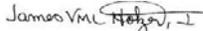




Homeland
Security

March 16, 2015

MEMORANDUM FOR: DHS FOIA Officers

FROM: James V.M.L. Holzer 
Senior Director, FOIA Operations

SUBJECT: Implementation of Technology to Address Freedom of
Information Act (FOIA) Processing

Purpose

The purpose of this guidance is to address the findings by the Government Accountability Office (GAO) as outlined in the November 2014 report entitled, “Freedom of Information Act; DHS Should Take Steps to Improve Cost Reporting and Eliminate Duplicate Processing.”¹

Background

The GAO found that the Department of Homeland Security’s (DHS) components² have not been consistent with the implementation of technology to address Freedom of Information Act (FOIA) processing based on best practices and Section 508 requirements. Some of the systems currently used fail to provide certain functionality as recommended by federal guidance. The GAO provided 13 best practices, that if implemented may increase efficiency of processing FOIA requests department-wide.

Discussion

DHS understands the challenge in implementing a single solution that addresses 100% of component FOIA Office IT requirements. Therefore, the Privacy Office offers component FOIA Offices the option of utilizing the department-wide capable IT solution to undergird FOIA processing.

¹ “Freedom of Information Act: DHS Should Take Steps to Improve Cost Reporting and Eliminate Duplicate Processing,” GAO-15-82 (Nov. 19, 2014), <http://www.gao.gov/products/GAO-15-82>.

² U.S. Citizenship and Immigration Services and the United States Coast Guard

Conclusion

The Privacy Office currently offers a department-wide IT solution for, submitting and checking status of requests online, redacting responsive records, and preparing reports. The Privacy Office has encouraged all DHS components to utilize the department-wide IT solution, and a large number of DHS components have done so. However, some components have opted to pursue other technical solutions.

It is the understanding and expectation of DHS that for those component FOIA Offices, that chose to use alternate technical solutions for FOIA processing, the selected solution, at a minimum must meet the recommendations as identified by the GAO, Section 508 requirements, and outlined in this guidance. For technical solutions currently being used that are not in compliance with these requirements, components are expected to identify which requirements are not being met, and undergo any necessary development efforts to satisfy outstanding unmet requirements. Component FOIA Offices will provide an update the Privacy Office on the status of their FOIA IT efforts in upcoming Chief FOIA Officer Reports.

Please let me know if you wish to discuss further. I can be reached on 202-343-1756.