACTS) or the [Electronic System for Trademark Trials and Appeals](#) (ESTTA).
- DOD/Defense Finance and Accounting Service (DFAS) has developed a tool called AskDFAS, which allows individuals to request first-party records outside the FOIA/PA process. This platform helps track inquiries, reduces call/email traffic, and provides a streamlined, secure method for the public to interact with DFAS. DFAS offers several online tools, such as MyPay, MyInvoice, and PayDFAS, which allow authorized users to access payroll and debt account information without needing to go through FOIA.
- ED also engages with students, parents, and third-party representatives by responding to their inquiries and redirecting them to [informational resources](#), usually outside of the FOIA process. Student loan borrowers are also able to access their current year data while in school through the [self-serve portal](#) without having to submit a Privacy Act request for their records.
- HHS has provided first-party requesters seeking several types of records with alternative means of obtaining first-party records outside of the FOIA process. For example, HHS/CMS provides access to first-party data outside the FOIA process through the [Medicare Blue Button](#) tool. Additionally, HHS/Indian Health Service (IHS) provides patients with direct access to their medical records through the [IHS Personal Health Record](#), which makes it

easier for patients to access or share their health data with a designated personal representative.

- The NEA provides an [online search tool](#) for information on NEA grants awarded since 1998. Applicants/grantees for NEA grants may also contact NEA program staff to receive additional information or feedback and ask questions regarding their applications/awards. The agency website is updated with the current contact information of NEA staff by artistic discipline and program.
- PBGC's Office of Benefits Administration discloses certain first-party pension records, such as income verifications, beneficiary designations, election forms, and benefit determination records, outside the FOIA process. Additionally, PBGC makes some first party information available at [MyPBA: My Pension Benefit Access](#), which allows plan participants to electronically access their own records such as benefit estimates, 1099-R, and verification of income.

### *Requests for Expedition*

The FOIA requires that agencies establish procedures in their regulations that provide “for expedited processing of requests” in certain circumstances. 5 U.S.C. § 552(a)(6)(E)(i) (2018). For 2025, OIP asked agencies to report the average number of days they took to adjudicate requests for expedition. During FY 2024, thirty-eight medium and high-volume agencies adjudicated requests for expedition in less than ten days.

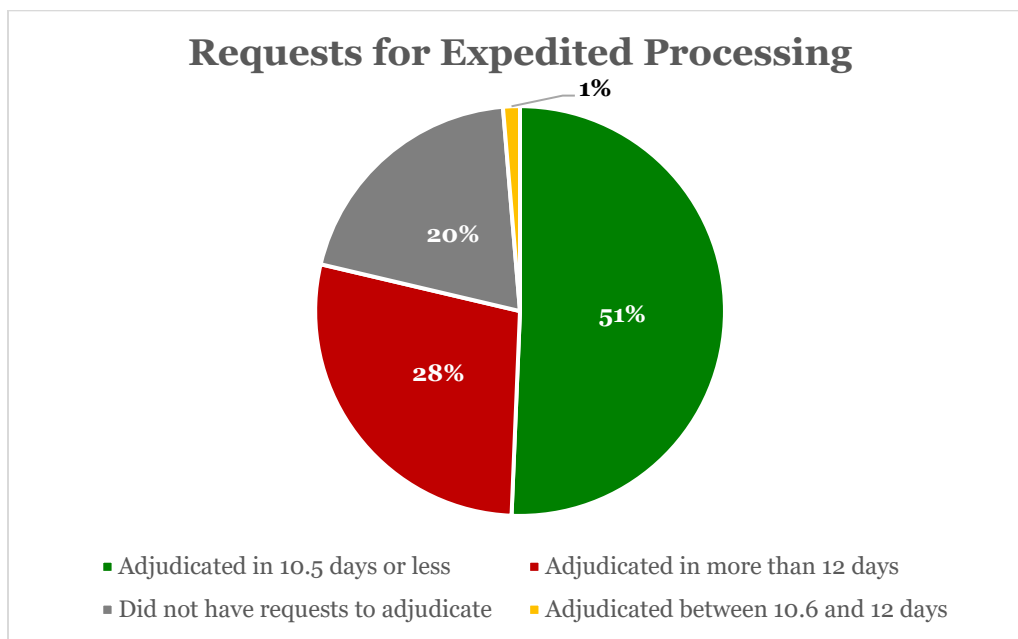


Figure 3: Requests for Expedited Processing distribution

### *Simple Track Requests*

Because of the strong correlation between the type of request that is made and the ability of the agency to respond to that request more quickly, in 2012 OIP established a milestone that addressed whether the agency overall responded to requests in its simple track within an average of twenty working days or less. Agencies once again reported on this metric in their [2025 Chief FOIA Officer Reports](#). Thirty-two medium and high-volume agencies reported that they either

processed their simple-track requests in an average of twenty-working days or less, or if they did not use multi-track processing, they processed all their non-expedited requests within that average timeframe. One agency did not process any requests. Of the forty-two agencies that did not process simple-track requests in fewer than twenty-working days, thirteen reported that the simple-track processing time decreased compared to the prior fiscal year.

#### Average Number of Days to Process Simple Requests

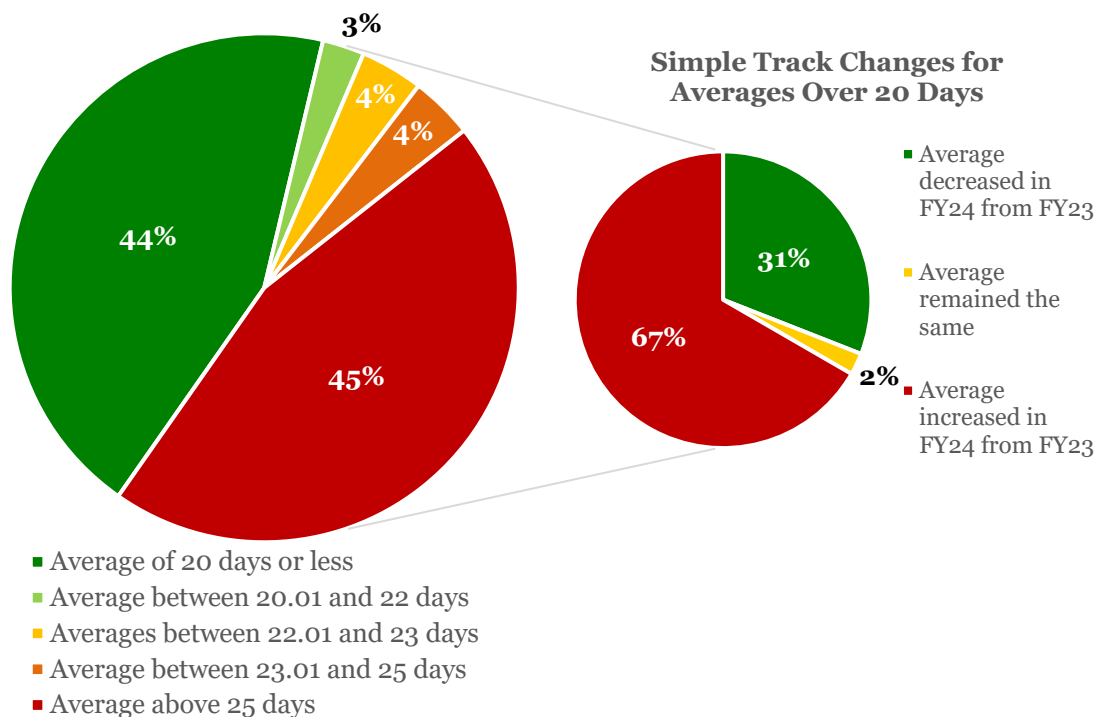


Figure 4: Simple Requests Average Number of Days Distribution and Average Comparison, FY 2023 to FY 2024 for Averages over 20 days.

#### Backlogs

With regard to request backlogs, as illustrated in Figure 5, twenty medium and high-volume agencies reported that they either reduced the number of requests in their backlog at the end of FY 2024 or they had no backlog to reduce. Eight agencies reported that the backlog was the same as the previous fiscal year or an increase of up to five backlogged requests. Forty-seven agencies experienced a backlog increase of more than five requests. Of the fifty-five agencies that reported a constant or increased backlog, fifty reported that they processed more requests than the previous fiscal year.

### Comparison of Request Backlog FY23 - FY24

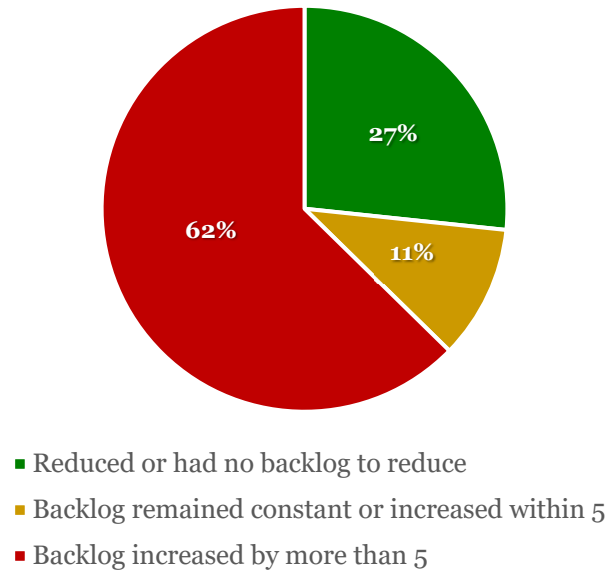


Figure 5: Requests Backlog Comparison, FY 2023 to FY 2024

For administrative FOIA appeals, as illustrated in Figure 6, fifty-one medium and high-volume agencies reported that they either reduced the number of appeals in their backlog at the end of FY 2024 or they had no backlog to reduce. Sixteen agencies reported that the backlog was the same as the previous fiscal year or an increase of up to five backlogged appeals. Eight agencies reported an appeal backlog increase of more than five appeals. Further, of the twenty-four agencies that reported a constant or increased appeals backlog, fourteen of those agencies reported that they processed more appeals than the previous fiscal year.

### Comparison of Appeals Backlog FY23 - FY24

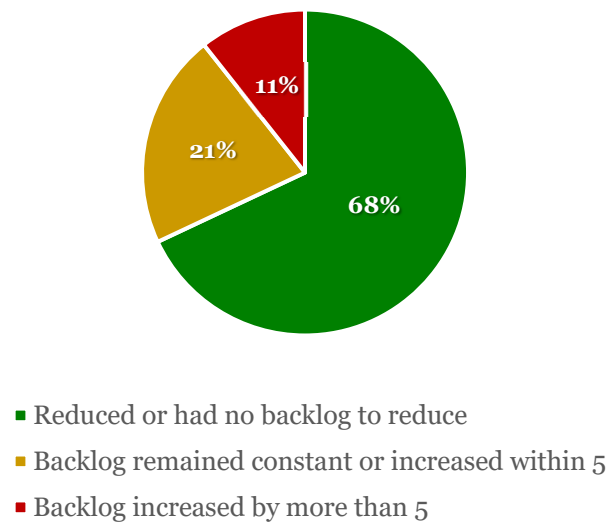


Figure 6: Appeals Backlog Comparison, FY 2023 to FY 2024

As with previous years, agencies that experienced an increase in their request or appeal backlogs explained the causes that contributed to those increases in their [2025 Chief FOIA Officer Reports](#). The most frequently cited factors were the increase in the number and complexity of requests and the loss of staff. Thirty-three agencies reported an increase in the complexity of requests as contributing to the backlog. Twenty agencies reported the loss of staff as a contributing factor. Forty-nine agencies identified the increased number of requests as another factor. Fifteen agencies identified increased litigation diverting resources as another contributing factor.

With respect to appeals, eight agencies identified the complexity of appeals as contributing to the backlog. Seven agencies identified a loss of staff as a factor. Nine agencies identified the increased number of appeals received as another factor. Seven agencies reported increased litigation diverting resources as another contributing factor.

#### *Status of Ten Oldest Requests, Appeals, and Consultations*

A critical element of the government's backlog-reduction efforts is the closing of the ten oldest pending requests, appeals, and consultations at each agency every year. Seventeen medium and high-volume agencies reported that they either closed all ten of their oldest requests from FY 2023 by the end of FY 2024, or they had no ten oldest to close.

With regard to appeals, fifty medium and high-volume agencies either closed their ten oldest pending appeals or they had no ten oldest to close. Finally, sixty medium and high-volume agencies closed their ten oldest pending consultations, or they continued to maintain no pending consultations at the end of the fiscal year.

#### *FOIA Litigation*

OIP asked agencies whether any requests were the subject of FOIA litigation during the reporting period and, if so, to provide examples describing the impact on the agency's overall request processing. OIP also asked agencies to report common causes leading to litigation, if possible. For context, as reported in the [Department of Justice's Litigation and Compliance Report](#), during Calendar Year 2024, 889 FOIA cases were filed in the federal district courts. As reported in OIP's [Summary of the Annual FOIA Reports for Fiscal Year 2024](#), approximately \$54 million was spent by agencies on FOIA litigation-related activities.

Overall, forty-two of the seventy-five agencies that submitted Chief FOIA Officer Reports reported having FOIA litigation during the reporting period. The number of cases that agencies reported handling varied with some agencies handling one or two FOIA cases while others such as DOJ, DHS, HHS, and State having over a hundred. The most common cause of litigation reported by agencies was constructive exhaustion when the agency was not able to meet the twenty- or thirty-day deadline for responding to the request. However, some agencies also reported having litigation because of a dispute concerning agency withholdings or denials of requests for expedition.

Nearly all agencies that reported having litigation during the reporting period indicated that the resources required to respond to the litigation diverted resources from processing administrative cases. Significant staffing resources are often required to effectively coordinate with litigating counsel, review court filings, and draft declarations, in addition to processing the records themselves. Additionally, agencies reported that court-ordered production deadlines often require the agency to prioritize cases in litigation and divert resources away from the requests in the administrative queue. For some smaller agencies, even one or two requests in litigation can have a significant impact on their overall FOIA administration due to limited resources.



## **Conclusion**

OIP's 2025 Summary and Assessment demonstrates that agencies continued to implement new ways to improve their administration of the FOIA through various initiatives connected to the five key areas addressed above. As illustrated in the individual agency Chief FOIA Officer Reports, significant efforts have been made to apply a presumption of openness in FOIA administration, ensure effective systems are in place to process requests, continue to make more proactive disclosures, utilize technology, and make efforts to reduce barriers to access, improve timeliness, and reduce backlogs. While there are many achievements noted in this summary, the successes achieved by individual agencies vary significantly. OIP's Assessment serves as a visual snapshot of where each agency should focus its efforts in the upcoming year to achieve greater success.

## 2025 Assessment of Agency Progress in FOIA Administration

For the 2025 assessment, OIP selected twenty-two milestones for scoring high volume agencies and twenty milestones for medium volume agencies, each of which is tied to one of the five key areas addressed in [DOJ's FOIA Guidelines](#). These milestones were chosen as indicative of progress made in each area, but they are by no means exclusive. Agencies include in their [Chief FOIA Officer Reports](#) a wide range of accomplishments and initiatives that they have undertaken to improve their administration of the FOIA. As these reports themselves provide a more comprehensive picture of each agency's work in implementing [DOJ's FOIA Guidelines](#), this assessment is designed to provide a visual snapshot of several key areas of agency FOIA administration and is meant to be read in conjunction with the [Chief FOIA Officer Reports](#). The assessment readily illustrates many areas where agencies have made real progress in the past year and also serves to highlight areas where further improvements can be made.

The assessment covers the twenty-eight high volume agencies and forty-seven medium-volume agencies that were subject to the FOIA during FY 2024. As in prior years, agencies are scored on the different milestones based on a stoplight scoring system. Agencies provide a wealth of information as a part of their [Chief FOIA Officer Reports](#) that do not lend themselves to scoring, but are still very informative as to their efforts to improve their FOIA administration. In an effort to streamline the presentation of the assessment, narrative information is not included in the charts.

A detailed methodology is provided below describing how each milestone was scored. As in prior years, questions assessed on the three-step scoring system use a score of dark green, yellow, and red. Dark green indicates that the agency met the milestone, yellow indicates partial progress, and red indicates that the milestone was not met. For the five-step scoring system, the colors light green and orange provide more gradation as to the progress the agency has made towards that milestone.

The time period for the assessment is generally March 2024 to March 2025, which is the period covered by the [2025 Chief FOIA Officer Reports](#). For the milestones concerning average time to adjudicate requests for expedited processing, processing times for simple track requests, backlogs, and the ten oldest requests, appeals, and consultations, the time period is FY 2024. The data for these metrics was compiled from agency Annual FOIA Reports, which are available on both [FOIA.gov](#) and OIP's [Reports](#) page.