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[FOIAonline](#)

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April 14, 2022

This letter is in response to your U.S. General Services Administration (GSA) Freedom of Information Act (FOIA) request number (GSA-2022-000763), submitted on March 18, 2022, in which you requested the following:

“A copy of the GSA FOIA Desktop Manual, which describes (or described) how to process FOIA requests. I understand that this document was prepared in 2017 or 2018. If this document is not current or is considered "obsolete", I would still like to get a copy of the document.”

Enclosed please find the documents responsive to your request.

This completes our action on this request. Should you have any questions, please contact me at (202) 219-3078 or by email at [travis.lewis@gsa.gov](mailto:travis.lewis@gsa.gov). You may also contact the GSA FOIA Public Liaison, Seth Greenfeld at (202) 501-4560 or by email at [seth.greenfeld@gsa.gov](mailto:seth.greenfeld@gsa.gov) for any additional assistance and to discuss any aspect of your FOIA request.

Sincerely,

*Travis Lewis*

Travis Lewis  
FOIA Program Manager  
Office of the General Counsel  
General Services Administration

Enclosure



Freedom  
OF  
Information  
— ACT —

A large graphic featuring the text "Freedom OF Information ACT" in a dark blue, serif font. The text is overlaid on a background of a red brick path leading into the distance. The word "OF" is smaller and positioned between "Freedom" and "Information". The word "ACT" is underlined with two parallel lines.

**U.S. General Services Administration**

**Desktop FOIA Manual**

**Updated October 2015**

**This manual has been prepared to provide assistance and guidance for the GSA FOIA process. This manual is not a substitute for legal advice and any legal related questions should be directed to the Office of General Counsel (OGC).**

**This manual accompanies and is not a substitution the GSA FOIA Regulations. GSA's FOIA regulations 41 CFR 105-60 are posted at:**  
<http://cfr.regstoday.com/41cfr105-60.aspx>.

**Also, The United States Department of Justice Guide to the Freedom of Information Act is available online at: <http://www.justice.gov/oip/foia-guide.html>.**

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## **BACKGROUND**

The Freedom of Information Act (FOIA) grants the public access to information possessed by government agencies. (5 U.S.C. § 552, As Amended By Public Law No. 110-175, 121 Stat. 2524, and Public Law No. 111-83, § 564, 123 Stat. 2142, 2184). Upon written request, U.S. government agencies are required to release information unless the information falls under one of nine exemptions listed in the Act. All Executive Branch departments, agencies and offices, federal regulatory agencies and federal corporations are subject to the Freedom of Information Act. However, the FOIA does not apply to Congress, federal courts and the parts of the Executive Office of the President that serve only to advise and assist the President. The FOIA is enforceable in a court of law.

In FY 2013, the FOIA Program at the General Services Administration (GSA) was consolidated and centralized in order to ensure additional oversight and control over the FOIA process, including further tracking and electronic management of each FOIA response; ensuring compliance with statutory time limits; increasing the quality and consistency of agency response letters; as well as improving coordination with different offices throughout GSA. This shift towards a centralized FOIA process fundamentally changed previously existing roles and responsibilities of the GSA FOIA Program, as well as all the Services/Staff Offices and Regional Offices.

The purpose of this desk guide and the accompanying GSA FOIA Service Level Expectations is to ensure greater understanding of the required processes, explain the procedures, duties, responsibilities and associated actions to effectively and efficiently execute FOIA requests between the OAS, FOIA Requester Service Center and its GSA counterparts within the statutory time limits set forth by the Department of Justice (DOJ).

## History of the Freedom of Information Act (FOIA)

The Freedom of Information Act (FOIA) establishes the right of public access to General Services Administration (GSA) records. Upon receipt of a request for GSA records, those records must be disclosed unless they are protected by at least one of the nine categories of exempt information contained in the FOIA. Both the FOIA and GSA regulations contain rules and procedures that must be followed.

The Freedom of Information Act established that records of the Executive Branch of the United States Government are accessible to the people. This was not always the policy regarding federal information disclosure. Before the FOIA was enacted in 1966, the burden was on the individual to establish a right to examine Government records.

With the passage of the FOIA, the burden of proof shifted from the individual to the government. Those seeking information are no longer required to show a need for information. Instead, the “need to know” standard has now been replaced by a “right to know” standard. The government now has to justify the withholding of requested records.

The FOIA sets standards for determining which records must be made available for public inspection and which records can be withheld from disclosure. The law also provides administrative and judicial remedies for those denied access to records. Above all, the statute requires federal agencies to provide the fullest possible disclosure of information to the public.

### Who Can Submit a FOIA Request?

Any person can make a request for GSA records – individuals, foreign citizens, partnerships, corporations, associations and foreign, state or local governments, universities, federal or state penitentiary inmates and not for profit organizations. Federal agencies and fugitives are prohibited from making a FOIA request. Federal employees who wish to submit a FOIA must do so as a private citizen representing themselves and not in their capacities as a federal employee. Federal Agencies cannot legally submit a FOIA request to another Federal Agency.

Requesters are treated equally under the FOIA; however, distinctions are made between requesters in order to identify their user category. User categories become a factor when determining the fees associated with processing requests.

### FOIA Requests

The FOIA process is initiated by the Requester when he or she makes a request to the agency. The FOIA Requester Service Center is the office that oversees FOIA requests for all of GSA. All requests should be submitted to this office via FOIAonline (<https://foiaonline.regulations.gov/>). If it is not possible for a requester to submit an electronic request, it can be sent by U.S. Postal Service



to Freedom of Information Requester Service Center Act Officer (H1C), U.S. General Services Administration, 1800 F St. NW, Room 7308, Washington, DC 20405.

For a request to be processed by the FOIA Requester Service Center it must meet the following conditions:

- (1) The request must be provided in writing. Requests may be submitted via FOIAonline at <https://foiaonline.regulations.gov> or via email at ([gsa.foia@gsa.gov](mailto:gsa.foia@gsa.gov)), and/or via fax at (202) 501-2727.
- (2) The requester must provide in writing the following items of contact information:  
Full name with surname (Mr., Ms., Mrs., Dr., etc.)  
Complete mailing address,  
personal/business email address,  
phone number.
- (3) The request must be for existing GSA “agency records” that can be located in agency files, including archived and non-destruction schedule records stored at National Archives and Records Administration) NARA.

“Agency records” are those created or received in the course of conducting agency business, including paper, electronic or other physical forms. They include reports, letters, photographs, recordings, emails, etc. A record must exist and be in the possession and control of the agency before it is considered for release.

The following are not considered agency records:

- (A) Objects (furniture, wall paintings, etc)
- (B) Non-tangibles (an individual’s memory or oral communications)
- (C) Personal records of an individual that are:
  - i. Maintained for the convenience of the employee, and
  - ii. Not subject to record retention and disposal rules
- (D) Private material brought into agency for employee’s reference
- (E) Notes created by supervisors and other employees provided they are:

- i. Not filed with official records; and
  - ii. Not shared with other employees; and
  - iii. Not required by law, regulation, or custom to be created
  - iv. Not used in the decision making process.
- (4) Describe the records being requested in sufficient detail to help an employee clearly identify the correct records. The description should include, at the very least, the subject matter, date or timeframe, and if known, the component of GSA housing the records.
- (5) State which format is preferred to receive the response. All records provided to the requester will be in electronic format, unless stated otherwise. If the file containing the responsive records is too large to transmit through email, the information will be provided on a compact disk or USB flash drive and mailed to the requester.
- (6) Include information that will enable the FOIA Requester Service Center to determine the user category for fee related purposes (i.e. brief background on who is requesting the records, what the intent is with the records).
- (7) Include a firm agreement from the requester to pay fees for search, duplication or review, as appropriate. The requester may submit a request for a waiver or reduction of fees, along with justification of how such a waiver request meets the criteria for a waiver or reduction of fees found in the statute at 5 U.S.C. §552(a)(4)(A)(iii). Once the fees are agreed upon, they must be paid in full before the responsive records will be released to the requester.

According to 5. U.S.C. FOIA Code FOIA does not require Federal Agencies to:

- (1) Answer questions or interrogatories posed as FOIA requests;
- (2) Issue opinions;
- (3) Analyze and/or interpret documents for a requester;
- (4) Create records;
- (5) Conduct research;
- (6) Initiate investigations; or

- (7) Provide statutes, regulations, publications or other documents that are otherwise made available to the public.

## **Understanding the Process**

### Roles and Responsibilities

#### **FOIA Requester Service Center**

*\*Please reference GSA FOIA Service Level Expectations documents for specific Roles and Responsibilities and timeframes.*

The FOIA Requester Service Center is responsible for managing requests from the time the request is received until the time a response is provided to the requester.

Upon receiving a request, the FOIA Requester Service Center determines whether the information resides within GSA or another agency. If GSA is not the owner of the information, then the FOIA Requester Service Center enters the request into FOIAonline and sends a referral to the Agency which owns the documents. The FOIA Requester Service Center then sends a letter to the requester indicating that this action has been taken.

If GSA has the information, then the FOIA Requester Service Center enters the request into the FOIAonline system and uploads a copy of the original request. The FOIA Requester Service Center then sends an acknowledgment letter to the requester informing them of this action.

The FOIA Requester Service Center will then determine which business line is most likely responsible for the records being requested. After determining the appropriate business line, they will work with the business line to determine a Subject Matter Expert (SME) who is highly familiar with the subject matter of the request. The FOIA Requester Service Center will work in coordination with the Subject Matter Expert to determine the scope, timeframes, and fees involved with completing the request.

After assigning the request, the FOIA Requester Service Center monitors the request to ensure it is moving efficiently through the process. To accomplish this, the FOIA Requester Service Center provides assistance to the information gatherers/subject matter experts. The FOIA Requester Service Center maintains communication with the requester regarding status updates, clarifications, due dates, and extensions. The FOIA Requester Service Center is also responsible for fee waiver requests, expedited processing requests, and approving final fees presented to requesters.

Finally, once the package is ready for the FOIA Requester Service Center to review, the SME should close the task assigned through FOIAonline or email to their Central Office FOIA point of contact. The FOIA Requester Service Center then reviews the proposed final package to make sure it is appropriate, responsive and complete. This process includes: reviewing the documents to make sure all redactions are properly noted in the letter, reviewing the letter to make sure it explains what is included in the mailing, what is being withheld, and why we are withholding those items. The FOIA Requester Center also reviews the letter for grammatical errors, misspellings and to make sure the response is standardized. The FOIA Requester Service Center also reviews the package to ensure that all appropriate concurrences have occurred before release and obtain signatures on all final FOIA packages (including those with redactions). Proper concurrences include appropriate Business Line Supervisors, as well as Office of General Counsel approval. For FOIA request responses that contain specialty information regarding people or finances, the response package must be reviewed by those source offices (i.e. Office of Human Resources and/or the Office of the Chief Financial Officer) prior to Office of General Counsel concurrence. For example Bonuses, travel expenses, etc. must be concurred on by OCFO).

Finally, once the package is ready, the FOIA Requester Service Center releases the material to the requester via FOIAonline or US postal mail.

### **Subject Matter Experts (SME)**

The SME is primarily responsible for searching and compiling records, making proposed redactions, and explaining why the redactions were made. The SME typically works within a regional office or central office business line. He or she will be responsible for the "hands-on" work involved in gathering information and creating a response. The SME is responsible for searching, examining, proposing redactions, and drafting responses to requests that fall under their area of expertise, as well as drafting the response letter to the requester for submission to the FOIA Requester Center. The FOIA Requester Service Center provides the SME with leadership, guidance, instruction and assistance on all aspects of preparing the FOIA request response package. Response letter templates are provided and guidance and training is provided on required actions such as redactions of withheld information.

As is necessary, the SME works with the FOIA Requester Center and the FOIA requester to coordinate and submit for approval from the FOIA Requester Service Center the following: any necessary clarifications of the request, timeframes for completing requests, extension requests, and any applicable costs (if applicable). Additionally, the SME also works directly with the subcontractors to negotiate the redactions of their documents if necessary.

## **HSSO's and Regional Administrators/Regional Commissioners (RA/RC)**

All senior executives continue to be responsible for ensuring timely and accurate gathering of all responsive FOIA materials and for maintaining oversight of FOIAs assigned to their respective business lines and/or regional offices.

HSSOs and RA/RCs will receive FOIA notices with upcoming due dates, as well as continuing to receive weekly overdue reports to ensure that they are fully aware of all late items within their respective business lines/offices.

Responsibilities include ensuring that the following occur in a complete and timely fashion:

- (1) Notifying the FOIA Requester Service Center if a request comes directly to a business line or regional office. This will allow the FOIA Requester Service Center to open the request in FOIAonline and initiate the process.
- (2) Working in coordination with FOIA Requester Service Center to assign a Subject Matter Expert (SME) to gather the documents responsive to the request.
- (3) Obtaining the concurrence of the Office of the General Counsel staff assigned to the organization on all proposed redactions.
- (4) Verifying that the final responsive documents are complete and without errors. It is critical that an HSSO or RA/RC, are aware of proposed responses as well as the status of the response.
- (5) Ensuring that the internal deadlines for preparing the proposed FOIA response package are met.
- (6) Uploading the responsive documents into FOIAonline (both Redacted and Unreacted Versions). This step must occur at least two (3) days prior to the FOIA due date; five (5) days prior to the due date if it is a Press FOIA.

## **PROCESSING INITIAL FOIA REQUESTS**

### Acknowledgement and Tracking

Upon receipt of a request not directly entered by the requester into FOIAonline (i.e. email, fax, US mail, etc.) the FOIA Requester Service Center will immediately upload the request into the FOIAonline system (see Appendix section titled "Getting Started") under the "Attached

Supporting Files” tab. Once the request is entered, the system will generate a tracking number which will allow for easy identification of each request. The system will generate an estimated date for when the response is required to be completed.

The FOIA Requester Service Center determines whether the information requested resides with GSA or with another agency. After this initial determination that the request belongs with GSA and not another agency, an acknowledgment letter will be sent to the requester by the FOIA Requester Service Center within 48 hours of receiving the request. The acknowledgement will provide the tracking number for the request and contact information for his or her FOIA Requester Service Center point of contact for any questions that may arise throughout the process.

Throughout each step of the process, the FOIA Requester Service Center is responsible for noting important information by using either a step note or informational copy. An information copy, or task allows one person to send the information to one or multiple persons through the FOIAonline system. However, the Subject Matter Expert also has this primary responsibility for the documents they have custody of and the documents that will be contained in the FOIA response package. Having all the steps and documents related to a request within one system allows all aspects of the process to be tracked, documented and provides accountability and reference in case of during a an appeal or litigation.

Uploaded documents should appear in the case file tab of FOIAonline. Documents that must be included under the **CASE FILE** tab within FOIAonline are:

- (1) Incoming Request (only if submitted by written letter or email)
- (2) Any and all relevant correspondence between the requester, FOIA Requester Service Center, SME, legal, submitter, subcontractor, etc. (restricted material tab)
- (3) All concurrences of information
- (4) Fee Sheet
- (5) Original and redacted documents
- (6) Draft response letter
- (7) Final response letter

Once the information has been uploaded into FOIAonline, the SME must close out the assigned task. Once the task is closed by the SME the FOIA Requester Service Center will receive a notification from the FOIAonline system. Once the FOIA Requester Service Center has reviewed the response and deemed the request as complete and final, the FOIA Requester Service Center will upload the final signed letter and attach the responsive documents in the Case File tab in

FOIAonline and provide formal response to the requester. Lastly, the FOIA Requester Service Center must ensure collection of any remaining fees or payments and then close out the response in the FOIAonline system.

## **Timeframe**

Once a completed, accurate and final perfected request is received, it can begin to be processed by the GSA FOIA Requester Service Center. FOIA regulations state that GSA has 20 business days to issue a response to the requester, excluding Saturdays, Sundays, and legal holidays. This time period generally begins when the request is received by the FOIA Requester Service Center. If a request was misdirected, the receiving office of the request should inform the FOIA Requester Service Center and if known provide the appropriate office the request should be routed to along with a contact person. If GSA takes more than ten days to route the request to the appropriate office, the twenty-day time period begins to run at that point, even if the appropriate office has not yet received the request. An agency is not required to send the releasable documents to the requester by the last business day; but it is required to reach out to the FOIA requester to notify and inform of GSA's decision and then send the requester the documents within a reasonable time and or negotiated timeframe based on scope and level of effort to prepare the FOIA request response.

## **10 Day Extension**

Under FOIA, GSA may extend the twenty-day response time for an additional one -time only ten business day extension when "unusual circumstances" exist, including the following situations:

- (1) The employee processing the response needs to search and collect records from field offices;
- (2) The request requires the examination of a large amount of records;
- (3) There is a need to consult others that have a substantial interest in the request, including other components of GSA, other agencies, or the submitter of the records being examined.

The business line responsible for handling the request should review the subject matter of the request and determine if more than 20 business days will be needed to issue a response. If so, the business line needs to contact the FOIA Requester Service Center as soon as possible to get approval for the extension. The FOIA Requester Service Center is the only office within GSA that can approve or deny FOIA extensions and sign off on the responses.

An approved extension allows GSA to have a total of 30 business days to complete a response. If upon initial review of the request, it is determined that more than 30 business days will be needed to complete the request in full, the requester must be notified and given the opportunity to

narrow the scope of the request or to negotiate a new timeframe for completion. Any negotiated timeframes must be handled by the FOIA Requester Service Center, made in writing and documented within the FOIAonline system.

### Fees and Payments

The Freedom of Information Act provides for the charging of fees “applicable to the processing of requests.” The FOIA Requester Service Center and the Subject Matter Expert are responsible for working together to determine the fee associated with each request. The FOIA Requester Service Center will notify the requester of the fees due. A Fee Sheet must be provided to the requester; in addition, the fees must be paid in full before the records can be released for FOIA requests over \$250. Until an agreement for fees due is made, the twenty business timeframe to complete the request does not start.

Fees **can** be charged for the following items:

- (1) Time spent in locating records that come within the scope of the request;
- (2) Direct costs of computer time required to locate or retrieve information;
- (3) Time spent by an agency searcher to travel to a record storage facility, or to order records from such a facility;
- (4) Time spent in examining a requested record to determine whether it should be withheld in whole or in part; and
- (5) Time spent in deleting exempt material withheld from records otherwise releasable.

Fees **cannot** be charged for the following items:

- (1) Internal GSA-OGC or GSA Management and review and concurrence.
- (2) Copies or replication of documents made exclusively for internal for GSA staff to review and redact.
- (3) Scanning or digitizing of documents for the purpose of internal review.

For purposes of fee assessment only; the FOIA categorizes requesters into three categories, which are described below. Fees charged are based on the category under which the requester



falls. The FOIA Requester Service Center and the Subject Matter Expert work together to determine the requester's user category. Once this is determined and the Subject Matter Expert has determined the appropriate cost, the FOIA Requester Service Center notifies the requester of fees due. The fee rates are set per GSA FOIA Regulations 41 CFR 105-60. The FOIA Requester Service Center must ensure that the fees are paid in full before the records are released for all FOIA requests over \$250. In the case of Media requesters, if there is a question, the FOIA Requester Service Center should perform research and work with the Office of the General Counsel to determine the appropriate requester's user category.

The FOIA provides for three categories of requesters:

(1) Commercial use requesters

Commercial-use requesters are defined as those who seek records for "a use or purpose that furthers the commercial trade, or profit interests of the requester or the person on whose behalf the request is being made which can include furthering those interests through litigation. Commercial Users may be charged fees for searching for records, "processing" the records (i.e., reviewing them to determine the application of FOIA exemptions and making redactions), and duplicating them to respond to a request.

(2) Educational institutions, non-commercial scientific institutions, and representatives of the news media

This category consists of requesters who seek records for a noncommercial use and who qualify as one of three distinct subcategories of requesters: those who are affiliated with an educational institution, those who are part of a noncommercial scientific institution, and those who are representatives of the news media. Educational, noncommercial scientific institutions, and representatives of the news media are charged only for duplication fees, and are provided the first one hundred requested pages free of charge.

(3) All requesters who do not fall within either of the preceding two categories

All other requesters are charged only for record searches and duplication. For non-commercial-use requesters there is no charge for the first two hours of search time or for the first 100 pages of duplication. GSA currently charges ten cents per page for duplication. It charges an hourly search fee of \$13 for clerical staff and \$29 for professional staff.

In all cases, if the final total fee due does not exceed \$25, GSA will not charge any fee. In other cases, GSA may waive or reduce fees for FOIA requests if the requester explains:

- (1) How the subject matter of the requested records directly and clearly concerns identifiable operations of the Federal Government;
- (2) How disclosure will contribute significantly to public understanding of the operations or activities of the Government or agency;
- (3) How the materials are FOIAonline and do not duplicate materials already in the public domain; and
- (4) What the impact on the commercial interests of the requester will be, if any.

Requests for waivers must be included in the initial request for access to records and must provide sufficient information to enable GSA to evaluate the request.

If the total fees due are over \$250, the processing of the request will stop until the requester pays the fees. If the fees due are under \$250, GSA must receive an assurance of payment by the requester to process the request. Once the materials are ready for response, the GSA FOIA Requester Service Center must receive payment prior to releasing the response to the requester.

## **SEARCHING FOR AND COMPILING RECORDS**

### Conducting an Adequate Search

The Subject Matter Expert (SME) is required to make reasonable efforts to locate records responsive to a FOIA request, including page-by-page or line-by-line identification of material within records. All files likely to contain responsive records must be searched, including electronic records such as hard drives, disks, and databases. However, no one is required to create records for the purpose of satisfying the FOIA request.

If a request is seeking contractual information, the SME should use the following resources:

- Federal Procurement Data System (FPDS) [www.fpds.gov/](http://www.fpds.gov/)
- [www.usaspending.gov/](http://www.usaspending.gov/)
- FedBizOpps ([www.fedbizopps.gov/](http://www.fedbizopps.gov/))
- Schedules e-Library (within GSA Advantage) <http://www.gsaelibrary.gsa.gov/>

If a request contains language asking for records “up to the present”, records that are dated on the day the search begins are considered to be the most recent records.

### Providing Records in the Format Requested

In accordance with Federal Government Records Management Regulations, GSA, like all federal agencies, must make reasonable efforts to maintain records in forms or formats that are reproducible for purposes of the FOIA. The SME must provide the FOIA Requester Service Center

the records in the format requested (e.g., CD-ROM, Excel, Portable Document File (PDF), ZIP file, flash drive, etc.) if they are reproducible in that format. If the requester did not specify a preferred format, records will be provided electronically in a form commonly used by the general public. (e.g., CD-ROM, Excel, Portable Document File (PDF), ZIP file, flash drive, etc.)

In most instances, records provided in an electronic format will be a PDF. If the information requested requires the information to be provided in Excel, the cells of the spreadsheet must be locked. In addition, if the spreadsheet contains any Personally Identifiable Information (PII), it must be fully redacted per applicable FOIA Exemptions.

### Searching for Electronic Records

Electronic records such as information and data stored on hard drives, disks and agency servers along with email records are subject to the FOIA.

For particularly large or voluminous system and server data requests, there is no mandatory requirement to write or create any new data in order to respond to a FOIA request. However, if extracting the requested information requires only a modification of existing programming, and the effort spent in making the modification is minimal, then the SME should do what is needed to do to retrieve the responsive records. Otherwise, if retrieval of the information requested would require reprogramming /or new programming or unreasonable additional expenses, the SME is not required to proceed. An assessment of reasonableness should be applied on a case-by-case basis.

### *Request for Email Retrievals*

In the event that a FOIA request requires pulling e-mail files, all such requests for email records need to be performed by the Office of the Chief Information Officer (OCIO) staff. These requests must first be submitted from the GSA FOIA Director to the Chief FOIA Officer /or his or her designee for approval. The Chief FOIA Officer /or his or her designee is the only official that can authorize the email retrievals. The Chief FOIA Officer will contact the Chief Information Officer or his or her designee to retrieve the raw data.

The request submitted to the Chief FOIA Officer must include the parameters for the search, including: keywords, mailboxes to be searched (i.e. emails sent or received by), and appropriate and specified date ranges.

Once the data pull is completed by the OCIO, the raw data results will be sent to the lead GSA SME to review and redact (if necessary) the emails. After reviewing and redacting (if necessary) the emails, the SME will submitting their proposed redactions to the GSA FOIA Requester Service Center for final review. The GSA FOIA Requester Service Center will seek concurrence on the final release from the Office of General Counsel prior to releasing the responsive records to the requester (if any).

The following is an example of an Email Pull Request:

[GSA-2015-000533](#) -

**REQUEST DESCRIPTION:**

- 1. Any accounting showing the name and salary of every person currently employed by a former president under the Former Presidents Act at 3 U.S.C. § 102(b).
- 2. Purchase contracts or lease documents for all office space provided to former presidents under the Former Presidents Act at 3 U.S.C. §102(c).
- 3. An accounting of all disbursements for security and travel for former presidents under the Former Presidents Act at 3 U.S.C. § 102(g) since January 20, 2001.

**KEYWORD(S):**

- "Former Presidents Act" and
- "Leases" and "Security" and "Travel" and "Office Space"

**TIMEFRAME:** January 1, 1999 - June 1, 2015

**MAILBOXES:** All [gsa.gov](#) accounts

Redactions and Exemptions

GSA's policy is to provide maximum allowable disclosure of agency records upon request by any individual.

The FOIA requires that virtually every record in the possession of a federal agency be made available to the public, unless the record or any portion of it is exempt from disclosure. The nine exemptions of FOIA provide the only basis for withholding information. Records that meet the exemption criteria may be withheld from public disclosure, and thus not be provided in response to a FOIA request.

Here's a "quick list" of the nine FOIA exemptions (for official verbiage please visit DOJ Office of Information Policy at <http://www.justice.gov/oip/doj-guide-freedom-information-act>):

Exemption 1: Protects from disclosure information that has been deemed classified "under criteria established by an Executive order to be kept secret in the interest of national defense or foreign policy" and is "in fact properly classified pursuant to such Executive order." The current Executive order that addresses classified National Security Information is EO 13526.

- Exemption 2:** Protects records that are “related solely to the internal personnel rules and practices of an agency.” Examples of these may be rules as to personnel’s use of parking facilities or regulation of lunch hours, statements of policy as to sick leave, and the like.
- Exemption 3:** Information that is prohibited from disclosure by another federal law. Allows the withholding of information prohibited from disclosure by another federal statute provided that one of two disjunctive requirements were met: the statute either "(A) requires that the matters be withheld from the public in such a manner as to leave no discretion on the issue, or (B) establishes particular criteria for withholding or refers to particular types of matters to be withheld.
- Exemption 4:** **Protects commercial or financial information obtained from a person that is privileged or confidential.**
- Exemption 5:** **Protects “inter-agency or intra-agency memorandums or letters which would not be available by law to a party other than an agency in litigation with the agency.”**
- Exemption 6:** **Protects information in "personnel and medical files and similar files the disclosure of which would constitute a clearly unwarranted invasion of personal privacy."**
- Exemption 7:** **Protects information compiled for law enforcement purposes, that release of which:**
- A) Could reasonably be expected to interfere with law enforcement proceedings,
  - B) Would deprive a person of a right to a fair trial or an impartial adjudication,
  - C) Could reasonably be expected to constitute an unwarranted invasion of personal privacy,**
  - D) Could reasonably be expected to disclose the identity of a confidential source,
  - E) Would disclose techniques, procedures, or guidelines for investigations or prosecutions, or
  - F) Could reasonably be expected to endanger an individual’s life or physical safety.**

Exemption 8: Protects matters contained in or related to examination, operating, or condition reports prepared by or for regulators or supervisors of financial institutions.

Exemption 9: Protects geological information and data, including maps, concerning wells.

\*Bolded text represents most commonly used exemptions at GSA.

### The “Reasonably Segregable” Requirement

If a record contains both disclosable and protected information, any disclosable portion of that record that is “reasonably segregable” from the rest of the record must be released to the requester. Courts look closely at an agency’s decision process regarding what portions, if any, of a record is released. However, if disclosable material is so intertwined with exempt material that disclosure would leave only meaningless words and phrases, or if editing out the protected portions would be so extensive as to effectively result in the creation of a new record, the entire record can be withheld.

### Redacting the Records

The word “redact” is often used in the FOIA business to refer to removing some information from a document because that information cannot be disclosed. GSA uses electronic software applications for redacting documents. The official software application used by GSA is Adobe Acrobat Professional. Hand redactions are obsolete. Adobe Acrobat Professional will be used to make proposed redactions. The SME must save the proposed redactions for review without applying the final redactions. The original documents should never be redacted. Both the copy with proposed redactions and a copy of the original record must be saved and uploaded into FOIAonline under the “Case File” Tab.

### **Tips for Redacting records:**

Ensure that you have GSA IT Service approved redaction software. (i.e. Adobe Professional or Nuance). The GSA IT Service Center can assist you with procurement of these applications and general settings.

(1) Indicate which exemption(s) was used and why.

Cite in the draft response letter why the exemption(s) was used and specifically what type of information was redacted (e.g., personal phone numbers, proprietary business information, or security-related information (See Appendix for listing of commonly redacted examples). This allows the requester to correlate the FOIA exemptions with the words or lines that have been deleted.

(2) Indicate the amount withheld.

When a record is redacted, the requester must be able to see how much of the information was redacted. For example, rather than send only the disclosable material to the requester, send the record with the redacted material marked out, unless the result is material withheld in its entirety. This way, the requester can see where material existed that was marked out so as to not be viewable by the public. In addition, the type of information redacted must be described in the letter to the requester in order to help him or her understand what information is not being provided to them.

(3) Indicate amount withheld in its entirety.

When an entire record is withheld, the draft response letter must inform the requester approximately how much has been denied. The estimate will usually take the form of number of pages or electronic file size; or for extremely large-volume requests, the estimate can be in terms of boxes, file drawers, or even linear feet. For withheld electronic records, use kilobytes, megabytes, an electronic “word count” or a conventional record equivalent (standard document pages), whichever would be most effective in communicating the volume withheld. (See appendix for examples.)

### FOIA Record Referrals

When GSA locates records which originated with another agency, the records will be referred to the originating agency for processing and direct response to the requester. The following steps are taken when making a referral of documents to another agency or component of an agency, subject to the exceptions described below regarding coordinating a response:

- The Subject Matter Expert should work with the FOIA Requester Service Center to identify records appropriate for referral to other agencies or components as soon as practicable during the course of processing a request.
- If applicable, prior to making the referral, the Subject Matter Expert should review the records for any records GSA may have and send the material to the FOIA Requester Service Center. The FOIA Requester Service Center will include GSA’s disclosure recommendations in the referral memorandum and will facilitate the processing of the referral by the

receiving agency.

- The FOIA Requester Service Center will send the documents, with the accompanying memorandum containing GSA's disclosure recommendations, to the originating agency or agencies as soon as practicable during the course of processing.
- The FOIA Requester Service Center will include in the referral package the FOIA request number assigned by GSA. The original FOIA request number should always accompany any communication concerning the referred documents. Also include a copy of the FOIA original request.
- The FOIA Requester Service Center will provide the original request date of the referred FOIA request. This will allow the agency receiving the referral to place the records in any queue according to that request receipt date.
- The FOIA Requester Service Center will advise the FOIA requester that a referral of records has been made, provide the name of the agency to which the referral was directed, and include that agency's FOIA contact information.
- The FOIA Requester Service Center will maintain a copy of the records being referred and the cover memorandum accompanying the referral and upload it into FOIAonline.

These steps serve several overlapping purposes:

- Makes the referral process transparent;
- Maximizes administrative efficiency; and
- Facilitates tracking of the referred documents.

To assist the requesters/agencies readily match the documents released as a result of their original request, the FOIA Requester Service Center will:

- Identify the agencies to which referrals) were directed;
- Maintain a copy of the original GSA FOIA request number; and
- Store all records in the FOIAonline system.

### Interagency FOIA Consultations

Interagency FOIA Consultations are used when GSA locates a record that contains information of likely interest to another agency. GSA will ask for the views of that other agency on the disclosure



of the records before any final determination about releasing the documents to the requester is made.

Also, consultations are especially useful in informing an agency of any sensitivity of records originating with entities not subject to the FOIA. A formal consultation notice from GSA that the agency is consulting with a record's originator whenever this process delays an agency's FOIA response.

### Considering Submitter (Vendor/Contractor) Rights

[Executive Order 12600](#) sets forth, "Predisclosure Notification Procedures for Confidential Commercial Information" and lays out procedures for notifying those who submit business information to the federal government when that information becomes the subject of a FOIA request. Such businesses are referred to in the Executive Order as "submitters".

The Executive order is based upon the principle that submitters or those people who are seeking to do business with the government (vendor/contractors) are entitled to such notification and an opportunity to object to disclosure before an agency makes a disclosure determination.

Upon receipt of a FOIA request that seeks business information provided to GSA, the official to whom the FOIA request has been assigned must promptly notify the submitter if:

- (1) The records are less than 10 years old and the information has been designated by the submitter as confidential commercial information; or
- (2) GSA has reason to believe that disclosure of the information could reasonably be expected to cause substantial competitive harm.

The notification letter to the submitter shall explain that the submitter must include the following in its response to GSA:

- (1) Specifically identify the records or portions of records that would be harmful to the submitter if released;
- (2) Specify why disclosure would cause the submitter substantial competitive harm; e.g. how a competitor could use the information to the submitter's commercial disadvantage; and
- (3) Describe the methods the submitter uses to protect or maintain the confidentiality of this information within the business. The submitter must be given seven (7) working days from the date of the letter to respond.

These Submitter (Vendor/Contractor) notice requirements do not apply if GSA

determines that the information should not be disclosed, the information has been lawfully published or otherwise made available to the public, or disclosure of the information is required by law.

At the same time that notice is provided to the submitter, the SME should notify the FOIA Requester Service Center of this action. The FOIA Requester Service Center will notify the FOIA requester in writing of the following:

- (1) That notice has been given to the submitter; and
- (2) That additional time may be required to process the request. The SME will discuss with the FOIA Requester Service Office whether an extension is necessary and the FOIA Requester Service Center Office will negotiate with the requester for an extension if necessary.

There is no need to notify the submitter when:

- (1) GSA determines the information should not be disclosed;
- (2) The information is already public;
- (3) A law other than FOIA requires disclosure;
- (4) A GSA regulation meeting specified requirements requires release;
- (5) The submitter did not designate the material as confidential and GSA agrees; or
- (6) The designation as confidential seems frivolous (although there is a disclosure notification requirement).

If GSA decides to disclose any part of the information that the submitter has asked the agency to withhold, the FOIA office must:

- (1) Notify the submitter by telephone; and
- (2) Follow up contact with a formal letter with the following information:
  - (A) Reasons for release;
  - (B) Copy of released documents; and
  - (C) Notification that release will not occur for at least five (5) working days.

## WRITING A RESPONSE<sup>1</sup>

In any situation, standard language to be stated in the response letter should include:

*Date*

*Requester's address*

*Dear Mr./Mrs./Ms. [Requester's Last name]:*

*This is in response to your U.S. General Services Administration (GSA) Freedom of Information Act (FOIA) request (2015-XXXXXX), submitted on (e.g. January 1, 2015,) in which you requested the following:*

*“(insert language from initial request).”*

In most cases, after researching a FOIA request, the response to be provided will fall into one of four categories:

(1) Full release of records

If a full grant of access is made, tell the requester that he/she is granted full access to the records located. No appeal rights are given.

*Enclosed please find the documents responsive to your request. These documents include (list/describe the documents to be sent to the requester).*

(2) No records found.

If no records are located, tell the requester that a search was conducted and no responsive records were found. Appeal rights are cited because a no-records response is considered an adverse determination.

Language to include for a no-records response:

*After a thorough search, GSA was not able to locate any records responsive to your request.*

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<sup>1</sup> Example letters are included in the appendix of this manual.

*You have the right to appeal the adequacy of our search. To do so, you must write, within 120 days of your receipt of this letter, to the following address:*

*FOIA Requester Service Center (H1C)  
U.S. General Services Administration  
1800 F St. NW, Room 7308  
Washington, DC 20405*

*Your appeal must be in writing and should contain a brief statement of the reasons why you believe GSA should have the requested information. Enclose a copy of your initial request and a copy of this letter. Both the appeal letter and envelope should be marked prominently, "Freedom of Information Act Appeal."*

(3) Partial release of records

If a partial grant of access is made, tell the requester that access is being granted to part of the responsive records. In addition, advise the requester regarding the types of records withheld and the FOIA exemption(s) claimed for withholding. All exemptions that are applicable must be cited in full so that the administrative record is complete. Appeal rights are given for this type of response. A copy of the redacted record should be provided to the requester.

*In processing your request we withheld the following: (describe what information is being withheld, for example, employee cell phone numbers, the Employer Tax Identification number, or home addresses, etc.. This is done in accordance with (cite exemption number and give reasoning why this exemption applies).*

*You have the right to appeal the partial denial of the information withheld. To do so, you must write, within 120 days of your receipt of this letter, to the following address:*

*Freedom of Information Act Office (H1C)  
U.S. General Services Administration  
1800 F St. NW, Room 7308  
Washington, DC 20405*

*Your appeal must be in writing and contain a brief statement of the reasons why the withheld information should be released. Enclose a copy of your initial request and a copy of this letter. Both the appeal letter and envelope*

*should be marked prominently, "Freedom of Information Act Appeal."*

(4) Full denial of access

When responsive records have been located but none are being disclosed, tell the requester that access to the records is denied in full. All exemptions that are applicable must be cited so that the administrative record is complete. Appeal rights are given and are similar to the paragraph above.

### **CLEARANCE PROCESS**

After a draft response is prepared and uploaded into FOIAonline by the Subject Matter Expert, it should be provided for concurrence to the necessary parties. If the document contains redactions, then the attorney that works specifically with the SME's office or business line should review the redactions and ensure they are proper and approved by OGC. Once the SME has made any changes recommended by OGC and the other parties, the final documents should be provided in FOIAonline under the **Documents** tab. It is critical that the HSSO or RA/RC also be aware of proposed responses for FOIA's relating to their business lines and/or regional offices; however, they will not release FOIA responses.

After the concurrences are finalized, the FOIA Requester Service Center must be notified so that they can review the final documents in FOIAonline. When the FOIA Requester Service Center reviews the response package, they must make sure that the response is complete. In cases where no documents are being provided, the response letter must explain why the documents are not provided. In addition, when information is being withheld, the letter must correctly cite the exemptions being used. It is also the responsibility of the FOIA Requester Service Center to edit the letter for misspellings and grammatical errors. The office is authorized to make minor edits as long as it does not change the substance of the response. The most important responsibility is to verify that the records being provided answer the request and that the exemptions listed in the letter match the exemptions used on the documents.

If it is a press request, the FOIA Requester Service Center should advise the communication director or his/her designee before releasing the final response to the requester.

If another agency is asking for GSA's concurrence on a request they are responding to, the Chief FOIA Officer must be notified of the request.

After a thorough review, the FOIA Requester Service Center Program Manager / FOIA Director will sign the response letter and ensure all necessary documents are in FOIAonline. Once these steps are completed and the applicable required fees are collected, the FOIA Requester Service Center can release the response to the requester and close out the request in FOIAonline.

## **PROCESSING APPEALS**

If GSA withholds records either in whole or in part, that decision may be appealed by the requester in writing to the FOIA Requester Service Center.

The appeal should:

- (1) Contain the basis for disagreement with the initial denial; and
- (2) Be received by the GSA FOIA Requester Service Center within 120 days of the receipt date that the denial letter was received by the requester.

Appeal procedures also apply to the denial of a request for a waiver or reduction of fees; when there has been an adverse determination of the requester's fee category; a finding of no responsive records located; or the denial of a request for expedited processing.

Once the FOIA Requester Service Center receives a legitimate Appeal request, a new FOIAonline entry is opened to manage this appeal, an acknowledgement sent, and the new FOIAonline entry is created by the FOIA Requester Service Center. For the newly created FOIAonline record, it is important that all of the documents created in the original FOIA request (such as correspondence) and the responsive documents sent to the requester are uploaded into FOIAonline. This file should contain such items as:

- (1) The initial FOIA request;
- (2) Any correspondence between the Agency and the requester acknowledging the request, negotiating the scope, fees or time required to respond to the request;
- (3) Copies of any information released;
- (4) Copies of any information withheld;

- (5) Any document discussing the status of the request;
- (6) The initial determination and any interim responses;
- (7) Any index that may have been prepared at the discretion of the responsible official;
- (8) Any notes or memoranda generated as a result of the FOIA request.

### Time limits for Appeals

If the requester chooses to appeal the initial determination, he or she must do so within 120 days from the date of his or her receipt of the final response letter informing the requester that a determination to withhold has been made (or the date of the letter transmitting the last records released, whichever is later). Final determinations on appeals shall be made within 20 business days after receipt.

### Time Extensions for Appeals

If it is not possible to review the case file and respond to an appeal within 20 business days, the requester should be contacted to negotiate an extension of time. In unusual circumstances, GSA can take up to 10 working days to respond to the appeal.

### Preparing the Administrative Appeal Letter

When the GSA FOIA Requester Service Center receives an appeal letter it assigns the appeal to a new GSA office to get a fresh review.

For example, if the original FOIA request was for Federal Acquisition Service (FAS) - Region 7, the appeal may be assigned to Central Office FAS.

The new SME will perform the FOIA review, prepare the findings and response letter, obtain legal review, and forward the proposed response package, through FOIAonline, to the FOIA Requester Service Center. The GSA FOIA Requester Service Center handles the concurrence process of getting the letter approved by appropriate GSA management officials. When the appeal official makes a determination to release all or a portion of records previously withheld in the initial determination, a copy of these records should be forwarded promptly to the requester after the final letter is prepared and sent to the requester, signed by the Chief FOIA Officer.

If the appeal official determines that the appeal is to be denied, either in whole or in part, the written response shall notify the requester of the denial, the reasons for the denial including the FOIA exemptions relied upon, and the name and title of the appeal official. Additionally, the letter must include the following language:

*This is GSA's final determination of your appeal. You have the right to seek judicial review of this determination in the United States District Court in which you reside, where your principal place of business is, where the records are located, or in the District of Columbia.*

*As an alternative to litigation, the Office of Government Information Services (OGIS) has been created under the 2007 FOIA amendments. OGIS was created to offer mediation services to resolve disputes between FOIA requesters and Federal agencies as a nonexclusive alternative to litigation. Using OGIS services does not affect your right to pursue litigation. You may contact OGIS by writing to:*

*Office of Government Information Services  
National Archives and Records Administration  
8601 Adelphi Road, Room 2510  
College Park, MD 20740  
Email: [ogis@nara.gov](mailto:ogis@nara.gov)  
Phone at (877) 684-6448.*



## Appendix

Getting Started: FOIAonline System

### Creating a workflow



**The FOIA Requester Service Center is responsible for creating all workflows.**

To create a workflow the, FOIA Requester Service Center must:



1. Access the FOIAonline through <https://foiaonline.regulations.gov/foia/gsa>.


### Step 1

When you have been assigned a task for a FOIA you will receive a email notification from FOIAonline.

FOIA Assignment for Request Detail Task for Request GSA-2015-000040 Inbox x  

foia@erulemaking.net  
foia@erulemaking.net


foia@erulemaking.net <foia@erulemaking.net> Oct 21 (10 days ago) ☆  

to me 

[Show details](#)

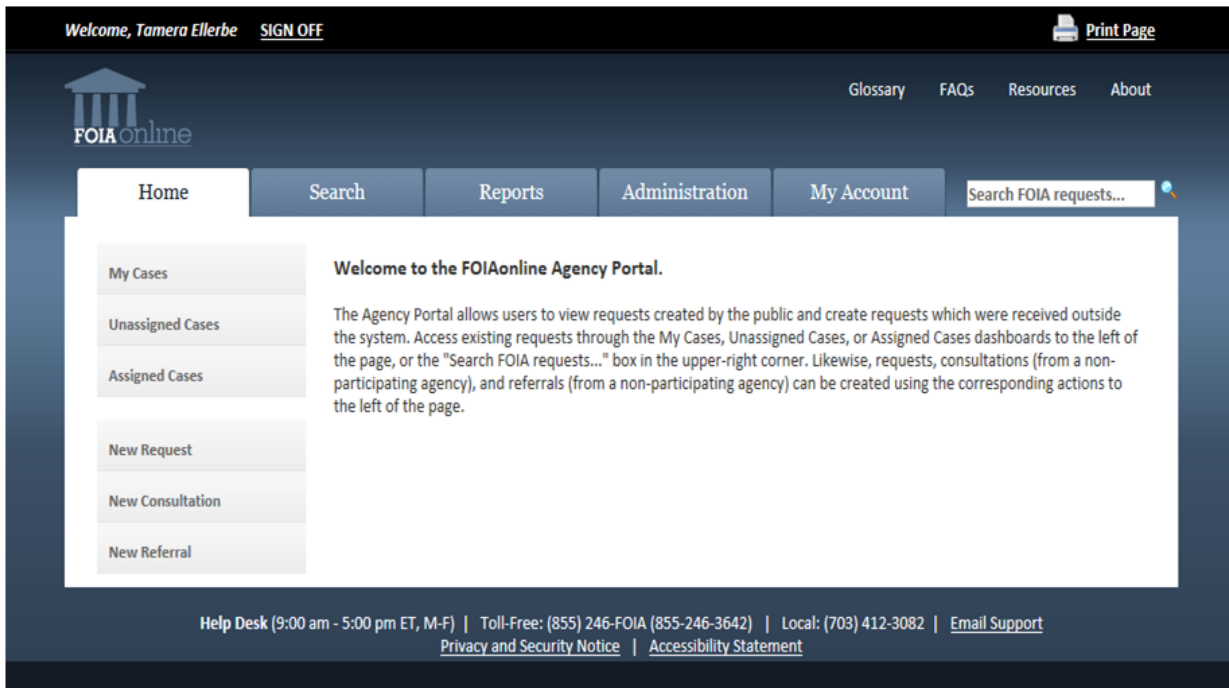
You have been assigned to the FOIA task - Request Detail Task. Additional details for this item are as follows:

- Assigned By: Tamera Ellerbe
- Tracking Number: GSA-2015-000040
- Due Date: 10/29/2014
- Sent Date: 10/21/2014
- Requester: Scott MacFarlane
- Request Track: Complex
- Short Description: Review responsive documents and complete redactions if needed.
- Long Description: N/A


 [Click here to Reply or Forward](#)


## Step 2

Once you have reviewed the task email notification, you will need to login to FOIA online to access the task.



The screenshot displays the FOIAonline Agency Portal homepage. At the top, a dark blue header contains the text "Welcome, Tamara Ellerbe" and a "SIGN OFF" link on the left, and a "Print Page" icon on the right. Below this, a navigation bar includes the FOIAonline logo, a search bar with the placeholder "Search FOIA requests...", and links for "Glossary", "FAQs", "Resources", and "About". A secondary navigation bar features buttons for "Home", "Search", "Reports", "Administration", and "My Account". The main content area is divided into a left sidebar with buttons for "My Cases", "Unassigned Cases", "Assigned Cases", "New Request", "New Consultation", and "New Referral". The central content area has a heading "Welcome to the FOIAonline Agency Portal." followed by a paragraph explaining the portal's functionality. At the bottom, a footer provides contact information for the Help Desk, toll-free and local phone numbers, and links to "Email Support", "Privacy and Security Notice", and "Accessibility Statement".

Welcome, Tamara Ellerbe [SIGN OFF](#)  [Print Page](#)

 [Glossary](#) [FAQs](#) [Resources](#) [About](#)

[Home](#) [Search](#) [Reports](#) [Administration](#) [My Account](#)

[My Cases](#) [Unassigned Cases](#) [Assigned Cases](#) [New Request](#) [New Consultation](#) [New Referral](#)

**Welcome to the FOIAonline Agency Portal.**

The Agency Portal allows users to view requests created by the public and create requests which were received outside the system. Access existing requests through the My Cases, Unassigned Cases, or Assigned Cases dashboards to the left of the page, or the "Search FOIA requests..." box in the upper-right corner. Likewise, requests, consultations (from a non-participating agency), and referrals (from a non-participating agency) can be created using the corresponding actions to the left of the page.

Help Desk (9:00 am - 5:00 pm ET, M-F) | Toll-Free: (855) 246-FOIA (855-246-3642) | Local: (703) 412-3082 | [Email Support](#)  
[Privacy and Security Notice](#) | [Accessibility Statement](#)

### Step 3

Next click the MyCases tab to access assigned tasks. Then select / click the tracking number of task to open the task details

The screenshot shows the FOIA online portal interface. At the top, there is a navigation bar with 'Welcome, Tamera Ellerbe' and 'SIGN OFF' on the left, and 'Print Page' on the right. Below this is a secondary navigation bar with 'Glossary', 'FAQs', 'Resources', and 'About'. The main navigation area includes 'Home', 'Search', 'Reports', 'Administration', and 'My Account'. The 'My Cases' tab is highlighted in yellow, with an arrow pointing to it and the text 'Click on the my cases tab'. Below the navigation, there is a sidebar with options: 'My Cases', 'Unassigned Cases', 'Assigned Cases', 'New Request', 'New Consultation', and 'New Referral'. The main content area is titled 'My Cases' and shows a table of cases. The table has columns: 'Tracking Number', 'Type', 'Track', 'Requester', 'Assigned', 'Due', 'Status', and 'Detail'. Two cases are listed, both with tracking number 'GSA-2015-000040'. The first case is a 'Task' and the second is a 'Request'. Both are assigned to 'Scott MacFarlane'. The first case is due on 10/29/2014 and the second on 11/12/2014. Both have a status of 'Assignment Determination'. An arrow points to the 'Tracking Number' column header with the text 'Select Tracking Number'. Below the table, it says '2 items found, displaying all items.' and 'Export options: CSV | Excel'. At the bottom of the page, there is a footer with contact information: 'Help Desk (9:00 am - 5:00 pm ET, M-F) | Toll-Free: (855) 246-FOIA (855-246-3642) | Local: (703) 412-3082 | Email Support | Privacy and Security Notice | Accessibility Statement'.

Welcome, Tamera Ellerbe [SIGN OFF](#) [Print Page](#)

FOIA online [Glossary](#) [FAQs](#) [Resources](#) [About](#)

Home Search Reports Administration My Account Search FOIA requests...

My Cases Filter All Results 25

2 items found, displaying all items. [1](#)

Tracking Number	Type	Track	Requester	Assigned	Due	Status	Detail
GSA-2015-000040	Task	Complex	Scott MacFarlane	10/21/2014	10/29/2014	Assignment Determination	<a href="#">▶</a>
GSA-2015-000040	Request	Complex	Scott MacFarlane	10/09/2014	11/12/2014	Assignment Determination	<a href="#">▶</a>

2 items found, displaying all items. [1](#)

Export options: [CSV](#) | [Excel](#)

Help Desk (9:00 am - 5:00 pm ET, M-F) | Toll-Free: (855) 246-FOIA (855-246-3642) | Local: (703) 412-3082 | [Email Support](#) | [Privacy and Security Notice](#) | [Accessibility Statement](#)

## Step 4

You are then prompted to the task details page. To review task details click the blue button to expand the details section.

The screenshot shows a web interface for task management. On the left is a sidebar with navigation options: My Cases, Unassigned Cases, Assigned Cases, Task Details (highlighted), Make Assignment, Create Task, Upload Responsive Records, Create Correspondence, Create Comment, Create Consultation, Create Referral, and Close Out Task. The main content area is titled 'Task Details' and shows a progress bar with five stages: Submitted, Evaluation, Assignment (current), Processing, and Closed. Below the progress bar are two expandable sections. The first, 'Request Details', contains fields for Tracking Number (GSA-2015-000040), Requester (Mr. Scott MacFarlane), Organization (Cox Television), Submitted Date (10/07/2014), Perfected Date (10/14/2014), Last Assigned Date (10/09/2014), Requester Has Account (No), and Fee Limit (\$25.00). The second, 'Task Details', shows Task Type (Request Detail) and Assigned To (Tamera Ellerbe). Below these are tabs for Submission Details, Case File, Admin Cost, Assigned Tasks, Comments (0), and Review. The final section, 'Request Handling', lists various request attributes like Requester Info, Available to the Public, Request Track, Fee Category, Fee Waiver Requested, Fee Waiver Status, Request Perfected, Perfected Date, Acknowledgement Sent Date, and Unusual Circumstances. Two blue arrows point to expandable icons in the 'Request Details' and 'Task Details' sections, with text annotations 'Click to expand details' on the right side of the page.

**Task Details** Request Status : *Assignment Determination* Task Due Date : 10/29/2014

Submitted Evaluation **Assignment** Processing Closed

**Request Details**

Tracking Number : GSA-2015-000040 Submitted Date : 10/07/2014  
Requester : Mr. Scott MacFarlane Perfected Date : 10/14/2014  
Organization : Cox Television Last Assigned Date : 10/09/2014  
Requester Has Account : No Fee Limit : \$25.00

**Task Details**

Task Type : Request Detail Assigned To : Tamera Ellerbe (General Services Administration)

Submission Details Case File Admin Cost Assigned Tasks Comments (0) Review

**Request Handling**

Requester Info : Yes Request Perfected : Yes  
Available to the Public : Perfected Date : 10/14/2014  
Request Track : Complex Acknowledgement Sent : 10/07/2014  
Fee Category : Media/Educational Date :  
Fee Waiver Requested : No Unusual Circumstances ? No  
Fee Waiver Status : N/A

Click to expand details

Click to expand details

## Step 5

Task details will provide a brief description of the actions you will need to take to complete the assigned task . (i.e gather responsive documents)

The screenshot displays a web interface for task management. On the left is a vertical sidebar with navigation options: My Cases, Unassigned Cases, Assigned Cases, Task Details (highlighted), Make Assignment, Create Task, Upload Responsive Records, Create Correspondence, Create Comment, Create Consultation, Create Referral, and Close Out Task. The main content area is titled 'Task Details' and shows a progress bar with five stages: Submitted, Evaluation, Assignment (current), Processing, and Closed. Below the progress bar, there are two sections: 'Request Details' and 'Task Details'. The 'Request Details' section includes: Tracking Number: GSA-2015-000040, Submitted Date: 10/07/2014, Requester: Mr. Scott MacFarlane, Perfected Date: 10/14/2014, Organization: Cox Television, Last Assigned Date: 10/09/2014, Requester Has Account: No, and Fee Limit: \$25.00. The 'Task Details' section includes: Task Type: Request Detail, Assigned To: Tamera Ellerbe (General Services Administration), Due Date: 10/29/2014, Last Assigned Date: 10/21/2014, Task Submitted Date: 10/21/2014, Last Assigned By: Tamera Ellerbe (General Services Administration), and Description: Review responsive documents and complete redactions if needed. At the bottom, there are tabs for Submission Details, Case File, Admin Cost, Assigned Tasks, Comments (0), and Review. A 'Request Handling' section is partially visible at the bottom.

**Task Details** Request Status : *Assignment Determination* Task Due Date : 10/29/2014

Submitted Evaluation **Assignment** Processing Closed

**Request Details**

Tracking Number : GSA-2015-000040 Submitted Date : 10/07/2014  
Requester : Mr. Scott MacFarlane Perfected Date : 10/14/2014  
Organization : Cox Television Last Assigned Date : 10/09/2014  
Requester Has Account : No Fee Limit : \$25.00

**Task Details**

Task Type : Request Detail Assigned To : Tamera Ellerbe (General Services Administration)  
Due Date : 10/29/2014 Last Assigned Date : 10/21/2014  
Task Submitted Date : 10/21/2014 Last Assigned By : Tamera Ellerbe (General Services Administration)  
Description : Review responsive documents and complete redactions if needed.  
Comments :

Submission Details Case File Admin Cost Assigned Tasks Comments (0) Review

**Request Handling**

## Step 6

After completing the assigned task, you can upload responsive documents under the Upload Responsive record tab.

Submitted Evaluation Assignment Processing Closed

**Request Details**

Tracking Number : GSA-2015-000040 Submitted Date : 10/07/2014  
Requester : Mr. Scott MacFarlane Perfected Date : 10/14/2014  
Organization : Cox Television Last Assigned Date : 10/09/2014  
Requester Has Account : No Fee Limit : \$25.00

**Task Details**

Task Type : Request Detail Assigned To : Tamera Ellerbe (General Services Administration)  
Due Date : 10/29/2014 Last Assigned Date : 10/21/2014  
Task Submitted Date : 10/21/2014 Last Assigned By : Tamera Ellerbe (General Services Administration)  
Description : Review responsive documents and complete redactions if needed.  
Comments :

**Upload Responsive Records**

*The Release Type can be modified after uploading but must be provided initially. Records should be uploaded in batches with identical release types.*

If you are having problems, or do not see the "Select Files" button, switch to the basic uploader.

**SELECT FILES**

**ADD WITHOUT FILE UPLOAD**

No records have been uploaded.

\* Release Type :

Keywords :

**SAVE CHANGES** **CANCEL**

## Step 7

After selecting the upload responsive tab, click the select files button to begin the uploading process.

Submitted Evaluation Assignment Processing Closed

**Request Details**

Tracking Number : GSA-2015-000040 Submitted Date : 10/07/2014  
Requester : Mr. Scott MacFarlane Perfected Date : 10/14/2014  
Organization : Cox Television Last Assigned Date : 10/09/2014  
Requester Has Account : No Fee Limit : \$25.00

**Task Details**

Task Type : Request Detail Assigned To : Tamera Ellerbe (General Services Administration)  
Due Date : 10/29/2014 Last Assigned Date : 10/21/2014  
Task Submitted Date : 10/21/2014 Last Assigned By : Tamera Ellerbe (General Services Administration)  
Description : Review responsive documents and complete redactions if needed.  
Comments :

**Upload Responsive Records**

*The Release Type can be modified after uploading but must be provided initially. Records should be uploaded in batches with identical release types.*

If you are having problems, or do not see the "Select Files" button, switch to the basic uploader.

**SELECT FILES** ← Click to upload files  
**ADD WITHOUT FILE UPLOAD**

No records have been uploaded.

\* Release Type : Select Release Type  
Keywords :

**SAVE CHANGES** **CANCEL**

## Step 8

### Review the uploaded file

My Cases

Unassigned Cases

Assigned Cases

Request Details

Make Assignment

Estimate Costs

Stop the Clock

Extend Due Date

Create Task

**Upload Responsive Records**

Create Correspondence

Create Comment

Create Consultation

Create Referral

Create Appeal

Interim Release

Transfer Request

Export Request

#### Request Details

Status : *Assignment Determination* Due Date : 11/12/2014 37

Submitted Evaluation **Assignment** Processing Closed

Tracking Number : GSA-2015-000040 Submitted Date : 10/07/2014

Requester : Mr. Scott MacFarlane Perfected Date : 10/14/2014

Organization : Cox Television Last Assigned Date : 10/09/2014

Requester Has Account : No Fee Limit : \$25.00

#### Upload Responsive Records

The Release Type can be modified after uploading but must be provided initially.  
Records should be uploaded in batches with identical release types.

If you are having problems, or do not see the "Select Files" button, switch to the basic uploader.

**SELECT FILES**

**ADD WITHOUT FILE UPLOAD**

Record Title	Record File Name	Type	Size (MB)	Remove
<input type="text" value="2012_Cardin_red_11.5"/>	2012_Cardin_red_11.5.pdf	PDF	9.91	

\* Release Type :

Keywords :

**SAVE CHANGES** **CANCEL**



## Step 9

Select a release type from the drop down menu. You must select a record type for all records uploaded into the FOIAonline system.


































The screenshot shows the 'Upload Responsive Records' interface. On the left is a sidebar with buttons: 'Upload Responsive Records' (active), 'Create Correspondence', 'Create Comment', 'Create Consultation', 'Create Referral', and 'Close Out Task'. The main content area is titled 'Task Details' and shows 'Task Type: Request Detail' and 'Assigned To: Tamera Ellerbe (General Services Administration)'. Below this is the 'Upload Responsive Records' section, which includes instructions: 'The Release Type can be modified after uploading but must be provided initially. Records should be uploaded in batches with identical release types.' and a note: 'If you are having problems, or do not see the "Select Files" button, switch to the basic uploader.' There are two buttons: 'SELECT FILES' and 'ADD WITHOUT FILE UPLOAD'. Below these, it says 'No records have been uploaded.' There is a required field 'Release Type:' with a dropdown menu. The dropdown menu is open, showing options: 'Select Release Type', 'UU - Unredacted - Unreleasable', 'RU - Redacted - Unreleasable', 'UR - Unredacted - Releasable', 'RR - Redacted - Releasable', and 'REQ - Release to Requester Only'. An arrow points to the dropdown menu with the text 'Click the drop down menu and select the release type'. At the bottom are 'SAVE CHANGES' and 'CANCEL' buttons.

There are five release types that you may select from **UU – Unredacted – Unreleasable**; **RU- Redacted –Unreleasable** ; **UR- Unredacted – Releasable**; **RR- Redacted- Releasable** and **REQ- Release to Requester Only**.

## Step 10

When **RR: redacted releasable** is selected as the file type you must select the exemptions applied to the document. Click on the pencil to select exemptions

The screenshot displays a web interface for managing FOIA requests. On the left is a sidebar with buttons: 'Create Appeal', 'Interim Release', 'Transfer Request', 'Export Request', 'Begin Close Out Process', 'Generate Invoice', and 'Print Case File'. The main area shows a search filter for 'RR - Unredacted - Releasable to the General Public' and a 'SUBMIT' button. Below the filter, it states '35 items found, displaying all items.' A table lists documents with columns: Publish, Title, Type, Exempt, Retention, Action, and Detail. Each row has a 'Publish' dropdown set to 'RR', a title starting with 'SF30-MOD', a 'Type' of 'PDF', 'Exempt' status of 'N/A', and 'Retention' of 'Default'. The 'Action' column contains a pencil icon (for editing exemptions) and a red 'X' icon. A callout box with the text 'Click to select exemptions that have been applied' has an arrow pointing to the pencil icon in the first row. The URL at the bottom is partially visible: //foia/action/agency/request/detail/edit/?recordId=3Lcbu1BcCIN8gHE...

Publish	Title	Type	Exempt	Retention	Action	Detail
RR	SF30-MOD 001_r	PDF	N/A	Default	 	
RR	MODS 1-31_r	PDF	N/A	Default	 	
RR	SF30-MOD 031_r	PDF	N/A	Default	 	
RR	SF30-MOD 030_r	PDF	N/A	Default	 	
RR	SF30-MOD 029_r	PDF	N/A	Default	 	
RR	SF30-MOD 028_r	PDF	N/A	Default	 	
RR	SF30-MOD 027_r	PDF	N/A	Default	 	
RR	SF30-MOD 026_r	PDF	N/A	Default	 	
RR	SF30-MOD 025_r	PDF	N/A	Default	 	
RR	SF30-MOD 024_r	PDF	N/A	Default	 	
RR	SF30-MOD 023_r	PDF	N/A	Default	 	

## **CONVERTING EMAILS: Preparing to Review and Propose Redactions**

In order to perform this portion of a FOIA request, it is necessary to have Microsoft Outlook and a PDF converter (such as Nuance or Adobe) installed on your computer.

The files you will receive from the Office of Chief Information Officer will be a personal folder (PST) file in Microsoft Outlook. To upload the file into Microsoft Outlook, you should:

1. Save a copy of the PST file on your desktop
2. Open Microsoft Outlook
3. Along the top of the tool bar, click on 'FILE'
4. Select 'OPEN; then select 'OUTLOOK DATA FILE'
5. OPEN OUTLOOK DATA FILE box will open.
6. Select the PST file that you saved on your desktop.
7. On the left hand side of Microsoft Outlook, click on 'IMPORTED FILES' and select the 'IMPORTED FOLDERS' file that is highlighted. This will be the emails from the PST file.

Once the emails are imported, you can begin converting them to PDF files.

1. Select the first email, open the email.
2. In the upper left hand corner, click the 'OFFICE BUTTON'
3. Under the dropdown, select 'PRINT'
4. The print screen will pop up, for the name click the drop down and select ScanSoft
5. You will need to do this for each attachment
6. Save pdf files (in numerical order)

Once you have converted the PST files to individual PDF files, you will need to merge the files. To merge the individual files:

1. Open Nuance Pdf Converter

2. Select 'FILE'
3. On the drop down menu, select 'CREATE A PDF'
4. Then select 'COMBINE MULTIPLE FILES'
5. Select all of the individual pdf files.
6. Click 'RUN'

Now, you have one file that contains all of the converted email files. Save a copy of this file. You will have to review the files to see if the material is responsive to the FOIA request. Additionally you will have to propose redactions. To propose redactions:

1. Open the combined email file in your PDF converter enterprise software.
2. Add the redaction tool to your toolbar by clicking 'VIEW,' then select 'TOOLBARS' then select 'SECURITY' (A padlock, pen and sheet of paper will appear on your toolbar).
3. Next, click the sheet of paper so that a drop down box appears. Click 'REDACTION TOOL PROPERTIES,' then click on 'REDACTION CODE. On the drop down menu, select 'US FOIA.'
4. Repeat step three (above) to chose an exemption code entry (ex. B6, B5) and change exemption code
5. Select black as your mark color
6. Once you have chosen the proper exemption code, click on the sheet of paper and select 'MARK REDACTION.'
7. Highlight the information you wish to redact
8. **Do not "apply redactions" until the document has been reviewed**
9. Before the document is ready for review, use the redaction tool, select the color white, to remove any pages numbers at the bottom of the document.

## EXEMPTIONS

The contents within this section are from the Department of Justice Guide to the Freedom of Information Act (2009 Edition).<sup>2</sup> Remember, this resource is not a substitute for legal advice. Any questions or legal issues should be forwarded to the Office of General Counsel. This information is included for general educational purposes only.

### **Exemption 4:**

This exemption is intended to protect the interests of both the federal government and submitters of business information. It encourages submitters to voluntarily furnish useful business information to the government and it provides the government with an assurance that such information will be reliable. It also safeguards submitters of business information from the competitive disadvantage that could result from disclosure.

Exemption 4 covers two categories of records:

- (1) Trade secrets and,
- (2) Information which is commercial or financial, obtained from a person and privileged or confidential.

A "trade secret" is a secret, commercially valuable plan, formula, process, or device that is used for the making preparing, compounding, or processing of trade commodities and is the end product of either innovation or substantial effort.

The vast majority of Exemption 4 cases focus on whether the withheld information falls within the second category (commercial or financial information, obtained from a person, and privileged or confidential).

The terms "commercial" and "financial" should be given their ordinary meanings. Records are "commercial" so long as the submitter has a "commercial interest" in the information.

"Obtained from a person" refers to an individual as well as a wide range of entities, including corporations, state governments, and foreign governments, but it generally does not apply to information generated by the federal government (such information may meet the "commercial" privilege of Exemption 5).

The term "privileged" in Exemption 4 refers to civil discovery privileges, such as the deliberative process, attorney-client, and attorney work-product privileges.

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<sup>2</sup> The full text of the Guide can be found on The Department of Justice website, at: <http://www.justice.gov/oip/foia-guide.html>.

Whether commercial or financial information is "confidential" generally depends upon how the government obtained the information. If the information was voluntarily submitted, then it will be considered "confidential" if the submitter "customarily" does not disclose such information to the public. See *Critical Mass Energy Project v. NRC*, 975 F.2d 871, 878 (D.C. Cir 1992). If the information was required to be submitted, on the other hand, it will be considered confidential if disclosure would likely: 1. Impair the Government's ability to obtain necessary information in the future ("impairment prong"); or 2. Cause substantial competitive harm to the competitive position of the person from whom the information was obtained ("competitive harm " prong). Actual competition need not be demonstrated. Only evidence of competition and the likelihood of substantial competitive injury need be shown; or 3. Harm an "identifiable" private or governmental interest which the Congress sought to protect by enacting Exemption 4, such as the effectiveness of an agency program ("third prong"). See *National Parks & Conservation Ass'n v. Morton*, 498 F.2d 765 (D.C. Cir. 1974).

The overwhelming number of Exemption 4 cases concern the "competitive harm" prong of the National Parks test for confidentiality. Competitive harm determinations are made on a case-by-case basis, and their focus is limited to harms flowing from affirmative use of information by competitors. In making competitive harm determinations, agencies typically must solicit and consider views of the business submitter. Mundane information about submitter's operations, general descriptions of a manufacturing process with no details, or disclosures that would cause "customer or employee disgruntlement" have been determined not to qualify as competitive harm. Nor will the disclosure of information that is already in the public domain likely cause substantial competitive harm.

Numerous types of competitive injury have been identified by the courts, including the harms caused generally by disclosure of a company's assets, profits, losses, market share, data describing a company's workforce that would reveal labor costs, profit margins, competitive vulnerability, a company's selling prices, purchase activity, freight charges, technical and commercial data, names of consultants and subcontractors and performance costs and equipment information; currently unannounced and future products, proprietary technical information, pricing strategy and subcontractor information.

Materials such as formulae, designs, drawings, research data, may be significant not as records, but as items of valuable property. Such an "intrinsically valuable" item of written work can be sold like any other commodity in the marketplace, bringing to its private owner the economic benefit of his/her proprietary interest.

If the Department can show the loss of market value resulting from a FOIA disclosure would be substantial, Exemption 4 (third prong) should be invoked to prevent it.

### **Exemption 5:**

This exemption encompasses “inter-agency or intra-agency memorandums or letters which would not be available by law to a party other than an agency in litigation with the agency.” This includes internal advice, recommendations, and subjective evaluations, as opposed to factual matters contained in records that pertain to the decision-making process of an agency, whether within or among agencies (as “agency” is defined in 5 U.S.C. 552(e)) or within the Office.

The three primary privileges incorporated in exemption (b)(5) are the deliberative process privilege, the attorney work-product privilege, and the attorney-client privilege.

Three purposes constitute the basis for the **deliberative process privilege**: (1) to encourage open, frank discussions between subordinates and superiors; (2) to protect against premature disclosure of proposed policies before they are finally adopted; and (3) to protect against public confusion that might result from disclosure of reasons and rationales that were not in fact ultimately the grounds for an agency’s action. Examples include:

1. The nonfactual portions of staff papers, including after-action reports and situation reports that contain staff evaluations, advice, opinions, or suggestions;
2. Advice, suggestions, or evaluations prepared on behalf of the Office by individual consultants or boards, committees, councils, groups, panels, conferences, commissions, task forces, or other similar groups that are formed for the purpose of obtaining advice and recommendations;
3. The nonfactual portions of evaluations by an Office or by personnel of contractors;
4. Information of a speculative nature, tentative, or evaluative nature, or such matters as proposed plans to purchase, lease, or otherwise acquire and dispose of facilities or functions, when such information would provide undue or unfair competitive advantage to private personal interests or would impede legitimate Government functions;
5. Trade secret or other confidential research development, or commercial information owned by the Government, where premature release is likely to affect the Government’s negotiating position or other commercial interests.

If any intra- or inter-agency record or reasonably segregable [releasable] portion of a record would be made available routinely through the “discovery process” in the course of litigation with the agency, then it should not be withheld from the general public even though discovery had not been sought in actual litigation. “Discovery” is the process by which litigants obtain information from each other that is relevant to the issues in a trial or hearing. The record or document need not be made available under this section if the information hypothetically would only be made available through the discovery process by special order of the court based on the particular needs of the litigant, and balanced against the interests of the agency in maintaining its confidentiality.

Intra- or inter-agency memoranda or letters that are factual, or reasonably segregable portions that are factual, are routinely made available through “discovery” and shall be made available to a requester, unless the factual material is:

1. Otherwise exempt from release; or
2. Inextricably intertwined with the exempt information; or
3. So fragmented as to be uninformative.

A direction or order from a superior to a subordinate, though contained in an internal communication, generally cannot be withheld from a requester if it constitutes policy guidance or a decision, as distinguished from a discussion of preliminary matters or a request for information or advice that would compromise the decision-making process.

Also incorporated into exemption (b)(5) is the **attorney work-product privilege**, which protects documents and other memoranda, prepared by an attorney in contemplation of litigation. Its purpose is to protect the adversary trial process by insulating the attorney’s preparation from scrutiny. Litigation need never have actually commenced, so long as specific claims have been identified which make litigation probable. Rule 26(b)(3) of the Federal Rules of Civil Procedure allows the privilege to be used to protect documents prepared “by or for another party or by or for that other party’s representative.” The work-product privilege has been held to persist where the information has been shared with a party holding a common interest with the agency, even where it has become the basis for a final agency decision.

**Attorney client privilege** concerns “confidential communications between an attorney and his client relating to a legal matter for which the client has sought professional advice.” *Mead Data Central, Inc. vs. Office of Air Force*, 566 F. 2d at 242 (D.C.Cir. 1977). It is not limited to litigation and includes protection for facts provided by the client as well as the attorney’s opinions.

Exemption (b)(5) also applies to trade secret or confidential research, development or commercial information generated by the Government itself in the process leading up to the



awarding of a contract. It expires once the contract is awarded or after an offer has been withdrawn. Early release of this information could put the government at a competitive disadvantage in the contract process. Other examples of this type of material would include: realty appraisal for property to be sold by the Government; background documents used to calculate its bid in a contracting out procedure; inter-agency cost estimates used in evaluating construction proposals; and reports prepared by expert witnesses. If a prior release of information ordinarily protectable under exemption (b)(5) has been made by an agency such as disclosure to the subject of the record, under a protective order in an administrative proceeding, or in the course of criminal discovery, the agency's authority to later withhold the document is not diminished.

### **Exemption 6:**

This exemption exempts "personnel and medical files and similar files the disclosure of which would constitute a clearly unwarranted invasion of personal privacy." Examples of files containing personal information similar to that contained in personnel and medical files are:

1. Those compiled to evaluate or determine the suitability of candidates for employment and the eligibility of individuals for security clearances, or for access to particularly sensitive classified information;
2. Files containing reports, records, and other materials pertaining to personnel matters in which administrative action, including disciplinary action, may be taken.

The information must be identifiable to a specific individual and not merely pertain to an individual.

Corporate and business information cannot be protected under exemption (b)(6), unless the information pertains to a small business where the individual and his/her business is identical. Then, depending on the information, exemption (b)(6) may be applicable.

The Supreme Court has limited the concept of public interest under the FOIA to the "core purpose" for which Congress enacted the FOIA: To shed light on an agency's performance of its statutory duties. Information that does not directly reveal the operations or activities of the Federal government falls outside the ambit of the public interest that the FOIA was enacted to serve. This public interest standard must be weighed against the threat to privacy. Put another way, it must be determined which is the greater result of disclosure: the harm to personal privacy or the benefit to the public.

Intimate details about an individual's life are usually protected, such as marital status, legitimacy of children, medical condition, welfare payments, family fights, and reputation.

Generally, civilian Federal employees' names, present and past position titles, grades, salaries, and duty stations, as well as position descriptions are releasable. Military personnel are given

greater privacy protection overseas because of threats of terrorism. Even favorable information, such as details of an employee's outstanding performance evaluation, can be protected on the basis that it may embarrass an individual or cause jealousy among co-workers. Also, release of such information reveals by omission the identities of those who did not receive high ratings, creating an invasion of their privacy.

When the request is from a third party concerning another individual and the records are of a particularly sensitive nature (such as information from the Employee Assistance Program files), it may be necessary to use the "Glomar" response; you would neither confirm nor deny the existence or nonexistence of records because to do so would in itself be an invasion of privacy. To be successful, the Glomar response would have to be used for all requests about individuals, whether or not information pertaining to them existed. Appeal rights are provided to the requester when the Glomar response is used.

In some instances, deletion of identifying information may not provide enough privacy protection when the requester may already know some information about the principals involved. This may happen when there is a small group of coworkers, or when information that has been previously publicized combined with other facts and circumstances could identify individuals. In these instances, the material would not be disclosed.

**As a reminder, any incoming “Referral” must be logged into the FOIAonline as a Referral.**

**Referral Process Categories:**

**General Export Process**

Examples of this type:

Incoming advertisements, flyers, FOIA requests in a Foreign language, Requests that do not make sense or are obviously not in the Business Lines of GSA, FOIAs that are determined to not be under GSA purview and we cannot determine the appropriate agency.

i.e. Solicitations, Phishing attempts, Banking Fraud Attempts, etc.

How we do we process these?:

1. An incoming action item comes into the FOIAonline System (Unassigned or My Cases).
2. Verify that it belongs in one of the above Example categories.
3. If it is determined to not belong to GSA, create a correspondence letter to the requester identifying GSA’s Mission and Goals and the specific action in exporting their request.
4. Use the FOIAonline system to export the file.

Screen Shots:

**Referral Export Process**

Overview:

Examples of this type:

Incoming Questions, FOIAs that are determined not to be GSA’s after researching but we can identify the appropriate Agency,

i.e. Social Security Info, Customs and Border Immigration Documents, Security Clearances, Veterans Affairs Information,

Screenshots:

**Referral through FOIAonline Process - Partner Agencies**

Overview:

Examples of this type: an incoming electronic referral from our partner Agencies.

Screenshots:

**Other Referrals Process - both Paper and Electronic**

Overview:

Examples of this type: Emails, Letters and/or facsimiles.

Screenshots: