A Reference Model for The Freedom of Information Act (FOIA)

An End-to-End Business Process and Information Model for FOIA

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Abstract

The purpose of the Freedom of Information Act (FOIA) is to enable an informed citizenry by providing the public with access to information that sheds light on a federal agency’s activities and performance of its statutory duties. Complying with the law means agencies must establish FOIA programs that can sustainably support complex operations at scale and consistently meet challenging deadlines. Currently, each agency supports and manages its own FOIA operation, and while the Department of Justice’s Office of Information Policy (DOJ/OIP) provides agencies with FOIA guidance and legal interpretation, there exists no standard for describing the business functionality and data needed to operate a FOIA system.

MITRE addressed this gap with the creation of the FOIA Reference Model (FRM) version 1.0, an end-to-end business specification, comprising process and data models, activity definitions, common services, agile-like user stories, and other systems engineering constructs. Our aim was to define a superset of capabilities that serves as a standard and consistent “vocabulary” for business and technical stakeholders to describe FOIA needs. The model, which addresses both operational and analytical FOIA capabilities, strives to be an idealized, yet realistic view of FOIA needs. Given the unique needs, sizes, and complexities of each agency’s FOIA program, the FRM’s defined capabilities are intended to be evaluated holistically and applied by agencies selectively.
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1 Introduction

1.1 Background

The Freedom of Information Act (FOIA) (5 U.S.C. § 552) is a federal law that provides the public with a right to access government records. The purpose of the law is to enable an informed citizenry by providing the public with access to information that sheds light on an agency’s activities and performance of its statutory duties. The FOIA provides that any person may ask a federal agency for records and that the agency must provide those records, unless an exemption applies, or the records fall outside the coverage of the FOIA. Additionally, the law requires federal agencies to proactively release certain records.

The law contains nine exemptions that allow agencies to withhold some of its records from the public. The FOIA applies to executive branch federal agencies, including some offices within Executive Office of the President (EOP). It does not apply to Congress, the US Federal Courts, the President, the Vice President, or EOP offices that directly advise the President. Originally passed in 1966 as an amendment to the Administrative Procedures Act, the law has been updated multiple times, most recently in 2016.

For many agencies, complying with the law in practice means establishing FOIA programs that can sustainably support complex operations at scale and consistently meet challenging deadlines. The scale of FOIA operations has grown considerably over the last ten years. Since fiscal year 2012 (FY12), FOIA requests have grown nearly 29% to 838,164 requests in FY21. Administrative appeals have increased 44% since FY12, growing to 15,468 appeals in FY21.

FOIA has grown not just in size, but also complexity. The number of complex requests processed has increased 81% over the last ten years. In addition, the portion of all processed requests that were complex (as opposed to simple) has risen from 32% in FY12 to 59% in FY21.

An entire FOIA oversight and advisory infrastructure has emerged—and continues to mature—within the federal government to meet this demand and increased complexity. Compliance with the law is encouraged and overseen by the Department of Justice’s (DOJ) Office of Information Policy (OIP). The OPEN Government Act of 2007 mandated the creation of the Office of Government Information Services (OGIS), which started operating within the National Archives and Records Administration (NARA) in 2009 to serve as the law’s ombudsman and help resolve disputes between requesters and agencies. NARA established the FOIA Advisory Committee in 2014 in compliance with the Second Open Government National Action Plan for the United States. The committee, which started its fifth two-year term in 2022, is composed of government employees and members of the requester community to develop consensus recommendations for improving FOIA practices or modifying the law. The Chief FOIA Officers Council was established by the FOIA Improvement Act of 2016. Composed of federal FOIA officers, it fosters, disseminates, and encourages best practices and innovative FOIA practices; facilitates cross-government initiatives; and promotes the use of common performance measures.

The demands and complexities of managing FOIA programs has prompted the maturation of FOIA into its own area of practice and professionalization. The American Society of Access Professionals (ASAP), founded in 1980, serves as the professional organization for FOIA and Privacy Act officials at the federal, state, and local levels. In 2012 the Office of Personnel Management (OPM) created the Government Information Specialist (GIS) job category specifically for FOIA and Privacy Act professionals. [3] [4] Across the federal government
agencies reported having 5,362.55 full-time equivalent FOIA staff in FY21, which represents a growth of 32% over the past ten years. [1] [2] The growth in staff roughly corresponds to the increased number of requests and appeals. FOIA programs are having to manage larger, more multi-faceted staffs to meet their more difficult FOIA demands.

1.2 What is a Reference Model?

A reference model is “an abstract framework for understanding significant relationships among the entities of some environment, and for the development of consistent standards or specifications supporting that environment.” [5] Reference models aim to provide a common language and conceptual framework that “can be used unambiguously across and between different implementations” [5] without defining technologies or implementation details. In the context of the federal government, reference models are “designed to facilitate cross-agency analysis, through the development of a common taxonomy and ontology for describing the business operations of Federal agencies, independent of any specific agency.” [6]

1.3 Purpose of the FOIA Reference Model

It is within the context of the public’s increasing use of FOIA, the growing complexity of recordkeeping system as agencies transition to digital government, the maturation of FOIA programs and oversight, and the professionalization of FOIA practices that MITRE developed the Freedom of Information Act Reference Model (FRM). Many federal agencies require systematic and scalable practices to fulfill their FOIA requests. The FRM provides an abstracted depiction of FOIA process elements that is not tied to a particular implementation, architecture, or technology, but facilitates the well-informed, carefully planned creation and maintenance of robust, scalable, and measurable FOIA operations. Being independent of technical solutions and implementations, the FRM provides value to all agencies. The FRM also facilitates cross-agency evaluation and analysis of FOIA operations through a common articulation of FOIA program elements.

The FRM articulates the business capabilities that compose federal agency FOIA programs. The FRM describes FOIA as an integrated framework of capabilities and data. This framework does not specify a particular architecture or technology. As with other reference models, the aim for FRM is to be used by architects to build specific architectures [5] and by analysts and business owners to analyze processes within and across agencies to identify gaps, inefficiencies, and opportunities for collaboration and process improvements. [6] A guiding principle that anchored the development of the FRM was to describe the components of an idealized yet realistic FOIA system. The FRM does not try to recite FOIA practices as they were most commonly conducted in 2022. Rather, the model describes a system that maximizes automation and efficiency where feasible. While forward-looking, the FRM does not depend on miraculous advances in technology or dramatic changes in the law.

The development of the FRM took inspiration from the Open Archival Information System (OAIS) reference model, which provides an abstracted way to describe digital archives services and components. The Space Data Systems Committee, with input from a wide range of stakeholders, developed the OAIS over the course of the 1990s and early 2000s. The OAIS became an ISO standard in 2003. [7] The OAIS is designed to “increase awareness and understanding of concepts…; elucidate terminology and concepts for [description and comparison]…; expand consensus on elements and processes…; and create a framework to guide the identification and development of standards.” [8] In a similar fashion, the project team aims
for the FRM to facilitate a richer, more systematic description of FOIA concepts that can enable an effective articulation of FOIA requirements for the design and implementation of architectures for robust and sustainable FOIA systems. FOIA as an area of practice has reached a level of maturity where it needs a detailed, systematic, and common articulation of activities, functions, processes, artifacts, and resources that work together to comprise systems that enable agencies to meet their FOIA obligations. The aim of the FRM is to meet that need.

### 1.4 Scope of the FOIA Reference Model

As noted in Section 1.2, the FRM as a reference model articulates FOIA business capabilities rather than describing technologies or defining an architecture. The FRM describes the what rather than the how of a FOIA system.

The FRM describes FOIA processes that articulate the lifecycle of processing a request, as well as processing an administrative appeal, tracking a FOIA litigation case, and proactively disclosing records. Additionally, the FRM describes processes that are not directly tied to individual requests, appeals, or litigation cases but are necessary for sustainably operating a FOIA program. These processes are defined as either core, enabling, or supporting processes supported by a set of common services (see Section 3.3).

Some processes are part of a broadly defined FOIA program or adjacent to FOIA processes that are not described in the FRM:

- **Litigation.** While the FRM models the tracking of FOIA litigation cases and remand activities back to FOIA programs, it does not model litigation processes. What happens in the courts is out of the FRM’s scope.

- **Mediation.** Like litigations, while the tracking of requester-agency mediations is modeled in the FRM, the details of how OGIS facilitates these mediations falls outside the scope of the FRM.

- **Classified records handling.** The search and review processes and activities described in the FRM can be applied to classified responsive records. However, the model does not describe activities that are specific to handling classified records. Additionally, the FRM does not model steps for declassifying responsive classified records.

- **System security.** Security requirements and use cases for a FOIA system are not in the scope of the FRM.

The FRM is constructed to model a system that enables federal agencies to meet the obligations placed on them by the FOIA as articulated in 5 U.S.C. § 552 and supplemented by agency regulations and guidance issued by OIP and OGIS. The FRM does not attempt to incorporate or accommodate Freedom of Information (FOI) requirements from any other jurisdictions, be that state, local, or those outside of the United States.

### 1.5 Audience and Applicability

The primary audience for the FRM are FOIA officers and program managers as well as system designers, architects, and engineers to inform the design, development, and implementation of FOIA systems and assess FOIA programs and processes.

The FRM is applicable to FOIA programs in all federal agencies. Because the FRM is an abstracted articulation of FOIA processes, it is applicable to the full range of FOIA programs.
from the smallest to the largest. The model is applicable to highly centralized FOIA programs where a single office carries out all FOIA activities and to decentralized program where FOIA activities are distributed across regional or functional offices. The model also speaks to agencies that have a mix of centralized and decentralized functions, such as managing request intake in one office, but assigning the responsibility of searching for responsive records to multiple offices. The FRM is designed to represent the broadest range of functionality. Smaller programs can either eliminate or roll up elements of the FRM that do not apply to them.

While the FRM is written strictly to the federal FOIA law, it can be used to inform the development of systems that support freedom of information (FOI) programs in other jurisdictions. Many systems are used by federal, state, and local agencies to support their FOI programs.

1.6 Reference Model Usage Scenarios

Uses for the FRM revolve around program evaluation and system acquisition. This section provides examples of how the FRM could be used; however, this may not be an exhaustive list.

It is expected that the FRM will be used in a variety of ways, including creative ways that the project team did not imagine. To that end, elements of the FRM are separately available in editable form, including MS Excel and Visio documents, that allow users to extract and repurpose portions of model for their program evaluation and acquisition efforts. One of the primary goals of the FRM is to provide a common “FOIA system language” to facilitate more informed and precise conversations amongst FOIA staff, system developers, and vendors.

Define and assess FOIA programs. The FRM can serve as the basis for programs to articulate their needs for new or enhanced FOIA systems. It can help translate the complexities within FOIA practices into a structured requirements specification. The FRM’s functional models provide a common framework for systematically reviewing FOIA program activities for gaps or opportunities for improved efficiency. Agencies can use the FRM in conjunction with other evaluation frameworks, such as OIP’s “FOIA Self-Assessment Toolkit.” [9]

Support agency acquisitions. Program staff can use the FRM to support their acquisition activities. The FRM contains one or more agile-style user stories for each process and activity in the functional model. These user stories can be used as the basis for building a Request for Information (RFI) or Request for Proposal (RFP) that agencies can send to vendors.

Inform staffing models. The functional models include role definitions and their involvement in specific program activities. This content can facilitate the evaluation of organization and staff structure. For example, a FOIA officer can use the FRM to demonstrate how a particular staff member is “wearing too many hats” by being asked to perform too many roles. The role definitions in the FRM can also help to define and allocate appropriate user permissions within a FOIA system design specification.

Define business needs for system development. The FRM can be used to define a system engineering specification that developers can use for building and enhancing FOIA systems. In addition to defining functional capabilities and pro forma requirements (user stories), the FRM describes a conceptual data model, defines case types and structure, and includes core data elements that provide the basis for agencies to articulate their data needs to developers.

Fast-track business intelligence (BI) capabilities. It is all too common for system development initiatives to consider information analysis, performance monitoring, and BI in general as an afterthought. However, it is important for the data needed to monitor performance be included
from the start, otherwise there will likely be rework after the system is implemented. The FRM includes a section on reporting and analytics capabilities that extend beyond existing mandated reporting requirements to DOJ. That section can serve as a starter kit for defining business questions and the corresponding metrics and measures to monitor program and resource efficiency, detect emergent problems, identify opportunities for improvements, and test new ideas.

**Enhance marketplace vendors’ offerings.** The FRM can also contribute to the maturation of a FOIA solution marketplace that is driven by a clear articulation of agency needs rather than solely by a reuse of vendor tools that meets other business needs, such as electronic discovery. Thus, software vendors and systems integrators can use the FRM to create their own requirements and system designs for developing their FOIA products.

### 1.7 Model Development Approach

The catalyst for developing the FRM was born out of MITRE’s experience engaging with several agencies looking to address operational challenges with their FOIA programs or invest in new solutions that could support some or all their FOIA processes. MITRE recognized that a systematic articulation of FOIA business requirements can help agencies effectively analyze and monitor their programs and articulate their needs to system providers.

Using systems engineering techniques the elements of the FRM were developed iteratively. Initial development of the FRM took shape through outlining core processes in use case diagrams. These were iteratively refined by modifying, combining, and/or splitting these core processes. The project team then built out the use case diagrams with definitions and agile-style user stories. The development of these processes, use cases, and user stories were directly informed by MITRE’s experience working with agency FOIA programs and analysis of the FOIA statute, agency FOIA regulations, OIP guidance, and OGIS findings. The FRM was also informed by a review of Chief FOIA Officers Council and FOIA Advisory Committee reports and recommendations as well as the academic literature.

The development of the FRM benefited from the Chief FOIA Officer Council’s Technology Committee standing up the FOIA Reference Model Working Group in June 2022. Members of the Working Group provided feedback to initial process diagrams, use case diagrams, and user stories in weekly review sessions and asynchronously. This feedback was iteratively incorporated into the FRM. Additionally, the FRM was refined based on feedback from MITRE colleagues. Members of the Working Group and MITRE staff who provided feedback are listed in the Acknowledgements.
2 Reference Model Overview

2.1 Model Components

The components of the FRM, as depicted in Figure 1, are organized into four categories of business functionality, including a Functional Model, Data Model, Interaction Model, and Requirements Model. The intent of the FRM is to define “what” is needed (activities to be performed, data to be captured and managed), rather than “how” (e.g., technology, designs, architectures).

![Figure 1. FRM Metamodel](image)

**Functional Model.** The Functional Model describes what the business system should do, including the major processes, the activities that comprise those processes, the services that would provide common functionality across multiple activities, and the defined roles permitted to perform the activities.

The FRM comprises 26 distinct processes. Two types of graphical depiction are included:

- **Use Case Models.** Each use case model illustrates the activities involved in the process, the roles (actors) who would perform those activities, and key relationships between activities whereby one activity may be invoked when another executes.

- **Representative Process Flow Models.** The process flow models use a Business Process Modeling Notation (BPMN) approach with “swim lanes” for each actor and a more defined sequence to the activities. These also incorporate, per the BPMN standard, gateways (conditions) where certain activities may or may not execute.
**NOTE:** As a reference guide, the FRM is not intended to reflect all the different pathways and sequencing that an agency may wish to implement in their FOIA solution. The Process Flow Models should be viewed as a possible set of processing scenarios, leaving the detailed deployment decisions to the agencies and system designers. While the models and the portrayed sequencing in them are not meant to be universally applied, the activities within them are expected to have broad universal applicability.

**Data Model.** The Data Model comprises the information needed to perform the activities in the Functional Model and to support the analytical inputs to the Requirements Model. This version of the FRM is focused on the conceptual level data classes and core data attributes, mostly for Request-related data. Also included are a pro forma set of configurable processing rules that should, where possible, be implemented in part within a system’s data layer, rather than be “locked” fully within the software. Future versions of the data model may refine this content into a more detailed logical data model or fully attributed class model.

**Interaction Model.** The Interaction Model defines the “bridge” between the Functional and Data Models. In this version of the FRM, the Interaction Model is focused on a “CRUD” mapping, which specifies the expected actions that each business process would take upon each major class of data, including actions that Create, Read, Update, and/or Delete data.

**Requirements Model.** The Requirements Model is divided into two components.

- **User Stories** are business requirement statements. The structure of these statements adheres to the agile pattern: “As a(n) <actor>, I need <requirement statement>, so that <rationale statement>”). User Stories are presented in Appendix E. Some User Stories reflect **Configurable Processing Rules** (presented as a subset in Section 3.2.5), which reflect both government-wide and agency-specific policies that would be updated in a data layer of a system implementation, such as the number of elapsed days (e.g., 90 days) permitted for a Requester to file an appeal after receiving a response to their FOIA Request.

- This model also includes **Analytical Requirements**, including performance **Measures** and **Dimensions** to support continuous monitoring and process improvement, and for enabling standard reporting. Section 6 includes a set of candidate performance measures aligned to the business improvement opportunities (BIOs) and business processes they are intended to support and influence. Also included in Section 6 are the key measures needed for mandated quarterly and annually FOIA reporting by agencies to DOJ/OIP for publishing on FOIA.gov.

### 2.2 Key Features

To make effective use of the FRM, it is important to understand its key features, including:

- FOIA Request and Request Item
- Case Management
- Workflow and Configurable Tasking
- FOIA Records Environments
- Proactive Disclosure
- Fee Management
• Operational and Analytical Perspectives

2.2.1 FOIA Request and Request Item

A FOIA Request is at the heart of the FRM, as it represents the foundational object where most other information and functionality exist. A FOIA Request is “born” when it is received by an agency, typically from a Requester and sometimes as “transfers”, such as a Referral from another agency or Misdirected Request from another agency component.

To process a Request, it must be first confirmed as a “perfected request”, which means it has been determined to be a valid FOIA request, it is actionable, and it clearly describes the types of records being sought so that search and review activity may proceed.

Once considered perfected, which may have required review and refinement with the Requester, the Request is scoped and sized as a precursor to the search. Within the FRM, scoping a Request will instantiate one or more related Request Items to the Request, each of which comprises a holistic and cohesive “request” for records and will be processed through its own search and review processes. Depending on the estimated effort to complete the search and review processes, a Request with more than one Request Item might be considered “complex” rather than “simple”, a characteristic that is reported annually by agencies to DOJ. The FRM also defines the concept of a Process Queue, which would not only group complex, simple, and expedited requests into processing queues, but also permit further delineation of different types or categories of complex, simple, and expedited requests. Refer to the Common FOIA Case Content in Section 2.2.2.2 for the Process Queue description.

A response to the overall Request is then, in effect, a response to each of the Request Items within the Request. Further, an agency may wish to provide rolling responses, such as to respond to a specific Request Item before others have been completed. This can improve customer service by addressing and responding to those items that can be completed sooner, while continuing to work on others that may require more effort to search or review.

As described in the section below, both a Request and each of its associated Request Items are defined as types of a “case”, which shares common functionality across case types. Note that for simple Requests, there will likely be only one Request Item associated with it.

2.2.2 Case Management

The concept of a “case” is utilized throughout the FRM, and it applies to the information and processing in various contexts. Gartner provides a relevant definition for case management solutions:

“…Applications designed to support a complex process that requires a combination of human tasks and electronic workflow, such as an incoming application, a submitted claim, a complaint, or a claim that is moving to litigation. These solutions support the workflow, management collaboration, storage of images and content, decisioning, and processing of electronic files or cases.” [10]

2.2.2.1 Types of FOIA Cases

Figure 2 below illustrates, in a hierarchical fashion, the different types of cases in the FRM, beginning with the generic case at the top. The blue-filled squares in the figure are placeholders for categories of cases; teal-filled squares are the specific case types in the model. For example, a FOIA Request from a Requester is a type of case. As such, it will undergo a “birth to death”
life cycle, be trackable as a unit along with related communications, documents, decisions, and workflow. Likewise, each identifiable item within a FOIA Request is also a case (referred to as a sub-case in the FRM). This is important because much of the activities and information that support case-related actions can be shared.

The FRM defines the following nine types of cases:

**FOIA Request.** The primary case based on a Requester’s submission to an agency requesting records per the FOIA.

**FOIA Request Item.** One or more discrete requests (sub-cases to the FOIA Request), each of which requires its own search and review processing.

**Appeal.** A dispute registered by a Requester against an agency’s decision pertaining to the amount of fees to be paid, an expedited request, or the set of responsive records provided (e.g., the set of records discovered, withholding of records by exemptions/exclusions, the format of responsive records provided). Each Appeal case would relate to either the set of FOIA Request Items that are the subject of the appeal or to the FOIA Request itself, such as in the case of an appeal over the expedited status decision.

**Litigation.** A court case filed by a Requester or injunction filed by a commercial Submitter of records (e.g., a company that does business with the agency), which is tracked and monitored for possible remand actions required by the courts. Each Litigation case would relate to a FOIA Request and could relate to one or more specific FOIA Request Items that are the subject of the litigation.

**Inter-Agency Referral.** A referral of records from another agency that should be processed by an agency because the latter is the originator of the records of interest. In this context, the “referring” agency would have established their own FOIA Request (prior to the referral) and then created its own Referral case pertaining to the FOIA Request Items that are being referred to the other agency. The “referred to” agency would establish a new FOIA Request case based on the referral.

**Inter-Agency Coordination.** A request from another agency that should be coordinated with either a law enforcement or intelligence community (IC) agency “in order to avoid inadvertently revealing a sensitive fact that could invade someone’s personal privacy or damage national security interests.” [11] Both the initiating and receiving agency for the coordination would likely create a Coordination case to track their own activities related to the action.

**Inter-Agency Consultation.** A request from another agency to consult with the agency on the release of records, such as “when an agency locates records in response to a request that originated with the agency, but which contain within them information of interest to another
agency or another component. In those situations, the agency processing the [FOIA] request should consult with that other agency, or equity holder, to obtain its views prior to disclosure of the records.” [11] Both the initiating and receiving agency for the consultation would likely create a Consultation case to track their own activities related to the action.

**Requester Inquiry.** A question from a Requester about any aspect of the FOIA, to include general questions about the FOIA process or the agency’s procedures, or specific questions pertaining to the Requester’s FOIA Request, such as assistance with formulating the request, questions about its progress, etc.

**FOIA Mediation.** A mediation action taken by a Requester to NARA OGIS for assistance with a dispute resolution, such as an appeal. The agency will typically be involved in the resolution process along with OGIS and the Requester.

### 2.2.2.2 Common FOIA Case Content

While each case type, defined in the prior section, requires unique information and processing to work the case, all cases regardless of type include common (or shared) data and functionality. Examples of information common across cases can be seen in Figure 3.

A case and all its related information, including notes, documents, communications, tasks, actions, and the people and organizations involved in the case form what is typically referred to as a “case folder”. In this sense, the folder is a logical construct based on the data relationships in the figure and can be enabled by linking a unique case identifier to each of the related data classes. In practice, a case folder will include more information than is shown in the figure, such as data related to fees (if applicable), responsive records, etc.

![Diagram of Common Case “Folder” Information Across Case Types](image)

**Figure 3. Common Case “Folder” Information Across Case Types**

The following types of information (data classes) may be associated with a case:
**Communication.** A communication may be either an in-system notification from one person (or the system itself) to one or more other individuals, or may be an email message, either automatically created from within the system or captured as information from an email system. Each communication is linked to the case and to the sender and the targeted recipients.

**Document.** A case may include one or more document attachments, such as those provided by the Requester (e.g., supporting documents to authenticate a first-person request) or an agency staff person as part of working the case (e.g., attaching policy documents to inform the Requester). Note that the FRM defines a “Document” object as different and distinct than a “Responsive Record”, even though the latter could be a type of a document. Refer to the definition of a Responsive Record in Section 3.2.1.

**Note.** Case workers may need to annotate a case with notes to clarify issues, status, and other case-related information as part of working the case.

**Agency Organization.** When cases are established, they are assigned to the appropriate organization within an agency. For some agencies, this may always be the same FOIA office, however, other agencies may have a more distributed approach to case management, and thus a given division, office or other delineation may be assigned ownership and responsibility for completing the case. To permit agencies to define their own hierarchical structure, the Agency Organization also has a relationship to itself, which enables an organization to “point to” the parent organization.

**Person/Group.** A Person/Group defines the various people involved in working the case as well as the Requester who submitted it. Groups of staff can be defined and be assigned tasks and actions, such as designating a pool of staff responsible for completing a task or for handling the activities within a particular Process Queue.

**Process Queue.** A Process Queue is an agency-defined grouping of cases (typically a “track”) with some aspect(s) in common. The grouping serves not only to characterize the cases but more importantly to drive the workflow and the Person(s)/Group(s) of staff that are associated with the Process Queue. For example, an agency may wish to define different queues for simple, complex, and expedited requests, such that all similar requests (or requests of a typical size and scope) are tracked and managed within that group. Likewise, agencies may wish to further subdivide these requests into more specific groupings, such as an “Expedited First-Person Requests” or perhaps even more granular, such as an “Expedited First-Person Immigration Record Requests” Process Queue. Refer to Section 2.2.3.1 for additional information on how the Process Queue relates to workflow, as envisioned in the FRM.

**Task.** A Task is a specific “to-do” item for completing part of a case and is assigned to an individual who may be part of the FOIA processing staff or external to it (e.g., a recordkeeping system SME). Tasks may be created to handle anything that should be statused, tracked, and/or measured. For example, search staff may be tasked with searching recordkeeping systems; review staff may wish to task certain additional staff (e.g., legal, OPSEC) with reviewing records, and so on. Refer to Section 2.2.3.1 for additional information on how the Process Queue relates to workflow, as envisioned in the FRM.

**Action.** An Action is like a Task in that it specifies something to be done involving one or more staff. It differs from a Task in that it is something that happens to them and not by them. For example, when FOIA staff review a Requester’s request to expedite their FOIA Request, an automated action might be to notify the Requester of the approval (or denial if that were the
situation). Refer to Section 2.2.3.1 for additional information on how the Process Queue relates to workflow, as envisioned in the FRM.

**Timesheet.** A Timesheet captures time spent on a particular task for a particular case (FOIA Request Item) by a particular person over a period (e.g., weekly, bi-weekly, etc.). Timesheet information is expected to support tactical fee determinations and enable analytics for evaluating process efficiencies and inefficiencies, such as bottlenecks.

### 2.2.3 Workflow and Configurable Tasking

Processing a FOIA Request is inherently carried out in workflows, as the case (work product) is handled by multiple people (referred to as roles or actors in the FRM) until the case is completed and closed. To ensure each case is processed efficiently and to permit post-completion analysis of FOIA case work, the FRM prescribes both formalization and end-user configurability to the workflow.

This section refers to the conceptual graphic in Figure 4. Note that as a conceptualization, the ideas in this section are not meant as design or implementation constructs; rather, a system developer should review the concept as input to making those determinations. Further, there is no one design that could be developed from the workflow concept below. Designing configurable workflows is inherently a complex undertaking.

#### 2.2.3.1 Workflow Concept

Figure 4 depicts, at a conceptual level, how workflow can be formalized by associating cases (recall Requests, Appeals, Litigations, etc.) with a particular Process Queue, assigning Tasks to be completed, defining Actions to be performed (e.g., notifications), and updating the case with Status changes.

Workflow is configured by permitting the user to define the set of tasks, actions, and status changes to occur, as related to each case. Workflow can be made more configurable by defining reusable templates for these items as related to a particular Process Queue (shown in green on the righthand-side of Figure 4). Thus, once a Process Queue is assigned to a case, its workflow can be initialized with these items and then further refined by the lead staff responsible for the case, such as by adding or removing unnecessary tasks or changing their dependencies. The righthand-side of Figure 4 (in turquoise) illustrates the concept of reusable templates. The lefthand-side of the figure (in blue) shows the objects that would be instantiated from the template for a particular case.
2.2.3.2 Workflow Features

This section summarizes the key features represented by the concept in Figure 4. The concept is intended to convey:

- Each FOIA Case is assigned to a specific Process Queue containing a template set of Tasks, Actions, and participants (Person/Groups). By selecting a Process Queue for a specific Case, the template Tasks, Actions, Triggers, and Statuses becomes instantiated for the Case.

- Case Tasks and Actions are derived from Task Types and Action Types, both of which can be added by an appropriate role, such as the Process Administrator. Tasks define something someone needs to do. Actions define something that the system will do in response to some activity.

- A completed Task or Action may transition a Case into a new Status (state).

- A completed Task may trigger the start of a dependent Task and its Task Status.

- A completed Task or change in Status may trigger Actions, such as notifying a Requester with a communication, or notifying a case worker and updating their inbox of a new Task to complete.

- Case Status changes are triggered (caused) by the completion of a Task.
• A Person/Group may be assigned as the template lead for a Task Type or the template recipient of an Action Type.
• A Person/Group may be assigned to complete a Case Task or be the recipient of a Case Action.
• A caseworker’s inbox should be updated automatically based on the completion of tasks, both their tasks and other tasks that trigger a new task to complete by the caseworker.
• Case workers should not manually update Case Status, which is known to cause data quality issues. Rather, status updates should occur as the result of completing tasks.

2.2.4 FOIA Records Environments

The FRM comprises three types of records environments, each with a different purpose. Only the first two listed below are considered “within the FOIA business system”, as the third is external. However, tools and technologies that can integrate with the third category are becoming increasingly important.

FOIA Repository. The FRM refers to this repository as the primary record store for consolidating all responsive records across all FOIA Requests and includes the FOIA Requests themselves. When responsive records are found from Recordkeeping Systems (see below) and determined to be responsive to a particular FOIA Request, records are ingested into the FOIA Repository for further review, such as confirming releasability, determining applicable exemptions and exclusions, and making appropriate redactions. Over time, the application of retention rules will purge older records from the repository.

FOIA Library (aka “Public Reading Room”). This library is a public-facing repository that has been populated with records approved for proactive disclosure. The repository may be updated with new records based on different processes. Per DOJ guidance, records meeting a “multiple release rule” (currently referred to as the “three times rule”) should be added to the Library. These are records, other than first-person records, that have been released to Requesters on three different occasions and thus considered releasable to the public.

Recordkeeping Systems. These are the back-office systems, including email and other records-based environments where responsive records to FOIA Requests are found. When found, records from these systems are ingested into the FOIA Repository (see above). Generally, these systems are considered as “external” to the FOIA business system.

2.2.5 Proactive Disclosure

In 1996 and then again in 2016, Congress amended the FOIA with additional provisions for making certain records publicly accessible through electronic means. In the most recent version of the law, it states within 5 U.S.C. §552(a)(2)(D) that “each agency, in accordance with published rules, shall make available for public inspection in an electronic format…copies of all records, regardless of form or format (i) that have been released to any person under paragraph (3); and (ii)(I) that because of the nature of their subject matter, the agency determines have become or are likely to become the subject of subsequent requests for substantially the same records; or (II) that have been requested 3 or more times.” [12]

In her book, Saving the Freedom of Information Act, Margaret Kwoka highlights several reasons why FOIA has not lived up to its calling. One of the main concerns raised is the volume of FOIA Requests agencies respond to that are either not the types of requests FOIA was intended to
address (supporting private rights or interests rather than public oversight and accountability) or are seeking records that could have been proactively provided to the public and thus precluded the need for a FOIA Request and the extensive search and review processing that goes with it. Kwoka notes that “the express purpose of [the 1996 and 2016] amendments were to reduce the number of FOIA requests filed, not by curtailing FOIA rights, but by preempting the need for a request because the information is already affirmatively available.” [13] Kwoka goes on to promote not only the proactively disclosure of individual records that have been previously released via FOIA, but also to advance the notion of “categorical affirmative disclosure” that discloses records based on the types of records involved. This is in line with recent open government and open data initiatives.

The FRM explicitly addresses the two aspects of disclosure described above, which might be summarized as proactively disclosing (1) those records that are likely to be requested, regardless of whether they have been previously released, and (2) those meeting the 3 times rule. The following areas within the FRM explicitly address the proactive disclosure of records:

Within the Provide Pre-Request Support process, Requesters are provided with tools to:

- Identify non-FOIA methods for accessing agency records (i.e., published elsewhere),
- Search the agency’s FOIA Library (aka “Public Reading Room”), and
- Obtain information about responsive records that other Agencies or Components have and thus point them in the right direction when submitting a new Request.

Within the Scope and Size Request process (after a Request is confirmed as perfected), two activities relate to proactive disclosure:

- The initial step is to address whether the Request or part of it may be addressed with publicly available information. If so, the Requester is notified where to find responsive records and the Request or part of it is closed.
- As part of defining the scope of the Request, when topics are assigned to the Request as descriptors (metadata), those topics may be associated with proactive public disclosure. The FRM views this alignment as providing a “signal” to the Review Responsive Records process for possible proactive disclosure, rather than a definitive designation, since other factors must be considered beyond the inherent topics addressed in the Request.

Within the Review Responsive Records process, two activities relate to proactive disclosure:

- Part of the review itself is to flag those records that may be well-suited for proactive disclosure. An input to this flagging activity (as listed above), are topics identified in the Request in the Scope and Size Request process that pertain to public disclosure.
- Upon completion of the review for a given FOIA Request, if any records have been flagged for proactive disclosure, then the Manage Records for Proactive Disclosure process is invoked.

The Manage Records for Proactive Disclosure process is focused on approving records for proactive disclosure. Several important functional capabilities include:

- Records may be identified based on agency criteria and can be pushed to the agency’s FOIA Library or other publicly available repository.
• Records may be identified based on being flagged during the *Review Responsive Records* process.

• Records may be identified that meet a multiple release rule (i.e., the “3 times rule” per the FOIA Improvement Act of 2016).

The FRM’s Policy Administrator role has a business need to be able to change the 3 times rule to the quantity that is considered OIP guidance or agency policy.

### 2.2.6 Fee Management

The request for and handling of fees varies widely across Agencies. While DOJ provides general guidance regarding whom to charge (based on the type of requester), for what types of fees (e.g., search and review time, digitizing/duplicating documents), and under what circumstances, the processing sequence for when agency’s complete fee estimation, finalization of the fees, and issuance of a fee request (invoice) varies.

The FRM incorporates fees and fee management within several areas, including:

*Estimate Fees* process, which is typically invoked once a Request has been scoped within the Scope and Size Request process, and fees are appropriate for the given Request.

*Request Payment* process, which depending on the situation, might occur prior to releasing records. The FRM defines three types of payment scenarios:

- A *Routine Payment* that will be requested as part of the response package and thus not payable until after responsive records are released to the Requester.

- A *Pre-Payment*, which must be paid prior to conducting the Search.

- An *Advance Payment*, which must be paid before a response package will be provided.

*Modify Scope of the Request* process, which may result in a change in both the scope of the Request and fees due. For example, Requesters may wish to reduce the scope of their Request upon learning of the estimated fees involved.

Related to fee management is the FRM capability to track staff effort within timesheets. In this context, a timesheet would track the hours expended by a staff member, such as a Records Search Specialist, working on a specific Request case. This tracking supports both fee estimation and provides analytical value as part of monitoring and measuring agency performance and evaluating resource needs and allocations.

### 2.2.7 Operational and Analytical Perspectives

The FRM addresses both operational and analytical capabilities. While much of the modeling content focuses on the capabilities needed to operate the day-to-day functions of FOIA processing, Section 6, *Reporting and Analytical Capabilities*, defines a pro forma set of performance measures and analytical capabilities that should be considered as a necessary part of a FOIA processing solution. That section includes the current set of mandatory measures for Agencies’ annual and quarterly FOIA reports to DOJ plus additional content aimed at agency’s ongoing FOIA process improvement.
3 Top-Level of the FOIA Reference Model

The FOIA Reference Model (FRM) includes high-level constructs and detailed content, the latter comprising process and activity-level definitions and pro forma business needs. The top-level, described in this section, presents high-level constructs and model views for:

- Functional Components
- Informational Components
- Common Services

3.1 Functional Components

The top-level functional components of the FRM include:

- Top-Level Context Diagram
- Top-Level Process Flow Model
- Functional Roles (also called Process Actors)
- Process-Role Mapping

3.1.1 Top-Level Context Diagram

The FRM is organized into 26 processes, as shown in the Business System Context diagram in Figure 5. These processes, which collectively form the “FOIA system”, are organized as follows:

- **Core processes (13)** that span the life cycle of a specific FOIA Request. Note that not every process is invoked for each Request. Some are executed conditionally, such as the Appeal Request-Related Decision or Create Referral, Coordination, or Consultation processes.

- **Enabling processes (8)** that are foundational and are thus required to executing the Core processes.

- **Supporting processes (5)** that while not required to execute the Core or Enabling processes, are particularly useful and important for ensuring high-quality FOIA processing and which many Agencies already execute.

Each process is further detailed into a set of discrete activities performed by the roles, which are presented in 3.1.3. Definitions for each process and for each of the activities comprising each process are presented in Section 7.
Definitions for each of the processes and their component activities can be found in Section 7. Figure 5 also illustrates the major relationships between the FOIA system and external parties, including organizations, people, and systems:

- **Requester or Representative.** The Requester is either the person making a FOIA Request or on whose behalf a Representative is making the request. It is important to note that although the context diagram depicts the Requester as external to the system (to better illustrate their interaction from a high-level), they are treated in the FRM as within the system. The reason for this is straightforward—when Requesters register as a user within an agency’s FOIA operation, they will be provided various capabilities, such to submit Requests, check their Request status, make modifications, receive communications, acknowledge receipts and payment assurances, and download responsive records. Although it would be inappropriate to assume all Requesters would want to engage with an agency as a registered user, if they do, they become additional “actors” in the system. Of course, some Requesters will not take this path and will only interact via email or by phone. In that case, the Requester is more akin to an external entity.

- **Agency’s Other Component.** Because DOJ’s rules for FOIA explicitly call out the situation where a Requester may submit a Request to the right agency but to the wrong Component within that agency, and upon doing so the agency must redirect the “misdirected request” within a defined timeframe (e.g., 10 days).
• **Another Agency.** While reviewing responsive records, it is sometimes necessary to collaborate with another agency that may hold equity interest in those records, either because the other agency was the originating source of the records or because there is content within the records that are of interest to the other agency. Three types of collaboration, as further detailed in the FRM, include referrals, coordination, and consultations.

• **Government-wide FOIA Portal.** This entity represents a generalized and centralized government platform (e.g., FOIA.gov) for Requesters to prepare and submit FOIA Requests that are subsequently routed to the appropriate agency. The use of this portal is optional for Requesters, since they can submit directly to an agency, presuming they know which agency holds records of interest. Note that the use of FOIA.gov for submitting requests is already a supported capability. The FRM addresses the portal since it represents an important interface to an agency’s FOIA system.

• **Accounts Receivable (A/R) System.** Although FOIA fees do not seem to be a high priority for Agencies (some don’t collect fees, and collected fees typically go to the general Treasury and thus not typically returned to agencies’ FOIA program funds), a mechanism is required to handle fees owed and fees paid. Part of the Estimate Fees process is based on evaluating payment risk, such as whether a Requester has a prior balance or whether they tend to pay on time. For many agencies, fees are handled external to the FOIA system, such as through the [www.pay.gov](http://www.pay.gov) site.

• **Commercial Information Submitters.** Referred to as “Submitters” in the FRM, these organizations are typically commercial businesses who have provided various commercial or financial records to the agency, such as in their business proposals, project activities, or other support. Some records may have valid confidentiality claims and may be exempted from release with Exemption 4. The Review Responsive Records process includes interactions with Submitters to inform them of the potential release of records the agency deems as not exempted and gives the Submitter an opportunity to dispute the lack of exemption, either resulting in an agency change, Submitter agreement, or possibly an injunction action by the Submitter.

• **Agency’s General Counsel.** When disputes with Requesters or Submitters result in them taking legal action, the FOIA office must be kept aware of the status of the court cases as well as explicitly addressing remand and other actions dictated by the court. To reflect whom the FOIA office will most likely interact with, the FRM uses the agency’s Office of General Counsel (OGC) as the primary entity external to the FOIA system.

### 3.1.2 Top-Level Process Flow Model

The core processes depicted in Figure 5 and two supporting processes (*Provide Pre-Request Support* and *Provide Customer Service*) are further detailed in Figure 6 to illustrate the inter-process relationships.

Because each process does not exist in isolation and may trigger the execution of other processes, these linkages reflect likely flow of control. As noted previously, the sequencing depicted at this level and within the Process Flow Diagrams in Section 7 are meant to be instructive and not prescriptive. That is, each agency may design a somewhat different workflow, ideally leveraging the activities defined across the processes.
3.1.3 Functional Roles (Process Actors)

The FRM uses the concept of role (aka actor) to define the likely permissions needed for performing each activity in the model. These relationships can be viewed within both the Use Case diagrams and the Process Flow diagrams in Section 7.

With the aim of serving as a starting point for system requirements and design, the roles within the FRM are intentionally granular. That is, rather than presume a given role can perform a lot of activities across the model, the FRM presumes the opposite, with the notion that when applied in a systems context a person can easily be assigned multiple roles (i.e., “wear many hats”). For some agencies, especially ones with smaller FOIA teams, this may be common. However, for agencies with much larger teams, the separation by more granular roles may be both convenient and necessary.

Thus, defining more granular roles enables greater flexibility across agencies regardless of their team’s complexity. Of course, when designing and implementing a system, it is anticipated that some roles may need to be further decomposed to meet the unique needs of a particular
organization. As a general practice, it is not recommended that agencies combine roles as part of their implementation, because if a future need required splitting a role (i.e., “trying to cut a hat in half”) it would be more difficult to do so once deployed.

### 3.1.3.1 FOIA Role Descriptions

The FRM defines the following roles, which comprise both “actors” who are within the boundaries of the FOIA business system and actors that are external, either to the FOIA business system but within the agency or external to the agency. In Section 7, the roles are referenced across the set of Process Flow diagrams and illustrate which roles can perform what activities. Table 1 below provides the full set of roles and definitions within the FRM. Note that some roles are external to the agency (designated as “[External]”) and others are within the agency but external to the FOIA process/system (designated as “[External to Agency’s FOIA]”).

<table>
<thead>
<tr>
<th>Role</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Accounts Receivable System [External Requester]</td>
<td>A system or service (e.g., Pay.gov) that tracks both payment request information (invoices) and payments from Requesters and maintains balances owed by (or due to) each Requester.</td>
</tr>
<tr>
<td>Agency General Counsel [External to Agency’s FOIA]</td>
<td>The agency’s general counsel office. Represents the agency in FOIA litigation. Will sometimes be involved in FOIA administrative appeals or other FOIA review activities.</td>
</tr>
<tr>
<td>Agency Reporting Manager</td>
<td>Responsible for producing and disseminating official, mandated reports to DOJ/OIP, which are quarterly and annually.</td>
</tr>
<tr>
<td>Analytics User</td>
<td>This role is a composite of more fine-grained roles that an agency would likely delineate, such as based on (1) the category of analytics (e.g., requests, fees, appeals, etc.) and/or (2) the level of the user, such as to limit the scope of records that may be included in an analysis, and/or (3) any other criteria deemed useful by an agency.</td>
</tr>
<tr>
<td>Appeal Lead</td>
<td>Evaluates valid appeals to prepare a recommended decision on the Appeal case, which is subsequently forwarded to the appropriate agency Authorized Official for Appeals to make the final determination on the case.</td>
</tr>
<tr>
<td>Appeals Intake Specialist</td>
<td>Reviews newly submitted appeals from Requesters, evaluates the validity of the appeal in accordance with DOJ and agency guidance, and assigns valid the appeals to an Appeal Lead for further processing and evaluation.</td>
</tr>
<tr>
<td>Authorized Official for Expedited Decision</td>
<td>This an officially designated person that is authorized to make final FOIA determinations, particularly adverse determinations, concerning the expedited status of requests. The authorized person is the head of the agency. This authority can be delegated downward. Having an authorized official to make adverse decisions is mandated by law. Most agencies articulate who is authorized to make FOIA determinations in their FOIA regulations. In some agencies, such as DoD, this role is referred to as an Initial Denial Authority.</td>
</tr>
</tbody>
</table>

Warrant: § 552(a)(6)(A)(i)(III)(aa) “the right of such person to appeal to the head of the agency, within a period determined by the head of the agency that is not less than 90 days after the date of such adverse determination;”

32 CFR 286.7(b) [DoD] Authority to deny requests. DoD Components will designate one or more Initial Denial Authorities (IDA) with the authority to deny any requests for records that are maintained by that agency.

40 CFR 2.103(b) [EPA] The Administrator, Deputy Administrators, Assistant Administrators, Deputy Assistant Administrators, Regional Administrators, Deputy Regional Administrators,
General Counsel, Deputy General Counsels, Regional Counsels, Deputy Regional Counsels, and Inspector General or those individuals’ delegates, are authorized to make determinations required by 5 U.S.C. 552(a)(6)(A), including to issue final determinations whether to release or withhold a record or a portion of a record on the basis of responsiveness or under one or more exemptions under the FOIA, and to issue “no records” responses.

**Authorized Official for Expedited-Related Appeals**
This is the person authorized to make final determinations concerning expedited status appeals. See the Authorized Official for Expedited Decision for more details.
Warrant: See the Authorized Official for Expedited Decision for details.

**Authorized Official for Fee Waivers**
This is the person authorized to make final determinations concerning fee waivers. See the Authorized Official for Expedited Decision for more details.
Warrant: See the Authorized Official for Expedited Decision for details.

**Authorized Official for Fee-Related Appeals**
This is the person authorized to make final determinations concerning fee waiver appeals. See the Authorized Official for Expedited Decision for more details.
Warrant: See the Authorized Official for Expedited Decision for details.

**Authorized Official for Proactive Records Disclosure**
This is the person authorized to make final determinations concerning records that will be made public through the FOIA Library (aka “Public Reading Room”). Records considered for public disclosure may have originated from prior FOIA Requests or independent from a Request.

**Authorized Official for Records Release**
This is the person authorized to make final determinations concerning the release of records. See the Authorized Official for Expedited Decision for more details.
Warrant: See the Authorized Official for Expedited Decision for details.

**Authorized Official for Records-Related Appeals**
This is the person authorized to make final determinations concerning appeals over the release of records. See the Authorized Official for Expedited Decision for more details.
Warrant: See the Authorized Official for Expedited Decision for details.

**Coordination & Consultation Coordinator**
Supports internal assignment of Coordination and Consultation requests from other agencies, including determination of appropriate Process Queue, internal organization, and Request Lead.

**Exemption & Exclusion Specialist**
Provides expertise in applying FOIA exemptions, redactions, and exclusions by proposing (recommending) these release decisions as part of the process to Search for Responsive Records. These are non-binding and will be reviewed and possibly adjusted as part of the Review Responsive Records process.

**Fee Specialist**
Leads the preparation of FOIA Request fee estimates and final payment requests (invoices).

**FOIA Library Manager**
A type of FOIA Records Environment Manager that is responsible for managing the externally facing FOIA Library, sometimes referred to as the “public reading room.” The repository manages and stores agency records approved for public release.

**FOIA Public Liaison**
Public liaisons are a resource for requesters to reach out to for clarifying problems and inquire about the status of requests. Public liaisons are mean to help resolve disputes between the agency and requestors, educate requestors, help reduce delays, and help rectify problematic requests. Every agency is required to have at least one FOIA public liaison by law.

Warrant: § 552 (l) “FOIA Public Liaisons shall report to the agency Chief FOIA Officer and shall serve as supervisory officials to whom a requester under this section can raise concerns about the service the requester has received from the FOIA Requester Center,
following an initial response from the FOIA Requester Center Staff. FOIA Public Liaisons shall be responsible for assisting in reducing delays, increasing transparency, and understanding of the status of requests, and assisting in the resolution of disputes.”

<table>
<thead>
<tr>
<th>FOIA Records Environment Manager</th>
<th>A generalized role responsible for managing records-based repositories, including the FOIA Repository and the FOIA Library.</th>
</tr>
</thead>
<tbody>
<tr>
<td>FOIA Repository Manager</td>
<td>A type of FOIA Records Environment Manager that is responsible for managing the internally facing FOIA repository. The repository manages and stores responsive records. It is the environment where FOIA staff review, redact, and prepare responsive records.</td>
</tr>
<tr>
<td>FOIA Requester Service Center Staff</td>
<td>Provides customer service to Requesters, such as by answering their questions, assisting with FOIA Request preparation, and when appropriate, escalating more difficult issues to the FOIA Public Liaison.</td>
</tr>
<tr>
<td>Government-wide Portal [External]</td>
<td>A cross-agency portal, such as FOIA.gov, that can be used to prepare a FOIA Request that would subsequently be routed to the appropriate agency.</td>
</tr>
<tr>
<td>Intake Specialist</td>
<td>The role responsible for handling the intake of individual requests.</td>
</tr>
<tr>
<td>Intake Supervisor</td>
<td>The role responsible for managing the process of taking in requests.</td>
</tr>
<tr>
<td>Litigation Lead</td>
<td>The lead is the person responsible for tracking the litigation case and coordinating the remand activities, as applicable, and not the lead lawyer litigating the case on behalf of the agency.</td>
</tr>
<tr>
<td>NARA OGIS [External]</td>
<td>The Office of Government Information Services (OGIS) within the National Archives and Records Administration (NARA) reviews FOIA policies, procedures and compliance of Federal agencies and identifies ways to improve compliance. Their mission includes mediating and resolving FOIA disputes between Federal agencies and requesters.</td>
</tr>
<tr>
<td>Other Agency’s FOIA Office [External]</td>
<td>The FOIA office of another agency. Agencies may have to refer requests to another agency, consult with another agency about requests, or may have to coordinate with another agency about requests. FOIA offices from another agency. Agencies that have received a misdirected FOIA request that belongs to another agency that is not within the same department are only obligated to inform the requester that their request is misdirected and is not obligated to send that request to the correct agency. Agencies that have receive a misdirected FOIA request that belongs to another agency within the same department are obligated by law to send that request to the proper agency within 10 days.</td>
</tr>
<tr>
<td>Other Publicly Accessible Agency Repository [External to Agency’s FOIA]</td>
<td>A publicly accessible records repository that is external to the FOIA libraries (i.e., the FOIA Repository and FOIA Library) and which may contain records of interest to the public and to individual FOIA Requesters (or those who might otherwise be requesters had this repository not been made available).</td>
</tr>
<tr>
<td>Perfection Specialist</td>
<td>The role responsible for perfecting individual requests.</td>
</tr>
<tr>
<td>Perfection Supervisor</td>
<td>The role responsible for managing the process of perfecting requests.</td>
</tr>
<tr>
<td>Policy Manager</td>
<td>The role responsible for developing, updating, reviewing, and maintaining a FOIA program’s policies.</td>
</tr>
<tr>
<td>Proactive Disclosure Lead</td>
<td>Leads the identification and review of candidate records for proactive disclosure, including those that become known through the multi-release rule (i.e., 3 times rule) and other records that meet the agency’s criteria for proactive disclosure.</td>
</tr>
<tr>
<td>Role</td>
<td>Description</td>
</tr>
<tr>
<td>------------------------------------------</td>
<td>-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Process Administrator</td>
<td>The role responsible for developing, updating, reviewing, and maintaining one or more processes.</td>
</tr>
<tr>
<td>Records System SME [External to Agency's FOIA]</td>
<td>A person who specializes in using e-discovery tools, techniques, and processes to discover potentially responsive records, typically in enterprise systems such as email. This actor is often situated outside of the agency's FOIA team(s). An actor who has SME of an agency program or recordkeeping system. This actor is often a member of that program and is usually situated outside of the agency's FOIA team(s).</td>
</tr>
<tr>
<td>Records Reviewer</td>
<td>The role responsible for reviewing collected responsive records and determining their releasability.</td>
</tr>
<tr>
<td>Records Search Specialist</td>
<td>The role responsible for identifying responsive records from one or more agency sources and who may make preliminary assessments of exemptions, exclusions, and redactions.</td>
</tr>
<tr>
<td>Request Item Lead</td>
<td>The role responsible for ensuring that a request item is fulfilled accurately and on time.</td>
</tr>
<tr>
<td>Request Lead</td>
<td>The role responsible for ensuring that a request is fulfilled accurately and on time.</td>
</tr>
<tr>
<td>Requester</td>
<td>The person who submits a FOIA request. Note that with proper authentication, a Requester Representative (e.g., parent, guardian, attorney, etc.) may make requests on behalf of a Requester and subsequently participate in the FOIA process as if they were the Requester.</td>
</tr>
<tr>
<td>Requester Representative</td>
<td>A person who submits a FOIA request on behalf of someone else. This typically comes into play for first person requests, such as a guardian making a request on behalf of a minor. For the Reference Model, only Requester is used as the key role (actor) in the activities and user stories.</td>
</tr>
<tr>
<td>Resource Administrator</td>
<td>The role responsible for defining the organizational structure of FOIA team(s) and staff, define the structure of work calendars and schedules, establish, and maintain staff skills and training requirements, and align staff teams to assignments and queues.</td>
</tr>
<tr>
<td>Resource Manager</td>
<td>The role responsible for maintaining staff training and skills, managing staff calendars/schedules, and managing staff workload.</td>
</tr>
<tr>
<td>Response Completion Staff</td>
<td>The role responsible for finalizing the response to a request. This work includes preparing and finalizing a release package.</td>
</tr>
<tr>
<td>Response Release QC Staff</td>
<td>The role responsible for providing a quality control check on a response or release package before it is sent to the requestor.</td>
</tr>
<tr>
<td>Sizing &amp; Scoping Specialist</td>
<td>The role responsible for sizing and scoping individual requests.</td>
</tr>
<tr>
<td>Sizing &amp; Scoping Supervisor</td>
<td>The role responsible for managing the process of sizing and scoping individual requests.</td>
</tr>
<tr>
<td>Submitter [External]</td>
<td>Any person or entity that provided an agency with confidential commercial information that is subsequently responsive to a FOIA request. Submitters are defined in some agency FOIA regulations.</td>
</tr>
</tbody>
</table>

**Submitter**

Warrant: 32 CFR 286.10(a)(1)&(2) [DOD]: Confidential Commercial Information: “commercial or financial information obtained by the DoD Component from a submitter that may be protected from disclosure under” FOIA Exemption 4. “Any person or entity, including a corporation, State, or foreign government, but not including another Federal Government entity, that provides confidential commercial information, either directly or indirectly to the Federal Government.”

6 CFR 5.7(a)(1)&(2) [DHS]: “Confidential commercial information means commercial or financial information obtained by DHS from a submitter that may be protected from
disclosure under Exemption 4 of the FOIA.” “Submitter means any person or entity from whom DHS obtains confidential commercial information, directly or indirectly.”

<table>
<thead>
<tr>
<th>Role</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Task Lead</td>
<td>The role responsible for completing individual tasks. Individual may be anyone within the agency.</td>
</tr>
<tr>
<td>Task Manager</td>
<td>The role responsible for defining and managing tasks that are assigned to Task Leads. Note that this role may be assigned to anyone but typically may be assigned to the same person with the Request Lead and/or Request Item Lead role.</td>
</tr>
<tr>
<td>The System</td>
<td>The system itself. Some functionality is defined as likely targeted for full automation; thus, for those situations, only the system would be the applicable role.</td>
</tr>
<tr>
<td>User</td>
<td>Any person who is a registered user of the FOIA system, including agency staff, and requesters and requester representatives who have registered.</td>
</tr>
<tr>
<td>User Account Manager</td>
<td>The role responsible for managing requestor user accounts of public facing FOIA systems where people can make and track their requests.</td>
</tr>
</tbody>
</table>

### 3.1.3.2 Role-Activity Mappings

The roles, described in the previous section, are performers of the FOIA processes presented in Section 7. Appendix A provides a detailed mapping between each defined FRM role and the process activities where they participate. This mapping can be used as a starting point within a systems specification for defining and managing the specific privileges permitted by each role. As part of evaluating the scope for a system design effort, new roles may be required, and others decomposed into additional roles.

It is not recommended to define generalized roles that essentially group existing roles together. While agencies with smaller FOIA shops may wish to do that, the system becomes more flexible with discrete roles, such that a single person might be assigned multiple roles. That is an important concept in the FRM and is seen in the conceptual data model in Section 3.2.1

### 3.2 Informational Components

The informational components reflected in the FRM are presented in the following sub-sections:

- FRM Conceptual Data Model
- Process-Data Mapping (also called a CRUD matrix)
- Preliminary Set of Request-Related Data Attributes
- Preliminary Set of Controlled Vocabularies (also called Reference Tables)

#### 3.2.1 Conceptual Data Model

A conceptual data (or object) model conveys the major types of information the FOIA system needs to capture and manage so that (1) the processes can be executed and (2) analysis of the FOIA operation can be conducted and performance can be measured. The data model, depicted in Figure 7, is conveyed in the FRM as a high-level construct. As part of leveraging this content into a system design specification, the model should be further detailed with data attributes (elements) as part of a logical data model (or fully enumerated UML class model). It may be useful to refer to the common FOIA case content presented earlier in Section 2.2.2.2.

The data objects in the conceptual data model include:
**Action.** An Action is something done by the system in response to an event or change in data (or object) status. Perhaps the most typical actions are automated email notifications sent to Requesters and other involved parties when something in the system happens, such as when a Request is rejected as not being valid or an expedited decision is made. Another example might be to update a caseworker’s inbox when the status of a Request and/or supporting task changes and thus the Request is now ready for them to process.

**Agency’s FOIA Guidance.** Documentation comprising the agency’s FOIA policies and procedures. These are typically made available to both internal Agency Staff and to the public through the agency’s website.

**Agency Staff.** A sub-type of Person representing an individual affiliated with an agency, including employees and contractors who are involved in FOIA processing.

**Appeal (Case).** A type of FOIA Case created to manage a dispute raised by a Requester for one of three reasons related to a specific FOIA Request, including either a disagreement over (1) the fees expected for a specific FOIA Request, (2) the disapproval by the agency to expedite a Request (as asked by the Requester), or (3) the records provided (or not provided) by the agency to the Requester.

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**Figure 7. FOIA Conceptual Data Model**

**Assigned Role.** One or more roles, as defined in Section 3.1.3.1, are assigned to an Agency Staff person, which when tied to the FOIA system’s defined user privileges, should constrain the functionality that a given person can perform. Because a person may be assigned multiple roles...
(and thereby “wear many hats”), it becomes possible for agencies to customize how the work and responsibilities are assigned.

**Communication.** Either an internal system communication or email between parties as related to a specific FOIA Request. The FRM includes many activities where specific notifications are to be sent and captured within the FOIA system. Note the FRM also defines a common service for *Email Integration and Correspondence Production*, which would need to support the capture and tracking of Communications.

**Customer Inquiry (Case).** A question posed to an agency by a Requester, including a *Requester Inquiry* for general support or assistance with processing their FOIA Request, or a *FOIA Mediation* to capture mediation actions with NARA that a Requester has initiated to resolve their FOIA Request-related dispute.

**Document.** An uploaded document that is associated with a case. A document could be attached for any number of reasons, such as providing proper authentication for first-person requests, permitting Requesters to supplement their request with additional or clarifying information, etc. Note that the FRM defines a “Document” object as different and distinct than a “Responsive Record”, even though the latter could be a type of a document. *Refer to the definition of a Responsive Record below.*

**FOIA Case.** A general object that aligns with the case concept in Section 2.2.2 and comprises others in this list, including:

- Appeal
- Customer Inquiry
- Request
- Request Item
- FOIA-Related Litigation
- Inter-Agency Referral, Coordination, or Consultation (case created by the receiving agency)

**FOIA Clock Stop Period (Tolling).** A defined period (i.e., a start and end date) that represents time that can be “subtracted” from the response compliance period, which is typically 20 days for routine requests with no “unusual circumstances”. Examples of when a FOIA Clock Stop Period might be created include time spent coordinating fees and Requester-driven scope changes. Note the FRM also defines a common service for *FOIA Processing “Clock” Starts and Stops*, which supports the creation of these periods, associates them with a FOIA Request, and captures the reason for the clock stoppage.

**FOIA Library Record ("Public Reading Room").** A record within the FOIA Library that is accessible by the public without requiring a FOIA Request to obtain the content.

**FOIA-Related Litigation (Case).** A court case that involves or impacts one or more FOIA Requests. The case may have been initiated by a Requester(s), such as to bring a legal lawsuit against an agency for records received or not received as part of their Request. Another example is if a commercial Submitter of information aims to block an agency with an injunction from releasing records it believes should be withheld as part of exemption 4(b).

**FOIA Repository Record.** A record within the internal FOIA Repository that was previously considered responsive to a request, though may not have been released, or was previously determined to be a candidate for proactive disclosure but required records review before it could be migrated to the FOIA Library.
**FOIA Request (Case).** A type of case representing the FOIA Request itself. FOIA Requests will be assigned a unique case number for tracking purposes. As a case, certain features pertaining to all cases become relevant, such as uploading and associating it with documents, correspondence, notes, a process queue, etc.

**FOIA Request Item (Case).** A type of case representing a logical subset of a FOIA Request that is differentiated from any other FOIA Request Items associated with the Request based on the type of records being sought and/or the search to be completed. It is envisioned that each FOIA Request would require at least one Request Item but could have more. Like the related data described for a FOIA Request, the Request Item would also relate to Tasks, Topics,

**Inter-Agency Referral, Coordination, or Consultation (Case).** One of three action types that require the collaboration of two agencies to complete a single FOIA Request. When an agency is on the receiving end of these actions—that is, Agency B has initiated a referral, coordination, or consultation with Agency A, then Agency A would establish a case to handle the request. When Agency A initiates one of the three actions, then there is not additional case to track, as those actions are associated with, and conducted for, a Request case.

“Agencies refer records for direct handling to another agency when the records originated with that other agency. By contrast, when records originated with the agency processing the request, but contain within them information of interest to another agency, the agency processing the request will typically consult with that other agency prior to making a release determination….

An agency may locate in its files law enforcement records originating with a law enforcement agency or classified records originating with an agency that is a member of the Intelligence Community. When responding to requests that encompass those records, it has occasionally been necessary to use modified procedures to avoid inadvertently revealing a sensitive fact that could invade someone’s personal privacy or damage national security interests. Under such modified procedures, which should be invoked only when necessary to avoid such inadvertent disclosures, the agency that originally received the request will typically respond to the requester itself, after coordinating with the law enforcement or Intelligence Community agency that originated the records.” [11]

**Organization.** A group of persons as part of an ongoing and officially recognized group, such as a government agency, component, or any other sub-division of the agency; and external organizations, such as commercial companies, academic institutions, news organizations, etc.

**Payment.** A financial transaction that creates an accounts receivable credit amount and transfers money to the government for fees owed by a Requester for a FOIA Request. Depending on the agency and their policy and systems, payments might be made electronically, such as through the pay.gov site, by check, or other form of payment.

**Payment Assurance.** A written agreement from a Requester stating their commitment to pay for the estimated fees associated with a FOIA Request.

**Payment Request (Invoice).** A financial transaction that creates an accounts receivable debit amount of the exact and therefore final fees to be paid for a specific FOIA Request.

**Person.** Someone of interest to FOIA processing, including for example, Requesters, Requester Representatives, Agency Staff, FOIA caseworkers, agencies’ points of contact, etc.

**Process Queue.** A pre-defined, conceptual grouping of FOIA Requests that ensure all requests in the queue will be treated in a similar manner. For example, a Process Queue might be defined and used for all “simple” first-person requests, or perhaps all compound requests that pertain to a
particular topic. The intent is for an agency to define all Process Queues that are useful collections for organizing and managing the processing of related requests.

**Recordkeeping System.** An official system of record within an agency that may hold records of interest to the public and/or to individuals. When considered as potentially responsive to a FOIA Request, records from these systems are copied into the FOIA Repository for processing and review.

**Request Response.** A notification to a Requester either with a set of responsive records to a FOIA Request or with no responsive records if none are found by the agency. Note that in some cases, multiple responses may be applicable to a single FOIA Request, such as when the agency decides to provide a “rolling release” of large volumes of records that may be processed in batches over a period.

**Requester.** A person who decides to submit a FOIA Request to an agency.

**Responsive Record.** A record considered responsive to a FOIA Request because the record meets the basic criteria for what a Requester is seeking. Note however that not all responsive records are released, either in full or part (i.e., redacted), because responsive records are considered so prior to the application of exemptions and exclusions. Refer to **Responsive Record Exemption / Exclusion** below.

**Responsive Record Exemption / Exclusion.** A single exemption or exclusion applied to a responsive record, including any redactions that may have been applied to address the exemption. FOIA “sets forth the broad outlines of a process for agencies to follow when responding to FOIA requests: first, identify responsive records; second, identify those responsive records or portions of responsive records that are statutorily exempt from disclosure; and third, if necessary and feasible, redact exempt information from the responsive records.” [14]

**Skill.** An ability or expertise required by a Role and for which one or more Agency Staff Persons may possess. By matching skills to people, roles, and training, it becomes possible to improve the human resources management by evaluating and addressing gaps and aligning appropriate staff to roles.

**Task.** A specific action item associated with a Request Item (sub-case) that is assigned to an individual or group to be completed as part of processing a FOIA Request. One or more Tasks are associated with a Process Queue and those become “instantiated” when a new case is assigned to a queue. Per the FRM, additional tasks may be assigned to Task Leads, as needed, and as directed by the Request Lead and/or Request Item Lead roles. Once a Task is completed, the next dependent Task would become “active” for that assigned Task Lead.

**Timesheet.** A recording of hours worked on one or more FOIA Requests over a period (e.g., bi-weekly) by a single Agency Staff member. The Timesheet should discern the number of hours worked on each Request and the type of work performed, such as **Conduct Request Intake,** **Confirm Perfected Request,** **Scope and Size the Request,** **Search for Responsive Records,** **Review Responsive Records,** etc.

**Topic.** An agency-defined term that can be associated with both the records in the two FOIA records environments, the FOIA Repository and FOIA Library, and with each FOIA Request. The use of topics supports multiple activities, including **Provide Pre-Request Support** to assist a person with determining the correct agency or component to submit a FOIA Request to, **Search for Responsive Records** to improve the quality of the search results, and **Scope and Size Request** and **Review Responsive Records** to flag opportunities for proactive disclosure.
Training. An event that enhances the Skills of Agency Staff persons.

User Account. A registered user within the FOIA system, including Agency Staff, Requesters (if they register), and any other people who would be performing the functionality within the FRM, such as contractors.

### 3.2.2 Process-Data Mapping (CRUD)

The information model also addresses the relationship between the FOIA processes and the data objects from the conceptual data model, depicted in Figure 7. A mapping between the two types of FRM content describes the actions taken upon the data within each process. These actions are commonly called CRUD and include:

Create. The referenced process instantiates new instances of the object. For example, a Create action between the Conduct Request Intake process and the FOIA Case object means a new FOIA Case (i.e., a FOIA Request) will be created within that process.

Read. The referenced process looks up information from the object but neither updates it nor creates new instances.

Update. The referenced process may update one or more attributes for an instance of the data object.

Delete. The referenced process may delete (remove) an instance of the data object.
Table 2 provides a CRUD mapping between the processes within the FRM and the data objects from the conceptual data model. When the FRM is used as an input to a system design initiative, typically a more detailed CRUD would be defined by a project team, so that the actions to be taken on the data (represented by a more detailed data model) will be complete with respect to the detailed set of activities, software modules and/or procedures.

3.2.3 Preliminary Set of Request-Related Data Attributes

Although a fully enumerated data model is not the focus of the current version of the FRM, FOIA SMEs, technical staff and other stakeholders may find it useful to refer to the list in Table 3 as a starting point for request-related data attributes.

Clearly, each data entity (object) in the conceptual model would be further decomposed as part of a detailed requirements and/or design effort. Likewise, each resulting logical data entity in the refined model would be defined with its own set of data. Table 3 below differentiates the core data expected to be provided by the Requester as part of their Request from other data that a FOIA operation would subsequently capture by the agency for processing and tracking purposes.
### Table 2. Process-Data Mapping (CRUD)

| Core Process | Action | Agency’s FOIA Guidance | Agency Staff | Appeal | Aligned Role | Communication | Customer Inquiry / Requestor Inquiry | FOIA Mediation | Document | FOIA Clock Stop Period | FOIA Library Record | FOIA-Related Litigation | FOIA Request (Case) | FOIA Request Item (Sub-Case) | FOIA Request Item (Sub-Case) | Organization | Payment | Payment Assurance | Payment Request (Finance) | Request | Request Process Queue | Requesting / Approving System | Request Response | Requestor | Responsive Record | Responsive Record Exemption / Exclusion | Skill | Task | Team Lead | Topic | User Account |
|--------------|--------|------------------------|-------------|--------|--------------|---------------|-------------------------------------|----------------|-----------|-----------------------|-----------------|----------------------|-------------------|-----------------------------|-----------------------------|----------------|---------|-----------------|--------------------------|----------|----------|-------------------|----------------|-----------------|
| Conduct Request Intake | —      | —                      | —           | R      | —            | CRUD           | RU                                  | CRUD           | RU        | —                     | —               | CRUD                | R                 | CRUD                      | CRUD                        | R               | —       | —               | —                        | R        | —        | R                       | R            | —               |
| Confirm Perfected Request | —      | —                      | R           | R      | CRU          | —              | RU                                  | CRUD           | R         | —                     | R               | R                   | RU                | R                          | CRUD                        | RU               | RU      | RU              | RU                        | R        | —        | R                       | R            | —               |
| Scope and Size Request | —      | CRU                    | R           | R      | RU           | CRUD           | R                                  | R              | R         | R                     | R               | R                   | R                 | R                          | CRUD                        | RU               | R       | R               | R                        | R        | —        | R                       | R            | —               |
| Estimate Fees | —      | R                      | R           | R      | CRU          | RU              | R                                  | R              | CRUD     | R                     | R               | CRUD                | R                 | R                          | CRUD                        | R               | —       | CRUD           | CRUD                      | R        | —        | R                       | R            | —               |
| Search for Responsive Records | —      | R                      | R           | R      | R            | CRU             | RU                                  | R              | R         | R                     | R               | R                   | R                 | R                          | CRUD                        | R               | —       | CRUD           | CRUD                      | R        | —        | R                       | R            | —               |
| Review Responsive Records | —      | CRU                    | R           | R      | RU           | R              | R                                  | R              | R         | CRUD                  | R               | R                   | R                 | R                          | CRUD                        | R               | —       | CRUD           | CRUD                      | R        | —        | R                       | R            | —               |
| Create Referral, Coordination or Consultation | —      | CRU                    | R           | R      | CRU          | R              | RU                                  | CRUD           | R         | CRU                   | R               | R                   | R                 | R                          | CRUD                        | R               | —       | CRUD           | CRUD                      | R        | —        | R                       | R            | —               |
| Request Payment | —      | R                      | R           | R      | CRU          | RU              | RU                                  | R              | RU        | RU                    | RU              | RU                   | R                 | R                          | CRUD                        | R               | —       | CRUD           | CRUD                      | R        | —        | R                       | R            | —               |
| Receive Payment | —      | R                      | R           | R      | CRU          | RU              | RU                                  | R              | RU        | RU                    | RU              | RU                   | RU                | R                          | CRUD                        | R               | —       | CRUD           | CRUD                      | R        | —        | R                       | R            | —               |
| Respond to Request | —      | R                      | R           | R      | CRU          | RU              | RU                                  | R              | R         | CRU                   | RU              | RU                   | RU                | R                          | CRUD                        | R               | —       | CRUD           | CRUD                      | R        | —        | R                       | R            | —               |
| Appeal Request-Related Decision | —      | CU                  | R           | R      | CRU          | CRU             | R                                  | RU              | R         | R                     | R               | R                   | R                 | R                          | CRUD                        | R               | —       | CRUD           | CRUD                      | R        | —        | R                       | R            | —               |
| Manage Tasks | CRUD | R                      | R           | R      | CRU          | RU              | RU                                  | R              | RU        | RU                    | RU              | RU                   | RU                | R                          | CRUD                        | R               | —       | CRUD           | CRUD                      | R        | —        | R                       | R            | —               |
| Perform Supplemental Case Activities | R      | R                      | R           | CRU | —            | RU              | RU                                  | C               | R         | R                     | R               | R                   | R                 | R                          | R                            | R               | —       | R               | R                        | R        | —        | R                       | R            | —               |

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<table>
<thead>
<tr>
<th>Data Object</th>
<th>Enabling Process</th>
<th>Action</th>
<th>Agency's FOIA Guidance</th>
<th>Filing</th>
<th>Assigned Role</th>
<th>Communication</th>
<th>Customer Inquiry (Requester Inquiry)</th>
<th>FOIA Library Record (Public Reading Room)</th>
<th>FOIA Request (Case)</th>
<th>FOIA Request Item (Sub-Case)</th>
<th>Inter-Agency FOIA Action (Referral, Consultation)</th>
<th>Organization</th>
<th>Payment Assurance</th>
<th>Payment Request (Invoice)</th>
<th>Person</th>
<th>Process Queue</th>
<th>Recordkeeping System</th>
<th>Responsive Record</th>
<th>Responsive Record Exception / Exclusion</th>
<th>Skill</th>
<th>Time/Shift</th>
<th>Topic</th>
<th>Training</th>
<th>User Account</th>
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<tr>
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<td>Respond to Referral</td>
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<tr>
<td>Modify Scope of Request</td>
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<td>Monitor Litigation</td>
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<td>Manage Account</td>
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</tr>
</tbody>
</table>

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Note that for the items in the table, no specific distinction is made between attributes associated with the “parent” Request and one or more “child” Request Items. The distinction would be clarified as part of preparing a logical data model.

For those attributes in the table that are of the “List” Data Type, there is a corresponding draft set of valid values provided in Appendix C as a starting point.

Table 3. Preliminary Request, Request Item, and Requester-Related Data Attributes

<table>
<thead>
<tr>
<th>Data Attribute</th>
<th>Description</th>
<th>Data Type</th>
<th>[E]ntered or [D]erived</th>
<th>Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>Actual Processing Time</td>
<td>The number of hours consumed by agency staff and/or contractors to complete a FOIA Request. This data would be derived from more granular data at a task and person level, such as from timesheet data.</td>
<td>Numeric</td>
<td>D</td>
<td>Agency</td>
</tr>
<tr>
<td>Agency Summary Of Request</td>
<td>An agency’s description of the Request used to make clear the type of search required to locate responsive records.</td>
<td>String</td>
<td>E</td>
<td>Agency</td>
</tr>
<tr>
<td>Closed Date</td>
<td>The date the Request has been completed, either administratively closed or final response made.</td>
<td>Date</td>
<td>E</td>
<td>Agency</td>
</tr>
<tr>
<td>Description</td>
<td>The Requester’s written text describing the records they are seeking.</td>
<td>String</td>
<td>E</td>
<td>Requester</td>
</tr>
<tr>
<td>Document Attachment</td>
<td>One or more documents attached to a Request.</td>
<td>Document</td>
<td>E</td>
<td>Requester / Agency</td>
</tr>
<tr>
<td>Estimated Completion Date(s) (ECD)</td>
<td>The expected date to complete a Request. To support performance analysis, it may be useful to track a history of multiple dates (initial, revised, etc.) and the reason for each extension. Refer to Extension Reason.</td>
<td>Date</td>
<td>E</td>
<td>Agency</td>
</tr>
<tr>
<td>Estimated Processing Time</td>
<td>The number of work hours (effort) expected to be required to complete a request.</td>
<td>Numeric</td>
<td>E</td>
<td>Agency</td>
</tr>
<tr>
<td>Exclusion Type(s)</td>
<td>The set of exclusions applied to the responsive records. This would be derived from the responsive records within the FOIA Repository that are associated with each Request Item.</td>
<td>List</td>
<td>D</td>
<td>Agency</td>
</tr>
<tr>
<td>Exemption Type(s)</td>
<td>The set of exemptions applied to the responsive records. This would be derived from the responsive records within the FOIA Repository that are associated with each Request Item.</td>
<td>List</td>
<td>D</td>
<td>Agency</td>
</tr>
<tr>
<td>Expedited Decision Status</td>
<td>The decision outcome for an expedited Request.</td>
<td>List</td>
<td>E</td>
<td>Agency</td>
</tr>
<tr>
<td>Expedited Request Flag</td>
<td>An indication the Requester has asked for an expedited Request.</td>
<td>Boolean</td>
<td>E</td>
<td>Requester</td>
</tr>
<tr>
<td>Expedited Request Justification</td>
<td>A Requester’s explanation as to why their Request should be expedited.</td>
<td>String</td>
<td>E</td>
<td>Requester</td>
</tr>
<tr>
<td>Extension Reason</td>
<td>The reason for a change to the Estimated Completion Date (ECD) or a type of unusual circumstance.</td>
<td>List</td>
<td>E</td>
<td>Agency</td>
</tr>
<tr>
<td>Fee Waiver Decision Status</td>
<td>The decision outcome for a fee waiver.</td>
<td>List</td>
<td>E</td>
<td>Agency</td>
</tr>
<tr>
<td>Data Attribute</td>
<td>Description</td>
<td>Data Type</td>
<td>Source</td>
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</tr>
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<td>----------------------------------------</td>
<td>-----------------------------------------------------------------------------</td>
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</tr>
<tr>
<td>Fee Waiver Justification</td>
<td>An explanation as to why the Requester is asking for a fee waiver.</td>
<td>String</td>
<td>Requester</td>
<td></td>
</tr>
<tr>
<td>Fee Waiver Request Flag</td>
<td>An indication the Requester has asked for a fee waiver.</td>
<td>Boolean</td>
<td>Requester</td>
<td></td>
</tr>
<tr>
<td>Fee Waiver Up To Amount</td>
<td>A dollar amount determined by the agency up to which fees should be waived.</td>
<td>Numeric</td>
<td>Agency</td>
<td></td>
</tr>
<tr>
<td></td>
<td>This would occur only in rare circumstances, such as to permit fees for unusually large duplication efforts but waive other fees.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Fee Willing To Pay Amount</td>
<td>The total amount a Requester indicates they are willing to pay for a response to their Request.</td>
<td>Numeric</td>
<td>Requester</td>
<td></td>
</tr>
<tr>
<td>First Person Identification Document Type</td>
<td>One or more types of documentation permitted by an agency to authenticate the Requester’s identify. Each document used by the Requester for this purpose would also be tied to this attribute.</td>
<td>List</td>
<td>Agency</td>
<td></td>
</tr>
<tr>
<td>First Person Request Flag</td>
<td>An indication that the Request is a first-person Request; that is, the person is seeking records about him/herself.</td>
<td>Boolean</td>
<td>Agency</td>
<td></td>
</tr>
<tr>
<td>First Response Release Date</td>
<td>The date the first of possibly multiple releases were made to a Requester, such as part of a rolling response. Derived from the Response data.</td>
<td>Date</td>
<td>Agency</td>
<td></td>
</tr>
<tr>
<td>ID Number</td>
<td>An alternate identifier to a Request, typically more “user friendly” than the Internal ID number.</td>
<td>String</td>
<td>Agency</td>
<td></td>
</tr>
<tr>
<td>Improper Request Reason</td>
<td>The reason a Request was deemed improper and thus could not be considered a “perfected request”.</td>
<td>List</td>
<td>Agency</td>
<td></td>
</tr>
<tr>
<td>Internal ID</td>
<td>A unique identifier for a FOIA Request, typically automatically generated by a system.</td>
<td>Numeric</td>
<td>Agency</td>
<td></td>
</tr>
<tr>
<td>Last Response Release Date</td>
<td>The date the last (final) release was made to a Requester, such as part of a rolling response. Derived from the Response data.</td>
<td>Date</td>
<td>Agency</td>
<td></td>
</tr>
<tr>
<td>Owning Agency ID Number</td>
<td>For a Referral case where the agency has received records to be reviewed from another agency, this is the other agency’s Request identification number. It is used for tracking and communication purposes between the agencies.</td>
<td>String</td>
<td>Agency</td>
<td></td>
</tr>
<tr>
<td>Owning Organization</td>
<td>The internal agency organization with responsibility for completing the Request.</td>
<td>List</td>
<td>Agency</td>
<td></td>
</tr>
<tr>
<td>Pages Released Count</td>
<td>The total number of pages (e.g., PDF pages) that were released to the Requester for a specific FOIA Request.</td>
<td>Numeric</td>
<td>Agency</td>
<td></td>
</tr>
<tr>
<td>Pages Reviewed Count</td>
<td>The total number of pages (e.g., PDF pages) that were reviewed by the agency for a specific FOIA Request.</td>
<td>Numeric</td>
<td>Agency</td>
<td></td>
</tr>
<tr>
<td>Data Attribute</td>
<td>Description</td>
<td>Data Type</td>
<td>Entered or Derived</td>
<td>Source</td>
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</tr>
<tr>
<td>Person Making Request Role Type</td>
<td>The role of the person who is submitting the Request, typically either the “Requester” or “Representative”.</td>
<td>List</td>
<td>E</td>
<td>Requester / Agency</td>
</tr>
<tr>
<td>Process Queue</td>
<td>The assigned queue (track) for the Request.</td>
<td>List</td>
<td>E</td>
<td>Agency</td>
</tr>
<tr>
<td>Receipt Channel</td>
<td>The mechanism used to receive a new FOIA Request.</td>
<td>List</td>
<td>E</td>
<td>Agency</td>
</tr>
<tr>
<td>Received Date</td>
<td>The date the agency received a new FOIA Request.</td>
<td>Date</td>
<td>E</td>
<td>Agency</td>
</tr>
<tr>
<td>Records Released Count</td>
<td>The number of records that are released to the Requester. This data would be derived from the responsive records associated with all Request Items for the Request.</td>
<td>Numeric</td>
<td>D</td>
<td>Agency</td>
</tr>
<tr>
<td>Records Withheld Count</td>
<td>The number of records considered responsive but withheld from release to the Requester due to exemptions or exclusions. This data would be derived from the responsive records associated with all Request Items for the Request.</td>
<td>Numeric</td>
<td>D</td>
<td>Agency</td>
</tr>
<tr>
<td>Related Appeal(s)</td>
<td>One or more Appeal cases pertaining to the FOIA Request.</td>
<td>Related</td>
<td>E</td>
<td>Requester / Agency</td>
</tr>
<tr>
<td>Related Communication(s)</td>
<td>One or more communication records associated with the Request, either from or to the agency.</td>
<td>Related</td>
<td>E</td>
<td>Agency</td>
</tr>
<tr>
<td>Related Customer Inquiry(ies)</td>
<td>One or more Inquiry cases associated with the FOIA Request.</td>
<td>Related</td>
<td>E</td>
<td>Requester / Agency</td>
</tr>
<tr>
<td>Related Duplicate Request(s)</td>
<td>The unique identifiers of one or more other Requests that are considered duplicates to the Request.</td>
<td>Related</td>
<td>E</td>
<td>Agency</td>
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<tr>
<td>Related FOIA Clock Stop Period (Tolling)</td>
<td>One or more documented periods of time (begin and end date) and reason for which the total response compliance period can be reduced.</td>
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<td>E</td>
<td>Agency</td>
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<tr>
<td>Related Litigation(s)</td>
<td>The unique identifiers of one or more Litigation records that are associated with the Request.</td>
<td>Related</td>
<td>E</td>
<td>Agency</td>
</tr>
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<td>Related Non-Labor Cost(s)</td>
<td>One or more cost items (quantity, unit cost) associated with a Request. An example is the cost of reproduction.</td>
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<td>E</td>
<td>Agency</td>
</tr>
<tr>
<td>Related Payment Assurance</td>
<td>If applicable, a related Payment Assurance record.</td>
<td>Related</td>
<td>E</td>
<td>Agency</td>
</tr>
<tr>
<td>Related Payment Request(s)</td>
<td>One or more Payment Requests (invoices) associated with the Request.</td>
<td>Related</td>
<td>E</td>
<td>Agency</td>
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<tr>
<td>Related Payment(s)</td>
<td>One or more payments made by the Requester.</td>
<td>Related</td>
<td>E</td>
<td>Agency</td>
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<tr>
<td>Related Request Lead</td>
<td>The Agency Staff person assigned to lead the Request.</td>
<td>Related</td>
<td>E</td>
<td>Agency</td>
</tr>
<tr>
<td>Request Clarification Status</td>
<td>The status of a request made to a Requester for clarifications to their FOIA Request.</td>
<td>List</td>
<td>E</td>
<td>Agency</td>
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<tr>
<td>Request Disposition</td>
<td>The final disposition status of the Request.</td>
<td>List</td>
<td>E</td>
<td>Agency</td>
</tr>
<tr>
<td>Request Item Status</td>
<td>The processing status of an individual Request Item associated with the Request.</td>
<td>List</td>
<td>E</td>
<td>Agency</td>
</tr>
<tr>
<td>Data Attribute</td>
<td>Description</td>
<td>Data Type</td>
<td>[E]ntered or [D]erived</td>
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</tr>
<tr>
<td>Request Receipt Acknowledgement Sent Date</td>
<td>The date the agency sent an acknowledgement communication to the Requester that their Request has been received. Derived from a related Communication record.</td>
<td>Date</td>
<td>D</td>
<td>Agency</td>
</tr>
<tr>
<td>Request Stage</td>
<td>The stage (or process) the Request is currently in. Note the history of each stage with start and end dates should also be tracked for performance reporting purposes.</td>
<td>List</td>
<td>E</td>
<td>Agency</td>
</tr>
<tr>
<td>Request Status</td>
<td>The processing status of the Request.</td>
<td>List</td>
<td>D</td>
<td>Agency</td>
</tr>
<tr>
<td>Request Topic</td>
<td>One or more Topics associated with the Request.</td>
<td>List</td>
<td>E</td>
<td>Agency</td>
</tr>
<tr>
<td>Requested Records End Date</td>
<td>The ending period of the records being sought by the Requester. Either provided directly by the Requester or determined by the agency based on clarifying the Request.</td>
<td>Date</td>
<td>E</td>
<td>Requester / Agency</td>
</tr>
<tr>
<td>Requested Records Response Format</td>
<td>The technical format of the records to be delivered to the Requester. May be determined by the agency if not specified by the Requester and agreed to by the agency.</td>
<td>List</td>
<td>E</td>
<td>Requester / Agency</td>
</tr>
<tr>
<td>Requested Records Start Date</td>
<td>The beginning period of the records being sought by the Requester. Either provided directly by the Requester or determined by the agency based on clarifying the Request.</td>
<td>Date</td>
<td>E</td>
<td>Requester / Agency</td>
</tr>
<tr>
<td>Requested Response Channel</td>
<td>The mechanism for receiving responsive records. May be determined by the agency if not specified by the Requester.</td>
<td>List</td>
<td>E</td>
<td>Requester / Agency</td>
</tr>
<tr>
<td>Requester Address City Name</td>
<td>The Requester’s city name for correspondence purposes.</td>
<td>String</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Requester Address Country</td>
<td>The Requester’s country code for correspondence purposes.</td>
<td>Country Code</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Requester Address Line1</td>
<td>The Requester’s first line address for correspondence purposes.</td>
<td>String</td>
<td></td>
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</tr>
<tr>
<td>Requester Address Line2</td>
<td>The Requester’s second line address for correspondence purposes.</td>
<td>String</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Requester Address State or Province</td>
<td>The Requester’s state or province for correspondence purposes.</td>
<td>State Code</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Requester Address Zip or Postal Code</td>
<td>The Requester’s zip or postal code for correspondence purposes.</td>
<td>Zip Code</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Requester Email</td>
<td>The email address of the Requester, used for correspondence.</td>
<td>Email Address</td>
<td>E</td>
<td>Requester</td>
</tr>
<tr>
<td>Requester Fax Number</td>
<td>The Requester’s fax phone line number for correspondence purposes.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Requester First Name</td>
<td>The first name of the Requester.</td>
<td>String</td>
<td>E</td>
<td>Requester</td>
</tr>
<tr>
<td>Requester Last Name</td>
<td>The last name of the Requester.</td>
<td>String</td>
<td>E</td>
<td>Requester</td>
</tr>
<tr>
<td>Requester Organization</td>
<td>The name of the Requester’s organization, if applicable.</td>
<td>String</td>
<td>E</td>
<td>Requester</td>
</tr>
<tr>
<td>Requester Phone Number</td>
<td>The Requester’s preferred phone number for contact purposes.</td>
<td>Phone Number</td>
<td>E</td>
<td>Requester</td>
</tr>
<tr>
<td>Requester Type</td>
<td>The type of Requester.</td>
<td>List</td>
<td>E</td>
<td>Requester</td>
</tr>
<tr>
<td>Search Strategy</td>
<td>A description of the intended approach to locate responsive records within the agency.</td>
<td>String</td>
<td>E</td>
<td>Agency</td>
</tr>
</tbody>
</table>
### 3.2.4 Preliminary Set of Controlled Vocabularies

A controlled vocabulary is a list of valid values that are used to control what a user or system can enter within a specific data attribute. A typical example for FOIA is the selection from a controlled vocabulary (sometimes called a “reference table”) of exemption types for a responsive record, such as exemptions 1, 2, 3, 4, 5, 6, 7A, 7B, 7C, 7D, 7E, 7F, 8 and 9. The anticipated data attributes in the table below are mapped to the conceptual data entities presented earlier in this section. Refer to Appendix C for draft valid value sets for each of the attributes below.

#### Table 4. Preliminary List of Data Attributes Using a Controlled Vocabulary

<table>
<thead>
<tr>
<th>Conceptual Data Entity</th>
<th>Candidate Data Attribute Using a Controlled Vocabulary</th>
</tr>
</thead>
<tbody>
<tr>
<td>Assigned Role</td>
<td>• Role Type</td>
</tr>
<tr>
<td>Communication</td>
<td>• Communication Channel</td>
</tr>
<tr>
<td></td>
<td>• Communication Type</td>
</tr>
<tr>
<td>Customer Inquiry</td>
<td>• Inquiry Status</td>
</tr>
<tr>
<td></td>
<td>• Inquiry Topic</td>
</tr>
<tr>
<td>Customer Inquiry: Mediation</td>
<td>• Mediation Request Status</td>
</tr>
<tr>
<td></td>
<td>• Requester Dispute Resolution Status</td>
</tr>
<tr>
<td>Fee</td>
<td>• Fee Type</td>
</tr>
<tr>
<td>FOIA Case</td>
<td>• Case Type</td>
</tr>
<tr>
<td>FOIA Case: Appeal</td>
<td>• Appeal Disposition</td>
</tr>
<tr>
<td></td>
<td>• Appeal Status</td>
</tr>
<tr>
<td></td>
<td>• Appeal Type</td>
</tr>
<tr>
<td></td>
<td>• Non-Exemption Appeal Disposition</td>
</tr>
<tr>
<td></td>
<td>• Other Appeal Disposition</td>
</tr>
<tr>
<td>FOIA Case: Consultation</td>
<td>• Consultation Disclosure Recommendation</td>
</tr>
<tr>
<td>FOIA Case: Request/Request Item</td>
<td>• Expedited Decision Status</td>
</tr>
<tr>
<td></td>
<td>• Expedited Denial Reason</td>
</tr>
<tr>
<td></td>
<td>• Extension Reason</td>
</tr>
<tr>
<td></td>
<td>• Fee Waiver Decision Status</td>
</tr>
<tr>
<td></td>
<td>• Fee Waiver Denial Reason</td>
</tr>
<tr>
<td></td>
<td>• First Person Identification Document Type</td>
</tr>
<tr>
<td></td>
<td>• Improper Request Reason</td>
</tr>
<tr>
<td></td>
<td>• Owning Organization</td>
</tr>
<tr>
<td></td>
<td>• Person Making Request Role Type</td>
</tr>
<tr>
<td></td>
<td>• Process Queue</td>
</tr>
<tr>
<td></td>
<td>• Receipt Channel</td>
</tr>
<tr>
<td></td>
<td>• Request Clarification Status</td>
</tr>
<tr>
<td></td>
<td>• Request Disposition</td>
</tr>
<tr>
<td></td>
<td>• Request Item Status</td>
</tr>
<tr>
<td></td>
<td>• Request Stage</td>
</tr>
<tr>
<td></td>
<td>• Request Status</td>
</tr>
<tr>
<td></td>
<td>• Request Topic</td>
</tr>
<tr>
<td></td>
<td>• Requested Records Response Format</td>
</tr>
<tr>
<td></td>
<td>• Requested Response Channel</td>
</tr>
<tr>
<td></td>
<td>• Requester Type</td>
</tr>
<tr>
<td>FOIA Clock Stop Period</td>
<td>• Clock Stop Reason</td>
</tr>
</tbody>
</table>
### Configurable Processing Rules

A significant feature of the FRM is the articulation of capabilities that should be highly configurable. An example of this is the ability to construct workflows, including tasking, actions, and routings as part of configurable process queues to support any possible work scenario. Another example is the focus of this section, that of capturing certain rules and parameters within the data layer of the model. Because these rules affect functionality, the FRM could have described them in that section, however, the suggestion within the FRM is avoid having software developers define the values for these rules within the software layer, which would in effect “lock” them into code and thus not be easily configurable.

These below rules all share the following characteristics:

- **Processing rules as user stories.** The rules are stated as agile user stories and included in Appendix E along with all other user stories covering the business processes and activities. They are extracted as a subset of user stories into this section to highlight and

---

<table>
<thead>
<tr>
<th>FOIA Library Record</th>
<th>Record Source</th>
<th>Retention Category</th>
</tr>
</thead>
<tbody>
<tr>
<td>FOIA-Related Litigation</td>
<td>FOIA Litigation Status</td>
<td>Litigation Remand Status</td>
</tr>
<tr>
<td>FOIA Repository Record</td>
<td>FOIA Repository Record Status</td>
<td>Record Source</td>
</tr>
<tr>
<td>FOIA Repository Responsive Record</td>
<td>Responsive Record Status</td>
<td></td>
</tr>
<tr>
<td>FOIA Responsive Record Exemption / Exclusion</td>
<td>Exclusion Type</td>
<td>Exemption Type</td>
</tr>
<tr>
<td>Payment</td>
<td>Payment Source</td>
<td></td>
</tr>
<tr>
<td>Payment Assurance</td>
<td>Payment Assurance Response</td>
<td></td>
</tr>
<tr>
<td>Payment Request (Invoice)</td>
<td>Fee Type</td>
<td>Payment Request Status</td>
</tr>
<tr>
<td>Person</td>
<td>Address Type</td>
<td>Phone Type</td>
</tr>
<tr>
<td>Process Queue</td>
<td>Process Queue</td>
<td></td>
</tr>
<tr>
<td>Request Response</td>
<td>Records Format</td>
<td></td>
</tr>
<tr>
<td>Task or Action</td>
<td>Task Assignment Status</td>
<td>Task or Action Category</td>
</tr>
<tr>
<td></td>
<td>Task Role</td>
<td>Task Status</td>
</tr>
<tr>
<td></td>
<td>Task Succession Type</td>
<td>Task or Action Type</td>
</tr>
<tr>
<td>Timesheet</td>
<td>Agency Staff Person</td>
<td>Timesheet Review Status</td>
</tr>
<tr>
<td>Topic</td>
<td>Target for Proactive Disclosure</td>
<td>Topic Sensitivity</td>
</tr>
<tr>
<td>User Account</td>
<td>User Account Status</td>
<td></td>
</tr>
</tbody>
</table>
isolate them for faster identification. Note that only the first user story listed in the table includes two phrases that are common to all:

- The actor and first part of the story, including “As a Policy Manager, I need to be able to configure a data-driven processing rule that will”.
- The last part of the story, which expresses the rationale, including “so that the rule can be easily modified as laws, regulations, and/or Agency policies change, and the result of the change will dynamically modify the related business activity”.

- **Sources of rules.** Some rules are driven specifically by current law and/or DOJ guidelines. Others, however, are likely agency-specific determinations. Further, some rules may not apply to all agencies and thus would be eliminated from their scope of analysis when applying the FRM.

- **Non-specific data design.** The content is expected to be captured as updatable data when the values for the rules change, such as from Federal regulations, DOJ guidance, and/or agency policy. At this point, the FRM is not recommending a particular data design for these rules; one possibility is that most or all could be captured in a “control table” that a Policy Manager role would be permitted to update.

### Table 5. Configurable Processing Rules

<table>
<thead>
<tr>
<th>Process</th>
<th>Activity</th>
<th>User Story for Processing Rule</th>
</tr>
</thead>
<tbody>
<tr>
<td>Conduct Request Intake</td>
<td>Save FOIA Request</td>
<td>As a Policy Manager, I need to be able to configure a data-driven processing rule that will set the number of days to allow a saved, unsubmitted request to be kept before archived (or deleted) (e.g., 10 days), which is based on the date of last save, so that the rule can be easily modified as laws, regulations, and/or Agency policies change, and the result of the change will dynamically modify the related business activity.</td>
</tr>
<tr>
<td>Confirm Perfeated Request</td>
<td>Ask Requester to Refine Request</td>
<td>...set the number of days for requester to respond to a clarification request before it’s closed (e.g., 30 days), which is based on the agency policy...</td>
</tr>
<tr>
<td></td>
<td>Evaluate Expedited Request</td>
<td>...set the number of business days to grant or reject expedited processing requests (e.g., required within 10 days), which is based on the date the Request was received...</td>
</tr>
<tr>
<td></td>
<td>Evaluate Validity of Request</td>
<td>...set the number and type of documents required for validating first-person requests by list (e.g., 2 documents of type A or 1 document of type B) ...</td>
</tr>
<tr>
<td></td>
<td>Redirect Request to Another Agency Component</td>
<td>...set the number of working days (e.g., 10 days) to route a misdirected Request from the original Agency Component to the appropriate Component within the Agency...</td>
</tr>
<tr>
<td></td>
<td></td>
<td>...set the number of working days to route request to proper agency component within same agency when requester submits to an incorrect component (e.g., 10 days), which is based on the date of requester’s submission...</td>
</tr>
<tr>
<td>Scope and Size Request</td>
<td>Estimate Processing Effort</td>
<td>...set the number of business days required to complete a request with unusual circumstances (e.g., 30 days) ...</td>
</tr>
<tr>
<td>Process</td>
<td>Activity</td>
<td>User Story for Processing Rule</td>
</tr>
<tr>
<td>---------</td>
<td>----------</td>
<td>--------------------------------</td>
</tr>
<tr>
<td>and Other Fee-Based Items</td>
<td>...set the number of days (e.g., 10 business days) beyond the standard response period (e.g., 20 days) for which an Estimated Completion Date (ECD) would need to be prepared...</td>
<td></td>
</tr>
<tr>
<td>Estimation Fees</td>
<td>Estimate Fees</td>
<td>...determine whether fees are to be collected (e.g., Yes, No), which is based on the agency policy...</td>
</tr>
<tr>
<td>Notify Requester of Fee Estimate</td>
<td>...set the notification requirement when fees exceed threshold (e.g., $25), which is based on the estimated fee amount...</td>
<td></td>
</tr>
<tr>
<td>Prepare Fee Estimate</td>
<td>...set the number of days to wait for requester response to a fee estimate (e.g., 30 days), which is based on the date requester notified of fee estimate...</td>
<td></td>
</tr>
<tr>
<td>Review Responsive Records</td>
<td>Determine Releasable Records from Commercial “Submitters”</td>
<td>...set a constraint on proceeding with a Request given the requester's payment history (e.g., 2 prior late payments), such as late payments or unpaid invoices...</td>
</tr>
<tr>
<td></td>
<td>...set the minimum billable amount (e.g., $25), which is based on the processing fee amount...</td>
<td></td>
</tr>
<tr>
<td></td>
<td>...set the minimum fee estimate to require a payment assurance (e.g., $300), which is based on the anticipated fee amount, requester's fee limit, advanced payment not received, requester's payment history...</td>
<td></td>
</tr>
<tr>
<td></td>
<td>...set the minimum fee estimate to require an advance payment (e.g., $250), which is based on the fee estimate, requester's prior failure to pay history...</td>
<td></td>
</tr>
<tr>
<td>Review Responsive Records</td>
<td>Determine</td>
<td>...set the number of years designated confidential commercial information (CCI) from a submitter is protected (unless extended based on submitter justification) (e.g., 10 years), which is based on the date original content was submitted...</td>
</tr>
<tr>
<td>Request Payment</td>
<td>Determine Billable and Unbillable Costs</td>
<td>...set the fees to be charged, which is based on the fee category / requester type, processing time, number of pages to review, number of pages duplicated for response, minimum billable threshold (separate rule), failure to respond in time required (separate rule) ...</td>
</tr>
<tr>
<td></td>
<td>...set the number of hours of search time that are free for non-commercial requesters (e.g., 2 hours), which is based on the requester type, fee category (search, review, duplication, etc.) (this may be best handled as part of the fee tables themselves) ...</td>
<td></td>
</tr>
<tr>
<td></td>
<td>...set the number of pages that are free duplication (e.g., 100 pages), which is based on the number of pages...</td>
<td></td>
</tr>
<tr>
<td>Process</td>
<td>Activity</td>
<td>User Story for Processing Rule</td>
</tr>
<tr>
<td>-------------------------</td>
<td>-----------------------------------</td>
<td>-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Respond to Request</td>
<td>Conduct Quality Review of Response Package</td>
<td>...set the percentage of responses for quality control review/audit (e.g., 10%), which is based on the agency policy...</td>
</tr>
<tr>
<td></td>
<td>Appeal Request-Related Decision</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Notify Parties of Appeal Decision</td>
<td>...set the due date to respond to a Requester’s appeal to be within 20 business days after the Requester has submitted their appeal if no unusual circumstances apply...</td>
</tr>
<tr>
<td></td>
<td>Prepare Appeal</td>
<td>...set the appeal period threshold (e.g., 90 days) for a Requester to submit an appeal, which is based on the number of days after final FOIA determination...</td>
</tr>
<tr>
<td>Manage Tasks</td>
<td>Capture Staff Work Time</td>
<td>...set the timesheet due frequency and schedule (e.g., Bi-weekly on Fridays starting on 1/13/2023)...</td>
</tr>
<tr>
<td></td>
<td>Notify Case Worker of Tasks and Cases Coming Due</td>
<td>...set the # days (e.g., 5 days) prior to tasks coming/over due to remind a Task Lead of their action items...</td>
</tr>
<tr>
<td></td>
<td></td>
<td>...set the # default days prior to due date to remind task assignee (e.g., 2 days), which is based on the date task is due...</td>
</tr>
<tr>
<td></td>
<td></td>
<td>...set the number of days (e.g., 5 days) prior to requests coming/over due to remind the Request Lead...</td>
</tr>
<tr>
<td>Perform Supplemental Case Activities</td>
<td>Close Case</td>
<td>...set the number of days before auto-closing a request when a pre-payment or advance payment is not received (e.g., 30 days), which is based on the date when advance payment was requested of the requester...</td>
</tr>
<tr>
<td>Manage FOIA Records Environments</td>
<td>Apply Final Disposition of Repository Records</td>
<td>...set the number of years to retain FOIA requests before setting aside or destroying if not appealed (e.g., 6 years), which is based on the date original request was received by responding agency...</td>
</tr>
<tr>
<td></td>
<td>Deactivate User Account</td>
<td>...set the number of years to retain responsive records in the FOIA Repository before setting aside or destroying (e.g., 25 years), which is based on the date of original record creation...</td>
</tr>
<tr>
<td></td>
<td>Expire User Password</td>
<td>...set the number of years to retain FOIA requests before setting aside or destroying after final adjudication if appealed (e.g., 3 years), which is based on the date original request was received by responding agency...</td>
</tr>
</tbody>
</table>

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### 3.3 Common Services

Many of the core activities supporting FOIA require functionality that is common to more than one activity. This common functionality is organized into the following discrete services:

- AI/ML/HLT-Enabled Decisioning
- AI/ML/HLT-Enabled Metadata Extraction
- AI/ML/HLT-Enabled Search
- Configurable Workflow
- Content Management
- Document Management
- Email Integration and Correspondence Production
- FOIA Processing “Clock” Starts and Stops (Tolling)
- Review and Redaction
- Standardized Data Exchange

Each of the above services are described in the following sub-sections. Refer to Appendix B for a detailed mapping between the common services and their intended support for specific processes and activities within the processes.
3.3.1 AI/ML/HLT-Enabled Decisioning

AI/ML/HLT-Enabled Decisioning applies advanced analytical technologies, such as artificial intelligence (AI), machine learning (ML), and/or human language technology (HLT) to either make automated decisions or recommend decisions to Agency Staff as part of the FOIA process. Examples of its application could include making or suggesting a decision about the appropriate Process Queue the Request should be placed in; determining which recordkeeping systems should be included to search for responsive records; and highlighting or applying exemptions and redactions to a document or corpus. For detailed activity definitions and user stories pertaining to this common service, refer to Appendix E.28.1.

3.3.2 AI/ML/HLT-Enabled Metadata Extraction

AI/ML/HLT-Enabled Metadata Extraction applies advanced analytical technologies, such as artificial intelligence (AI), machine learning (ML), and/or human language technology (HLT) to find and extract information about a potentially responsive record or from a FOIA Request. The results of the extraction could add metadata to the item, which would then provide enhanced searching and decision-making such as with additional tags. For detailed activity definitions and user stories pertaining to this common service, refer to Appendix E.28.2.

3.3.3 AI/ML/HLT-Enabled Search

AI/ML/HLT-Enabled Search applies advanced analytical technologies, such as artificial intelligence (AI), machine learning (ML), and/or human language technology (HLT) to conduct various types of searching. Searching may be applied to locating responsive records within a repository or recordkeeping system, locating similar or duplicate requests, finding, and cataloging new recordkeeping systems within the agency, etc. These technologies typically rely on models and algorithms and through their use, improve results over time. For detailed activity definitions and user stories pertaining to this common service, refer to Appendix E.28.3.

3.3.4 Configurable Workflow

Configurable Workflow provides a comprehensive capability to define and tailor process workflows (aligned with processing queues) that automate the sequencing of tasks, status changes, and actions. Workflow definition is an essential component of case management. Provides in-system notifications to case workers and others regarding upcoming actions, actions taken, and other alerts. Refer to Section 2.2.3 for an explanation of the configurable workflow concept. For detailed activity definitions and user stories pertaining to this common service, refer to Appendix E.28.4.

3.3.5 Content Management

Gartner refers to content Management as “a broad term referring to applications and processes to manage Web content, document content and e-commerce-focused content.” In the context of the FRM, a typical content management scenario includes the process of maintaining unstructured or semi-structured information that helps Requesters understand an agency’s FOIA processes. For detailed activity definitions and user stories pertaining to this common service, refer to Appendix E.28.5.
3.3.6 Document Management

Document Management stores, manages, categorizes, tracks, retrieves, shares, and protects electronic documents, which are often the subject of FOIA records. Document types span a wide gamut, such as MS Office documents (e.g., MS Word, Excel, PowerPoint), PDF files, emails, images, videos, and other types that hold potentially releasable content. For detailed activity definitions and user stories pertaining to this common service, refer to Appendix E.28.6.

3.3.7 Email Integration and Correspondence Production

Email Integration and Correspondence Production integrates email processing with the FOIA functionality by providing bi-directional interfaces with an email system to (1) capture emails relevant to the FOIA process, (2) send out notifications to external and internal parties, and (3) support the preparation of emails, including the use of standardized communication templates, which are defined in the Policy and Process Management process. For detailed activity definitions and user stories pertaining to this common service, refer to Appendix E.28.7.

3.3.8 FOIA Processing “Clock” Starts and Stops (Tolling)

FOIA Processing “Clock” Starts and Stops provides functionality to toll (stop) the clock and capture the start and stop periods, beginning with the Perfected Request. Generally, a request will be perfected upon receipt. However, current FOIA rules dictate the clock may stop one time (toll) if a case worker needs clarification about a perfected request from the requester. The clock may also stop (toll) as many times as needed to clarify fee-related issues with the Requester. Note the durations reflected by the start and stop periods are to be excluded from determining the due date and thus counting the number of days until a Request is to be completed (or otherwise overdue). For detailed activity definitions and user stories pertaining to this common service, refer to Appendix E.28.8.

3.3.9 Review and Redaction

Review and Redaction provides capabilities to search, filter, categorize, and review large sets of records within the FOIA Repository for responsiveness to FOIA Requests and for possible proactive disclosure for subsequent requests; and identify, review, and approve exemptions, exclusions, and redactions related to those records. The capability includes viewing all prior applied exemptions, exclusions, and redactions to the records. For detailed activity definitions and user stories pertaining to this common service, refer to Appendix E.28.9.

3.3.10 Standardized Data Exchange

Standardized Data Exchange leverages standard formats, structure, and protocols for enabling the transfer of data between systems, including those that may be external to the agency. Some examples include exchanges of data between two different agencies’ FOIA systems, such as to support FOIA Request referrals, consultations, or coordinations; transmitting financial payment information between a FOIA system and an accounts receivables (A/R) system (e.g., pay.gov); and sending required reporting data to the government's central FOIA reporting environment (e.g., FOIA.gov). Additional information about the specific opportunities within the FRM to articulate and lead to future deployment of data exchanges can be found in the next section. For detailed activity definitions and user stories pertaining to this common service, refer to Appendix E.28.10.

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4 Opportunities for Standardized Data Exchanges

As indicated in Section 3.3.10 and further detailed in part of Appendix B, the FOIA business system includes multiple data exchanges (i.e., system interfaces) with external entities and systems. Each exchange provides an opportunity for standardization to promote interoperability, enhanced data quality, and improved processing efficiency through automation. Each standardized interface should meet the following characteristics:

- Specifies the data and its format within the interface. An example is the current use of a defined XML schema and the use of the National Information Exchange Model (NIEM) vocabulary standard for agencies to publish their FOIA results data to the FOIA.gov website as part of their mandatory quarterly and annual reporting. An alternative to XML is the JSON format, which is also currently in use as part of the exchanges with FOIA.gov. Refer to the Developer resources on FOIA.gov for more information.

- Employs a mechanism to hide implementation details from those that will either publish to or receive data from an interface, such as through an application programming interface (API). To the extent possible, APIs should be designed to be independent of the specific computing platform and communication protocols, so that systems with different architectures can utilize the same API. The use of a REST API (also called RESTful API) is an example that accomplishes this over the internet using web services to communicate using the HTTP protocol. Another example is the SOAP standard.

- Application developers must adhere to the standard and the constraints defined by the interface specification so that variability and error are eliminated.

- Changes to an API specification should be managed by the providing organization and designed with proper versioning to minimize the impact to agencies and their systems that use the existing interfaces. Thus, retaining support for legacy interfaces is essential to ensure uninterrupted operations.

- There are different types of data exchange mechanisms, and each should be considered as to the best approach to meet the specific business needs. Data complexity, data timeliness, the frequency of update, and the amount of data to be transferred are example considerations that may influence the appropriate style of interface, which may be synchronous or asynchronous, batch or real-time, etc.

Table 6 indicates several interfaces that currently exist as of this writing, including those with foia.gov and pay.gov sites. The remaining data exchange opportunities are largely focused on inter-agency and intra-agency communications, including transferring data related to referrals, consultations, coordinations, and misdirected requests.
Table 6. Opportunities for Standardized Data Exchanges

<table>
<thead>
<tr>
<th>FRM Process</th>
<th>FRM Activity Involving a Potential Data Exchange</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>Conduct Request Intake</td>
<td>Received Coordination or Consultation Request from Another Agency</td>
<td>Ø</td>
</tr>
<tr>
<td></td>
<td>Received FOIA Request from Government-wide Portal</td>
<td>✓ +</td>
</tr>
<tr>
<td></td>
<td>Received Misdirected Request from Another Agency Component</td>
<td>Ø</td>
</tr>
<tr>
<td></td>
<td>Received Referral from Another Agency</td>
<td>Ø</td>
</tr>
<tr>
<td></td>
<td>Send Confirmation of Inter-Agency Action Receipt</td>
<td>Ø</td>
</tr>
<tr>
<td>Confirm Perfected Request</td>
<td>Redirect Request to Another Agency Component</td>
<td>Ø</td>
</tr>
<tr>
<td>Create Referral, Coordination or Consultation</td>
<td>Received Confirmation of Inter-Agency Referral Receipt</td>
<td>Ø</td>
</tr>
<tr>
<td></td>
<td>Receive Consultation Response from Another Agency</td>
<td>Ø</td>
</tr>
<tr>
<td></td>
<td>Receive Coordination Response from Another Agency</td>
<td>Ø</td>
</tr>
<tr>
<td></td>
<td>Send Consultation Inquiry to Another Agency</td>
<td>Ø</td>
</tr>
<tr>
<td></td>
<td>Send Coordination Inquiry to Another Agency</td>
<td>Ø</td>
</tr>
<tr>
<td></td>
<td>Send Referral Package to Another Agency</td>
<td>Ø</td>
</tr>
<tr>
<td>Estimate Fees</td>
<td>Review Fee Balance Due (from an A/R system)</td>
<td>✓ *</td>
</tr>
<tr>
<td>Monitor, Analyze and Report FOIA Performance</td>
<td>Produce Mandated Reports (government wide FOIA reporting)</td>
<td>✓ +</td>
</tr>
<tr>
<td>Receive Payment</td>
<td>Receive Payment Info from A/R System</td>
<td>✓ *</td>
</tr>
<tr>
<td>Request Payment</td>
<td>Send Payment Request to A/R System</td>
<td>✓ *</td>
</tr>
<tr>
<td>Respond to Coordination or Consultation Inquiry</td>
<td>Respond to Coordination or Consultation Inquiry from Another Agency</td>
<td>Ø</td>
</tr>
</tbody>
</table>

Legend: ✓ = Implemented as of December 2022   Ø = Not Implemented
+ = Supported by foia.gov    * = Supported by pay.gov
5 Relationship to Other Functional Areas

5.1 Records Management

The records management function covers an agency’s management of its active, semi-active, and inactive records. Agencies create, use, maintain, and execute the disposition of its records while performing its mission-based and administrative activities. Agencies manage physical and electronic records in a wide range of systems. In the FRM these systems are referred to as recordkeeping systems. These systems are separate from FOIA systems. Business standards for electronic records management systems are defined in the Federal Integrated Business Framework. [15] The Records Management function intersects most closely in the FRM in the core process Search for Responsive Records (see Section 1.1).

5.2 Accounts Receivable

The account receivables (A/R) function intakes and processes payments made to an agency. In the context of FOIA, A/R receives and processes payments for FOIA requests. The A/R function is also responsible for tracking account balances that requestors may have. Agencies usually manage accounts receivables in enterprise financial management systems. Some agencies leverage government-wide systems, such as pay.gov, to enable users to make payments. FOIA staff can use standard exchanges with financial systems such as pay.gov to confirm the status of payments and balances. Business standards for financial management systems, including the A/R function, are defined in the Federal Integrated Business Framework. [16] The Accounts Receivable function intersects most closely in the FRM in the core processes Request Payment and Receive Payment (see Sections 1.1 and 1.1, respectively).

5.3 Human Resources Management

FOIA operations intersects with human resources (HR) management as FOIA programs must manage its staff, both agency employees and contractors. One of the central challenges of leading a FOIA program is determining the size, configuration, skills, and experience of the staff needed to enable the agency to meet its FOIA obligations. HR management encompasses the tracking of staff experience, grade levels, job categories, and billets. It also includes the development of an agency’s FOIA professionals, including providing professional mentorship, training opportunities, and advancement opportunities. The skills and knowledge expected of FOIA professionals in the federal government is defined by the Office of Personnel Management in job category 0306 Government Information Specialist. [3] Business standards for human resources management systems, including talent development and employee performance management, are defined in the Federal Integrated Business Framework. [17] [18] The HR management functional area intersects most closely in the FRM in the enabling process Manage Human Resources and the Role-Activity Mapping (see Section 7.15 and Appendix A, respectively).

5.4 Litigation Management

Litigation management refers to the agency and the Department of Justice (DOJ) managing a FOIA litigation case brought against the agency by a requester or a submitter. DOJ Assistant United States Attorneys represent agencies in FOIA court cases. This function encompasses includes all aspects of managing these cases, including coordination between the DOJ and the
agency, all interactions between the DOJ, the agency, the litigant, and the courts. Litigation management intersects most directly in the FRM with the enabling process Monitor Litigation (see Section 7.20).

5.5 User Account Management

User Account Management is the functional activity of managing accounts of requesters who need to authenticate into a requester interface as part of FOIA system to create and submit requests and receive responses from an agency. It also includes managing accounts of agency staff and contractors who need to authenticate into a FOIA system to complete tasks into the system. User account management intersects most directly in the FRM with the enabling process Manage Account (see Section 7.21).
6 Reporting and Analytical Capabilities

As important as it is to consider the capabilities needed to operate a FOIA program, such as performing the processes described in Sections 3 and 7, using well-defined performance measures and metrics derived from those processes may be vital to operating a program that can be continually measured, monitored, and improved.

This section provides a set of candidate performance and operating measures that agencies may wish to adopt and/or refine to meet their analytical capabilities. Often termed, “business intelligence” or BI for short, the intent is to align measures to the areas of ongoing improvement within a FOIA program.

6.1 Business Improvement Objectives (BIOs)

As a means of structuring and organizing the measures, two constructs are used in this section, as depicted in Figure 8 below. Each of the defined business processes may have one or more business improvement objectives (BIOs), which in turn may be measured by one or more performance measures.

Table 7 below illustrates the processes and associated BIOs in this framework. By putting this content forward, the FRM is offering a possible organizing structure for defining, evaluating, and refining the set of measures that would be appropriate for a given FOIA program. That is, not every program will place the same priority on capturing these measures and the list of both BIOs and measures are not necessarily complete. However, this framework can be a starting point for subsequent analysis.

Note that some BI capability analysis efforts devise a more comprehensive framework, such as by articulating the specific business questions (BQs) that domain experts, analysts and managers need to pose to the program. Specifying the BQs may offer another way to think about the data needed for analysis. Further, a more detailed expression of the operational and management-oriented decisions could also lend itself to a richer set of performance measures and help to
better align analytical and operational capabilities. While these enhanced frameworks add value, it is beyond the current scope of the FRM.

Table 7. Framework of Business Processes and Business Improvement Objectives (BIOs)

<table>
<thead>
<tr>
<th>Process / Business Improvement Objective</th>
<th>FOIA Business System</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Improve quality of request outcomes</td>
</tr>
<tr>
<td></td>
<td>Operate a cost-efficient FOIA program</td>
</tr>
<tr>
<td></td>
<td>Provide effective interface and communications for Requesters to interact with the agency</td>
</tr>
<tr>
<td></td>
<td>Provide timely service to process a request</td>
</tr>
<tr>
<td>Conduct Request Intake</td>
<td>Ensure requesters can easily formulate and submit proper requests</td>
</tr>
<tr>
<td></td>
<td>Provide timely service to perform request intake</td>
</tr>
<tr>
<td>Confirm Perfected Request</td>
<td>Improve quality of perfection confirmation</td>
</tr>
<tr>
<td></td>
<td>Improve quality of requester’s submissions</td>
</tr>
<tr>
<td></td>
<td>Provide timely service to adjudicate expedited request</td>
</tr>
<tr>
<td></td>
<td>Provide timely service to complete perfected request confirmation</td>
</tr>
<tr>
<td>Scope and Size Request</td>
<td>Improve accuracy of estimated effort</td>
</tr>
<tr>
<td></td>
<td>Leverage scoping for early identification of records for proactive disclosure</td>
</tr>
<tr>
<td></td>
<td>Provide timely service to scope and size request</td>
</tr>
<tr>
<td>Estimate Fees</td>
<td>Improve accuracy of fee estimate</td>
</tr>
<tr>
<td></td>
<td>Provide timely service to adjudicate fee waivers</td>
</tr>
<tr>
<td>Search for Responsive Records</td>
<td>Ensure efficient process to locate responsive records</td>
</tr>
<tr>
<td></td>
<td>Ensure search produces responsive records</td>
</tr>
<tr>
<td>Review Responsive Records</td>
<td>Ensure proper use of exemptions and exclusions</td>
</tr>
<tr>
<td></td>
<td>Leverage review for identification of responsive records for proactive disclosure</td>
</tr>
<tr>
<td></td>
<td>Provide high quality of service</td>
</tr>
<tr>
<td></td>
<td>Provide timely service to review responsive records</td>
</tr>
<tr>
<td>Create Referral, Coordination or Consultation</td>
<td>Ensure efficient process to refer, consult, or coordinate with another agency</td>
</tr>
<tr>
<td>Request Payment</td>
<td>Use appropriate payment determination (pre-pay, advance-pay, routine, pay assurance)</td>
</tr>
<tr>
<td>Receive Payment</td>
<td>Ensure quality of payment received</td>
</tr>
<tr>
<td>Respond to Request</td>
<td>Enable requesters to easily receive responses</td>
</tr>
<tr>
<td></td>
<td>Provide high quality of service</td>
</tr>
<tr>
<td></td>
<td>Provide timely service to complete response package</td>
</tr>
<tr>
<td>Appeal Request-Related Decision</td>
<td>Provide timely service to process appeals</td>
</tr>
<tr>
<td></td>
<td>Reduce number of appeals to adverse determinations</td>
</tr>
</tbody>
</table>
### Process / Business Improvement Objective

<table>
<thead>
<tr>
<th>Manage Tasks</th>
<th>Define reusable (template) tasks that streamline workflow</th>
</tr>
</thead>
<tbody>
<tr>
<td>Perform Supplemental Case Activities</td>
<td>None</td>
</tr>
<tr>
<td>Maintain Policy and Process Rules</td>
<td>Ensure predefined process queues are defined with useful pre-defined workflows</td>
</tr>
<tr>
<td>Manage Human Resources</td>
<td>Ensure an adequately trained and skilled workforce</td>
</tr>
<tr>
<td></td>
<td>Optimally allocate agency resources to perform FOIA activities and meet demand</td>
</tr>
<tr>
<td>Manage FOIA Records Environments</td>
<td>Ensure metadata describing records in FOIA environments are complete and accurate</td>
</tr>
<tr>
<td>Respond to Referral</td>
<td>Provide timely service to respond to referrals</td>
</tr>
<tr>
<td>Respond to Coordination or Consultation Inquiry</td>
<td>Provide timely service to respond to coordinations and consultations</td>
</tr>
<tr>
<td>Modify Scope of Request</td>
<td>Ensure requester can formulate revised request</td>
</tr>
<tr>
<td>Monitor Litigation</td>
<td>Ensure litigation information is captured and tracked to related request(s)</td>
</tr>
<tr>
<td>Manage Account</td>
<td>Encourage requesters to register with login accounts to improve the service they receive</td>
</tr>
<tr>
<td>Provide Pre-Request Support</td>
<td>Enable requesters and members of the public to easily discover materials and use proactively released materials</td>
</tr>
<tr>
<td></td>
<td>Ensure adequate public understanding of FOIA rules and related agency policies</td>
</tr>
<tr>
<td>Manage Records for Proactive Disclosure</td>
<td>Identify alternatives to FOIA for making records available</td>
</tr>
<tr>
<td></td>
<td>Maximize proactive disclosure of impactful records</td>
</tr>
<tr>
<td>Maintain Requester Dashboard</td>
<td>Ensure requesters can easily track their requests</td>
</tr>
<tr>
<td>Provide Customer Service</td>
<td>Provide high quality of service</td>
</tr>
<tr>
<td></td>
<td>Provide timely service to customers</td>
</tr>
</tbody>
</table>

### 6.2 Candidate Business Performance Measures

With the Process and BIO framework presented in the prior section, the FRM includes an initial set of measures that align to each of the BIOs. Table 8 provides this detail, which incorporates the required annual and quarterly reporting to DOJ/OIP that agencies currently must comply with. Rather than viewing them solely through the lens of a list of data elements, this listing incorporates them as additional measures that can be analyzed using the same types of BI tools as other measures. Thus, the FRM is offering an initial collection for BI that would also serve to meet agencies’ mandated reporting.
Table 8. Performance Measures Aligned to Processes and BIOs

<table>
<thead>
<tr>
<th>Business Process / Business Improvement Objective / Measure</th>
<th>Dimensions</th>
<th>Required for Reporting to DOJ</th>
<th>DOJ Reported Data Clarification</th>
<th>FOIA Statute Citation</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>FOIA Business System</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Improve quality of request outcomes</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td># appeals [measure]</td>
<td>Fiscal Year, Agency Component, Appeal Disposition</td>
<td>Yes</td>
<td>Number of initial decisions affirmed on appeal</td>
<td>§ 552(e)(1)(B)(i)</td>
</tr>
<tr>
<td></td>
<td>Fiscal Year, Agency Component, Appeal Disposition</td>
<td>Yes</td>
<td>Number of initial decisions completely reversed/remanded on appeal</td>
<td>§ 552(e)(1)(B)(i)</td>
</tr>
<tr>
<td></td>
<td>Fiscal Year, Agency Component, Appeal Disposition</td>
<td>Yes</td>
<td>Number of initial decisions partially affirmed &amp; partially reversed/remanded on appeal</td>
<td>§ 552(e)(1)(B)(i)</td>
</tr>
<tr>
<td></td>
<td>Fiscal Year, Agency Component, Appeal Disposition</td>
<td>Yes</td>
<td>Number of times appeal denied because appeal based solely on denial of request for expedited processing</td>
<td>§ 552(e)(1)(B)(i)</td>
</tr>
<tr>
<td><strong>Operate a cost-efficient FOIA program</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>% Fees collected of total costs [measure]</td>
<td>Fiscal Year, Agency Component</td>
<td>Yes</td>
<td>Fees collected as a percentage of total costs</td>
<td>None</td>
</tr>
<tr>
<td>amount of fees collected [measure]</td>
<td>Fiscal Year, Agency Component</td>
<td>Yes</td>
<td>Total amount of fees collected</td>
<td>§ 552(e)(1)(N)</td>
</tr>
<tr>
<td>cost per appeal [measure]</td>
<td>Fiscal Year, Month, Process Queue, Appeal Type, Topic</td>
<td>No</td>
<td>—</td>
<td>(blank)</td>
</tr>
<tr>
<td>cost per record reviewed [measure]</td>
<td>Fiscal Year, Month, Process Queue, Recordkeeping System, Topic</td>
<td>No</td>
<td>—</td>
<td>None</td>
</tr>
<tr>
<td>cost per request [measure]</td>
<td>Fiscal Year, Month, Process Queue, Topic</td>
<td>No</td>
<td>—</td>
<td>None</td>
</tr>
<tr>
<td>cost to process FOIA [measure]</td>
<td>Fiscal Year, Agency Component, Cost Type</td>
<td>Yes</td>
<td>Processing costs</td>
<td>§ 552(e)(1)(O)</td>
</tr>
<tr>
<td>litigation attorney fees and costs [list/data]</td>
<td>Fiscal Year, Agency Component</td>
<td>Yes</td>
<td>—</td>
<td>§ 552(e)(6)(A)(ii)(III)</td>
</tr>
<tr>
<td>litigation-related costs [list/data]</td>
<td>Fiscal Year, Agency Component</td>
<td>Yes</td>
<td>—</td>
<td>§ 552(e)(6)(A)(ii)(III)</td>
</tr>
<tr>
<td>total FOIA processing and litigation cost [measure]</td>
<td>Fiscal Year, Agency Component</td>
<td>Yes</td>
<td>Total costs</td>
<td>§ 552(e)(1)(O)</td>
</tr>
<tr>
<td><strong>Provide effective interface and communications for Requesters to interact with the agency</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td># requester complaints (general, mediations, etc.)</td>
<td>Fiscal Year, Month, Type of Requester,</td>
<td>No</td>
<td>—</td>
<td>None</td>
</tr>
<tr>
<td>Business Process / Business Improvement Objective / Measure</td>
<td>Dimensions</td>
<td>Required for Reporting to DOJ</td>
<td>DOJ Reported Data Clarification</td>
<td>FOIA Statute Citation</td>
</tr>
<tr>
<td>------------------------------------------------------------</td>
<td>------------</td>
<td>-------------------------------</td>
<td>--------------------------------</td>
<td>---------------------</td>
</tr>
<tr>
<td>regarding use of FOIA system [measure]</td>
<td>Type of Complaint, Mechanism for Complaint (Service Center, FOIA Liaison, OGIS, etc.)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>% change in requester satisfaction score [measure]</td>
<td>Fiscal Year, Month, Type of Requester</td>
<td>No</td>
<td>—</td>
<td>None</td>
</tr>
</tbody>
</table>

*Provide timely service to process a request*

<table>
<thead>
<tr>
<th># days request is open [measure]</th>
<th>Fiscal Year, Agency Component, Request Status (history), Request Stage (at least perfected)</th>
<th>Yes</th>
<th>Average number of working days as of the end of reported fiscal year that open perfected complex requests have been open</th>
<th>§ 552(e)(1)(C)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fiscal Year, Agency Component, Process Queue, Request Status (history), Request Stage (at least perfected)</td>
<td>Yes</td>
<td></td>
<td>Average number of working days as of the end of reported fiscal year that open perfected expedited requests have been open</td>
<td>§ 552(e)(1)(C)</td>
</tr>
<tr>
<td>Fiscal Year, Agency Component, Process Queue, Request Status (history), Request Stage (at least perfected)</td>
<td>Yes</td>
<td></td>
<td>Median number of working days as of the end of reported fiscal year that open perfected complex requests have been open</td>
<td>§ 552(e)(1)(C)</td>
</tr>
<tr>
<td>Fiscal Year, Agency Component, Process Queue, Request Status (history), Request Stage (at least perfected)</td>
<td>Yes</td>
<td></td>
<td>Median number of working days as of the end of reported fiscal year that open perfected expedited requests have been open</td>
<td>§ 552(e)(1)(C)</td>
</tr>
<tr>
<td>Fiscal Year, Agency Component, Process Queue, Request Status (history), Request Stage (at least perfected)</td>
<td>Yes</td>
<td></td>
<td>Median number of working days as of the end of reported fiscal year that open perfected simple requests have been open</td>
<td>§ 552(e)(1)(C)</td>
</tr>
<tr>
<td>Fiscal Year, Agency Component, Process Queue, Request Status (history), Process Queue, Request</td>
<td>Yes</td>
<td></td>
<td>Average number of working days as of the end of reported fiscal year that open perfected simple requests have been open</td>
<td>§ 552(e)(1)(C)</td>
</tr>
<tr>
<td>Business Process / Business Improvement Objective / Measure</td>
<td>Dimensions</td>
<td>Required for Reporting to DOJ</td>
<td>DOJ Reported Data</td>
<td>FOIA Statute Citation</td>
</tr>
<tr>
<td>----------------------------------------------------------</td>
<td>------------</td>
<td>-------------------------------</td>
<td>-------------------</td>
<td>----------------------</td>
</tr>
<tr>
<td>Stage (at least perfected)</td>
<td></td>
<td></td>
<td>Number of working days ten oldest open perfected requests have been open as of the end of reported fiscal year</td>
<td>§ 552(e)(1)(J)</td>
</tr>
<tr>
<td>Fiscal Year, Agency Component, Fiscal Quarter, Request, Request Status (history), Request Stage (at least perfected)</td>
<td>Yes</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td># days to close appeal [measure]</td>
<td>Fiscal Year, Agency Component</td>
<td>Yes</td>
<td>Highest number of days to close an appeal during the reported fiscal year</td>
<td>§ 552(e)(1)(l)</td>
</tr>
<tr>
<td># days to close request [measure]</td>
<td>Fiscal Year, Agency Component, Process Queue, Request Stage (at least perfected)</td>
<td>Yes</td>
<td>Average number of working days to close perfected complex requests closed during the reported fiscal year</td>
<td>§ 552(e)(1)(F)</td>
</tr>
<tr>
<td>Fiscal Year, Agency Component, Process Queue, Request Stage (at least perfected)</td>
<td>Yes</td>
<td>Average number of working days to close perfected expedited requests closed during the reported fiscal year</td>
<td>§ 552(e)(1)(F)</td>
<td></td>
</tr>
<tr>
<td>Fiscal Year, Agency Component, Process Queue, Request Stage (at least perfected)</td>
<td>Yes</td>
<td>Average number of working days to close simple perfected requests closed during the reported fiscal year</td>
<td>§ 552(e)(1)(F)</td>
<td></td>
</tr>
<tr>
<td>Fiscal Year, Agency Component, Process Queue, Request Stage (at least perfected)</td>
<td>Yes</td>
<td>Highest number of working days to close a perfected complex request during the reported fiscal year</td>
<td>§ 552(e)(1)(F)</td>
<td></td>
</tr>
<tr>
<td>Fiscal Year, Agency Component, Process Queue, Request Stage (at least perfected)</td>
<td>Yes</td>
<td>Highest number of working days to close a perfected expedited request during the reported fiscal year</td>
<td>§ 552(e)(1)(F)</td>
<td></td>
</tr>
<tr>
<td>Fiscal Year, Agency Component, Process Queue, Request Stage (at least perfected)</td>
<td>Yes</td>
<td>Highest number of working days to close a simple perfected request during the reported fiscal year</td>
<td>§ 552(e)(1)(F)</td>
<td></td>
</tr>
<tr>
<td>Fiscal Year, Agency Component, Process Queue, Request Stage (at least perfected)</td>
<td>Yes</td>
<td>Lowest number of working days to close a perfected complex request during the reported fiscal year</td>
<td>§ 552(e)(1)(F)</td>
<td></td>
</tr>
<tr>
<td>Fiscal Year, Agency Component, Process</td>
<td>Yes</td>
<td>Lowest number of working days to close a</td>
<td>§ 552(e)(1)(F)</td>
<td></td>
</tr>
<tr>
<td>Business Process / Business Improvement Objective / Measure</td>
<td>Dimensions</td>
<td>Required for Reporting to DOJ</td>
<td>DOJ Reported Data Clarification</td>
<td>FOIA Statute Citation</td>
</tr>
<tr>
<td>------------------------------------------------------------</td>
<td>------------</td>
<td>-------------------------------</td>
<td>-------------------------------</td>
<td>-----------------------</td>
</tr>
<tr>
<td>Queue, Request Stage (at least perfected)</td>
<td></td>
<td>perfected expedited request during the reported fiscal year</td>
<td></td>
<td>§ 552(e)(1)(F)</td>
</tr>
<tr>
<td>Fiscal Year, Agency Component, Process Queue, Request Stage (at least perfected)</td>
<td>Yes</td>
<td>Lowest number of working days to close a simple perfected request during the reported fiscal year</td>
<td>§ 552(e)(1)(E) § 552(e)(1)(F)</td>
<td></td>
</tr>
<tr>
<td>Fiscal Year, Agency Component, Process Queue, Request Stage (at least perfected)</td>
<td>Yes</td>
<td>Median number of working days to close perfected complex requests closed during the reported fiscal year</td>
<td>§ 552(e)(1)(E) § 552(e)(1)(F)</td>
<td></td>
</tr>
<tr>
<td>Fiscal Year, Agency Component, Process Queue, Request Stage (at least perfected)</td>
<td>Yes</td>
<td>Median number of working days to close perfected simple requests closed during the reported fiscal year</td>
<td>§ 552(e)(1)(E) § 552(e)(1)(F)</td>
<td></td>
</tr>
<tr>
<td>Fiscal Year, Agency Component, Request Disposition, Process Queue, Request Stage (at least perfected)</td>
<td>Yes</td>
<td>Average number of working days to close perfected complex requests in which information was granted that were closed during the reported fiscal year</td>
<td>§ 552(e)(1)(H)</td>
<td></td>
</tr>
<tr>
<td>Fiscal Year, Agency Component, Request Disposition, Process Queue, Request Stage (at least perfected)</td>
<td>Yes</td>
<td>Average number of working days to close perfected expedited requests in which information was granted that were closed during the reported fiscal year</td>
<td>§ 552(e)(1)(H)</td>
<td></td>
</tr>
<tr>
<td>Fiscal Year, Agency Component, Request Disposition, Process Queue, Request Stage (at least perfected)</td>
<td>Yes</td>
<td>Average number of working days to close perfected simple requests in which information was granted that were closed during the reported fiscal year</td>
<td>§ 552(e)(1)(H)</td>
<td></td>
</tr>
<tr>
<td>Fiscal Year, Agency Component, Request Disposition, Process Queue, Request Stage (at least perfected)</td>
<td>Yes</td>
<td>Highest number of working days to close a perfected complex request in which information was granted</td>
<td>§ 552(e)(1)(H)</td>
<td></td>
</tr>
<tr>
<td>Business Process / Business Improvement Objective / Measure</td>
<td>Dimensions</td>
<td>Required for Reporting to DOJ</td>
<td>DOJ Reported Data Clarification</td>
<td>FOIA Statute Citation</td>
</tr>
<tr>
<td>-------------------------------------------------------------</td>
<td>------------</td>
<td>-------------------------------</td>
<td>---------------------------------</td>
<td>-----------------------</td>
</tr>
<tr>
<td>Fiscal Year, Agency Component, Request Disposition, Process Queue, Request Stage (at least perfected)</td>
<td>Yes</td>
<td>Highest number of working days to close a perfected expedited request in which information was granted during the reported fiscal year</td>
<td>§ 552(e)(1)(H)</td>
<td></td>
</tr>
<tr>
<td>Fiscal Year, Agency Component, Request Disposition, Process Queue, Request Stage (at least perfected)</td>
<td>Yes</td>
<td>Highest number of working days to close a perfected simple request in which information was granted during the reported fiscal year</td>
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</tr>
<tr>
<td>Fiscal Year, Agency Component, Request Disposition, Process Queue, Request Stage (at least perfected)</td>
<td>Yes</td>
<td>Lowest number of working days to close a perfected complex request in which information was granted during the reported fiscal year</td>
<td>§ 552(e)(1)(H)</td>
<td></td>
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<tr>
<td>Fiscal Year, Agency Component, Request Disposition, Process Queue, Request Stage (at least perfected)</td>
<td>Yes</td>
<td>Lowest number of working days to close a perfected expedited request in which information was granted during the reported fiscal year</td>
<td>§ 552(e)(1)(H)</td>
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<td>Fiscal Year, Agency Component, Request Disposition, Process Queue, Request Stage (at least perfected)</td>
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<td>§ 552(e)(1)(H)</td>
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<tr>
<td>Fiscal Year, Agency Component, Request Disposition, Process Queue, Request Stage (at least perfected)</td>
<td>Yes</td>
<td>Median number of working days to close perfected complex requests in which information was granted that were closed during the reported fiscal year</td>
<td>§ 552(e)(1)(H)</td>
<td></td>
</tr>
<tr>
<td>Fiscal Year, Agency Component, Request Disposition, Process Queue, Request Stage (at least perfected)</td>
<td>Yes</td>
<td>Median number of working days to close perfected expedited requests in which information was granted</td>
<td>§ 552(e)(1)(H)</td>
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<td>Business Process / Business Improvement Objective / Measure</td>
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<tr>
<td>Fiscal Year, Agency Component, Request Disposition, Process Queue, Request Stage (at least perfected)</td>
<td>Yes</td>
<td>Median number of working days to close perfected simple requests in which information was granted that were closed during the reported fiscal year</td>
<td>§ 552(e)(1)(H)</td>
<td></td>
</tr>
<tr>
<td>Fiscal Year, Agency Component, Fiscal Quarter, Request Status (history)</td>
<td>Yes</td>
<td>Number of backlogged requests as of end of current reported fiscal year</td>
<td>(e)(1)(C)</td>
<td></td>
</tr>
<tr>
<td>Fiscal Year, Agency Component, Fiscal Quarter, Request Status (history)</td>
<td>Yes</td>
<td>Number of backlogged requests as of end of reported fiscal year</td>
<td>(e)(1)(C)</td>
<td></td>
</tr>
<tr>
<td>Fiscal Year, Agency Component, Request Status (history)</td>
<td>Yes</td>
<td>Number of backlogged requests as of end of the previous fiscal year</td>
<td>None</td>
<td></td>
</tr>
<tr>
<td>Fiscal Year, Month, Agency Staff, Requester Type, Topic</td>
<td>No</td>
<td>—</td>
<td>None</td>
<td></td>
</tr>
<tr>
<td>Fiscal Year, Month, Agency Staff, Requester Type, Process Queue</td>
<td>No</td>
<td>—</td>
<td>None</td>
<td></td>
</tr>
<tr>
<td>Fiscal Year, Month, Agency Staff, Requester Type, Process Queue</td>
<td>No</td>
<td>—</td>
<td>None</td>
<td></td>
</tr>
<tr>
<td>Fiscal Year, Month, Agency Staff, Requester Type, Topic</td>
<td>No</td>
<td>—</td>
<td>None</td>
<td></td>
</tr>
<tr>
<td>Fiscal Year, Agency Component, Fiscal Quarter, Request Stage (at least perfected), Request Status (history)</td>
<td>Yes</td>
<td>Date of receipt of ten oldest open perfected request</td>
<td>§ 552(e)(1)(J)</td>
<td></td>
</tr>
</tbody>
</table>

**Conduct Request Intake**

**Ensure requesters can easily formulate and submit proper requests**

<p>| # draft unsubmitted requests [measure] | Fiscal Year, Month, Requester Type, Topic, # Days Until Submitted | No | — | None |</p>
<table>
<thead>
<tr>
<th>Business Process / Business Improvement Objective / Measure</th>
<th>Dimensions</th>
<th>Required for Reporting to DOJ</th>
<th>DOJ Reported Data Clarification</th>
<th>FOIA Statute Citation</th>
</tr>
</thead>
<tbody>
<tr>
<td># requests [measure]</td>
<td>Fiscal Year, Agency Component, Request Disposition</td>
<td>Yes</td>
<td>Number of full grants</td>
<td>None</td>
</tr>
<tr>
<td></td>
<td>Fiscal Year, Agency Component, Request Disposition</td>
<td>Yes</td>
<td>Number of requests with disposition of All records referred to another component or agency</td>
<td>§ 552(e)(1)(A)</td>
</tr>
<tr>
<td></td>
<td>Fiscal Year, Agency Component, Request Disposition</td>
<td>Yes</td>
<td>Number of requests with disposition of duplicate request</td>
<td>§ 552(e)(1)(A)</td>
</tr>
<tr>
<td></td>
<td>Fiscal Year, Agency Component, Request Disposition</td>
<td>Yes</td>
<td>Number of requests with disposition of Fee-related reason</td>
<td>§ 552(e)(1)(A)</td>
</tr>
<tr>
<td></td>
<td>Fiscal Year, Agency Component, Request Disposition</td>
<td>Yes</td>
<td>Number of requests with disposition of improper FOIA request for other reason</td>
<td>§ 552(e)(1)(A)</td>
</tr>
<tr>
<td></td>
<td>Fiscal Year, Agency Component, Request Disposition</td>
<td>Yes</td>
<td>Number of requests with disposition of No records</td>
<td>§ 552(e)(1)(A)</td>
</tr>
<tr>
<td></td>
<td>Fiscal Year, Agency Component, Request Disposition</td>
<td>Yes</td>
<td>Number of requests with disposition of not agency record</td>
<td>§ 552(e)(1)(A)</td>
</tr>
<tr>
<td></td>
<td>Fiscal Year, Agency Component, Request Disposition</td>
<td>Yes</td>
<td>Number of requests with disposition of other reason</td>
<td>§ 552(e)(1)(A)</td>
</tr>
<tr>
<td></td>
<td>Fiscal Year, Agency Component, Request Disposition</td>
<td>Yes</td>
<td>Number of requests with disposition of records not reasonably described</td>
<td>§ 552(e)(1)(A)</td>
</tr>
<tr>
<td></td>
<td>Fiscal Year, Agency Component, Request Disposition</td>
<td>Yes</td>
<td>Number of requests with disposition of Request withdrawn</td>
<td>§ 552(e)(1)(A)</td>
</tr>
<tr>
<td></td>
<td>Fiscal Year, Agency Component, Request Disposition</td>
<td>Yes</td>
<td>Number of times other reason was relied upon</td>
<td>§ 552(e)(1)(A)</td>
</tr>
<tr>
<td></td>
<td>Fiscal Year, Agency Component, Request Disposition</td>
<td>Yes</td>
<td>Total number of request dispositions</td>
<td>§ 552(e)(1)(A)</td>
</tr>
<tr>
<td>description of other reasons for request denial [list/data]</td>
<td>Fiscal Year, Agency Component</td>
<td>Yes</td>
<td>Description of other reasons for denials</td>
<td>§ 552(e)(1)(A)</td>
</tr>
</tbody>
</table>

*Provide timely service to perform request intake*

average/median # days from request receipt to start of its validity | Fiscal Year, Month, Requester Type, Agency Component | No | — | None
<table>
<thead>
<tr>
<th>Business Process / Business Improvement Objective / Measure</th>
<th>Dimensions</th>
<th>Required for Reporting to DOJ</th>
<th>DOJ Reported Data Clarification</th>
<th>FOIA Statute Citation</th>
</tr>
</thead>
<tbody>
<tr>
<td>evaluation (for perfection) [measure]</td>
<td>Staff Person, Communication Channel (mode of submission)</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Estimate Fees**

**Improve accuracy of fee estimate**

% timesheets (recorded effort by staff) are approved with no revisions [measure]

| Fiscal Year, Month, Staff Person, FOIA Role, # Cases Worked ("bucketed" increments) | No | —             | None                      |

% variance (e.g., standard deviation) between initial fee estimate and final invoice [measure]

| Fiscal Year, Month, Process Queue, Topic, # Responsive Records ("bucketed" increments) | No | —             | None                      |

average/median % difference and standard deviation between initial fee estimate and final invoice [measure]

| Fiscal Year, Month, Process Queue, Topic, Fee Type | No | —             | None                      |

**Provide timely service to adjudicate fee waivers**

# days to adjudicate fee waiver [measure]

| Fiscal Year, Agency Component | Yes | Average number of calendar days it took the agency to adjudicate requests for a fee waiver | § 552(e)(1)(M) |

| Fiscal Year, Agency Component | Yes | Median number of calendar days it took the agency to adjudicate requests for a fee waiver | § 552(e)(1)(M) |

# fee waiver adjudications [measure]

| Fiscal Year, Agency Component, Fee Waiver Decision | Yes | Number of adjudications resulting in agency denying a fee waiver during reported fiscal year | § 552(e)(1)(M) |

| Fiscal Year, Agency Component, Fee Waiver Decision | Yes | Number of adjudications resulting in agency granting a fee waiver during reported fiscal year | § 552(e)(1)(M) |

**Confirm Perfected Request**

**Improve quality of perfection confirmation**

% requests that require clarification AFTER confirming perfected request [measure]

| Fiscal Year, Month, Process Queue, Topic, Requester Type | No | —             | None                      |

**Improve quality of requester’s submissions**

# redirects to another agency component [measure]

<p>| Fiscal Year, Month, Agency Component | No | —             | None                      |</p>
<table>
<thead>
<tr>
<th>Business Process / Business Improvement Objective / Measure</th>
<th>Dimensions</th>
<th>Required for Reporting to DOJ</th>
<th>DOJ Reported Data Clarification</th>
<th>FOIA Statute Citation</th>
</tr>
</thead>
<tbody>
<tr>
<td># requests received to the wrong agency [measure]</td>
<td>Fiscal Year, Month, Other Agency</td>
<td>No</td>
<td>—</td>
<td>None</td>
</tr>
<tr>
<td>% requests requiring refinement before considered perfected [measure]</td>
<td>Fiscal Year, Month, Requester Type, Topic, Process Queue</td>
<td>No</td>
<td>—</td>
<td>None</td>
</tr>
</tbody>
</table>

**Provide timely service to adjudicate expedited request**

<table>
<thead>
<tr>
<th># days to adjudicate expedited processing [measure]</th>
<th>Fiscal Year, Agency Component</th>
<th>Yes</th>
<th>Median number of calendar days it took the agency to adjudicate requests for expedited processing</th>
<th>§ 552(e)(1)(L)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Fiscal Year, Agency Component, Process Queue</td>
<td>Yes</td>
<td>Average number of calendar days it took the agency to adjudicate requests for expedited processing</td>
<td>§ 552(e)(1)(L)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th># expedited processing adjudications [measure]</th>
<th>Fiscal Year, Agency Component, Expedited Processing Decision</th>
<th>Yes</th>
<th>Number of adjudications resulting in agency denying expedited processing during reported fiscal year</th>
<th>§ 552(e)(1)(L)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Fiscal Year, Agency Component, Expedited Processing Decision</td>
<td>Yes</td>
<td>Number of adjudications resulting in agency granting expedited processing during reported fiscal year</td>
<td>§ 552(e)(1)(L)</td>
</tr>
</tbody>
</table>

| # requests [measure] | Fiscal Year, Agency Component, Process Queue, # Days to Adjudicate Expedited Processing ("bucketed" increments) | Yes | Number of requests adjudicated for expedited processing within ten calendar days | § 552(e)(1)(L) |

**Provide timely service to complete perfected request confirmation**

<table>
<thead>
<tr>
<th># times initial organizational ownership assignment is incorrect [measure]</th>
<th>Fiscal Year, Month, Agency Staff, Agency Organization, Topic, Process Queue</th>
<th>No</th>
<th>—</th>
<th>None</th>
</tr>
</thead>
<tbody>
<tr>
<td>average/median # days from request receipt to perfection confirmation [measure]</td>
<td>Fiscal Year, Month, Requester Type, Agency Component, Staff Person</td>
<td>No</td>
<td>—</td>
<td>None</td>
</tr>
</tbody>
</table>

**Appeal Request-Related Decision**

**Provide timely service to process appeals**

| # appeals [measure] | Fiscal Year, Agency Component, Appeal Status (history) | Yes | Number of appeals pending as of end of fiscal year | § 552(e)(1)(B)(i) |

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<table>
<thead>
<tr>
<th>Business Process / Business Improvement Objective / Measure</th>
<th>Dimensions</th>
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<th>DOJ Reported Data Clarification</th>
<th>FOIA Statute Citation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fiscal Year, Agency Component, Appeal Status (history)</td>
<td>Yes</td>
<td>Number of appeals pending as of start of fiscal year</td>
<td>None</td>
<td></td>
</tr>
<tr>
<td>Fiscal Year, Agency Component, Appeal Status (history)</td>
<td>Yes</td>
<td>Number of backlogged appeals as of end of reported fiscal year</td>
<td>None</td>
<td></td>
</tr>
<tr>
<td>Fiscal Year, Agency Component, Appeal Status (history)</td>
<td>Yes</td>
<td>Number of backlogged appeals as of end of the previous fiscal year</td>
<td>None</td>
<td></td>
</tr>
<tr>
<td>Fiscal Year, Agency Component, Appeal Status (history)</td>
<td>Yes</td>
<td>Number of backlogged appeals as of end of the reported fiscal year</td>
<td>None</td>
<td></td>
</tr>
<tr>
<td># days appeal is pending [measure]</td>
<td>Fiscal Year, Agency Component, Fiscal Quarter, Appeal, Appeal Status (history)</td>
<td>Yes</td>
<td>Number of working days pending for ten oldest appeals that remain pending at the end of the fiscal year</td>
<td>§ 552(e)(1)(K)</td>
</tr>
<tr>
<td># days to close appeal [measure]</td>
<td>Fiscal Year, Agency Component</td>
<td>Yes</td>
<td>Average number of days to close appeals closed during the reported fiscal year</td>
<td>§ 552(e)(1)(l)</td>
</tr>
<tr>
<td>Fiscal Year, Agency Component</td>
<td>Yes</td>
<td>Lowest number of days to close an appeal during the reported fiscal year</td>
<td>§ 552(e)(1)(l)</td>
<td></td>
</tr>
<tr>
<td>Fiscal Year, Agency Component</td>
<td>Yes</td>
<td>Median number of days to close appeals closed during the reported fiscal year</td>
<td>§ 552(e)(1)(l)</td>
<td></td>
</tr>
<tr>
<td>date of 10 oldest appeals [list/data]</td>
<td>Fiscal Year, Agency Component, Fiscal Quarter, Appeal, Appeal Status (history)</td>
<td>Yes</td>
<td>Date of receipt of ten oldest open appeals</td>
<td>§ 552(e)(1)(K)</td>
</tr>
<tr>
<td>Reduce number of appeals to adverse determinations</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td># appeals [measure]</td>
<td>Fiscal Year, Agency Component, Appeal Status (history), Appeal Disposition</td>
<td>Yes</td>
<td>Number of appeals closed for other reasons</td>
<td>§ 552(e)(1)(B)(i)</td>
</tr>
<tr>
<td>Fiscal Year, Agency Component, Appeal Status (history)</td>
<td>Yes</td>
<td>Number of appeals processed during the previous fiscal year</td>
<td>None</td>
<td></td>
</tr>
<tr>
<td>Fiscal Year, Agency Component, Appeal Status (history)</td>
<td>Yes</td>
<td>Number of appeals processed during the previous fiscal year</td>
<td>§ 552(e)(1)(B)(i)</td>
<td></td>
</tr>
<tr>
<td>Fiscal Year, Agency Component, Appeal Status (history)</td>
<td>Yes</td>
<td>Number of appeals processed during the reported fiscal year</td>
<td>§ 552(e)(1)(B)(i)</td>
<td></td>
</tr>
<tr>
<td>Fiscal Year, Agency Component, Appeal Status (history)</td>
<td>Yes</td>
<td>Number of appeals processed in fiscal year</td>
<td>§ 552(e)(1)(B)(i)</td>
<td></td>
</tr>
<tr>
<td>Business Process / Business Improvement Objective / Measure</td>
<td>Dimensions</td>
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</tr>
<tr>
<td>Fiscal Year, Agency Component, Appeal Status (history)</td>
<td>Yes</td>
<td>Number of appeals received during the previous fiscal year</td>
<td>None</td>
<td>§ 552(e)(1)(B)(i)</td>
</tr>
<tr>
<td>Fiscal Year, Agency Component, Appeal Status (history)</td>
<td>Yes</td>
<td>Number of appeals received during the reported fiscal year</td>
<td>§ 552(e)(1)(B)(i)</td>
<td></td>
</tr>
<tr>
<td>Fiscal Year, Agency Component, Appeal Status (history)</td>
<td>Yes</td>
<td>Number of appeals received in fiscal year</td>
<td>§ 552(e)(1)(B)(i)</td>
<td></td>
</tr>
<tr>
<td>Fiscal Year, Agency Component, Appeal Disposition</td>
<td>Yes</td>
<td>Number of times appeal denied because duplicate request or appeal</td>
<td>§ 552(e)(1)(B)(i)</td>
<td></td>
</tr>
<tr>
<td>Fiscal Year, Agency Component, Appeal Disposition</td>
<td>Yes</td>
<td>Number of times appeal denied because fee-related reason</td>
<td>§ 552(e)(1)(B)(i)</td>
<td></td>
</tr>
<tr>
<td>Fiscal Year, Agency Component, Appeal Disposition</td>
<td>Yes</td>
<td>Number of times appeal denied because improper request for other reasons</td>
<td>§ 552(e)(1)(B)(i)</td>
<td></td>
</tr>
<tr>
<td>Fiscal Year, Agency Component, Appeal Disposition</td>
<td>Yes</td>
<td>Number of times appeal denied because no records</td>
<td>§ 552(e)(1)(B)(i)</td>
<td></td>
</tr>
<tr>
<td>Fiscal Year, Agency Component, Appeal Disposition</td>
<td>Yes</td>
<td>Number of times appeal denied because not agency record</td>
<td>§ 552(e)(1)(B)(i)</td>
<td></td>
</tr>
<tr>
<td>Fiscal Year, Agency Component, Appeal Disposition</td>
<td>Yes</td>
<td>Number of times appeal denied because other reason</td>
<td>§ 552(e)(1)(B)(i)</td>
<td></td>
</tr>
<tr>
<td>Fiscal Year, Agency Component, Appeal Disposition</td>
<td>Yes</td>
<td>Number of times appeal denied because records not reasonably described</td>
<td>§ 552(e)(1)(B)(i)</td>
<td></td>
</tr>
<tr>
<td>Fiscal Year, Agency Component, Appeal Disposition</td>
<td>Yes</td>
<td>Number of times appeal denied because records referred at initial request level</td>
<td>§ 552(e)(1)(B)(i)</td>
<td></td>
</tr>
<tr>
<td>Fiscal Year, Agency Component, Appeal Disposition</td>
<td>Yes</td>
<td>Number of times appeal denied because request in litigation</td>
<td>§ 552(e)(1)(B)(i)</td>
<td></td>
</tr>
<tr>
<td>Fiscal Year, Agency Component, Appeal Disposition</td>
<td>Yes</td>
<td>Number of times appeal denied because request withdrawn</td>
<td>§ 552(e)(1)(B)(i)</td>
<td></td>
</tr>
<tr>
<td>Fiscal Year, Agency Component, Appeal Disposition Other</td>
<td>Yes</td>
<td>Total number of times other reason was relied upon for denials of appeals</td>
<td>§ 552(e)(1)(B)(i)</td>
<td></td>
</tr>
</tbody>
</table>

# exemptions for appeals [measure] Fiscal Year, Agency Component, Appeal Disposition Yes Number of times each other reason was relied upon § 552(e)(1)(B)(i)
<table>
<thead>
<tr>
<th>Business Process / Business Improvement Objective / Measure</th>
<th>Required for Reporting to DOJ</th>
<th>DOJ Reported Data Clarification</th>
<th>FOIA Statute Citation</th>
</tr>
</thead>
<tbody>
<tr>
<td>% adverse determinations that are appealed [measure]</td>
<td>No</td>
<td>—</td>
<td>None</td>
</tr>
<tr>
<td>% appeals granted [measure]</td>
<td>No</td>
<td>—</td>
<td>None</td>
</tr>
<tr>
<td>% requesters appealing fee waiver decision [measure]</td>
<td>No</td>
<td>—</td>
<td>None</td>
</tr>
<tr>
<td>description of other reasons for appeal denial [list/data]</td>
<td>Yes</td>
<td>Description of other reasons for denials of appeals</td>
<td>§ 552(e)(1)(B)(i)</td>
</tr>
</tbody>
</table>

**Respond to Coordination or Consultation Inquiry**

*Provide timely service to respond to coordinations and consultations*

<table>
<thead>
<tr>
<th># days consultation from another agency pending [measure]</th>
<th>Fiscal Year, Agency Component, Consultation, Consultation Status (history)</th>
<th>Yes</th>
<th>Number of working days the pending consultation from other agencies was pending at your agency as of the end of the reported fiscal year</th>
<th>None</th>
</tr>
</thead>
<tbody>
<tr>
<td>date of 10 oldest pending consultations from other agencies [list/data]</td>
<td>Fiscal Year, Agency Component, Fiscal Quarter, Consultation (from another agency), Consultation Status (history)</td>
<td>Yes</td>
<td>Dates received of ten oldest pending consultations from other agencies</td>
<td>None</td>
</tr>
</tbody>
</table>

**Provide Customer Service**

*Provide high quality of service*

| % change in requester satisfaction survey score [measure] | Fiscal Year, Month, Requester Type | No | — | None |

*Provide timely service to customers*

| # days to complete requester inquiry [measure] | Fiscal Year, Month, Agency Staff, Requester Type, Inquiry Topic | No | — | None |

**Review Responsive Records**

*Ensure proper use of exemptions and exclusions*

<table>
<thead>
<tr>
<th># exemptions for appeals [measure]</th>
<th>Fiscal Year, Agency Component, Appeal Disposition, Exemption Type</th>
<th>Yes</th>
<th>Number of times each exemption was used to deny an appeal</th>
<th>§ 552(e)(1)(B)(i)</th>
</tr>
</thead>
<tbody>
<tr>
<td># requests [measure]</td>
<td>Fiscal Year, Agency Component,</td>
<td>Yes</td>
<td>Number of full denials based on exemptions</td>
<td>§ 552(e)(1)(A)</td>
</tr>
<tr>
<td>Business Process / Business Improvement Objective / Measure</td>
<td>Required for Reporting to DOJ</td>
<td>DOJ Reported Data Clarification</td>
<td>FOIA Statute Citation</td>
<td></td>
</tr>
<tr>
<td>-------------------------------------------------------------</td>
<td>-------------------------------</td>
<td>---------------------------------</td>
<td>----------------------</td>
<td></td>
</tr>
<tr>
<td>Request Disposition, Exemption Type</td>
<td>Yes</td>
<td>Number of partial grants/partial denials</td>
<td>§ 552(e)(1)(A)</td>
<td></td>
</tr>
<tr>
<td>Fiscal Year, Agency Component, Request Disposition</td>
<td>Yes</td>
<td>Number of times exemptions applied</td>
<td>§ 552(e)(1)(A)</td>
<td></td>
</tr>
<tr>
<td>Fiscal Year, Agency Component, Exemption Type</td>
<td>Yes</td>
<td>Number of times statute relied upon per agency/component</td>
<td>§ 552(e)(1)(B)(ii)</td>
<td></td>
</tr>
<tr>
<td>Fiscal Year, Agency Component, Exclusion Type</td>
<td>Yes</td>
<td>Number of times FOIA subsection (c) exclusion used during reported fiscal year</td>
<td>§ 552(e)(1)(P)</td>
<td></td>
</tr>
<tr>
<td>Fiscal Year, Agency Component, Exemption Type, Statute</td>
<td>Yes</td>
<td>Total number of times statute relied upon by agency</td>
<td>§ 552(e)(1)(B)(ii)</td>
<td></td>
</tr>
<tr>
<td>Fiscal Year, Agency Component, Exemption Type, Statute, Information Type</td>
<td>Yes</td>
<td>Types of information withheld in exemption 3</td>
<td>§ 552(e)(1)(B)(ii)</td>
<td></td>
</tr>
<tr>
<td>% requests including submitter’s records that result in an injunction and courts rule in favor of submitter [measure]</td>
<td>Fiscal Year, Month, Requester Type, Process Queue</td>
<td>No</td>
<td>—</td>
<td>None</td>
</tr>
<tr>
<td>% requests that include CCI records and result in a submitter’s injunction [measure]</td>
<td>Fiscal Year, Month, Requester Type, Process Queue</td>
<td>No</td>
<td>—</td>
<td>None</td>
</tr>
<tr>
<td>case citations for Exemption 3 [list/data]</td>
<td>Fiscal Year, Agency Component</td>
<td>Yes</td>
<td>Case citations used for Exemption 3</td>
<td>§ 552(e)(1)(B)(ii)</td>
</tr>
<tr>
<td>statutes used for Exemption 3 [list/data]</td>
<td>Fiscal Year, Agency Component, Exemption Type, Statute</td>
<td>Yes</td>
<td>—</td>
<td>§ 552(e)(1)(B)(ii)</td>
</tr>
</tbody>
</table>

**Leverage review for identification of responsive records for proactive disclosure**

| # times records review results in flagging records for proactive disclosure [measure] | Fiscal Year, Month, Topic, Recordkeeping System, Reason (3x rule, agency policy) | No | — | None |

**Provide high quality of service**

<p>| # records differing in approved release/denial/partial vs reviewers’ &quot;draft&quot; | Fiscal Year, Month, Topic, Recordkeeping System, Type of | No | — | None |</p>
<table>
<thead>
<tr>
<th><strong>Business Process / Business Improvement Objective / Measure</strong></th>
<th><strong>Dimensions</strong></th>
<th><strong>Required for Reporting to DOJ</strong></th>
<th><strong>DOJ Reported Data Clarification</strong></th>
<th><strong>FOIA Statute Citation</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>recommendation, for requests where there was a difference [measure]</td>
<td>Modification (reduced, rolling response, etc.), Staff Person</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>% requests where approved release/denials/partial differed from reviewers' &quot;draft&quot; recommendations [measure]</td>
<td>Fiscal Year, Month, Topic, Recordkeeping System, Type of Modification (reduced, rolling response, etc.), Staff Person</td>
<td>No</td>
<td>—</td>
<td>None</td>
</tr>
<tr>
<td><strong>Provide timely service to review responsive records</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>% of requests involving CCI [measure]</td>
<td>Fiscal Year, Month, Agency Staff, Topic, Commercial Submitter</td>
<td>No</td>
<td>—</td>
<td>None</td>
</tr>
<tr>
<td>% of requests involving CCI that result in an injunction [measure]</td>
<td>Fiscal Year, Month, Agency Staff, Topic, Commercial Submitter</td>
<td>No</td>
<td>—</td>
<td>None</td>
</tr>
<tr>
<td><strong>Monitor Litigation</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><em>Ensure litigation information is captured and tracked to related request(s)</em></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>court hearing litigation case [list/data]</td>
<td>Fiscal Year, Agency Component</td>
<td>Yes</td>
<td>—</td>
<td>None</td>
</tr>
<tr>
<td>date case filed [list/data]</td>
<td>Calendar Year</td>
<td>Yes</td>
<td>Date file of cases filed in reported calendar year</td>
<td>§ 552(e)(6)(A)(i)</td>
</tr>
<tr>
<td>FOIA statute / exemptions in litigation case [list/data]</td>
<td>Fiscal Year, Agency Component</td>
<td>Yes</td>
<td>FOIA statute section and exemptions involved in litigation case.</td>
<td>§ 552(e)(6)(A)(ii)(I)</td>
</tr>
<tr>
<td>litigation case disposition [list/data]</td>
<td>Fiscal Year, Agency Component</td>
<td>Yes</td>
<td>Disposition of litigation case</td>
<td>§ 552(e)(6)(A)(ii)(II)</td>
</tr>
<tr>
<td>litigation case number [list/data]</td>
<td>Fiscal Year, Agency Component</td>
<td>Yes</td>
<td>—</td>
<td>§ 552(e)(6)(A)(i)</td>
</tr>
<tr>
<td>name of litigation case [list/data]</td>
<td>Fiscal Year, Agency Component</td>
<td>Yes</td>
<td>—</td>
<td>§ 552(e)(6)(A)(i)</td>
</tr>
<tr>
<td>special counsel involved in litigation case [list/data]</td>
<td>Fiscal Year, Agency Component</td>
<td>Yes</td>
<td>—</td>
<td>None</td>
</tr>
<tr>
<td><strong>Manage Records for Proactive Disclosure</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><em>Identify alternatives to FOIA for making records available</em></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td># records added to publicly accessible repositories, other than FOIA [measure]</td>
<td>Fiscal Year, Month, Topic</td>
<td>No</td>
<td>—</td>
<td>None</td>
</tr>
<tr>
<td><strong>Maximize proactive disclosure of impactful records</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td># (a)(2) records posted [measure]</td>
<td>Fiscal Year, Agency Component, Agency Organization (incl. program office, FOIA office)</td>
<td>Yes</td>
<td>Number of (a)(2) records posted by program offices (outside of FOIA office) during the reported fiscal year</td>
<td>§ 552(e)(1)(Q)</td>
</tr>
<tr>
<td>Business Process / Business Improvement Objective / Measure</td>
<td>Dimensions</td>
<td>Required for Reporting to DOJ</td>
<td>DOJ Reported Data Clarification</td>
<td>FOIA Statute Citation</td>
</tr>
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<td>-------------------------------------------------------------</td>
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<td>--------------------------------</td>
<td>----------------------</td>
</tr>
<tr>
<td>% change in # records flagged for proactive release due to 3x rule [measure]</td>
<td>Fiscal Year, Month, Requester Type, Process Queue, Topic</td>
<td>No</td>
<td>—</td>
<td>None</td>
</tr>
<tr>
<td>% change in # records flagged for proactive release within review process [measure]</td>
<td>Fiscal Year, Month, Requester Type, Process Queue, Topic</td>
<td>No</td>
<td>—</td>
<td>None</td>
</tr>
<tr>
<td>Manage Human Resources</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ensure an adequately trained and skilled workforce</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>% FOIA staff in 0306 Government Information Series (GIS) job classification [measure]</td>
<td>Fiscal Year, Month, Staff Person, FOIA Role, Job Classification</td>
<td>No</td>
<td>—</td>
<td>(blank)</td>
</tr>
<tr>
<td>% FOIA staff with current training requirements met [measure]</td>
<td>Fiscal Year, Month, Staff Person, FOIA Role</td>
<td>No</td>
<td>—</td>
<td>None</td>
</tr>
<tr>
<td>% FOIA staff with insufficient skill level to meet resource plan [measure]</td>
<td>Fiscal Year, Month, Staff Person, FOIA Role, Type of Skill</td>
<td>No</td>
<td>—</td>
<td>None</td>
</tr>
<tr>
<td>Optimally allocate agency resources to perform FOIA activities and meet demand</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td># appeals [measure]</td>
<td>Fiscal Year, Agency Component, Appeal Status (history)</td>
<td>Yes</td>
<td>Total number of appeals processed</td>
<td>§ 552(e)(1)(B)(i)</td>
</tr>
<tr>
<td># consultations received [measure]</td>
<td>Fiscal Year, Agency Component</td>
<td>Yes</td>
<td>Number of consultations received from other agencies during the reported fiscal year</td>
<td>None</td>
</tr>
<tr>
<td>Fiscal Year, Agency Component, Consultation Status (history)</td>
<td>Yes</td>
<td>Number of consultations received from other agencies that were pending at agency as of start of reported fiscal year</td>
<td>None</td>
<td></td>
</tr>
<tr>
<td>Fiscal Year, Agency Component, Consultation Status (history)</td>
<td>Yes</td>
<td>Number of consultations received from other agencies that were pending at the agency as of the end of the reported fiscal year</td>
<td>None</td>
<td></td>
</tr>
<tr>
<td>Fiscal Year, Agency Component, Consultation Status (history)</td>
<td>Yes</td>
<td>Number of consultations received from other agencies that were processed by the agency</td>
<td>None</td>
<td></td>
</tr>
<tr>
<td>Business Process / Business Improvement Objective / Measure</td>
<td>Dimensions</td>
<td>Required for Reporting to DOJ</td>
<td>DOJ Reported Data Clarification</td>
<td>FOIA Statute Citation</td>
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<tr>
<td>------------------------------------------------------------</td>
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<td>-------------------------------</td>
<td>-------------------------------</td>
<td>-----------------------</td>
</tr>
<tr>
<td># FTEs [measure]</td>
<td>Fiscal Year, Agency Component</td>
<td>Yes</td>
<td>Total number of full-time FOIA staff</td>
<td>§ 552(e)(1)(O)</td>
</tr>
<tr>
<td></td>
<td>Fiscal Year, Agency Component, Staff Allocation Type</td>
<td>Yes</td>
<td>Number of equivalent full-time FOIA employees (part-time)</td>
<td>§ 552(e)(1)(O)</td>
</tr>
<tr>
<td></td>
<td>Fiscal Year, Agency Component, Staff Allocation Type</td>
<td>Yes</td>
<td>Number of full-time FOIA employees</td>
<td>§ 552(e)(1)(O)</td>
</tr>
<tr>
<td># requests [measure]</td>
<td>Fiscal Year, Agency Component, Fiscal Quarter, Request Status (history)</td>
<td>Yes</td>
<td>Number of requests processed during the current reported fiscal year.</td>
<td>§ 552(e)(1)(D)</td>
</tr>
<tr>
<td></td>
<td>Fiscal Year, Agency Component, Fiscal Quarter, Request Status (history)</td>
<td>Yes</td>
<td>Number of requests processed in fiscal year</td>
<td>§ 552(e)(1)(D)</td>
</tr>
<tr>
<td></td>
<td>Fiscal Year, Agency Component, Fiscal Quarter, Request Status (history)</td>
<td>Yes</td>
<td>Number of requests received during the current reported fiscal year.</td>
<td>§ 552(e)(1)(D)</td>
</tr>
<tr>
<td></td>
<td>Fiscal Year, Agency Component, Fiscal Quarter, Request Status (history)</td>
<td>Yes</td>
<td>Number of requests received in fiscal year</td>
<td>§ 552(e)(1)(D)</td>
</tr>
<tr>
<td></td>
<td>Fiscal Year, Agency Component, Request Status (history)</td>
<td>Yes</td>
<td>Number of requests pending as of end of fiscal year</td>
<td>§ 552(e)(1)(C)</td>
</tr>
<tr>
<td></td>
<td>Fiscal Year, Agency Component, Request Status (history)</td>
<td>Yes</td>
<td>Number of requests pending as of start of fiscal year</td>
<td>None</td>
</tr>
<tr>
<td></td>
<td>Fiscal Year, Agency Component, Request Status (history)</td>
<td>Yes</td>
<td>Number of requests processed during the previous fiscal year.</td>
<td>None</td>
</tr>
<tr>
<td></td>
<td>Fiscal Year, Agency Component, Request Status (history)</td>
<td>Yes</td>
<td>Number of requests received during the previous fiscal year.</td>
<td>None</td>
</tr>
<tr>
<td></td>
<td>Fiscal Year, Agency Component, Request Stage (at least perfected), Request Status (history), Process Queue, # Days to</td>
<td>Yes</td>
<td>Number of perfected complex requests closed in the reported fiscal year, within specified days to close increments</td>
<td>§ 552(e)(1)(G)</td>
</tr>
<tr>
<td>Business Process / Business Improvement Objective / Measure</td>
<td>Required for Reporting to DOJ</td>
<td>DOJ Reported Data Clarification</td>
<td>FOIA Statute Citation</td>
<td></td>
</tr>
<tr>
<td>-------------------------------------------------------------</td>
<td>-----------------------------</td>
<td>--------------------------------</td>
<td>----------------------</td>
<td></td>
</tr>
<tr>
<td>Close (&quot;bucketed&quot; increments)</td>
<td>Yes</td>
<td>Number of perfected complex requests which remain open as of the end of the reported fiscal year</td>
<td>§ 552(e)(1)(C)</td>
<td></td>
</tr>
<tr>
<td>Fiscal Year, Agency Component, Process Queue, Request Stage (at least perfected), Request Status (history)</td>
<td>Yes</td>
<td>Number of perfected expedited requests which remain open as of the end of the reported fiscal year</td>
<td>§ 552(e)(1)(C)</td>
<td></td>
</tr>
<tr>
<td>Fiscal Year, Agency Component, Process Queue, Request Stage (at least perfected), Request Status (history)</td>
<td>Yes</td>
<td>Number of perfected simple requests which remain open as of the end of the reported fiscal year</td>
<td>§ 552(e)(1)(C)</td>
<td></td>
</tr>
<tr>
<td>Fiscal Year, Agency Component, Process Queue, Request Stage (at least perfected), Request Status (history), # Days to Close (&quot;bucketed&quot; increments)</td>
<td>Yes</td>
<td>Number of perfected expedited requests closed in the reported fiscal year, within specified increments</td>
<td>§ 552(e)(1)(G)</td>
<td></td>
</tr>
<tr>
<td>Fiscal Year, Agency Component, Process Queue, Request Stage (at least perfected), Request Status (history), # Days to Close (&quot;bucketed&quot; increments)</td>
<td>Yes</td>
<td>Number of perfected simple requests closed in the reported fiscal year, within specified increments</td>
<td>§ 552(e)(1)(G)</td>
<td></td>
</tr>
<tr>
<td>% requests considered to be compound (more than one request item) [measure]</td>
<td>No</td>
<td>—</td>
<td>None</td>
<td></td>
</tr>
</tbody>
</table>

**Scope and Size Request**

**Improve accuracy of estimated effort**

| % requests with additional set of recordkeeping systems after the Scope process completes [measure] | Fiscal Year, Month, Process Queue, Topic, Recordkeeping System | No | — | None |

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<table>
<thead>
<tr>
<th>Business Process / Business Improvement Objective / Measure</th>
<th>Dimensions</th>
<th>Required for Reporting to DOJ</th>
<th>DOJ Reported Data Clarification</th>
<th>FOIA Statute Citation</th>
</tr>
</thead>
<tbody>
<tr>
<td>% requests with reduced set of recordkeeping systems after the Scope process completes [measure]</td>
<td>Fiscal Year, Month, Process Queue, Topic, Recordkeeping System</td>
<td>No</td>
<td>—</td>
<td>None</td>
</tr>
<tr>
<td>average/median % difference and standard deviation between initial processing estimate and effort reflected on final invoice [measure]</td>
<td>Fiscal Year, Month, Process Queue, Topic, Recordkeeping System</td>
<td>No</td>
<td>—</td>
<td>None</td>
</tr>
<tr>
<td>average/median % difference and standard deviation in estimated effort vs. actual effort [measure]</td>
<td>Fiscal Year, Month, Process Queue, Topic, Recordkeeping System, Request Disposition</td>
<td>No</td>
<td>—</td>
<td>None</td>
</tr>
</tbody>
</table>

**Leverage scoping for early identification of records for proactive disclosure**

| # times early flagging of request based on topic(s) leads to proactive disclosure [measure] | Fiscal Year, Month, Topic | No | — | None |

**Provide timely service to scope and size request**

| average/median processing delay due to clarifications [measure] | Fiscal Year, Month, Agency Staff, Process Queue, Topic | No | — | None |

**Request Payment**

**Use appropriate payment determination (pre-pay, advance-pay, routine, pay assurance)**

| % requests by payment type (pre-payment, advance payment, routine payment) [measure] | Fiscal Year, Month, Requester Type, Process Queue, Payment Type | No | — | None |
| % requests with payment not made within X days [measure] | Fiscal Year, Month, Payment Determination Type, Requester Type, Fee Charge Type | No | — | None |

**Provide Pre-Request Support**

**Enable requesters and members of the public to easily discover materials and use proactively released materials**

| # times case closed or partially addressed due to publicly available information [measure] | Fiscal Year, Month, Process Queue, Topic | No | — | None |

**Ensure adequate public understanding of FOIA rules and related agency policies**

<p>| % requests where scope is modified within review [measure] | Fiscal Year, Month, Topic, Recordkeeping System, Type of | No | — | None |</p>
<table>
<thead>
<tr>
<th>Business Process / Business Improvement Objective / Measure</th>
<th>Dimensions</th>
<th>Required for Reporting to DOJ</th>
<th>DOJ Reported Data Clarification</th>
<th>FOIA Statute Citation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Search for Responsive Records</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ensure efficient process to locate responsive records</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>average/median days to complete search for responsive records [measure]</td>
<td>Fiscal Year, Month, Process Queue, Topic, Request Disposition</td>
<td>No</td>
<td>—</td>
<td>None</td>
</tr>
<tr>
<td>Ensure search produces responsive records</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td># times confirmation of responsive records differs from initial set from search [measure]</td>
<td>Fiscal Year, Month, Process Queue, Topic, Request Disposition</td>
<td>No</td>
<td>—</td>
<td>None</td>
</tr>
<tr>
<td>Create Referral, Coordination or Consultation</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ensure efficient process to refer, consult, or coordinate with another agency</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td># coordination or consultation actions initiated by the agency resulting in a subsequent referral [measure]</td>
<td>Fiscal Year, Month, Topic, Other Agency, Action Type (consult, coordination)</td>
<td>No</td>
<td>—</td>
<td>None</td>
</tr>
</tbody>
</table>

Receive Payment

Ensure quality of payment received

% requests where scope is modified within search [measure] | Modification (reduced, rolling response, etc.) | | |

% requests with fees not paid when due [measure] | Fiscal Year, Month, Topic, Recordkeeping System, Type of Modification (reduced, rolling response, etc.) | No | — | None |

% requests with payment received not equal to amount owed [measure] | Fiscal Year, Month, Type of Requester | No | — | None |

Receive Payment

Ensure quality of payment received

# payments received [measure] | Fiscal Year, Month, Form of Payment, Type of Requester | No | — | None |

% requests with fees not paid when due [measure] | Fiscal Year, Month, Process Queue, Topic, Request Disposition, Fee Decision (pre-pay, advance pay, routine, pay assurance), Previous Payment History | No | — | None |

% requests with payment received not equal to amount owed [measure] | Fiscal Year, Month, Form of Payment, Type of Requester | No | — | None |
<table>
<thead>
<tr>
<th>Business Process / Business Improvement Objective / Measure</th>
<th>Required for Reporting to DOJ</th>
<th>DOJ Reported Data Clarification</th>
<th>FOIA Statute Citation</th>
</tr>
</thead>
<tbody>
<tr>
<td># days between decision to initiate action (referral, consult, coordination) to another agency and actual referral made [measure]</td>
<td>Fiscal Year, Month, Topic, Other Agency, Action Type (referral, consult, coordination)</td>
<td>No</td>
<td>—</td>
</tr>
<tr>
<td><strong>Respond to Request</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Enable requesters to easily receive responses</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>% responses by distribution channel [measure]</td>
<td>Fiscal Year, Month, Request Disposition, Communication Channel (mode of distribution)</td>
<td>No</td>
<td>—</td>
</tr>
<tr>
<td><strong>Provide high quality of service</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td># times quality review of response package results in rework [measure]</td>
<td>Fiscal Year, Month, Staff Person, # Responsive Records (&quot;bucketed&quot; increments), Process Queue</td>
<td>No</td>
<td>—</td>
</tr>
<tr>
<td><strong>Provide timely service to complete response package</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>average/median # days from completed review to send response package [measure]</td>
<td>Fiscal Year, Month, Staff Person, # Responsive Records (&quot;bucketed&quot; increments), Process Queue</td>
<td>No</td>
<td>—</td>
</tr>
<tr>
<td><strong>Manage Account</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Encourage requesters to register with login accounts to improve the service they receive</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>% requesters who registered as FOIA system users [measure]</td>
<td>Fiscal Year, Month, Type of Requester</td>
<td>No</td>
<td>—</td>
</tr>
<tr>
<td><strong>Manage Tasks</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Define reusable (template) tasks that streamline workflow</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td># times pre-defined task used [measure]</td>
<td>Fiscal Year, Month, Task Type, Process Queue</td>
<td>No</td>
<td>—</td>
</tr>
<tr>
<td><strong>Perform Supplemental Case Activities</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>None</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Maintain Policy and Process Rules</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Ensure predefined process queues are defined with useful pre-defined workflows</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td># times pre-defined process queue used [measure]</td>
<td>Fiscal Year, Month, Process Queue</td>
<td>No</td>
<td>—</td>
</tr>
<tr>
<td>% of times a pre-defined process queue and its tasking are adjusted after assigning it to a request [measure]</td>
<td>Fiscal Year, Month, Process Queue, Topic</td>
<td>No</td>
<td>—</td>
</tr>
<tr>
<td><strong>Manage FOIA Records Environments</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Business Process / Business Improvement Objective / Measure</td>
<td>Dimensions</td>
<td>Required for Reporting to DOJ</td>
<td>DOJ Reported Data Clarification</td>
</tr>
<tr>
<td>-------------------------------------------------------------</td>
<td>------------</td>
<td>--------------------------------</td>
<td>--------------------------------</td>
</tr>
<tr>
<td>Ensure metadata describing records in FOIA environments are complete and accurate</td>
<td>% complete metadata in record repositories [measure]</td>
<td>Fiscal Year, Month, Type of Repository, Type of Metadata</td>
<td>No</td>
</tr>
<tr>
<td></td>
<td>% repository records requiring metadata changes as part of internal &quot;audit&quot; [measure]</td>
<td>Fiscal Year, Month, Type of Repository, Type of Metadata</td>
<td>No</td>
</tr>
<tr>
<td>Respond to Referral</td>
<td>Provide timely service to respond to referrals</td>
<td>average/median # days to respond to referral from referral receipt [measure]</td>
<td>Fiscal Year, Month, Agency (making referral), Topic, Review Staff</td>
</tr>
<tr>
<td>Modify Scope of Request</td>
<td>Ensure requester can formulate revised request</td>
<td>% of scope modifications resulting in a withdrawal of request [measure]</td>
<td>Fiscal Year, Month, Topic, Process Queue, Requester Type</td>
</tr>
<tr>
<td>Maintain Requester Dashboard</td>
<td>Ensure requesters can easily track their requests</td>
<td>% of registered requesters who used the Requester Dashboard [measure]</td>
<td>Fiscal Year, Month, User Account, Requester Type</td>
</tr>
</tbody>
</table>
7 Process Descriptions

This section and several of the appendices provide detailed FRM content for each of the major FOIA processes presented in Section 3.1.1, including:

- Process definitions in this section
- Process Flow (BPMN) diagrams in this section
- Use Case diagrams in Appendix D
- Activity definitions in Appendix E
- User stories, which are pro forma functional requirements in Appendix E
- Common services applicable to each process in Appendix B
- Roles involved at the activity level in Appendix A

The process descriptions in the sub-sections that follow are organized and presented in three groups:

- Core Processes
- Enabling Processes
- Supporting Processes

NOTE: The process flow diagrams in this section are intended to reflect a typical process, but not a prescriptive one. That is, agencies should review and adapt the model to their specific needs and workflows.

7.1 Core Process: Conduct Request Intake

This process produces an electronic FOIA request record (pre-perfected), either by direct entry from a requester or capture by an Intake Specialist when the request comes through an email, postal mail, or fax. Key deliverables include submitted requests from requesters (or their representatives), and inter-agency actions, including referrals, consultations, and coordination requests from other agencies.

The Request Intake process might be initiated from the Pre-Request process, should the Requester be looking for support prior to submitting a FOIA Request. For routine FOIA Requests, the processing will continue with the Confirm Perfected Request process, or if a referral, coordination, or consultation was received from another agency, the process will continue with either the Respond to Referral or Respond to Coordination or Consultation process respectively.

For detailed activity definitions and user stories pertaining to this process, refer to Appendix E.1. A use case diagram for this process is presented in Figure 30 in Appendix D.

Figure 9 below depicts the Conduct Request Intake process as a process flow diagram. Note that while a particular sequence of activities is depicted, agencies will need to adapt the flows to their specific needs and scenarios.
Figure 9. Process Flow Diagram: Conduct Request Intake
7.2  Core Process: Confirm Perfected Request

This process ensures that each FOIA request meets all requirements to be considered “perfected,” or ready to process. The FOIA specifies two requirements for an access request: It must “reasonably describe” the records sought, and it must be “made in accordance with published rules stating the time, place, fees (if any), and procedures to be followed.” The Department of Justice (DOJ) Guide to the Freedom of Information Act provides specific details for agencies in determining whether a request is perfected.

If the request, or any part of the request, is not considered proper but might be made so, the agency will coordinate with the Requester to refine their request. In addition to the assessment for a proper request, which is handled in the Evaluate Validity of Request activity, the process will, for a proper request, assign a process queue (track), assign organizational ownership within the agency, assign a case lead, define the individual Request Items that comprise the Request, and assign organizational ownership to each of the items. The agency is expected to process the request items that are considered perfected, even if other parts of the request are considered improper and not perfectible. The process also decides expedited requests, routes misdirected requests to the appropriate agency component, and informs Requesters to resubmit their Request to another agency if the records they are seeking are held by the other agency.

The Confirm Perfected Request process is initiated from the Conduct Request Intake process. Once complete, the processing will continue with the Size and Scope Request process. If the Requester were to disagree with an adverse decision regarding an expedited request, she could initiate an Appeal of that decision.

For detailed activity definitions and user stories pertaining to this process, refer to Appendix E.2. A use case diagram for this process is presented in Figure 31 in Appendix D.

Figure 10 below depicts the Confirm Perfected Request process as a process flow diagram. The activities (boxes in the “swim lanes”) are the same as the use case model.
Figure 10. Process Flow Diagram: Confirm Perfected Request
7.3 **Core Process: Scope and Size Request**

This process makes an initial determination whether the records being sought are already publicly available, makes a request for clarification from the Requester if needed, determines the likely sources of responsive records (e.g., from recordkeeping systems and/or the FOIA Repository), and makes a high-level estimate of the processing effort involved (which may suggest an unusual circumstance. “The FOIA defines ‘unusual circumstances’ as (1) the need to search for and collect records ‘from field facilities or other establishments that are separate from the office’ processing the request; (2) the need to search for, collect, and examine ‘a voluminous amount’ of records ‘demanded in a single request’; and (3) the need to consult with another agency or two or more agency components.” [14]

The *Scope and Size Request* process is initiated from the *Confirm Perfected Request* process. Depending on whether fees are applicable to the request, it may flow to the *Estimate Fees* process or may continue directly to the *Search for Responsive Records* process. If needed, additional tasking may be defined within the *Manage Tasks* process, such as to obtain confirmation and effort estimates from individual recordkeeping SMEs.

*For detailed activity definitions and user stories pertaining to this process, refer to Appendix E.3. A use case diagram for this process is presented in Figure 32 in Appendix D.*

Figure 11 below depicts the *Scope and Size Request* process as a process flow diagram. The activities (boxes in the “swim lanes”) are the same as the use case model.
Figure 11. Process Flow Diagram: Scope and Size Request
7.4 Core Process: Estimate Fees

The Estimate Fees process determines the applicable fees (if any), requests advanced payments and/or assurances from requester (as appropriate) and evaluates fee waiver requests. Within the FRM, the following payment scenarios apply:

- **Payment Assurance.** A Payment Assurance is a written confirmation from the Requester that they will pay the fees due upon receipt of the agency’s response.

- **Advance Payment.** An Advance Payment is required before the search effort will begin.

- **Pre-Payment.** A Pre-Payment is required before sending the response but does not stop the search effort from starting.

Example situations for requesting one of the above payment scenarios could include prior issues with the Requester making a payment, a prior balance due, an estimate that exceeds a standard threshold (e.g., $250) and/or the Requester's willingness to pay amount.

The Estimate Fees process may be initiated at any time, although typically invoked either from the Scope and Size Request or Modify Request Scope process. This process is not always applicable to a Request, such as when no fees are to be collected. If a pre- or advance payment is required, the process will branch to the Request Payment process. If an advance payment was required, the process will wait until the payment has been received before continuing to the Search process. If payment will be acceptable after the response has been delivered to the Requester, then the process can proceed with the Search process directly.

For detailed activity definitions and user stories pertaining to this process, refer to Appendix E.4. A use case diagram for this process is presented in Figure 33 in Appendix D.

Figure 12 below depicts the Estimate Fees process as a process flow diagram. The activities (boxes in the “swim lanes”) are the same as the use case model.
Figure 12. Process Flow Diagram: Estimate Fees
7.5 Core Process: Search for Responsive Records

This process conducts a search for responsive records and identifies preliminary redactions, exemptions, and exclusions that may apply. Those indications will be confirmed and approved within the subsequent Review Responsive Records process. Note that “records” includes structured database entries, documents, audio, and video files, and any other FOIA “objects” that may be requested.

The Search for Responsive Records process may be initiated from the Scope and Size Request or Estimate Fees processes, depending on whether fees are applicable to the request. Within the process, there may be a need for the Search Specialist to add tasking within the Manage Tasks process, such as for a recordkeeping SME to search for records in a particular system. The SME would then complete that effort and update their assigned task status. If responsive records are found, the process will continue with the Review Responsive Records process. If none are found, the process may continue directly to the Respond to Request process (which will respond to the Requester that no records were found). Should the search produce a significant number of records that impact either the fees owed, the ability to complete within the standard response period (e.g., 20 days), or the clarity of the request itself, the agency may wish to coordinate scope changes with the Requester as part of the Modify Scope of Request process.

For detailed activity definitions and user stories pertaining to this process, refer to Appendix E.5. A use case diagram for this process is presented in Figure 34 in Appendix D.

Figure 13 below depicts the Search for Responsive Records process as a process flow diagram. The activities (boxes in the “swim lanes”) are the same as the use case model.
Figure 13. Process Flow Diagram: Search for Responsive Records
7.6 Core Process: Review Responsive Records

This process conducts a review and approval of the responsive records produced by the Search for Responsive Records process, including approval of redactions, exemptions, and exclusions. If there are any responsive records pertaining to commercial information submitters (e.g., companies who do business with or plan to do business with the agency), the records will be vetted with the submitter prior to their release to a Requester. As appropriate, the process also “flags” approved records with repeated requests or that match conditions for proactive disclosure for possible inclusion within the public facing FOIA Library.

Typically, the Review Responsive Records process follows the Search for Responsive Records process. However, in the case of a request referral from another agency, this process will also be invoked to review the specific records forwarded by the other agency. During the Review process, additional tasking may be defined within the Manage Tasks process, such as to include specific sub-organizations (e.g., information or operational security) and/or staff in the review or approval. If, during the review, it becomes clear that some records involve equity interest by other agencies or other agencies were the originating source of those records, there may be a need to invoke the Create Referral, Coordination, or Consultation process. Also, like the Search for Responsive Records, if the review effort is much larger than anticipated, the agency may coordinate with the Requester to see if they want to Modify Scope of Request. Finally, if a commercial submitter decides to file an injunction with the courts to prevent the release of some of their records, the process may invoke the Monitor Litigation process to track that activity until it is resolved.

For detailed activity definitions and user stories pertaining to this process, refer to Appendix E.6. A use case diagram for this process is presented in Figure 35 in Appendix D.

Figure 14 below depicts the Review Responsive Records process as a process flow diagram. The activities (boxes in the “swim lanes”) are the same as the use case model.
Figure 14. Process Flow Diagram: Review Responsive Records
7.7 Core Process: Create Referral, Coordination or Consultation

The Create Referral, Coordination or Consultation process permits the agency to initiate an action with another agency as part of completing a FOIA Request. When an agency locates records that originated with another agency or component, the records should be “referred” to the originating agency for processing and direct response to the requester. Upon completion of the Referral to another agency or component, the FOIA Request (or one or more of the Request Items) will be closed.

At times it may be necessary to verify other agencies' equity in records that may impact what should be released. The outreach will take the form of a "coordination" or "consultation" action. A Consultation is used when another agency or entity which holds an interest in the documents that are the subject of a FOIA request. This most commonly arises when an agency locates records in response to a request that originated with the agency, but which contain within them information of interest to another agency or another component. It may also be used when an agency locates records in its files that originated with an entity that is not itself subject to the FOIA.

A Coordination action, on the other hand, is where an agency may locate in its files law enforcement records originating with a law enforcement agency or classified records originating with an agency that is a member of the intelligence community. When responding to requests that encompass those records, it may be necessary to use modified procedures to avoid inadvertently revealing a sensitive fact that could invade someone’s personal privacy or damage national security interests. [11]

While the process may be invoked at any time during or after the Search for Responsive Records process, it will most likely occur within the Review Responsive Records process. Once completed, the processing will resume with the Review Responsive Records.

For detailed activity definitions and user stories pertaining to this process, refer to Appendix E.7. A use case diagram for this process is presented in Figure 36 in Appendix D.

Figure 15 below depicts the Create Referral, Coordination or Consultation process as a process flow diagram. The activities (boxes in the “swim lanes”) are the same as the use case model.
Figure 15. Process Flow Diagram: Create Referral, Coordination or Consultation
7.8 Core Process: Request Payment

This process creates a request for payment (i.e., an invoice) that the Requester is expected to pay as part of receiving a FOIA response.

If determined within the Estimate Fees process, the payment may be required either as part of receiving a response (most typical), prior to releasing records (a pre-payment), or prior to initiating search activity (an advance payment). If the invoice is to be sent to a Requester at the time of the response, the Request Payment process will be invoked from the Respond to Request process. Depending on which of the two processes invoked the Request Payment process, the processing will continue with the originating process.

For detailed activity definitions and user stories pertaining to this process, refer to Appendix E.8. A use case diagram for this process is presented in Figure 37 in Appendix D.

Figure 16 below depicts the Request Payment process as a process flow diagram. The activities (boxes in the “swim lanes”) are the same as the use case model.
Figure 16. Process Flow Diagram: Request Payment
7.9 Core Process: Receive Payment

The Receive Payment process captures Requester payments, initially through a direct payment to the agency or through an agency or external accounts receivable (A/R) system (e.g., Pay.gov). Once the information is obtained, the agency updates the FOIA Request with payment status information.

A payment can be received at any time and thus there are no specific processes that invoke this process. Once received and information has been updated accordingly, the processing will continue wherever it left off.

For detailed activity definitions and user stories pertaining to this process, refer to Appendix E.9. A use case diagram for this process is presented in Figure 38 in Appendix D.

Figure 17 below depicts the Receive Payment process as a process flow diagram. The activities (boxes in the “swim lanes”) are the same as the use case model.
Figure 17. Process Flow Diagram: Receive Payment

- Requester or Representative
  - Requester Decides to Pay
  - Send FOIA Request Payment
  - Payments. Includes electronic and/or paper checks.

- Fee Specialist
  - Receive Payment Info from A/R System
  - Apply Payment to FOIA Case(s)
  - Tolling. May result in resetting/restarting the processing clock, such as if a pre- or advance payment was required.
  - Continue Processing Request

- Accounts Receivable System (e.g., Pay.gov)
  - A/R System
  - Process Requester Payment
7.10 Core Process: Respond to Request

This process packages and releases the reviewed set of records to the Requester. To accommodate either large volumes of records or effort to search and review them, the Requester may be sent multiple physical response packages, which are sometimes referred to as “rolling responses”. When multiple responses are involved, individual Request Items may be closed. The entire Request will be closed once all responses and Request Items are complete.

Typically, the process will be invoked from the Review Responsive Records process, however, if no responsive records were located from the search, this process may be invoked directly from the Search for Responsive Records process. If a pre- or advance payment is due prior to release, the process will wait for a payment by invoking the Request Payment process before completing the response.

For detailed activity definitions and user stories pertaining to this process, refer to Appendix E.10. A use case diagram for this process is presented in Figure 39 in Appendix D.

Figure 18 below depicts the Respond to Request process as a process flow diagram. The activities (boxes in the “swim lanes”) are the same as the use case model.
Figure 18. Process Flow Diagram: Respond to Request
7.11 Core Process: Appeal Request-Related Decision

This process supports the tracking of a requester’s statutory right to appeal an “adverse determination” by the agency. Adverse determinations, or denials of requests, include agency decisions that the requested records are exempt, in whole or in part, as well as determinations that the requested record does not exist or cannot be located. Adverse determinations can also encompass procedural matters associated with a request, such as decisions on a fee waiver or expedited processing, or the form or format of the requested records. [19]

An administrative appeal can be invoked from multiple processes:

- *Estimate Fees* process. A Requester may appeal an adverse fee waiver determination.
- *Confirm Perfected Request* process. A Requester may appeal an adverse expedited request determination.
- *Respond to Request* process. A Requester may appeal the records provided, not provided, or partially withheld (e.g., exemptions), or the form/format of the records provided.

To manage the appeal, additional tasking may be defined within the *Manage Tasks* process, such as to provide for additional internal review or recommendations prior to the final decision. *Manage Tasks* may also be invoked as part of the remand determination stemming from the appeal outcome.

For detailed activity definitions and user stories pertaining to this process, refer to Appendix E.11. A use case diagram for this process is presented in Figure 40 in 8Appendix D.

Figure 19 below depicts the *Appeal Request-Related Decision* process as a process flow diagram. The activities (boxes in the “swim lanes”) are the same as the use case model.
Figure 19. Process Flow Diagram: Appeal Request-Related Decision
7.12 Core Process: Manage Tasks

Manage Tasks supports the definition and assignment of individual, trackable tasks (i.e., action items) to complete each case (e.g., Request, Request Item, Appeal, Litigation). The process defines and assigns new tasks, captures task status, and records staff work time.

This process supports multiple processes and may be invoked from Scope and Size Request, Search for Responsive Records, Review Responsive Records, Appeal Request-Related Decision, and Monitor Litigation processes.

For detailed activity definitions and user stories pertaining to this process, refer to Appendix E.12. A use case diagram for this process is presented in Figure 41 in Appendix D.

Figure 20 below depicts the Manage Tasks process as a process flow diagram. The activities (boxes in the “swim lanes”) are the same as the use case model.
Figure 20. Process Flow Diagram: Manage Tasks

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7.13 Core Process: Perform Supplemental Case Activities

This “process” is more of a collection of several independent activities, including reassigning a case, reopening a closed case, handling a requester's withdrawal of their Request, or adding a point of contact.

There are no specific dependencies between the set of activities in this process and other processes. Rather, the activities in the Perform Supplemental Case Activities are invoked on an ad hoc basis.

For detailed activity definitions and user stories pertaining to this process, refer to Appendix E.13. A use case diagram for this process is presented in Figure 42 in Appendix D.

Figure 21 below depicts the Perform Supplemental Case Activities process as a process flow diagram. The activities (boxes in the “swim lanes”) are the same as the use case model.
Figure 21. Process Flow Diagram: Perform Supplemental Case Activities

The *Maintain Policy and Process Rules* process permits a *Policy Manager* and a *Process Administrator* to update processing rules; define process queues; maintain reference data (controlled vocabularies); maintain fee schedules; define topics that get mapped to recordkeeping systems and responsive records within other processes; and creates templates for tasks, actions, and communications. Policy Managers also maintain FOIA-related regulations and guidance within this process.

While the *data* maintained by the *Maintain Policy and Process Rules* process are used throughout the other FOIA processes, there are *no specific process-to-process dependencies* between this process and others.

*For detailed activity definitions and user stories pertaining to this process, refer to Appendix E.14. A use case diagram for this process is presented in Figure 43 in Appendix D. Note there is no process flow diagram for this process.*

7.15 Enabling Process: Manage Human Resources

The *Manage Human Resources* process defines organizational entities, staff, team structures (work groups), role assignments, work time (calendars), analysis of staff workload, and work rebalancing, as needed.

While the *data* maintained by the *Manage Human Resources* process are used throughout the other FOIA processes, there are *no specific process-to-process dependencies* between this process and others.

*For detailed activity definitions and user stories pertaining to this process, refer to Appendix E.15. A use case diagram for this process is presented in Figure 44 in Appendix D. Note there is no process flow diagram for this process.*

7.16 Enabling Process: Manage FOIA Records Environments

The *Manage FOIA Records Environments* supports both the FOIA Repository, the internal record store for FOIA, and the FOIA Library (aka “Public Reading Room”), the external, publicly accessible record store. The process ensures the ongoing integrity of the FOIA records environment, including maintaining disposition information, managing metadata and use (including logical folders), performing periodic audits, and applying retention rules to purge or transfer records, as appropriate. Overall, the process ensures the repositories operate reliably, consistently, and in a trustworthy manner.

While the *records* maintained by the *Manage FOIA Records Environments* process are used throughout the other FOIA processes, there are *no specific process-to-process dependencies* between this process and others.

*For detailed activity definitions and user stories pertaining to this process, refer to Appendix E.16. A use case diagram for this process is presented in Figure 45 in Appendix D. Note there is no process flow diagram for this process.*
7.17 Enabling Process: Respond to Referral

When Another Agency has sent responsive records for the Agency to review (received through the Intake process), the Respond to Referral process assigns a lead organization and person, defines the processing queue, and documents the Request so that it can then be sent to the Review process.

This process is invoked from the Conduct Request Intake process. After setting up initial assignments, the referral is sent to the Review Responsive Records process.

For detailed activity definitions and user stories pertaining to this process, refer to Appendix E.17. A use case diagram for this process is presented in Figure 46 in Appendix D.

Figure 22 below depicts the Respond to Referral process as a process flow diagram. The activities (boxes in the “swim lanes”) are the same as the use case model.
Figure 22. Process Flow Diagram: Respond to Referral
7.18 Enabling Process: Respond to Coordination or Consultation Inquiry

When another agency has sent either a Coordination or Consultation for the Agency to support, the Respond to Coordination or Consultation Inquiry process assigns a lead organization and person, defines the processing queue, documents the Request, and evaluates and responds to the Request.

This process is invoked from the Conduct Request Intake process. No other process dependencies are included in the FRM for this process.

For detailed activity definitions and user stories pertaining to this process, refer to Appendix E.18. A use case diagram for this process is presented in Figure 47 in Appendix D.

Figure 23 below depicts the Respond to Coordination or Consultation Inquiry process as a process flow diagram. The activities (boxes in the “swim lanes”) are the same as the use case model.
Figure 23. Process Flow Diagram: Respond to Coordination or Consultation Inquiry

Possible Referral Decision. If the Another Agency determines a referral is appropriate, it will be sent to the Agency’s Intake function. Refer to the Request process for the activities involved.
7.19 Enabling Process: Modify Scope of Request

The Modify Scope of Request process permits a Requester to change their request prior to an agency response. If, for example, a search results in more records than anticipated or the work to review those records exceeds the initial estimate, the Agency should initiate a dialog with the Requester to determine whether the scope should be adjusted and/or to determine whether unusual circumstances suggest a change to the fees.

While this process may be initiated at any time, either by the Requester or by the Agency, it would typically be invoked based on the results of the Search for Responsive Records or Review Responsive Records process. Within the Modify Scope of Request, fees may need to be assessed or reassessed and thus the Estimate Fees process may be invoked.

For detailed activity definitions and user stories pertaining to this process, refer to Appendix E.19. A use case diagram for this process is presented in Figure 48 in Appendix D.

Figure 24 below depicts the Modify Scope of Request process as a process flow diagram. The activities (boxes in the “swim lanes”) are the same as the use case model.
Figure 24. Process Flow Diagram: Modify Scope of Request
7.20 Enabling Process: Monitor Litigation

The *Monitor Litigation* process captures information about legal actions taken that pertain to a FOIA case, such as a lawsuit brought by the Requester or their Representative, or an injunction action brought by a commercial Submitter to prevent disclosure under exemption b(4).

The *Monitor Litigation* process may be invoked from the Review Responsive Records process to capture and track a submitter-related injunction. Typically, litigations initiated by a Requester would become known through the agency’s OGC, which would also trigger this process. Within the process, the Manage Tasks process should be invoked to create and track unique tasks associated with the litigation (e.g., prepare a declaration, capture a Vaughn index, coordinate with other internal or external parties, implement court-ordered remand actions).

*For detailed activity definitions and user stories pertaining to this process, refer to Appendix E.20. A use case diagram for this process is presented in Figure 49 in Appendix D.*

Figure 25 below depicts the *Monitor Litigation* process as a process flow diagram. The activities (boxes in the “swim lanes”) are the same as the use case model.
Figure 25. Process Flow Diagram: Monitor Litigation
7.21 Enabling Process: Manage Account

The Manage Account process supports user account registration, profile and contact information capture, password resets, and account deactivations and closings. This process is largely an IT function and thus not particularly unique to FOIA, except to underscore the notion that each Requester may become a registered user, which provides them access to additional functionality within the agency’s “FOIA system”.

There are no specific process-to-process dependencies between this process and others. However, each person who wishes to be a user of the agency’s “FOIA system” would require being set up with an account. Note that a Requester could, if they desired, submit FOIA Requests and engage with the agency without an account, however, their functionality would be more limited than those with an account. For example, various communications, form entry, and the requester dashboard would become available to Requesters who are registered system users.

For detailed activity definitions and user stories pertaining to this process, refer to Appendix E.21. A use case diagram for this process is presented in Figure 50 in Appendix D. Note there is no process flow diagram for this process.

7.22 Supporting Process: Provide Pre-Request Support

Provide Pre-Request Support process includes optional activities that a Requester may wish to perform prior to submitting a FOIA Request, such as searching for openly available agency records, learning about FOIA procedures and guidance, and making inquiries with the FOIA Requester Service Center and/or the FOIA Public Liaison for more information.

This process may be invoked by a Requester at any time. As a result of executing the process, the processing may proceed to either the Conduct Request Intake or Provide Customer Service process.

For detailed activity definitions and user stories pertaining to this process, refer to Appendix E.22. A use case diagram for this process is presented in Figure 51 in Appendix D.

Figure 26 below depicts the Provide Pre-Request Support process as a process flow diagram. The activities (boxes in the “swim lanes”) are the same as the use case model.

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Figure 26. Process Flow Diagram: Provide Pre-Request Support
7.23 Supporting Process: Manage Records for Proactive Disclosure

The Manage Records for Proactive Disclosure process maintains records in the public facing “reading room”. Typically, this repository would reside on an agency’s portal and be accessible either from their home page or a dedicated landing page pertaining to obtaining agency records. The process also maintains the agency’s criteria for proactive disclosure. Refer to the feature discussion on proactive disclosure in Section 2.2.5.

Records for proactive disclosure may be identified from various sources and processes, including those responsive records that meet a multiple release rule (e.g., the 3 times rule) or records that are linked to a topic that has been tagged for possible public disclosure. The Review Responsive Records process provides for a link to this process, if at least one record has been tagged for possible proactive disclosure to the public.

For detailed activity definitions and user stories pertaining to this process, refer to Appendix E.23. A use case diagram for this process is presented in Figure 52 in Appendix D.

Figure 27 below depicts the Manage Records for Proactive Disclosure process as a process flow diagram. The activities (boxes in the “swim lanes”) are the same as the use case model.
Figure 27. Process Flow Diagram: Manage Records for Proactive Disclosure
### 7.24 Supporting Process: Maintain Requester Dashboard

The *Maintain Requester Dashboard* provides a requester with visibility into the status of their open requests, appeals, and fees, and historical information of their previously submitted requests and dispositions.

There are *no specific process-to-process dependencies* between this process and others. However, for a Requester to utilize the dashboard functionality, they would need to become registered system users and thus have a user account. Refer to the Manage Account process in Section 1.1 for more information.

*For detailed activity definitions and user stories pertaining to this process, refer to Appendix E.24. A use case diagram for this process is presented in Figure 53 in Appendix D. Note there is no process flow diagram for this process.*

### 7.25 Supporting Process: Provide Customer Service

The *Provide Customer Service* process addresses questions and issues raised by requesters that FOIA Requester Service Center or FOIA Public Liaisons support and respond to. These may occur at any point in the FOIA Request lifecycle and during the appeals and litigation processes.

This process supports two overall categories of inquiry—general inquiries and inquiries pertaining to mediation requests the Requester has initiated with NARA OGIS.

This process may be invoked at any time and for any reason by a Requester. A specific processing dependency exists between the Provide Pre-Request Support process and Provide Customer Service, since a Requester may find themselves with unanswered questions that they wish to submit to the agency.

*For detailed activity definitions and user stories pertaining to this process, refer to Appendix E.25. A use case diagram for this process is presented in Figure 54 in Appendix D.*

Figure 28 below depicts the *Provide Customer Service* process as a process flow diagram. The activities (boxes in the “swim lanes”) are the same as the use case model.
Figure 28. Process Flow Diagram: Provide Customer Service
7.26 Supporting Process: Monitor, Analyze and Report FOIA Performance

This process supports both required, government-wide reporting and the analysis of agency performance across a wide range of performance areas. Government-wide reporting, such as through FOIA.gov, enables agency-to-agency comparisons of various pre-defined measures. Ad hoc analysis conducted by an agency, comprises a set of business intelligence (BI) capabilities. Refer to Section 5 for a specific list of candidate reporting measures.

There is no specific process model for this process. Rather, Section 5 provides candidate analytical measures and metrics that agencies may find useful for monitoring and improving their FOIA program performance. There are no specific process dependencies between this process and others. The data produced and used by other processes are the essential inputs to the Monitor, Analyze and Report FOIA Performance process.

For detailed activity definitions and user stories pertaining to this process, refer to Appendix E.26. Note there is no process flow diagram or use case diagram for this process.
**8 Bibliography**


Appendix A  Role-Activity Mapping

This appendix provides a detailed mapping between the defined FRM roles and the activities with which they participate. This mapping could be used as a starting point within a systems specification for defining and managing the specific privileges permitted by each role.

Table 9. Role-Activity Mapping

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<td>REQUEST PAYMENT: Apply FOIA Transaction to A/R</td>
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<td>MONITOR, ANALYZE AND REPORT FOIA PERFORMANCE: Monitor Referrals Sent and Received</td>
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<td>RESPOND TO COORDINATION OR CONSULTATION INQUIRY: Evaluate Coordination or Consultation Inquiry from Another Agency</td>
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<td>MODIFY SCOPE OF REQUEST: Evaluate Possible Impact to Fees and/or Estimated Completion Date</td>
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<td>MODIFY SCOPE OF REQUEST: Review Possible Change to Scope</td>
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<td>REVIEW RESPONSIVE RECORDS: Notify Agency to Reconsider Release</td>
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<td>MANAGE TASKS: Define Tasks to Complete Case</td>
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<td>MANAGE TASKS: Override Routing for Next Task</td>
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<td>The System</td>
<td>CONDUCT REQUEST INTAKE: Check for Existing User Account</td>
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<td>CONDUCT REQUEST INTAKE: Create and Log New Case</td>
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<td>CONDUCT REQUEST INTAKE: Notify Requester of Request Receipt Acknowledgement</td>
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<td>CONDUCT REQUEST INTAKE: Extract Metadata and Tags from Request</td>
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<td>RECEIVE PAYMENT: Receive Payment Info from A/R System</td>
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<td>MANAGE RECORDS FOR PROACTIVE DISCLOSURE: Identify Records Meeting Multiple Release Rule for Public Disclosure</td>
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<td>MAINTAIN REQUESTER DASHBOARD: Check for Existing User Account</td>
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<td>MANAGE ACCOUNT: Logout of FOIA System</td>
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<td>MONITOR, ANALYZE AND REPORT FOIA PERFORMANCE: Monitor Case Status</td>
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<td>MONITOR, ANALYZE AND REPORT FOIA PERFORMANCE: Monitor Process and Response Performance</td>
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<td>MONITOR, ANALYZE AND REPORT FOIA PERFORMANCE: Monitor Worker and Productivity Performance</td>
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<td>MONITOR, ANALYZE AND REPORT FOIA PERFORMANCE: Monitor Referrals Sent and Received</td>
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<td>MONITOR, ANALYZE AND REPORT FOIA PERFORMANCE: Monitor Fees and Fee Waivers</td>
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<td>MONITOR, ANALYZE AND REPORT FOIA PERFORMANCE: Monitor Appeals Activity</td>
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<td>MONITOR, ANALYZE AND REPORT FOIA PERFORMANCE: Monitor User Experience</td>
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<td>MONITOR, ANALYZE AND REPORT FOIA PERFORMANCE: Monitor Appeals, Mediation and Litigation Process and Resources</td>
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<td>MANAGE ACCOUNT: Close User Account</td>
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<td>MONITOR, ANALYZE AND REPORT FOIA PERFORMANCE: Track Cost of FOIA Activities</td>
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# Appendix B  Common Services-Activity Mapping

The table below identifies the specific processes and activities within those processes that could be supported by the set of Common Services as defined in Section 3.3

**Table 10. Mapping of Common Services to Processes and Activities**

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<tr>
<th>Service</th>
<th>Process</th>
<th>Activity</th>
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<tr>
<td>AI/ML/HLT-Enabled Decisioning</td>
<td>Manage Tasks</td>
<td>Determine Process Queue</td>
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<td></td>
<td>Review Responsive Records</td>
<td>Apply Draft Redactions to Records and Sensitive Metadata</td>
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<tr>
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<td></td>
<td>Review Records for Full/Partial Release or Denial</td>
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<tr>
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<td>Scope and Size Request</td>
<td>Determine Search Parameters</td>
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<tr>
<td></td>
<td></td>
<td>Identify Sources for Request Item</td>
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<tr>
<td></td>
<td>Search for Responsive Records</td>
<td>Identify Potential Records for Exemption and Exclusion</td>
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<td>AI/ML/HLT-Enabled Metadata Extraction</td>
<td>Conduct Request Intake</td>
<td>Extract Metadata and Tags from Request</td>
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<td>Manage FOIA Records Environments</td>
<td>Maintain Repository Metadata</td>
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<td>Manage Records for Proactive Disclosure</td>
<td>Update Records’ Metadata to Facilitate Discovery</td>
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<td>Scope and Size Request</td>
<td>Assign Topics to Request Items</td>
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<tr>
<td>AI/ML/HLT-Enabled Search</td>
<td>Confirm Perfected Request</td>
<td>Determine If Duplicate Request</td>
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<td></td>
<td>Provide Pre-Request Support</td>
<td>Determine if Related to Another Open Request</td>
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<tr>
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<td>Scope and Size Request</td>
<td>Search Agency’s Openly Available Records</td>
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<td>Search for Responsive Records</td>
<td>Determine Search Parameters</td>
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<td>De-Dupe Responsive Records from Recordkeeping System Search</td>
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<td>De-Dupe Responsive Records in FOIA Repository</td>
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<td>Identify Similar Requests</td>
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<td>Search FOIA Repository for Potentially Responsive Records</td>
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<td>Search Sources to Identify Potentially Responsive Records</td>
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<td>Configurable Workflow</td>
<td>Maintain Policy and Process Rules</td>
<td>Maintain Processes / Queues</td>
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<td>Manage Tasks</td>
<td>Maintain Task and Action Templates</td>
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<td>Add or Remove Individual Tasks to Case</td>
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<td>Apply Task Template to Case</td>
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<td>Define Tasks to Complete Case</td>
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<td></td>
<td></td>
<td>Determine Process Queue</td>
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<tr>
<td></td>
<td></td>
<td>Notify Case Worker of Tasks and Cases Coming Due</td>
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<tr>
<td></td>
<td>Perform Supplemental Case Activities</td>
<td>Override Routing for Next Task</td>
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<td>Trigger Next Task and Route to Task Lead</td>
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<td>Assign Case to Lead</td>
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<td></td>
<td></td>
<td>Assign Item to Request Item Lead</td>
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<tr>
<td>Content Management</td>
<td>Maintain Policy and Process Rules</td>
<td>Maintain Agency FOIA Regulations and Guidance</td>
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<td>Document Management</td>
<td>Appeal Request-Related Decision</td>
<td>Attach Supporting Documents to Appeal</td>
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<td>Conduct Request Intake</td>
<td>Attach Documents to Request</td>
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<td>Scan and Convert Non-Automated Requests</td>
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<td>Provide Pre-Request Support</td>
<td>Search Agency’s Openly Available Records</td>
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<td>Email Integration and Correspondence Production</td>
<td>Appeal Request-Related Decision</td>
<td>Notify Parties of Appeal Decision</td>
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<td>Notify Parties of Withdrawn Appeal</td>
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<td>Conduct Request Intake</td>
<td>Notify Requester of Request Receipt Acknowledgement</td>
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<td></td>
<td>Receive Coordination or Consultation Request from Another Agency</td>
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<td>Receive Notification from Agency</td>
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<td></td>
<td></td>
<td>Send Confirmation of Inter-Agency Action Receipt</td>
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<td>Confirm Perfected Request</td>
<td>Ask Requester to Refine Request</td>
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<td>Notify Requester of Expedited Decision</td>
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<td>Notify Requester of Redirection to Another Agency Component</td>
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<td>Notify Requester of Request Deficiency</td>
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<td>Notify Requester of Submission to Incorrect Agency</td>
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<td>Create Referral, Coordination or Consultation</td>
<td>Notify Requester of Referral to Another Agency</td>
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<td>Receive Coordination Response from Another Agency</td>
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<td>Send Referral Package to Another Agency</td>
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<td>Notify Requester of Fee Waiver Denial</td>
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<td>Request Payment Assurance</td>
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<td>Respond to Fee Waiver Denial</td>
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</table>
Appendix C  Controlled Vocabularies

The table below provides a starter set of valid values for many data attributes that are described in Section 3.2.3 as a “List” type. Although the lists have not gone through rigorous review and validation, agencies may find it helpful as an initial starting point from which to make additional refinements. Some of the candidate reference tables suggested below may not be needed by all FOIA implementations.

Table 11. List of Preliminary Controlled Vocabularies

<table>
<thead>
<tr>
<th>Data Category</th>
<th>Candidate Reference Table</th>
<th>Sample Valid Values</th>
</tr>
</thead>
<tbody>
<tr>
<td>Assigned Role</td>
<td>Role Type</td>
<td><em>The set of roles, as described in Section 3.1.3. Roles would be customized for each agency.</em></td>
</tr>
<tr>
<td>Communication</td>
<td>Communication Channel Type</td>
<td>• FOIA System/Agency Portal</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Email</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Phone</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Fax</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Postal</td>
</tr>
<tr>
<td></td>
<td>Communication Type</td>
<td>• Appeal Decision to Requester</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Appeal from Requester</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• FOIA Inter-Agency Referral Receipt Acknowledgement</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• FOIA Inter-Agency Referral Request</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• FOIA Request Receipt Acknowledgement to Requester</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Inter-Agency Coordination Request</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Inter-Agency Coordination Request Receipt Acknowledgement</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Notice to Commercial Records “Submitters” of Intent to Release Records</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Notification to Commercial Records “Submitters” of Pending Release (aka “Substantiation Letter”)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Notification to Requester of Change in Due Date</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Notification to Requester of Estimated Fees in Excess of Requester’s Stated Willingness to Pay</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Notification to Requester of Expedition Decision</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Notification to Requester of Referral Received by Another Agency</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Notification to Requester of Referral Sent to Another Agency</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Notification to Requester of Request Deficiency</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Receipt of Additional Information from Requester</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Receipt of Commercial Records “Submitter’s” View of Records Release</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Request for Additional Information from Requester</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Requester Inquiry or Support Question</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Response to Requester Inquiry or Support Question</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Task Due (or Coming Due) Reminder</td>
</tr>
<tr>
<td>Data Category</td>
<td>Candidate Reference Table</td>
<td>Sample Valid Values</td>
</tr>
<tr>
<td>------------------------</td>
<td>----------------------------</td>
<td>---------------------</td>
</tr>
<tr>
<td>Customer Inquiry</td>
<td>Inquiry Status</td>
<td>• Draft</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Submitted</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• In Progress</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Completed</td>
</tr>
<tr>
<td>Inquiry Topic</td>
<td></td>
<td>• Request Submission Process</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Appeal Submission Process</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Mediation Process</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Adverse Decisions</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Status—General</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Status—Non-Response</td>
</tr>
<tr>
<td>Request Topic</td>
<td></td>
<td>• Agency-specific list of Topics</td>
</tr>
<tr>
<td>Customer Inquiry: Mediation</td>
<td>Mediation Request Status</td>
<td>• In Progress</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Resolved With No Remand Actions</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Resolved With Remand Actions</td>
</tr>
<tr>
<td>Requester Dispute Resolution Status</td>
<td></td>
<td>• In Progress</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Resolved With No Remand Actions</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Resolved With Remand Actions</td>
</tr>
<tr>
<td>Fee</td>
<td>Fee Type</td>
<td>• Search Effort Cost per Hour</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Review Effort Cost per Hour</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Duplication Cost per Page</td>
</tr>
<tr>
<td>FOIA Case</td>
<td>Case Type</td>
<td>• Appeal</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Customer Inquiry</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Customer Inquiry: Mediation</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• FOIA Request</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• FOIA Request Item (sub-case)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Litigation</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Inter-Agency FOIA Action: Referral</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Inter-Agency FOIA Action: Coordination</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Inter-Agency FOIA Action: Consultation</td>
</tr>
<tr>
<td>FOIA Case: Appeal</td>
<td>Appeal Disposition</td>
<td>• Affirmed on Appeal</td>
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<td>• Partially Affirmed &amp; Partially Reserved/Remanded</td>
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<td>• Completely Reserved/Remanded</td>
</tr>
<tr>
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<td></td>
<td>• Appeal Went to Litigation</td>
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<td>• Duplicate Appeal</td>
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<td></td>
<td>• Appeal was Premature</td>
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<td></td>
<td></td>
<td>• Appeal Withdrawn</td>
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<tr>
<td></td>
<td></td>
<td>• Closed for Other Reasons</td>
</tr>
<tr>
<td></td>
<td>Appeal Type</td>
<td>• Denial of Expedited Processing</td>
</tr>
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<td></td>
<td></td>
<td>• Denial of Fee Waiver</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Denial of Records in Full or in Part</td>
</tr>
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<td></td>
<td></td>
<td>• No Records Response</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Denial of Request Response Format</td>
</tr>
<tr>
<td></td>
<td>Appeal Status</td>
<td>• Draft</td>
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<td>Data Category</td>
<td>Candidate Reference Table</td>
<td>Sample Valid Values</td>
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<tr>
<td>---------------</td>
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</tr>
<tr>
<td></td>
<td></td>
<td>• Submitted</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• In Review</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Closed</td>
</tr>
<tr>
<td>FOIA Case:</td>
<td>Consultation Disclosure</td>
<td>• Recommend Full</td>
</tr>
<tr>
<td>Consultation</td>
<td>Recommendation</td>
<td>Release of</td>
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<td></td>
<td>Responsive Records</td>
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<td></td>
<td>• Recommend Full</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Withholding of</td>
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<td></td>
<td>Responsive Records</td>
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<td>• Recommend Partial</td>
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<td></td>
<td>Release and Partial</td>
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<td></td>
<td>Withholding of</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Responsive Records</td>
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<td></td>
<td></td>
<td>• Other Recommendation</td>
</tr>
<tr>
<td>FOIA Case:</td>
<td>Expedited Decision</td>
<td>• Pending</td>
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<tr>
<td>Request /</td>
<td>Status</td>
<td>• Approved</td>
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<tr>
<td>Request Item</td>
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<td>• Denied</td>
</tr>
<tr>
<td></td>
<td>Fee Waiver Decision</td>
<td>• Pending</td>
</tr>
<tr>
<td></td>
<td>Status</td>
<td>• Approved</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Denied</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Partially Approved</td>
</tr>
<tr>
<td>First Person</td>
<td>Identification</td>
<td>• US Passport</td>
</tr>
<tr>
<td>Identification</td>
<td>Document Type</td>
<td>• Birth Certificate</td>
</tr>
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<td></td>
<td></td>
<td>• US State Driver’s License</td>
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<tr>
<td>Improper</td>
<td>Request Reason</td>
<td>• Submitted to</td>
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<tr>
<td>Request</td>
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<td>Wrong Agency</td>
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<tr>
<td>Reason</td>
<td></td>
<td>• Not a Request for</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Records</td>
</tr>
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<td>• Not Clear – Not</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Perfectible</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Requester Non-responsive</td>
</tr>
<tr>
<td>Own Organization</td>
<td></td>
<td>Agency-specific list of organizations internal to the agency that will lead the substantive processing of a FOIA Request</td>
</tr>
<tr>
<td>Person Making</td>
<td>Request Role Type</td>
<td>• Requester</td>
</tr>
<tr>
<td>Request</td>
<td></td>
<td>• Representative</td>
</tr>
<tr>
<td>Process Queue</td>
<td>Agency-specific list of queues (or “tracks”) to which a Request can be assigned to manage the Request. A basic example might be queues defined for “Simple”, “Complex”, and “Expedited”, however, the use of Process Queues can be made much more distinctive and granular, as an agency determines useful.</td>
<td></td>
</tr>
<tr>
<td>Receipt Channel Type</td>
<td>See Communication: Channel Type</td>
<td></td>
</tr>
<tr>
<td>Request</td>
<td>Clarification Status</td>
<td>• Clarification Request Sent</td>
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<td>Clarification</td>
<td></td>
<td>• Clarification Received – Not Yet Reviewed</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Clarification Received – Supports Perfected Request</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Clarification Received – Does Not Support Perfected Request</td>
</tr>
<tr>
<td>Request</td>
<td>Disposition</td>
<td>• Full Grant</td>
</tr>
<tr>
<td>Disposition</td>
<td></td>
<td>• Partial Grant/Partial Denial</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Full Denial Based on Exemptions</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Full Denial Based on Reasons Other than Exemptions</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• No Records</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• All Records Referred to Another Agency</td>
</tr>
<tr>
<td>Data Category</td>
<td>Candidate Reference Table</td>
<td>Sample Valid Values</td>
</tr>
<tr>
<td>-------------------------------</td>
<td>---------------------------</td>
<td>-------------------------------------------------------------------------------------</td>
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</tbody>
</table>
|                               |                           | • Request Withdrawed  
• Fee-Related Reason  
• Records Not Reasonably Described  
• Improper Request for Other Reasons  
• Not an Agency Record  
• Duplicate Request or Appeal  
• Administratively Close – Still Interested Letter  
• Administratively Closed  
• Administratively Withdrawn  
• Aggregate Cases |
| Request Item Status           |                           | • In Progress  
• Closed |
| Request Stage                 |                           | • Draft  
• Intake  
• Perfect Confirmation  
• Scoping & Sizing  
• Search  
• Review  
• Response  
• Appeal  
• Closed |
| Request Status                |                           | • Open  
• Closed |
| Request Topic                 |                           | *Agency-specific List of Topics* |
| Requested Records             |                           | • Structured Data File  
• Textual Document  
• Email or Other Communication File |
| Response Format               |                           |  
| Request Records Response Format Transformation |                           | • File Transformation Required  
• File Transformation Not Required  
• Digitization Required  
• Digitization Not Required |
| Requested Response Channel    |                           | *See Communication: Channel Type* |
| Requester Type                |                           | • Commercial-use Requester  
• Educational Institution  
• Non-Commercial Scientific Institution  
• Representative of the News Media  
• Other Requester |
| FOIA Clock Stop Period Type   |                           |  
| Clock Stop Reason Type        |                           | • Clarification  
• Fee-based Discussion  
• Requester Scope Modification |
<p>| FOIA Library Record           |                           |<br />
| Record Source                 |                           | <em>Agency-specific List of Recordkeeping Systems</em> |
| Retention Category            |                           | <em>See FOIA Repository Responsive Record: Retention Category</em> |</p>
<table>
<thead>
<tr>
<th>Data Category</th>
<th>Candidate Reference Table</th>
<th>Sample Valid Values</th>
</tr>
</thead>
<tbody>
<tr>
<td>FOIA-Related Litigation</td>
<td>Litigation Status</td>
<td><em>Litigation stage—specific litigation stages in US Courts</em></td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Open Without Remand</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Open With Remand</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Closed</td>
</tr>
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<td></td>
<td>Litigation Remand Status</td>
<td>• No Remand Action</td>
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<tr>
<td></td>
<td></td>
<td>• Remand Action Opened</td>
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<tr>
<td></td>
<td></td>
<td>• Remand Action Closed</td>
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<td>Litigation Type</td>
<td>• Adverse Decision – Fee Exemption</td>
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<tr>
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<td></td>
<td>• Adverse Decision – Expedited Status</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Adverse Decision – Responsive Records Scope</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Adverse Decision – Responsive Records Denial</td>
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<tr>
<td></td>
<td></td>
<td>• Adverse Decision – Responsive Records Format</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Constructive Denial</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Submitter Injunction</td>
</tr>
<tr>
<td>FOIA Repository Record</td>
<td>FOIA Repository Record Status</td>
<td>• Proposed</td>
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<td></td>
<td></td>
<td>• Reviewed</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Approved</td>
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<td></td>
<td>Record Source</td>
<td><em>Agency-specific List of Recordkeeping Systems</em></td>
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<td></td>
<td>Retention Category</td>
<td><em>Agency records control schedule category</em></td>
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<td><em>General records schedule category</em></td>
</tr>
<tr>
<td>FOIA Repository Responsive Record</td>
<td>Responsive Record Status</td>
<td>• Preliminary from Search</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Reviewed</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Approved</td>
</tr>
<tr>
<td>FOIA Repository Responsive Record</td>
<td>Exemption Type</td>
<td>1. Information that is classified to protect national security.</td>
</tr>
<tr>
<td>Exemption / Exclusion</td>
<td></td>
<td>2. Information related solely to the internal personnel rules and practices of an agency.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>3. Information that is prohibited from disclosure by another federal law.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>4. Trade secrets or commercial or financial information that is confidential or privileged.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>5. Privileged communications within or between agencies, including those protected by the:</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Deliberative Process Privilege (provided the records were created less than 25 years before the date on which they were requested)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Attorney-Work Product Privilege</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Attorney-Client Privilege</td>
</tr>
<tr>
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<td></td>
<td>6. Information that, if disclosed, would invade another individual’s personal privacy.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>7A. Information compiled for law enforcement purposes that could reasonably be expected to interfere with enforcement proceedings.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>7B. Information compiled for law enforcement purposes that would deprive a person of a right to a fair trial or an impartial adjudication.</td>
</tr>
<tr>
<td>Data Category</td>
<td>Candidate Reference Table</td>
<td>Sample Valid Values</td>
</tr>
<tr>
<td>---------------</td>
<td>---------------------------</td>
<td>---------------------</td>
</tr>
<tr>
<td></td>
<td></td>
<td>7C. Information compiled for law enforcement purposes that could reasonably be expected to constitute an unwarranted invasion of personal privacy.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>7D. Information compiled for law enforcement purposes that could reasonably be expected to disclose the identity of a confidential source.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>7E. Information compiled for law enforcement purposes that would disclose techniques and procedures for law enforcement investigations or prosecutions or would disclose guidelines for law enforcement investigations or prosecutions if such disclosure could reasonably be expected to risk circumvention of the law.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>7F. Information compiled for law enforcement purposes that could reasonably be expected to endanger the life or physical safety of any individual.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>8. Information that concerns the supervision of financial institutions.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>9. Geological information on wells.</td>
</tr>
</tbody>
</table>

| Exclusion Type | (c)(1): Subject of a criminal investigation or proceeding is unaware of the existence of records concerning the pending investigation or proceeding and disclosure of such records would interfere with the investigation or proceeding. |
|               | (c)(2): Informant records maintained by a criminal law enforcement agency and the individual's status as an informant is not known. |
|               | (c)(3): Existence of FBI foreign intelligence, counterintelligence or international terrorism records are classified fact. |

| Responsive Record Exemption / Exclusion Status | • Preliminary from Search |
|                                              | • Reviewed |
|                                              | • Approved |

| Payment | Payment Source | • Pay.gov |
|         |                | • Check |
|         |                | • Other |

| Payment Assurance Response | • Requested from Requester |
|                            | • Provided by Requester |
|                            | • Declined by Requester |

| Payment Request (Invoice) | Fee Type | • Routine Payment |
|                         |          | • Pre-Payment |
|                         |          | • Advance Payment |

| Payment Request Status | • Payment Pending |
|                       | • Partial Payment Received |
|                       | • Full Payment Received |

| Person | Address Type | • Home |
|        |             | • Office |

<p>| Phone Type | • Home |</p>
<table>
<thead>
<tr>
<th>Data Category</th>
<th>Candidate Reference Table</th>
<th>Sample Valid Values</th>
</tr>
</thead>
</table>
| Process Queue         | Process Queue              | • Simple  
                          • Complex  
                          • Expedited  
                          • Agency-specific process queue                                           |
| Request Response      | Records Format             | • Structured Data File  
                          • Textual Document  
                          • Email or Other Communication File                                             |
| Response Channel      |                            | See Communication: Channel Type                                                      |
| Task or Action        | Task Assignment Status     | • Not Assigned  
                          • Assigned  
                          • Reassigned                                                   |
|                       | Task or Action Category    | *Agency-specific categories to group related tasks* – might align with key processes or activities (e.g., Search, Review, Review Approval, Remand, etc.) |
|                       | Task Status                | • Ready to Start  
                          • In Progress  
                          • On Hold -- Blocked  
                          • Past Due  
                          • Completed                                         |
|                       | Task Dependency Type       | • Finish-to-Start  
                          • Finish-to-Finish  
                          • Start-to-Start  
                          • Start-to-Finish                                               |
|                       | Task or Action Type        | *Agency-specific list of reusable task types* that can be grouped within Task or Action Categories. For example, (1) a task to conduct a search within a specific recordkeeping system or (2) a task for operations security (OPSEC) to approve records for release. |
| Timesheet             | Agency Staff Person        | List of agency staff who support the FOIA program                                       |
|                       | Timesheet Review Status    | • Not Submitted  
                          • Submitted for Review  
                          • Approved  
                          • Not Approved  
                          • Revised                                        |
| Topic                 | Target for Proactive Disclosure | • 3x rule  
                          • Other § 552(a)(2) Records  
                          • Other Mandated Disclosure  
                          • Strategic Disclosure                                         |
|                       | Topic Sensitivity          | • None  
                          *Agency-specific list of topics that merit flagging for senior officials and/or communications officials* |
<p>| User Account          | User Account Status        | • Active                                                   |</p>
<table>
<thead>
<tr>
<th>Data Category</th>
<th>Candidate Reference Table</th>
<th>Sample Valid Values</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>• Inactive</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Retired</td>
</tr>
</tbody>
</table>
Appendix D  Use Case Diagrams

This appendix provides a use case diagram for each of the business processes in the FRM. Use case diagrams are a component within a Unified Modeling Language (UML) specification. Use case diagrams show the key functional decomposition of a process with individual use cases that different roles can perform or be involved in.

**NOTE:** Use case diagrams do not illustrate the sequence of processing. To understand a possible sequence in which the use cases (i.e., activities) are performed, refer to Section 7, which provides representative process flow diagrams that align to BPMN specifications.

**How to Read a Use Case Diagram.** Use case diagrams convey several aspects of a process, but do not depict the sequence of processing. Rather, each use case diagram itemizes the activities performed within the process, the roles (or actors) who participate in those activities, and any meaningful activity-to-activity relationships whereby one activity might be invoked as part of executing another activity. The figure below illustrates how to read these diagrams.

![Figure 29. How to Read a Use Case Diagram](image)

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Figure 30. Use Case Diagram: Conduct Request Intake
Figure 31. Use Case Diagram: Confirm Perfected Request

Key Deliverables: Perfected Request, Organizational Assignment within Agency, Case Lead Assignment, Defined Request Items, and Expedited Decision

Preliminary Search Strategy and Estimated Effort

Confirmation of Request to Search for Request

Request Perfection

Evaluate Validity of Request

Request Deficiency

Notify Requestor of Request Deficiency

Client Case

Determine if Related to Open Request

Another Request to Another Agency Component

Verify Requestor of Request Deficiency

Another Request to Another Agency Component

Update FISA Request

Refine FISA Request

Requestor or Representative

Receive Deconflict Request from Another Agency Component

Another Agency Component

Respondees or Representatives

Determine Request to Lead

Confirm Organizational Assignment to Lead

Assign Case to Lead

Analyze Organizational Assignment for Request Items

Notify Requestor of Exposed Request

Determine Perfection

Assign Case or Lead

Analyze Organizational Assignment for Request Items

Decompose a request into sub-requests (imput, each of which may require different sources, testing, responses, etc.)

Another Official for Expedited Decision

NOTE: Requesting Entity Case Assignment was not included for reference

NOTE: Manage Tadddy, task or case included for reference

Flow: Request Initiate

Perfection Specialist

To Scope

To Appeal (request appeals expedited decision)
Figure 32. Use Case Diagram: Scope and Size Request
Figure 33. Use Case Diagram: Estimate Fees
Figure 34. Use Case Diagram: Search for Responsive Records
Figure 35. Use Case Diagram: Review Responsive Records
Figure 36. Use Case Diagram: Create Referral, Coordination or Consultation
Figure 37. Use Case Diagram: Request Payment
Figure 38. Use Case Diagram: Receive Payment

Receive Payment

Key Deliverables: Payment Applied to FOIA Case

Accounts Receivables

Apply Payment to FOIA Case(s)

<<include>>

Receive Payment Info from A/R System

Send FOIA Request Payment

Requester or Representative

Process Requester Payment

Accounts Receivable System (e.g., Pay.gov)
Figure 39. Use Case Diagram: Respond to Request

NOTE: Supplemental Case Activities use cases included for reference

The format and mechanism for the Response to the Requester may take multiple forms. For example, records may be provisioned via a Requester portal, sent via email, etc.
Figure 40. Use Case Diagram: Appeal Request-Related Decision
Figure 41. Use Case Diagram: Manage Tasks
Figure 42. Use Case Diagram: Perform Supplemental Case Activities
Figure 43. Use Case Diagram: Maintain Policy and Process Rules
Figure 44. Use Case Diagram: Manage Human Resources
Manage FOIA Records Environments

Key Deliverables: Updates to FOIA Environments (FOIA Repository and FOIA Library)

- Manage Repository Access
- Apply Final Disposition of Repository Records
- Maintain Repository Metadata

Figure 45. Use Case Diagram: Manage FOIA Records Environments
From Request Intake (another agency referred records for review)

Perfection Specialist

Key Deliverables: Referral Response Assignment and Associated Responsive Records

**Referral Response Assignment**

- Determine Process Queue
- Assign Organizational Ownership to Request
- Assign Case to Lead
- Associate Responsive Records with Request Item

Supplemental Case Activities Use Cases included for Reference
Search Use Cases included for Reference
Manage Tasks Use Cases included for Reference

To Review (referred records to be reviewed)

---

Figure 46. Use Case Diagram: Respond to Referral
Respond to Coordination or Consultation Inquiry

Key Deliverables: Coordination or Consultation Response

- Determine Process Queue
- Assign Organizational Ownership to Request
- Assign Case to Lead
- Evaluate Coordination or Consultation Inquiry from Another Agency
- Respond to Coordination or Consultation Inquiry from Another Agency
- Close Case

Closes the Case for the Coordination or Consultation.

From Request Intake (another Agency requests coordination or consultation)

NOTE: Manage Tasks use cases included for reference

NOTE: Supplemental Case Activities use cases included for reference

Figure 47. Use Case Diagram: Respond to Coordination or Consultation Inquiry
Modify Scope of Request

Key Deliverables: Modified Request, Updated Estimated Effort and ECD, Possible Update to Fees

Scope Modification

- Request Lead
  - Evaluate Possible Impact to Fees and/or Estimated Completion Date
  - Review Possible Change to Scope
  - Initiate Change to Request Scope
  - Confirm Change in Request Scope
  - Update Request Items
  - Estimate Processing Effort and Other Fee-Based Items
  - Determine Estimated Completion Date
  - Notify Requester of Unusual Circumstances
  - Close Case
  - Withdraw Request

NOTE: Scope and Size Request use cases included for reference

NOTE: Supplemental Case Activities use cases included for reference

Requester or Representative

Resizing the request might be requested to reduce the fees. It also may change one or more request items associated with the request and resizing might reset the clock.

From Scope & Size Request (unusual circumstances apply)
From Search (search results in possible scope change)
From Review (review effort is larger than expected e.g., # records to review)
From Estimate Fees (requester is afforded opportunity to adjust scope)

To Fee Estimate (scope change may impact fees)
To Search (initiate search)
To Review (continue review processing)

Figure 48. Use Case Diagram: Modify Scope of Request
Figure 49. Use Case Diagram: Monitor Litigation

Monitor Litigation

Key Deliverables: Litigation Tracking and Status

Submitter Injunction

- Identify and Flag Responsive Records Subject to Injunction
- Capture Litigation Related to Request
- <<include>>

Requester Litigation

- Suspend Case Due to Litigation
- Capture Litigation Related to Request
- <<extend: need to suspend>>

Court Decision

- Resume Case Based on Litigation Result
- Capture Litigation Decision or Order
- <<extend: case previously suspended>>

Commercial Submitter

Agency General Counsel

Litigation Lead

From Review (commercial submitter files injunction)

To Task Management (additional tasking and routing needed)

Injunction information (sometimes direct from Submitter via Review Process)
Figure 50. Use Case Diagram: Manage Account
Provide Pre-Request Support

Key Deliverables: Response to Requester's Inquiry, Decision Whether or Not to Submit a Request

Requester's FOIA Submission Decision

- Review Agency FOIA Guidance and Procedures
- Identify Potential Agency(ies) and Components with Responsive Records
- Identify Non-FOIA Methods for Accessing Agency's Records
- Select Topic(s) to Identify Sources with Responsive Records
- Search Agency's Openly Available Records

To Request Intake (Requester decides to submit)
To Customer Service (for additional help as needed)

Figure 51. Use Case Diagram: Provide Pre-Request Support
Figure 52. Use Case Diagram: Manage Records for Proactive Disclosure
The functionality depicted for the Dashboard primarily supports status of current and past requests and associated fee information. Its functionality may be coupled with a Portal to provide the ability to submit requests, obtain responsive records and view and/or create related communications. Thus, a Requester Portal could encapsulate functionality from across the Reference model, including the Dashboard.

Refer also to the Request Intake and Request Response Use Case and Data models.

Figure 53. Use Case Diagram: Maintain Requester Dashboard
Figure 54. Use Case Diagram: Provide Customer Service
Appendix E  Activity Definitions and User Stories

The following definitions and user stories for the activities within each of the processes in the FRM are presented in alphabetic order by process.

E.1  Process: Conduct Request Intake

User Stories

- As a Requester, I need to prepare, modify, or withdraw a request I created online, so that I have control over my requests to an agency.

- As The System, I need to present the requester with a web-enabled request submission screen, so that requesters can interface with an agency in the most seamless, ubiquitous manner possible.

E.1.1  Activity: Add Point of Contact (POC)

NOTE: This is a recurrent activity. For a complete definition and associated user stories refer to the activity within the Perform Supplemental Case Activities process in Appendix E.13.1.

E.1.2  Activity: Attach Documents to Request

Description: Uploads and links a document (e.g., PDF, Word, Excel/csv, other) to a draft or submitted request.

Part of Process: Conduct Request Intake
Type of Activity: Automated with human interaction
Actors: Policy Manager | Requester | Intake Specialist | The System
Triggers: User determines need to upload documents related to their request.
Pre-Conditions: A draft request has been created.
Post-Conditions: One or more documents are attached to a request.
Supporting Services: Document Management

User Stories

- As a Policy Manager, I need to set a rule that permits or restricts the ability of a Requester to upload and attach documents to a Request, so that the rule can be easily modified as laws, regulations, and/or Agency policies change, and the result of the change will dynamically modify the related business activity.

- As a Requester or Intake Specialist, I need to upload documents that are related to my request and link them (attach) to the request, so that I can provide documentation that further explains or clarifies the records I am seeking.

- As a Requester or Intake Specialist, I need to remove an uploaded document that I have previously linked to a request, so that I can ensure that only appropriate documentation is associated with my request.

NOTE: An agency may want to consider if there are situations where a
Requester would not be permitted to remove a document that they had previously uploaded.

- As The System, I need to upload and store the following file types from requesters: Image – bmp, jpg, jpeg, gif, tiff, png; Documents - pdf, txt, MS Office (e.g., docx, xlsx, pptx), so that all pertinent supporting documentation can be captured and viewed by an agency when processing a request.

E.1.3 **Activity: Check for Existing User Account**

NOTE: This is a recurrent activity. For a complete definition and associated user stories refer to the activity within the *Manage Account* process in Appendix E.21.1.

E.1.4 **Activity: Create and Log New Case**

*Description:* A new case is created in the System, creating a FOIA tracking number for the Requester's and agency's benefit, and initiates agency processing.

*Part of Process:* Conduct Request Intake

*Type of Activity:* Fully automated with no human interaction

*Actors:* The System

*Triggers:* User created and submitted a FOIA request, and the status was updated from draft to submitted.

*Pre-Conditions:* A request is submitted to the System.

*Post-Conditions:* A new case for the Request is created in the System.

*Supporting Services:* None

*User Stories*

- As The System, I need to associate any requests submitted by the same Requester with a requester's account when a requester has previously registered with the FOIA system, so that the system can accurately track and report on all matters.

- As The System, I need to automatically generate a case record with a case number, based on metadata captured from the FOIA request submission, so that from the time a request is submitted by a requester, it can be properly tracked, statused, processed, and analyzed (e.g., counted).

- As The System, I need to support the capture of other tracking numbers, such as another agency's FOIA reference, so that all requests and related communications between agencies and/or the Requester are simplified and properly correlated with each other.

E.1.5 **Activity: Enter FOIA Request**

*Description:* Allows a user to create a new FOIA request that would include selecting a target agency, a description of the records requested, selection of a fee category, and (as appropriate) amount of fees willing to pay or requests for a fee waivers and justifications. This process ensures a Requester is
afforded the opportunity to provide all information required by FOIA rules and regulations.

**Part of Process:** Conduct Request Intake  
**Type of Activity:** Automated with human interaction  
**Actors:** Intake Specialist | Requester | Requester Representative | The System  
**Triggers:** Requester or representative decides to request information via the FOIA process.  
**Pre-Conditions:** None  
**Post-Conditions:** A draft FOIA Request can be saved and/or deleted as necessary by the Requester before submitting the request.  
**Supporting Services:** None

**User Stories**

- As an Intake Specialist, I need to enter and track FOIA requests received by email, postal mail, or fax, so that requests received manually (i.e., email, postal mail, fax) can be converted into an electronic record for review and processing.

- As a Requester, I need to provide at least one form of contact address information when making a request, such as postal address, email address, etc., so that the agency can correspond with me throughout the process as needed.

- As a Requester, I need to prepare a new request or modify a draft (unsubmitted) request that can be submitted to an agency along with any relevant attachments, so that there is a consistent way to complete and submit FOIA requests to an agency.

- As a Requester Representative, I need to make a request on behalf of someone else (i.e., the Requester), so that the Requester can be represented by another authenticated individual, such as a parent, guardian, attorney, etc.

- As The System, I need to perform edit checks on all pertinent data within the draft FOIA Request, so that data quality errors are reduced from the system and less rework is required when processing a Request.

- As The System, I need to capture submitted request information as structured metadata, so that the metadata can be properly processed and independently utilized in downstream processing.

**E.1.6 Activity: Extract Metadata and Tags from Request**

**Description:** Automatically creates new metadata about a request and associates that metadata with the request and where applicable, with standardized business terms, tags, or other vocabularies.

**Part of Process:** Conduct Request Intake
Type of Activity: Fully automated with no human interaction
Actors: The System
Triggers: A request is submitted to the System.
Pre-Conditions: A request has been submitted to the System.
Post-Conditions: New metadata (e.g., tags, business terms, etc.) about the request has been created.
Supporting Services: AI/ML/HLT-Enabled Metadata Extraction

User Story: As The System, I need to automatically extract and store keywords or tags from the text of a FOIA Request, so that the System can increase its ability to find similar FOIA Requests and identify opportunities for proactive disclosure (e.g., through topic assignment) as part of downstream processing.

E.1.7 Activity: Initiate New FOIA Request

Description: Verifies all data in the request passes edit checks (e.g., completeness, accuracy, valid values) and if ok then updates the request from a draft state to a submitted state, which pushes the request forward for processing by FOIA staff. Includes both electronic submissions by Requesters into the FOIA system and agency staff entering a new submission arriving in the form of postal mail, fax, or email. The request may be submitted by either registered users or guest users that provide all required contact information.

Part of Process: Conduct Request Intake
Type of Activity: Automated with human interaction
Actors: Requester | Intake Specialist | The System
Triggers: User finalizes their request and submits it for processing.
Pre-Conditions: A draft request has been created.
Post-Conditions: If edit checks pass ok, then status of request changes from draft to submitted, making it ready for processing by FOIA staff; otherwise, user is notified of invalid data and can make final corrections before submitting.
Supporting Services: None

User Stories

- As a Requester or Intake Specialist, I need to submit a FOIA request to an agency with all required information, so that my Request is as close to a perfected request as possible when I submit it.

- As The System, I need to automatically generate the submission date based on the date a FOIA request is submitted to (and thus received by) the target agency, so that accurate processing time tracking is recorded from the date a request is made.

- As The System, I need to validate the contents of a submitted FOIA request and determine whether to accept the request or reject it by informing the user that additional or updated information is needed, so that
each FOIA request is as close to a perfected request as possible when the requester submits to an agency.

- As The System, I need to inform the Requester if additional or updated information is needed before it can be processed, so that each FOIA request is as close to a perfected request as possible when the requester submits to an agency.

**E.1.8 Activity: Notify Requester of Request Receipt Acknowledgement**

*Description:* A notification (e.g., email, letter) acknowledging the receipt of a newly submitted request is sent to the Requester or Requester Representative. Typically includes a case number for reference and other information, such as instructions on how the Requester may obtain the status of their request and whom to contact if there are issues or questions.

*Part of Process:* Conduct Request Intake  
*Type of Activity:* Automated with human interaction  
*Actors:* The System  
*Triggers:* A request has been submitted either by a Requester or as an inter-agency referral.  
*Pre-Conditions:* A request has been submitted to the FOIA system.  
*Post-Conditions:* Notification sent to the Requester.  
*Supporting Services:* Email Integration and Correspondence Production

*User Story:* As The System, I need to notify the requester (or their representative) to confirm receipt of a FOIA Request submission or receipt of a request that has been referred from another agency, so that the requester has timely notification that their request is being processed by the agency.

**E.1.9 Activity: Receive Coordination or Consultation Request from Another Agency**

*Description:* Supports the ingestion of other agencies' requests for coordination or consultation actions specifically.

*Part of Process:* Conduct Request Intake  
*Type of Activity:* Automated with human interaction  
*Actors:* Intake Specialist | The System  
*Triggers:* Agency receives a coordination or consultation request from another agency  
*Pre-Conditions:* None  
*Post-Conditions:* Coordination or consultation request is captured in the System.  
*Supporting Services:* Email Integration and Correspondence Production | Standardized Data Exchange
User Stories

- As an Intake Specialist, I need to receive consultation and coordination requests from other agencies, so that response obligations can be logged, tracked, and processed.

- As The System, I need to ingest structured metadata for consultations and coordinations I receive from other agencies' systems or exports, so that the receiving agency can efficiently add these requests with minimal human intervention.

E.1.10 Activity: Receive FOIA Request from Government-wide Portal

Description: Receives a FOIA Request from a government-wide portal that can be processed as a new request for the receiving Agency.

NOTE: This activity offers an opportunity to standardize the data exchange between the government-wide portal and Agency's FOIA systems.

Part of Process: Conduct Request Intake
Type of Activity: Automated with human interaction
Actors: Intake Specialist
Triggers: A Requester has submitted a request to a Government-wide portal (e.g., FOIA.gov).
Pre-Conditions: None
Post-Conditions: A new request is created for the Agency using the data that was transferred from the government-wide portal.
Supporting Services: Standardized Data Exchange

User Story: As an Intake Specialist, I need to receive and import a new FOIA Request that is sent to the Agency from a government-wide site or portal, such as FOIA.gov, so that I can process those requests in the most efficient manner possible.

NOTE: The ability to automate the ingest of requests and other data between a FOIA system and a government-wide portal could be enabled with standardized data exchange formats and protocols and with application programming interfaces (APIs).

E.1.11 Activity: Receive FOIA Requests Submitted External to System

Description: The Intake Specialist receives requests that are submitted externally to the System, such as via email, postal mail, or fax.

Part of Process: Conduct Request Intake
Type of Activity: Manual (no user stories in scope)
Actors: Intake Specialist
Triggers: Requests submitted to the agency are external to the FOIA system, e.g., via email, postal mail, or fax.
Pre-Conditions: None
Post-Conditions: Requests reviewed by FOIA staff external to the System.
Supporting Services:  None

**E.1.12 Activity: Receive Misdirected Request from Another Agency Component**

**Description:** When an Agency receives a request that has been directed to an incorrect component within its purview, the agency will record it as a “misdirected” request and route it to the appropriate component.

**Part of Process:** Conduct Request Intake  
**Type of Activity:** Automated with human interaction  
**Actors:** Intake Specialist  
**Triggers:** Agencies using decentralized processing has multiple components responsible for processing. One component receives a request for records maintained by another component within the same agency refers the request to the correct component.

**Pre-Conditions:** None  
**Post-Conditions:** The receiving component records receipt of the referral and is subsequently responsible for any response and any adverse determination actions.

**Supporting Services:** Standardized Data Exchange

**User Story:** As an Intake Specialist, I need to capture a new FOIA Request that was sent to the incorrect component within our agency (and thus considered “misdirected”), so that the Request is referred to the correct component for appropriate processing.

**E.1.13 Activity: Receive Notification from Agency**

**Description:** This is a generalized activity that supports the Requester’s ability to receive a communication from the Agency. While defined as part of the Intake function, this activity has pervasive applicability across the entire business system and thus applies to all communications from the agency to the Requester. The communication may take the form of an email, a record within the FOIA business system accessible by the Requester, or postal mail.

NOTE: Requesters are required to provide at least one form of contact information as part of their request. Agencies should communicate with the Requester via the Requester’s preferred method of communication, which could include electronic communication via the agency’s portal (i.e., within the System).

**Part of Process:** Conduct Request Intake  
**Type of Activity:** Automated with human interaction  
**Actors:** Requester  
**Triggers:** Requester is alerted to a new communication, such as through the FOIA system, an email, or manually via postal mail.

**Pre-Conditions:** Agency sends a notification to the Requester through the System.
Post-Conditions: A read receipt (or an update to the notification status) is captured. If the method of communication is not electronic (e.g., postal mail), then no other outputs are relevant for the agency.

Supporting Services: Email Integration and Correspondence Production

User Stories

- As a Requester, I need to receive a communication via a method of my choosing (e.g., email, postal mail, in-system communication) about an action taken by the Agency or other important information, so that I am made aware of the status of my FOIA Request and all related actions taken on it, particularly when I'm not defined as a registered user of the FOIA system.
  
  NOTE: For Requesters who are defined registered users of the FOIA system, it may be important to always send an email in addition to an in-system notification, or perhaps permit the user to define their communication preferences.

- As a Requester, I need to receive updates about actions taken by the Agency or other important information, so that I am made aware of the status of my Request.

E.1.14 Activity: Receive Referral from Another Agency

Description: Includes referrals where an agency sends responsive records to another agency for review and potential release.

Part of Process: Conduct Request Intake
Type of Activity: Automated with human interaction
Actors: Intake Specialist | The System
Triggers: Agency receives a referral request from another agency
Pre-Conditions: None
Post-Conditions: Referred request is captured in the System.
Supporting Services: Standardized Data Exchange

User Stories

- As an Intake Specialist, I need to receive requests referred to our agency from other agencies, so that it can be logged, tracked, and processed.

- As The System, I need to ingest structured metadata for referred requests I receive from other agencies’ systems or exports, so that the receiving agency can efficiently add these requests with minimal human intervention.

E.1.15 Activity: Register with Agency’s FOIA System

NOTE: This is a recurrent activity. For a complete definition and associated user stories refer to the activity within the Manage Account process in Appendix E.21.8.
E.1.16 Activity: Save FOIA Request

Description: Permits a user to save a FOIA request in a draft status before submitting it for processing. Agency FOIA personnel do not begin processing until a request is submitted.

Part of Process: Conduct Request Intake
Type of Activity: Automated with human interaction
Actors: Policy Manager | Requester | Intake Specialist
Triggers: User saves a draft request before submitting to the FOIA system for processing.
Pre-Conditions: A draft request has been created.
Post-Conditions: Draft request is saved, permitting the user to make changes as necessary before submitting for processing.
Supporting Services: None

User Stories

- As a Policy Manager, I need to be able to configure a data-driven processing rule that will set the number of days to allow a saved, unsubmitted request to be kept before archived (or deleted) (e.g., 10 days), which is based on the date of last save, so that the rule can be easily modified as laws, regulations, and/or Agency policies change, and the result of the change will dynamically modify the related business activity.

- As a Requester or Intake Specialist, I need to save a draft FOIA request prior to submitting it, so that I can continue to work on the request at another time (i.e., another login session).

E.1.17 Activity: Scan and Convert Non-Automated Requests

Description: Creates an electronic record of paper or unstructured data (e.g., email, postal mail, file attachments). This may include optical character recognition (OCR) to convert a semi-structured or unstructured request into a complete or partial FOIA record.

Part of Process: Conduct Request Intake
Type of Activity: Automated with human interaction
Actors: Intake Specialist
Triggers: A non-electronic communication containing a FOIA request has been received by the agency and can be electronically scanned (e.g., using optical character recognition (OCR)) to create a draft request.
Pre-Conditions: None
Post-Conditions: An electronic record for a new draft FOIA Request is created.
Supporting Services: Document Management

User Story: As an Intake Specialist, I need to scan paper based FOIA requests and convert the information to electronic information (e.g., using optical character recognition or OCR) that automatically pre-populates data fields
within a structured request record, so that I can save time and effort by not having to be manually key it into the system.

E.1.18 Activity: Send Confirmation of Inter-Agency Action Receipt

Description: Sends a confirmation of receipt message to the agency or component who referred a request and/or potentially responsive records, and/or requested coordination or consultation.

Part of Process: Conduct Request Intake
Type of Activity: Automated with human interaction
Actors: Intake Specialist
Triggers: The Agency has received a referral and/or a request for a coordination or consultation.
Pre-Conditions: The Agency has received a referral and/or a request for a coordination or consultation.
Post-Conditions: A message is sent to the agency and/or component who initiated the referral/consultation/coordination.
Supporting Services: Email Integration and Correspondence Production | Standardized Data Exchange

User Story: As an Intake Specialist, I need to notify an agency when I receive their referral, consultation, and/or coordination request, so that the other agency is assured that our agency is processing its requests.

E.1.19 Activity: Send Non-Automated FOIA Request

Description: A manual activity external to the FOIA system whereby a Requester submits a new FOIA Request to an agency via email, postal mail, or fax.

Part of Process: Conduct Request Intake
Type of Activity: Manual (no user stories in scope)
Actors: Requester | Requester Representative
Triggers: Requester or representative determines the need to request information via the FOIA process.
Pre-Conditions: None
Post-Conditions: An email, postal mail, or fax containing a FOIA Request is received by the agency.
Supporting Services: None

E.1.20 Activity: Send Request from Government-wide Portal to Agency

Description: This activity, which is external to the System, sends a Request submitted to a Government-wide portal (e.g., FOIA.gov) to the Agency.

Part of Process: Conduct Request Intake
Type of Activity: External to the system (no user stories in scope)
Actors: Government-wide Portal
E.2 Process: Confirm Perfected Request

User Story: As a Perfection Specialist, I need as a Perfection Specialist, I need to ensure a request is perfected before adding it to the agency’s processing queue, so that a request is ready to be processed with search and review activities.

E.2.1 Activity: Accept or Reject Expedited Status Decision

Description: External to the FOIA Business System, a Requester will determine whether to accept the expedited request decision from the Agency. If they don't accept, they will submit an Appeal, which is typically the way the Agency learns of their rejection.

Part of Process: Confirm Perfected Request
Type of Activity: Manual (no user stories in scope)
Actors: Requester
Triggers: The Requester has been notified of the Agency's decision pertaining to an expedited request by the Requester.
Pre-Conditions: The Requester has been notified of the Agency's decision pertaining to an expedited request by the Requester.
Post-Conditions: No action or updates if the Requester accepts the expedited decision. An Appeal will be submitted by the Requester if they reject the decision.
Supporting Services: None

E.2.2 Activity: Ask Requester to Refine Request

Description: Ask the requester to clarify their request so the agency can confirm it as perfected and begin processing.

Part of Process: Confirm Perfected Request
Type of Activity: Automated with human interaction
Actors: Perfection Specialist | Policy Manager
Triggers: The case worker determines what deficiencies have been detected and what clarification may be necessary from the requester to begin processing.
Pre-Conditions: A new request is submitted to the System.
Post-Conditions: The request for clarification is recorded and the Requester is advised that before processing can begin, he/she must address the deficiencies.
Supporting Services: Email Integration and Correspondence Production

User Stories

- As a Perfection Specialist, I need clarification about various deficiencies in a request, before I can consider it perfected and begin processing, so that I can clearly understand the request to confirm it as perfected for records search and review.

- As a Policy Manager, I need to be able to configure a data-driven processing rule that will set the number of days for requester to respond to a clarification request before it's closed (e.g., 30 days), which is based on
the agency policy, so that the rule can be easily modified as laws, regulations, and/or Agency policies change, and the result of the change will dynamically modify the related business activity.

NOTE: Some agencies may not want to set a specific time limit.

**E.2.3 Activity: Assess Clarity of Request to Search for Responsive Records**

*Description:* The activity confirms that a new request includes sufficient description of the records requested to initiate a search for responsive records. Pursuant to DOJ and its Office of Information Policy (OIP) guidance, “The key to determining whether a request satisfies the first requirement is the ability of agency staff to reasonably ascertain exactly which records are being requested and to locate them.”

*Part of Process:* Confirm Perfected Request

*Type of Activity:* Automated with human interaction

*Actors:* Recordkeeping System SME

*Triggers:* A Recordkeeping System SME may be asked to conduct a preliminary assessment of the request to provide feedback to the Perfection Specialist as to whether the request is clear enough to conduct a search for responsive records.

*Pre-Conditions:* A request, not yet confirmed as perfected, was created in the FOIA system.

*Post-Conditions:* Informal determination from a Recordkeeping System SME about the feasibility of conducting a search based on the request.

*Supporting Services:* None

*User Stories*

- As a Recordkeeping System SME, I need to assess request clarity, so that I can confirm that the types of records that will be responsive to the request are clear.

- As a Recordkeeping System SME, I need to estimate the effort needed to search for records that could be responsive to the request, so that a preliminary estimate of the time and effort, as well as volume, can be determined.

- As a Recordkeeping System SME, I need to prepare a preliminary search strategy to determine how to search for records that could be responsive to the Request, so that the strategy can be used as input to estimate the effort involved in the Request.

**E.2.4 Activity: Assign Case to Lead**

NOTE: This is a recurrent activity. For a complete definition and associated user stories refer to the activity within the *Perform Supplemental Case Activities* process in Appendix E.13.2.
E.2.5 Activity: Assign Organizational Ownership to Request

NOTE: This is a recurrent activity. For a complete definition and associated user stories refer to the activity within the Perform Supplemental Case Activities process in Appendix E.13.4.

E.2.6 Activity: Assign Organizational Ownership to Request Items

NOTE: This is a recurrent activity. For a complete definition and associated user stories refer to the activity within the Perform Supplemental Case Activities process in Appendix E.13.5.

E.2.7 Activity: Close Case

NOTE: This is a recurrent activity. For a complete definition and associated user stories refer to the activity within the Perform Supplemental Case Activities process in Appendix E.13.6.

E.2.8 Activity: Determine If Duplicate Request

Description: The activity checks for any open request(s) previously submitted by the Requester that would essentially reflect a duplicate request. If identified, the new request would be administratively closed.

Part of Process: Confirm Perfected Request
Type of Activity: Automated with human interaction
Actors: Perfection Specialist
Triggers: The Perfection Specialist reviews a new request.
Pre-Conditions: A pre-perfected Request and access to previous requests.
Post-Conditions: The Perfection Specialist knows if the request is a duplicate of other requests from the same Requester.
Supporting Services: AI/ML/HLT-Enabled Search

User Story: As a Perfection Specialist, I need to identify if the new Request duplicates any others from the same Requester, so that unnecessary processing is avoided.

E.2.9 Activity: Determine if Related to Another Open Request

Description: Uses advanced searching, such as machine learning (ML), to identify possible other requests that may be requesting the same or similar records

Part of Process: Confirm Perfected Request
Type of Activity: Automated with human interaction
Actors: Perfection Specialist
Triggers: The Perfection Specialist initiates the evaluation of the validity of the Request.
Pre-Conditions: A confirmed, perfected request exists in the System.
Post-Conditions: The user receives information that the Request may be related to another requests (either currently open, completed, or otherwise closed).
Supporting Services: AI/ML/HLT-Enabled Search
User Story: As a Perfection Specialist, I need to search the System for similar requests that can be combined, so that I can reduce superfluous work and resources applied to FOIA processing and ensure a single consistent response.

E.2.10 Activity: Determine Process Queue

NOTE: This is a recurrent activity. For a complete definition and associated user stories refer to the activity within the Manage Tasks process in Appendix E.12.8.

E.2.11 Activity: Evaluate Expedited Request

Description: Determine if the agency should accept or reject a request for expedited processing.

Part of Process: Confirm Perfected Request
Type of Activity: Automated with human interaction
Actors: Authorized Official for Expedited Decision | Policy Manager
Triggers: The Requester has included a request for expedited processing.
Pre-Conditions: A Request must be perfected.
Post-Conditions: Request for expedited processing is either granted or denied.
Supporting Services: None

User Stories

- As an Authorized Official for Expedited Decision, I need to review a request for expedited processing to determine if the justification meets the criteria established to grant same, so that I can ensure the Request is properly designated as expedited or not expedited and processed appropriately.

- As a Policy Manager, I need to be able to configure a data-driven processing rule that will set the number of business days to grant or reject expedited processing requests (e.g., required within 10 days), which is based on the date the Request was received, so that the rule can be easily modified as laws, regulations, and/or Agency policies change, and the result of the change will dynamically modify the related business activity.

E.2.12 Activity: Evaluate Validity of Request

Description: The activity verifies (1) whether the FOIA request is sufficiently clear to search for responsive records, (2) specifically asks for agency held records, (3) the Requester type (and thus fee category), (4) the identity of a person making a first-person FOIA request, and (5) no other public facing records repository is available to the Requester for them to obtain the desired records.

NOTE: If, after any further refinements from the Requester are considered, if only parts of the Request can be considered perfected (and thus processed), then agencies are expected to proceed with those portions of the Request.

Part of Process: Confirm Perfected Request
**Type of Activity:** Automated with human interaction

**Actors:** Perfection Specialist | Policy Manager

**Triggers:** Perfection Specialist receives a newly submitted request.

**Pre-Conditions:** A new request is submitted to the System and is not yet confirmed as perfected.

**Post-Conditions:** Determination of request's validity. If it is not perfected, it would be returned to the Requester for clarification and/or withdrawal or be administratively closed for other reasons.

**Supporting Services:** None

**User Stories**

- As a Perfection Specialist, I need to confirm that the request is perfected, so that the processing clock can start (e.g., 20-day period) and I can move the request into the processing phase.

- As a Perfection Specialist, I need to verify the identity of requesters who request records about themselves, as such records could be specifically protected from release to others by the Privacy Act, so that only authorized requesters are permitted to submit these types of requests.

- As a Perfection Specialist, I need to be able to mark a FOIA request as “not proper”, so that I can close out improperly formed requests.

- As a Policy Manager, I need to be able to configure a data-driven processing rule that will set the number and type of documents required for validating first-person requests by list (e.g., 2 documents of type A or 1 document of type B), so that the rule can be easily modified as laws, regulations, and/or Agency policies change, and the result of the change will dynamically modify the related business activity.

NOTE: The types and quantities of documentation that support authenticating first-person requests may vary by agency. Also, agencies may have global privacy rules that span across FOIA and other systems.

### E.2.13 Activity: Merge Related Cases into a Single Aggregated Case

**Description:** Agencies may merge (i.e., aggregate) multiple requests into a single request if there is clear evidence that multiple Requesters are working together to divide a larger request into smaller individual requests to avoid fees, or an individual is making the same request multiple times within a defined period (e.g., 30 days). If requests are aggregated the processing clock may be reset if subsequent requests within the aggregation arrive within the compliance period (e.g., 20 business days).

**Part of Process:** Confirm Perfected Request

**Type of Activity:** Automated with human interaction

**Actors:** Perfection Specialist

**Triggers:** The Perfection Specialist has determined that a request duplicates or closely mirrors another request from the same or collaborating Requesters.
Pre-Conditions: Access to previous requests.
Post-Conditions: Two or more cases are merged into a single case.
Supporting Services: None

User Story: As a Perfection Specialist, I need to combine two or more similar requests into one, so that multiple requests for the same information from the same requester are not processed independently.

E.2.14 Activity: Notify Requester of Closed Case

NOTE: This is a recurrent activity. For a complete definition and associated user stories refer to the activity within the Perform Supplemental Case Activities process in Appendix E.13.8.

E.2.15 Activity: Notify Requester of Expedited Decision

Description: Notify requester whether the request for expedited processing was granted or denied.

Part of Process: Confirm Perfected Request
Type of Activity: Automated with human interaction
Actors: Perfection Specialist
Triggers: Authorized Official for Expedited Decision has decided on an expedited status request.
Pre-Conditions: The Request includes a request for expedited processing.
Post-Conditions: Requester knows the decision that was made on their expedited status request.
Supporting Services: Email Integration and Correspondence Production

User Story: As a Perfection Specialist, I need to notify the Requester with the official decision regarding their request for expedited status, so that requester knows the status their request will have when it is processed.

E.2.16 Activity: Notify Requester of Redirection to Another Agency Component

Description: If a Request is redirected by an Agency Component for processing, the Requester will be notified of the transfer to the receiving Component.

Part of Process: Confirm Perfected Request
Type of Activity: Automated with human interaction
Actors: Perfection Specialist
Triggers: A Request has been determined to be misdirected.
Pre-Conditions: A Request has been determined to be misdirected.
Post-Conditions: A message is sent to the requester advising that the request has been redirected to a different agency component.
Supporting Services: Email Integration and Correspondence Production

User Story: As a Perfection Specialist, I need to inform the Requester that their Request has been sent to a different agency component for processing and provide the updated contact information, so that the Requester understands
which Agency is handling their Request and whom to contact if there are questions, changes, or issues with their Request.

NOTE: Section 6(a)(1) of the OPEN Government Act encourages agencies to notify the requester in these situations. It would inform them of delays and let them know who is processing the request. Thus, if there are follow-up actions, the requester knows whom to contact. Refer to “Notifying the Requester and the Proper Component” (https://www.justice.gov/oip/blog/foia-post-2008-oip-guidance-new-requirement-route-misdirected-foia-requests).

**E.2.17 Activity: Notify Requester of Request Deficiency**

*Description:* Informs the requester that the request they submitted to the agency is not perfected and includes a description of deficiencies and suggestions for clarification.

*Part of Process:* Confirm Perfected Request

*Type of Activity:* Automated with human interaction

*Actors:* Perfection Specialist

*Triggers:* The Perfection Specialist has determined that the request is not perfected.

*Pre-Conditions:* A new request is submitted into the System

*Post-Conditions:* The Requester is informed the request is not perfected and will not be processed as written, and that he/she can elect to either provide the necessary clarification or opt to withdraw the request.

*Supporting Services:* Email Integration and Correspondence Production

*User Story:* As a Perfection Specialist, I need to notify requester of their request is not considered “perfected” and is not being processed, so that the requester knows they need to modify their request for it to be fulfilled.

NOTE: The notification will also inform Requesters of what they can do to modify or clarify the request or else the case will be closed.

**E.2.18 Activity: Notify Requester of Submission to Incorrect Agency**

*Description:* When the agency determines the request is seeking records that are not maintained within the agency, the Requester is informed that the request is being referred to the other agency.

*Part of Process:* Confirm Perfected Request

*Type of Activity:* Automated with human interaction

*Actors:* Perfection Specialist

*Triggers:* The agency has determined the Request was sent to the wrong agency.

*Pre-Conditions:* A Request has been determined to be sent to the wrong Agency.

*Post-Conditions:* If the agency knows which other agency is correct, it refers the request to that agency and notifies the requester. If the agency does not have records to provide, and does not know which agency might, it provides a “no records” response.

*Supporting Services:* Email Integration and Correspondence Production
User Story: As a Perfection Specialist, I need to inform the Requester that they submitted their Request to the wrong agency for processing and advise to where I referred it, so that the Requester may resubmit their Request to the appropriate Agency that can process their Request.

E.2.19 Activity: Receive Notification from Agency

NOTE: This is a recurrent activity. For a complete definition and associated user stories refer to the activity within the Conduct Request Intake process in Appendix E.1.13.

E.2.20 Activity: Redirect Request to Another Agency Component

Description: If a Request is submitted to an Agency Component and that Component is not the correct Component to respond to the Request, the Agency will redirect it to the appropriate Component. This effectively transfers and closes the case for the Component initially receiving the request.

Part of Process: Confirm Perfected Request
Type of Activity: Automated with human interaction
Actors: Perfection Specialist | Policy Manager
Triggers: A Requester submits a Request to the Agency.
Pre-Conditions: A request has been submitted to the FOIA system.
Post-Conditions: A message including the FOIA Request is sent to the appropriate Agency Component, which will lead the response to the Request.
Supporting Services: Standardized Data Exchange

User Stories

- As a Perfection Specialist, I need to send a FOIA Request that was incorrectly sent to the Agency Component, so that the appropriate Component can receive and fully process the FOIA Request.

- As a Policy Manager, I need to be able to configure a data-driven processing rule that will set the number of working days to route request to proper agency component within same agency when requester submits to an incorrect component (e.g., 10 days), which is based on the date of requester's submission, so that the rule can be easily modified as laws, regulations, and/or Agency policies change, and the result of the change will dynamically modify the related business activity.

NOTE: DOJ FOIA Guide / Procedural Requirements / Time Limits / page 36: “The FOIA provides that the standard twenty-day time period begins on the date the request is first received by the appropriate agency component (or office) but no later than ten days after the request is first received by any component within the agency that is designated by the agency’s regulations to receive FOIA requests.”

- As a Policy Manager, I need to be able to configure a data-driven processing rule that will set the number of working days (e.g., 10 days) to
route a misdirected Request from the original Agency Component to the appropriate Component within the Agency, so that the rule can be easily modified as laws, regulations, and/or Agency policies change, and the result of the change will dynamically modify the related business activity.

NOTE: 20-day window begins once the Request is routed to the proper agency.

E.2.21 Activity: Refine FOIA Request

**Description:** A Requester provides sufficient clarification in response to the agency’s notice of deficiency to perfect the Request.

**Part of Process:** Confirm Perfected Request

**Type of Activity:** Automated with human interaction

**Actors:** Requester

**Triggers:** A Requester receives notification from the agency that the Request is not perfected, and before it can be processed, he/she must address deficiencies and/or provide clarification.

**Pre-Conditions:** A pre-perfected Request exists for the Requester in the System.

**Post-Conditions:** Clarification is provided by the Requester and incorporated into the original Request.

**Supporting Services:** None

**User Story:** As a Requester, I need to revise and/or clarify my FOIA request when the agency has notified me that it cannot begin processing without that detail, so that the Request may be considered as a “perfected” Request and be sufficiently clear for the agency to conduct a search and review of responsive records.

E.3 Process: Scope and Size Request

**User Story:** As a Sizing & Scoping Specialist, I need to define, assign, and oversee the completion of one or more tasks, so that the process can be completed, and activities can be tracked and analyzed.

E.3.1 Activity: Ask Requester to Refine Request

NOTE: This is a recurrent activity. For a complete definition and associated user stories refer to the activity within the Confirm Perfected Request process in Appendix E.2.2.

E.3.2 Activity: Assess Whether Clarifications Needed

**Description:** If, after the Request has been deemed perfected, the Request will be evaluated to determine whether additional questions must be answered by the Requester before a search for responsive records can be conducted. This may be needed for the entire Request or only for one or more Request Items comprising the Request.

**Part of Process:** Scope and Size Request
**Type of Activity:** Automated with human interaction

**Actors:** Sizing & Scoping Specialist

**Triggers:** The specialist initiates an assessment of the clarity of the Request to support the search for responsive records.

**Pre-Conditions:** A Request has been confirmed as perfected.

**Post-Conditions:** The Request is deemed as clear (ready for further scoping) or unclear and therefore requires further clarification from the Requester.

**Supporting Services:** None

**User Story:** As a Sizing & Scoping Specialist, I need to evaluate, after confirming a perfected case, whether the Request is sufficiently clear to search for responsive records, so that if additional clarifications are needed, the Agency can request additional information from the Requester.

**E.3.3 Activity: Assign Organizational Ownership to Request Items**

NOTE: This is a recurrent activity. For a complete definition and associated user stories refer to the activity within the Perform Supplemental Case Activities process in Appendix E.13.5.

**E.3.4 Activity: Assign Topics to Request Items**

**Description:** One or more topics (request subject areas or categories) are assigned to each Request Item. Topics can be used for multiple purposes, including to improve the assignment of a Process Queue, help direct appropriate searches, and support analytics/reporting of requests by topic.

**Part of Process:** Scope and Size Request

**Type of Activity:** Automated with human interaction

**Actors:** Sizing & Scoping Specialist

**Triggers:** The case worker has been assigned a perfected request.

**Pre-Conditions:** There is an active, perfected request from the Requester.

**Post-Conditions:** One or more topics from the taxonomy of topics are associated with a Request Item.

**Supporting Services:** AI/ML/HLT-Enabled Metadata Extraction

**User Stories**

- As a Sizing & Scoping Specialist, I need to assign one or more topics to a request, so that search activities and workflow (task assignment) can be supported.

- As a Sizing & Scoping Specialist, I need to be prompted if there is one or more template workflows (processes/queues) for the selected topic(s) and decide which Process Queue should be used for the given case, so that topics with sensitivities or other criteria can be used to drive an appropriate workflow.

NOTE: It is envisioned that the selection of topic(s) could determine the default Process Queue for the Request Item, which the specialist could...
override as needed. Recall the Process Queue assignment is expected to drive the set of applicable tasks to the Request Item.

**E.3.5 Activity: Clarify FOIA Request**

*Description:* A Requester provides clarifications to their Request in response to a request to update their Request AFTER it has been considered perfected.

NOTE: Current statute stipulates agencies may stop the clock only once for clarifications to a Request AFTER it has been considered as perfected.

*Part of Process:* Scope and Size Request

*Type of Activity:* Automated with human interaction

*Actors:* Requester | Sizing & Scoping Specialist

*Triggers:* A Requester received a request to clarify their FOIA Request (post-perfection) and they decide to take that action.

*Pre-Conditions:* A perfected FOIA Request exists for the Requester.

*Post-Conditions:* Additional clarifications are captured from the Requester.

*Supporting Services:* None

*User Stories*

- As a Requester, I need to communicate with an agency, such as through a portal and/or email, and submit additional clarifying information in response to a request for clarification, so that I can ensure the request has been sufficiently perfected for processing.

- As a Sizing & Scoping Specialist, I need to modify the content of a FOIA request, so that the request is understandable, and the agency can respond to the request with reasonable effort.

**E.3.6 Activity: Close Case**

NOTE: This is a recurrent activity. For a complete definition and associated user stories refer to the activity within the *Perform Supplemental Case Activities* process in Appendix E.13.6.

**E.3.7 Activity: Close Sub-Case (Request Item)**

NOTE: This is a recurrent activity. For a complete definition and associated user stories refer to the activity within the *Perform Supplemental Case Activities* process in Appendix E.13.7.

**E.3.8 Activity: Confirm Recordkeeping System and Estimate LOE**

*Description:* The Recordkeeping System SME will confirm, deny and/or recommend other source systems in scope of the Request, and if confirmed, provide a rough level of effort (LOE) estimate to complete the search.

NOTE: This LOE is high-level; a more specific estimate will be completed as part of preparing the fee estimate, if applicable.

*Part of Process:* Scope and Size Request

*Type of Activity:* Automated with human interaction

*Actors:* Recordkeeping System SME

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**Triggers:**
A recordkeeping system SME has been tasked with confirming one or more source systems and providing a high-level LOE.

**Pre-Conditions:**
A recordkeeping system SME has been tasked with confirming one or more source systems and providing a high-level LOE.

**Post-Conditions:**
The recordkeeping system SME confirms one or more systems in the scope of responsive records and an initial, high-level LOE is provided for each system within their purview that is in scope.

**Supporting Services:**
None

**User Story:**
As a Recordkeeping System SME, I need to provide a rough LOE estimate to search the recordkeeping system I support for the FOIA Request, so that the estimate can be used to properly plan the search and review activity, and where applicable, support the estimation of fees.

**E.3.9 Activity: Define Request Items**

**Description:**
A single request can have one or more Request Items, each requiring their own search and response activities. Request Items are essentially "sub-cases" to the overall Request "case" and the specific items to be defined are at the Agency’s discretion for partitioning a "compound" request. Each Request Item may be linked to a different Process Queue and thus possibly a different set of search, review, and other appropriate tasks with assigned staff to complete them.

**Part of Process:**
Scope and Size Request

**Type of Activity:**
Automated with human interaction

**Actors:**
Sizing & Scoping Specialist

**Triggers:**
The case worker has been assigned a perfected request.

**Pre-Conditions:**
There is an active, perfected request from the Requester.

**Post-Conditions:**
One or more Request Items are defined for the Request.

**Supporting Services:**
None

**User Stories**

- As a Sizing & Scoping Specialist, I need to be able to treat each Request Item as its own case (sub-case to a Request), so that each can be assigned to a separate Process Queue with unique tasking and assignments necessary to complete the Request Item.

- As a Sizing & Scoping Specialist, I need to decompose a request into request items, so that components of a request can be efficiently completed.

- As a Sizing & Scoping Specialist, I need to resize the scope of the request in the FOIA system, so that the request in the system accurately reflects the request after the requester has modified its scope.
E.3.10 Activity: Determine If Publicly Available

Description: Determine if the records responsive to the request are posted in the FOIA Library or otherwise openly available to the Requester.

Part of Process: Scope and Size Request
Type of Activity: Automated with human interaction
Actors: Sizing & Scoping Specialist
Triggers: The Sizing and Scoping Specialist receives a perfected request.
Pre-Conditions: The received request is perfected.
Post-Conditions: A determination if any responsive records are publicly available. This may result in closing part of the case (i.e., a Request Item/Sub-Case) or the entire case (i.e., the full Request).

Supporting Services: None

User Story: As a Sizing & Scoping Specialist, I need to determine if the records responsive to request are publicly available, so that the requester can quickly get the records they seek, and the case can be closed in part or in full.

E.3.11 Activity: Determine Search Parameters

Description: Identify the search terms and parameters that will be used to search recordkeeping systems to discover responsive records.

Part of Process: Scope and Size Request
Type of Activity: Automated with human interaction
Actors: Recordkeeping System SME
Triggers: Search request received.
Pre-Conditions: Identified target recordkeeping system and topic(s) of search request are available.
Post-Conditions: Defined search parameters.
Supporting Services: AI/ML/HLT-Enabled Search | AI/ML/HLT-Enabled Decisioning

User Story: As a Recordkeeping System SME, I need to determine the search parameters for finding responsive records in source recordkeeping systems, so that search for responsive records can be estimated and subsequently executed.

E.3.12 Activity: Determine SMEs to Coordinate Search

Description: One or more recordkeeping system subject matter experts (SMEs) will be identified to support the confirmation of which systems are in scope of the Request.

Part of Process: Scope and Size Request
Type of Activity: Automated with human interaction
Actors: Sizing & Scoping Specialist
Triggers: An initial set of source systems with responsive records has been identified.
**Pre-Conditions:** An initial set of source systems with responsive records has been identified.

**Post-Conditions:** A list of SMEs have been identified for tasking with confirmation and a high-level level of effort (LOE) to complete the search.

**Supporting Services:** None

**User Story:** As a Sizing & Scoping Specialist, I need to identify the subject matter experts (SMEs) that support the Agency’s recordkeeping systems within the scope of the FOIA Request, so that I can engage and if appropriate, task the SMEs with action items to provide a level of effort to search each of the systems for responsive records.

### E.3.13 Activity: Estimate Processing Effort and Other Fee-Based Items

**Description:** Captures an estimate of the number of hours needed to search and process the request and other factors, such as digitizing quantities.

**Part of Process:** Scope and Size Request

**Type of Activity:** Automated with human interaction

**Actors:** Policy Manager | Sizing & Scoping Specialist

**Triggers:** The case worker determines the need to estimate fees, such as having an open Task to complete the estimate.

**Pre-Conditions:** A Fee Category has been assigned to the Request, Request Items have been defined, and a Search Strategy is completed.

**Post-Conditions:** Estimated hours, number of photocopies, and any other costing factors have been associated with each of the Request Items.

**Supporting Services:** None

**User Stories**

- As a Policy Manager, I need to be able to configure a data-driven processing rule that will set the number of days (e.g., 10 business days) beyond the standard response period (e.g., 20 days) for which an Estimated Completion Date (ECD) would need to be prepared, so that the rule can be easily modified as laws, regulations, and/or Agency policies change, and the result of the change will dynamically modify the related business activity.

- As a Policy Manager, I need to be able to configure a data-driven processing rule that will set the standard number of business days required to complete the request (e.g., 20 days if no unusual circumstances apply), which is based on the type of request (simple, complex) and date of request perfection, so that the rule can be easily modified as laws, regulations, and/or Agency policies change, and the result of the change will dynamically modify the related business activity.

- As a Policy Manager, I need to be able to configure a data-driven processing rule that will set the number of business days required to complete a request with unusual circumstances (e.g., 30 days), so that the rule can be easily modified as laws, regulations, and/or Agency policies change, and the result of the change will dynamically modify the related business activity.
change, and the result of the change will dynamically modify the related business activity.

- As a Sizing & Scoping Specialist, I need to assemble a list of fee line items (e.g., draft payment request line items), any assumptions that pertain to an item, and a total cost estimate, so that a fee estimate can be shared with the requester.

**E.3.14 Activity: Flag Request for Possible Proactive Disclosure Based on Topic(s)**

*Description:* During the scoping activities and prior to searching for specific responsive records to a Request, the Request itself is flagged (updated) to indicate that records may be within the set of publicly disclosed information. This determination would be derived based on the FOIA Topics assigned to the Request and an attribute of the selected Topic indicating this possible target for public disclosure. This serves as an early indication and provides a "heads up" to the reviewers in the Review Responsive Records process.

*Part of Process:* Scope and Size Request

*Type of Activity:* Automated with human interaction

*Actors:* Sizing & Scoping Specialist

*Triggers:* A Topic with a "potential for public disclosure flag" (or similar approach) is tagged to a Request Item.

*Pre-Conditions:* One or more Request Items have been created for the Request.

*Post-Conditions:* The FOIA Request Item is flagged to indicate that responsive records found in the Search process may be candidates for proactive disclosure.

*Supporting Services:* None

*User Story:* As a Sizing & Scoping Specialist, I need to update a FOIA Request with an indication that some or all responsive records found in a subsequent search activity may be a candidate for proactive disclosure and use the FOIA Topic(s) assigned (and a characteristic of the topics) to inform this decision, so that proactive disclosure is considered as new FOIA Requests are scoped, and before potentially less efficient responses are provided.

**E.3.15 Activity: Identify Sources for Request Item**

*Description:* Determine the recordkeeping systems and other sources that are likely to store the records that are responsive to a request.

*Part of Process:* Scope and Size Request

*Type of Activity:* Automated with human interaction

*Actors:* Recordkeeping System SME

*Triggers:* Source System of Records SME receives a request to conduct a search for responsive records.

*Pre-Conditions:* None

*Post-Conditions:* List of systems or other sources likely to contain records responsive to a request.

*Supporting Services:* AI/ML/HLT-Enabled Decisioning
User Stories

- As a Recordkeeping System SME, I need to access, “crawl”, and identify candidate data sources, so that the system can locate candidate data sources.

- As a Recordkeeping System SME, I need to search data catalogs to locate source recordkeeping systems that may have responsive records, so that potentially responsive records stored across multiple source recordkeeping systems can be located.

- As a Recordkeeping System SME, I need to view and select from the inventory of available data sources, so that I can search one or more sources for candidate responsive records.

E.3.16 Activity: Notify Requester of Closed Case

NOTE: This is a recurrent activity. For a complete definition and associated user stories refer to the activity within the Perform Supplemental Case Activities process in Appendix E.13.6.

E.3.17 Activity: Notify Requester of Publicly Available Information

Description: As part of evaluating the scope of the Request, if it is determined that the responsive records are already publicly available, the Requester will be notified of this.

Part of Process: Scope and Size Request
Type of Activity: Automated with human interaction
Actors: Request Lead
Triggers: The specialist determined that some or all responsive records are already publicly available.
Pre-Conditions: The specialist determined that some or all responsive records are already publicly available.
Post-Conditions: The Requester receives a message that some or all records are already publicly available.
Supporting Services: Email Integration and Correspondence Production

User Story: As a Request Lead, I need to inform the Requester that records already in the public domain, such as those available on the Agency’s website, will be responsive to the FOIA Request or to part of the Request (e.g., support one or more Request Item(s) in the Request), so that requesters can obtain the records they want in the most efficient and rapid manner.

E.3.18 Activity: Notify Requester of Unusual Circumstances

Description: Convey to the Requester that the Request will take longer than the standard turnaround time (e.g., 20 days) because of unusual circumstances, such as 1) the need to search for records from field facilities or other locations, 2) the need to search, collect and examine voluminous records, and 3) the need for consultation with another agency.
or among two or more components of an agency. Notifications of unusual circumstances include an estimated completion date.

**Part of Process:** Scope and Size Request  
**Type of Activity:** Automated with human interaction  
**Actors:** Request Lead  
**Triggers:** The estimated effort to search a voluminous number of records, the need to search for records from field facilities or other locations, or the need to consult with another agency, or among 2 or more components of the same agency.

**Pre-Conditions:** There is an active, perfected request from the Requester and an initial estimate to complete the effort has been prepared.

**Post-Conditions:** The Requester is notified of the unusual circumstances and the extended estimated completion date.

**Supporting Services:** Email Integration and Correspondence Production

### E.3.19 Activity: Receive Notification from Agency

NOTE: This is a recurrent activity. For a complete definition and associated user stories refer to the activity within the **Conduct Request Intake** process in Appendix E.1.13.

### E.3.20 Activity: Review Requester's Clarifications to FOIA Request

**Description:** The case worker reviews the clarification response from the Requester to determine whether it satisfactorily addresses the need.

**Part of Process:** Scope and Size Request  
**Type of Activity:** Automated with human interaction  
**Actors:** Request Lead  
**Triggers:** The case worker receives a response from the Requester related to the clarification request that was sent to them.

**Pre-Conditions:** Requester has responded to a clarification request.

**Post-Conditions:** Case worker determines whether the response from the Requester adequately clarifies the request. The clarification request record is updated with an appropriate status by the case worker. If determined inadequate, the case worker may either request a new clarification or reject the Request (or parts of the Request, e.g., one or more Request Items) as being not perfectible.

**Supporting Services:** None

**User Story:** As a Request Lead, I need to review the response provided by a requester to a request for clarifying information, so that I can ensure the request has been sufficiently described for processing.

### E.4 Process: Estimate Fees

**User Stories**

- As a Fee Specialist, I need to log fee estimates, including distinguishing between fee categories, such as search, review, and duplication, so that
each item contributing to the overall fee can be calculated and substantiated.

- As a Policy Manager, I need to be able to configure a data-driven processing rule that will determine whether fees are to be collected (e.g., Yes, No), which is based on the agency policy, so that the rule can be easily modified as laws, regulations, and/or Agency policies change, and the result of the change will dynamically modify the related business activity.

- As The System, I need to automatically reflect the accounting balance of a Requester (e.g., sum of fees, payments, refunds, corrections), so that a net balance due can be determined.

**E.4.1 Activity: Accept or Reject Estimated Fee**

*Description:* Accept the fee estimate, instructing the agency to proceed with the request or reject the fee estimate by either resizing or withdrawing the request.

*Part of Process:* Estimate Fees  
*Type of Activity:* Automated with human interaction  
*Actors:* Requester  
*Triggers:* The Requester or Representative receives the fee estimate.  
*Pre-Conditions:* None  
*Post-Conditions:* Fee estimate is accepted or rejected by the Requester.  
*Supporting Services:* Email Integration and Correspondence Production  

*User Story:* As a Requester, I need to accept or reject the estimated fee, so that the agency knows whether I intend to pay the fee.

**E.4.2 Activity: Close Case**

*NOTE:* This is a recurrent activity. For a complete definition and associated user stories refer to the activity within the *Perform Supplemental Case Activities* process in Appendix E.13.6.

**E.4.3 Activity: Determine Fee Decision**

*Description:* If a fee is appropriate for the Request, a decision will be made as to whether fees are due at the time of (1) responding to the Requester with a response package (i.e., after search and review), (2) prior to releasing responsive records or the “response package” (i.e., a “pre-payment”), (3) prior to initiating Search efforts (i.e., an “advance-payment”), or (4) at the time of responding to the Requester with a response package, but only if a “payment assurance” has been made by the Requester.

*Part of Process:* Estimate Fees  
*Type of Activity:* Automated with human interaction  
*Actors:* Fee Specialist  
*Triggers:* The case worker needs to estimate fees.  
*Pre-Conditions:* The specialist has considered payment risk by reviewing any prior balance due and prior payment history, the type of Requester, the scope and size of the request.
Post-Conditions: A fee decision including (1) no need for pre- or advance payment, (2) a pre-payment is required, (3) an advance payment is required, or (4) a payment assurance is required.

Supporting Services: FOIA Processing “Clock” Starts and Stops (Tolling)

User Story: As a Fee Specialist, I need to determine whether a pre-payment, advance payment or payment assurance is required for the FOIA Request and consider the Requester's prior payment history and any unpaid balances, so that payment risk is reduced to perform FOIA Requests that require payment of fees, especially with large-scale search and review efforts.

E.4.4 Activity: Determine Type of Requester

Description: A formal decision must be made to determine the type of Requester (e.g., commercial use; educational and noncommercial scientific institutions; representatives of the news media; and all other Requesters) who has submitted the Request. The decision can have a direct impact on whether and which fees are applicable.

NOTE: Depending on the context and aim of the Request, some organizations might be considered a news organization for one Request and a commercial business for another Request.

Part of Process: Estimate Fees
Type of Activity: Automated with human interaction
Actors: Fee Specialist
Triggers: The case worker needs to estimate fees.
Pre-Conditions: A Request has been confirmed as perfected.
Post-Conditions: The type of Requester has been applied by the specialist to the case. Note this is a distinct and separate designation than a self-reported type from the Requester.

Supporting Services: None

User Story: As a Fee Specialist, I need to formally document the type of Requester submitted the FOIA Request, so that appropriate fees are charged, since fees are determined, in part, by the type of Requester.

NOTE: Although a Requester may be asked to self-select the Requester Type as part of the initial Request submission, that value may not comport with an appropriate value based on the nature of the Request. For example, some news-oriented organizations sometimes act in their own interests, which may result in them being designated as a “commercial” organization, rather than a news agency.

E.4.5 Activity: Evaluate Fee Waiver Request

Description: Evaluate request from Requester asking the agency to waive the FOIA fee, based on criteria defined in the FOIA.

Part of Process: Estimate Fees
Type of Activity: Automated with human interaction
Actors: Authorized Official for Fee Waivers
Triggers: The case worker has been assigned a perfected request.
Pre-Conditions: There is an active, perfected request and a Fee Waiver is indicated for the Requester's FOIA request.
Post-Conditions: A Fee Waiver is either approved or denied.
Supporting Services: None

User Story: As an Authorized Official for Fee Waivers, I need to decide whether the Requester has provided a valid reason for a fee waiver, so that the Agency applies appropriate and consistent rules for when to collect fees from Requesters.

E.4.6 Activity: Notify Requester of Fee Estimate

Description: Convey to the Requester the estimated cost of the fulfilling the request.
Part of Process: Estimate Fees
Type of Activity: Automated with human interaction
Actors: Fee Specialist | Policy Manager
Triggers: Fee Estimate is created.
Pre-Conditions: None
Post-Conditions: Requester or Representative receives Fee Estimate.
Supporting Services: Email Integration and Correspondence Production

User Stories

- As a Fee Specialist, I need to notify the requester, such as via a portal or email, that the fees owed will exceed the regulatory threshold (e.g., $25), such as the result of extra processing time, duplication / printing costs, or other fees, so that the requester will be aware of the fees owed, especially when they exceed the standard regulatory thresholds.

- As a Fee Specialist, I need to share fee estimates, outstanding balance, fee waiver decisions, and payment requests with requesters, so that the Requester can determine how they want to proceed with their request.

- As a Policy Manager, I need to be able to configure a data-driven processing rule that will set the number of days to wait for requester response to a fee estimate (e.g., 30 days), which is based on the date requester notified of fee estimate, so that the rule can be easily modified as laws, regulations, and/or Agency policies change, and the result of the change will dynamically modify the related business activity.

- As a Policy Manager, I need to be able to configure a data-driven processing rule that will set the notification requirement when fees exceed threshold (e.g., $25), which is based on the estimated fee amount, so that the rule can be easily modified as laws, regulations, and/or Agency policies change, and the result of the change will dynamically modify the related business activity.
E.4.7 Activity: Notify Requester of Fee Waiver Denial

Description: A message is sent to the Requester if their request for a fee waiver has been denied.

Part of Process: Estimate Fees
Type of Activity: Automated with human interaction
Actors: Authorized Official for Fee Waivers
Triggers: A fee waiver has been denied.
Pre-Conditions: A Requester has included a request for a fee waiver in their FOIA Request.
Post-Conditions: The Requester is sent a message that their fee waiver request has been denied.
Supporting Services: Email Integration and Correspondence Production

User Story: As an Authorized Official for Fee Waivers, I need to inform the Requester that their request for a waiver of fees has been denied, so that the Requester is made aware of the status of their fee waiver request and that fees may apply.

E.4.8 Activity: Prepare Fee Estimate

Description: Applies cost factors to the estimated processing effort and other invoiceable items and produces a fee estimate for the Request. NOTE: This activity will be repeated for each Request Item in a Request.

Part of Process: Estimate Fees
Type of Activity: Automated with human interaction
Actors: Fee Specialist | Policy Manager
Triggers: The case worker determines the need to estimate fees, such as having an open Task to complete the estimate.
Pre-Conditions: Estimated processing effort, number of copies, and other factors are associated with a Request Item.
Post-Conditions: An estimated cost is associated with a Request Item.
Supporting Services: None

User Stories

- As a Fee Specialist, I need to automatically create and update fee estimates based on case record metadata, so that an accurate payment request can be developed based on all applicable charges.

- As a Fee Specialist, I need to manually create and update fee estimates, so that unique fee situations that could not be determined automatically can be supported.

- As a Fee Specialist, I need to reflect any prior amounts owed on a current payment request, so that to inform the Requester of all amounts due and to increase the likelihood of a payment for past items.
• As a Policy Manager, I need to be able to configure a data-driven processing rule that will set a constraint on proceeding with a Request given the requester's payment history (e.g., 2 prior late payments), such as late payments or unpaid invoices, so that the rule can be easily modified as laws, regulations, and/or Agency policies change, and the result of the change will dynamically modify the related business activity.

• As a Policy Manager, I need to be able to configure a data-driven processing rule that will set the minimum billable amount (e.g., $25), which is based on the processing fee amount, so that the rule can be easily modified as laws, regulations, and/or Agency policies change, and the result of the change will dynamically modify the related business activity.

• As a Policy Manager, I need to be able to configure a data-driven processing rule that will set the minimum fee estimate to require a payment assurance (e.g., $300), which is based on the anticipated fee amount, requester’s fee limit, advanced payment not received, requester’s payment history, so that the rule can be easily modified as laws, regulations, and/or Agency policies change, and the result of the change will dynamically modify the related business activity.

NOTE: This may require a set of inter-related rules to fully define.

• As a Policy Manager, I need to be able to configure a data-driven processing rule that will set the minimum fee estimate to require an advance payment (e.g., $250), which is based on the fee estimate, requester's prior failure to pay history, so that the rule can be easily modified as laws, regulations, and/or Agency policies change, and the result of the change will dynamically modify the related business activity.

E.4.9 Activity: Receive Notification from Agency

NOTE: This is a recurrent activity. For a complete definition and associated user stories refer to the activity within the Conduct Request Intake process in Appendix E.1.13.

E.4.10 Activity: Request Payment Assurance

Description: The Agency may request a payment assurance (i.e., an in-writing confirmation that the Requester will pay the estimated fees) from the Requester to complete their Request. While at the judgment of the case worker, this would typically be based upon a situation where the Requester's prior payments were not timely, the Requester has an outstanding balance, the Requester is seeking a very large search and review effort, or other fee-based issue.

NOTE: Some agencies may request a payment assurance at the time the Request is submitted by the Requester. Thus, this step may not occur within this process for all agencies.

Part of Process: Estimate Fees
**E.4.11 Activity: Respond to Fee Waiver Denial**

**Description:** Accept the Agency’s adverse decision to deny a fee waiver request or administratively appeal the decision or withdraw the request.

**Part of Process:** Estimate Fees  
**Type of Activity:** Automated with human interaction  
**Actors:** Requester  
**Triggers:** The Requester or Representative receives the adverse fee waiver decision.  
**Pre-Conditions:** The adverse decision includes a reason for the decision.  
**Post-Conditions:** The Requester either accepts or rejects the adverse fee waiver decision.  
**Supporting Services:** Email Integration and Correspondence Production

**User Story:** As a Requester, I need to either accept or reject the Fee Waiver denial, so that the agency knows whether to proceed with the Request.

NOTE: If the Requester rejects the denial, they will need to initiate an appeal.

**E.4.12 Activity: Respond to Payment Assurance Request**

**Description:** The Requester provides, either through a portal or via email, a statement of assurance that they will pay the estimated fees for a given Request.

**Part of Process:** Estimate Fees  
**Type of Activity:** Automated with human interaction  
**Actors:** Requester  
**Triggers:** Requester submits a payment assurance statement.  
**Pre-Conditions:** A Request for Payment Assurance has been previously sent to the Requester.
Post-Conditions: A record of the Requester’s Payment Assurance is captured and associated with the Request.

Supporting Services: FOIA Processing “Clock” Starts and Stops (Tolling) | Email Integration and Correspondence Production

User Story: As a Requester, I need to complete and submit a written payment assurance in response to a payment assurance request from an agency, so that processing on my request can continue.

E.4.13 Activity: Review Fee Balance Due

Description: Determines whether there is a prior balance owed for any prior FOIA Requests from the same Requester.

Part of Process: Estimate Fees
Type of Activity: Automated with human interaction
Actors: Fee Specialist
Triggers: A specialist selects a Request as part of determining what fees may apply.
Pre-Conditions: A Request has been perfected and scoped, including the creation of one or more Request Items for the Request.
Post-Conditions: The amount of any prior balance owed is presented to the specialist.
Supporting Services: Standardized Data Exchange

User Story: As a Fee Specialist, I need to view the net balance owed from any prior requests from the requester, including the details of all payment requests and payments made, so that I know whether the requester poses a payment risk and thus determine whether I will request an advance payment request or payment assurance request.

E.4.14 Activity: Review Payment History

Description: Provides a summary view and full historical log of invoices and payments pertaining to a Requester; and determines whether the Requester has been delinquent in paying past debts.

Part of Process: Estimate Fees
Type of Activity: Automated with human interaction
Actors: Fee Specialist
Triggers: A fee estimate is being prepared or a case worker chooses to review a Requester’s payment history.
Pre-Conditions: Requester is defined to the system.
Post-Conditions: Case worker is informed of any late or missing payments made by the Requester.
Supporting Services: None

User Story: As a Fee Specialist, I need to view a summary and detailed set of the Requester’s prior payment transactions, including the timeliness of payments made, so that I can ascertain the possible risk of the agency not receiving full payment from the requester considering prior payments and the nature of the current request.
E.5 Process: Search for Responsive Records

User Story: As a Records Search Specialist, I need to define, assign, and oversee the completion of one or more tasks, so that the process can be completed, and activities can be tracked and analyzed.

User Story: As The System, I need to unencrypt and/or apply a password to access protected records in source recordkeeping systems, so that potentially responsive records are accessible, reviewable, and remain protected.

E.5.1 Activity: Associate Responsive Records with Request Item

Description: Link responsive records captured in the FOIA repository to specific request items managed in the FOIA system. This is typically performed as part of searching for responsive records (by a Records Search Specialist) but may also be conducted when records have been referred from Another Agency (by a Perfection Specialist).

Part of Process: Search for Responsive Records
Type of Activity: Automated with human interaction
Actors: Records Search Specialist | Recordkeeping System SME
Triggers: Responsive records have been identified and captured.
Pre-Conditions: Responsive records are captured in the FOIA Repository.
Post-Conditions: Responsive records are linked to a Request Item in the FOIA Repository.
Supporting Services: None

User Story: As a Records Search Specialist or Recordkeeping System SME, I need to associate the responsive records with a request item, so that the request item can be processed.

E.5.2 Activity: Confirm Responsiveness of Records

Description: After the search for responsive records has been completed by search specialists, the set of records are reviewed to confirm their responsiveness. This serves as a quality control check prior to conducting the review activities, which will finalize the set of records for approval, including any exemptions, exclusions, and redactions. If no responsive records are found, the review process is skipped and the response to the Requester can commence.

Part of Process: Search for Responsive Records
Type of Activity: Automated with human interaction
Actors: Request Lead
Triggers: A set of likely responsive records have been identified from searching the FOIA Repository, Agency recordkeeping systems, or both.
Pre-Conditions: A set of likely responsive records have been identified from searching the FOIA Repository, Agency recordkeeping systems, or both.
Post-Conditions: The set of likely responsive records are confirmed with a status change and thus made ready for the review process to initiate.
Supporting Services: Review and Redaction

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User Story: As a Request Lead, I need to conduct a preliminary quality review prior to the official review process of all records deemed responsive that may be coming from the FOIA Repository and/or specific recordkeeping systems, so that the review process begins with a reasonably accurate set of responsive records to the FOIA Request.

E.5.3 Activity: De-Dupe Responsive Records from Recordkeeping System Search

Description: Identifies duplicate responsive records from a search. The capability includes locating multiple documents that are largely duplicative but may not be exact copies, which would highlight the sections that are duplicative.

Part of Process: Search for Responsive Records
Type of Activity: Automated with human interaction
Actors: Recordkeeping System SME | The System
Triggers: Search results for responsive records is available.
Pre-Conditions: Search of source system for responsive records is completed.
Post-Conditions: No duplicate records exist in the search results of a source system.
Supporting Services: AI/ML/HLT-Enabled Search

User Story: As a Recordkeeping System SME, I need to identify any duplicate records from the results of searching my recordkeeping system, so that only the unique set of records is input to the larger set of responsive records to the Request.

E.5.4 Activity: De-Dupe Responsive Records in FOIA Repository

Description: Remove duplicate records from a search result set.

Part of Process: Search for Responsive Records
Type of Activity: Automated with human interaction
Actors: Records Search Specialist
Triggers: Search results free of duplicate records
Pre-Conditions: Duplicate records exist
Post-Conditions: Search results free of duplicate records
Supporting Services: AI/ML/HLT-Enabled Search

User Story: As a Records Search Specialist, I need to remove duplicate records initially captured in a search result set, so that the FOIA repository is not storing duplicate records unnecessarily.

E.5.5 Activity: Identify Potential Records for Exemption and Exclusion

Description: Determines the initial set of exemptions, exclusions, and redactions across the set of responsive records.

Part of Process: Search for Responsive Records
Type of Activity: Automated with human interaction
Actors: Exemption & Exclusion Specialist
Triggers: Responsive records have been discovered.
Pre-Conditions: None
Post-Conditions: Responsive records in FOIA repository with initial indications of exemption(s) and exclusion(s).
Supporting Services: AI/ML/HLT-Enabled Decisioning | Review and Redaction

User Stories

- As an Exemption & Exclusion Specialist, I need to identify candidate records for exemption or exclusion, so that responsive records can be properly identified for exemptions or exclusions.
- As an Exemption & Exclusion Specialist, I need to identify records that may need to be excluded from the response to a FOIA request, so that ongoing law enforcement investigations, confidential informants, and particular FBI activities are protected.
- As an Exemption & Exclusion Specialist, I need to identify records that may need to be fully or partially exempted from the response to a FOIA request, so that classified, personnel, trade secret, deliberative, privacy, law enforcement, financial institution, and geological well information are properly protected.

E.5.6 Activity: Identify Similar Requests

Description: Search for previous requests that seek similar records to quickly identify responsive records already in the FOIA repository.
Part of Process: Search for Responsive Records
Type of Activity: Automated with human interaction
Actors: Records Search Specialist
Triggers: Records Search Specialist receives a request to conduct a search for responsive records.
Pre-Conditions: None
Post-Conditions: Similar requests are or are not discovered.
Supporting Services: AI/ML/HLT-Enabled Search

User Story: As a Records Search Specialist, I need to search for FOIA Requests that like the one I am processing, so that I can use that information to identify potentially responsive records already in the FOIA repository and ensure greater consistency in the Agency’s responses.

E.5.7 Activity: Ingest Responsive Records into FOIA Repository

Description: Imports any records that do not currently exist within the FOIA Repository to ensure the set of responsive records to a Request are also held within the Repository.

NOTE: The Repository may be either a physical or “logical” records store. All responsive records would be identified to the repository, including those that are not releasable.
**Part of Process:** Search for Responsive Records  
**Type of Activity:** Automated with human interaction  
**Actors:** Recordkeeping System SME  
**Triggers:** Responsive records are identified.  
**Pre-Conditions:** Records are ready to ingest.  
**Post-Conditions:** Responsive records are captured in the FOIA Repository  
**Supporting Services:** None

**User Story:**  
As a Recordkeeping System SME, I need to capture all responsive records into the FOIA Repository, so that responsive records can be reviewed and associated with a case.

### E.5.8 Activity: Memorialize System Search Actions and Criteria

**Description:** Ensure that the search conducted in a recordkeeping system for discovering the records that are responsive to a request is saved so it can be subsequently retrieved.

**Part of Process:** Search for Responsive Records  
**Type of Activity:** Automated with human interaction  
**Actors:** Records Search Specialist  
**Triggers:** Search has been saved from recordkeeping system.  
**Pre-Conditions:** None  
**Post-Conditions:** Search is captured and associated with case.  
**Supporting Services:** None

**User Story:**  
As a Records Search Specialist, I need to associate saved searches with responsive records captured in the FOIA repository, so that the search logic used to find responsive records can be provided as needed for administrative appeals or litigation activities.

### E.5.9 Activity: Save Search

**Description:** Ensure that the search conducted for discovering the records that are responsive to a request is saved so it can be subsequently retrieved.

**Part of Process:** Search for Responsive Records  
**Type of Activity:** Automated with human interaction  
**Actors:** Recordkeeping System SME | Records Search Specialist  
**Triggers:** Search has been conducted.  
**Pre-Conditions:** None  
**Post-Conditions:** Saved search.  
**Supporting Services:** None

**User Story:**  
As a Recordkeeping System SME or Records Search Specialist, I need to document the query for database searches within FOIA Request, so that there is an audit trail of the logic used to identify responsive records.
E.5.10 Activity: Search FOIA Repository for Potentially Responsive Records

Description: Identify records already in the FOIA Repository that are responsive to the request.

Part of Process: Search for Responsive Records
Type of Activity: Automated with human interaction
Actors: Records Search Specialist
Triggers: Search request received.
Pre-Conditions: Have search parameters
Post-Conditions: Responsive records in FOIA repository found or not found.
Supporting Services: AI/ML/HLT-Enabled Search

User Story: As a Records Search Specialist, I need to determine if records responsive to a request are already in the FOIA Repository, so that I can find records responsive to a request as quickly as possible and with optimal reuse of previous searches.

E.5.11 Activity: Search Sources to Identify Potentially Responsive Records

Description: Execute searches in recordkeeping systems that have been identified as likely having responsive records.

Part of Process: Search for Responsive Records
Type of Activity: Automated with human interaction
Actors: Recordkeeping System SME
Triggers: Search request received.
Pre-Conditions: Have search parameters
Post-Conditions: Search results
Supporting Services: AI/ML/HLT-Enabled Search

User Story: As a Recordkeeping System SME, I need to access, crawl, and index external data source records, so that the system can locate the responsive records.

E.6 Process: Review Responsive Records

User Stories

- As a Policy Manager, I need to be able to configure a data-driven processing rule that will set the number of years after which deliberative process (exemption 5) no longer applies (e.g., 25 years), which is based on the age of record(s), so that the rule can be easily modified as laws, regulations, and/or Agency policies change, and the result of the change will dynamically modify the related business activity.
• As a Records Reviewer, I need to define, assign, and oversee the completion of one or more tasks, so that the process can be completed, and activities can be tracked and analyzed.

• As a Records Reviewer, I need to determine what records are releasable, so that records or content containing sensitive information per the FOIA, and DOJ guidance are appropriately withheld from release to a Requester.

E.6.1 Activity: Approve or Deny Records and Metadata for Full Release

Description: Accept proposed full release of records or disagree with the proposed release.

Part of Process: Review Responsive Records
Type of Activity: Automated with human interaction
Actors: Authorized Official for Records Release
Triggers: Completion of the records review.
Pre-Conditions: Records have been reviewed and statused for release and/or denial for a specific Request.
Post-Conditions: Updates the status of releasable records, which may trigger re-executing the review process to identify the records to be released and/or exempted.
Supporting Services: Review and Redaction

User Story: As an Authorized Official for Records Release, I need to approve and or deny (reverse) draft determinations of full release of records, so that the Agency releases only appropriate records and record content to requesters.

E.6.2 Activity: Approve or Deny Records and Metadata for Partial Release with Redactions

Description: Accept proposed partial release (redactions) or disagree with the proposed partial release.

Part of Process: Review Responsive Records
Type of Activity: Automated with human interaction
Actors: Authorized Official for Records Release
Triggers: Completion of the records review.
Pre-Conditions: Records have been reviewed and statused for release and/or denial for a specific Request.
Post-Conditions: Updates the status of releasable records, which may trigger re-executing the review process to identify the records to be redacted or not redacted.
Supporting Services: Review and Redaction

User Story: As an Authorized Official for Records Release, I need to approve or deny (reverse) draft exemptions, exclusions, and redactions, so that responsive documents are appropriately redacted, and redactions can be finalized.
E.6.3 **Activity: Determine Releasable Records from Commercial “Submitters”**

*Description*: Determine if responsive records were provided to the agency by a commercial Submitter and potentially exempt from release under exemption b(4).

*Part of Process*: Review Responsive Records

*Type of Activity*: Automated with human interaction

*Actors*: Policy Manager | Records Reviewer

*Triggers*: Records review is started.

*Pre-Conditions*: An initial search for responsive records has been completed.

*Post-Conditions*: A determination is made whether to withhold certain responsive records provided by commercial Submitters from the response to the Requester.

*Supporting Services*: Review and Redaction

*User Stories*

- As a Policy Manager, I need to be able to configure a data-driven processing rule that will set the number of years designated confidential commercial information (CCI) from a submitter is protected (unless extended based on submitter justification) (e.g., 10 years), which is based on the date original content was submitted, so that the rule can be easily modified as laws, regulations, and/or Agency policies change, and the result of the change will dynamically modify the related business activity.

  NOTE: Some agencies might choose not to designate an expiration period for CCI.

- As a Records Reviewer, I need to accurately designate records containing confidential commercial information (CCI) with a (b)4 exemption involving the interest of a submitter, so that only appropriate records can be released to the Requester.

E.6.4 **Activity: Flag Responsive Records for Potential Proactive Disclosure**

*Description*: As part of reviewing and confirming the responsive records, the Records Review Specialist will flag (update a data attribute) in each record that should be considered for proactive disclosure. One of the important inputs would be the set of topics that were tagged to the Request, especially if some topics are designated by the Agency as either targets or candidates for proactive disclosure. This annotation is separate from tagging records that meet a multiple release rule (e.g., "rule of 3"), which is handled by a separate activity and may be fully automated.

*Part of Process*: Review Responsive Records

*Type of Activity*: Automated with human interaction

*Actors*: Records Reviewer

*Triggers*: The Reviewer begins an action to review records after the search activity has been completed.
Pre-Conditions: Search results for responsive records has been associated with a Request Item.

Post-Conditions: One or more responsive records may be tagged as a candidate for proactive disclosure. This output feeds a subsequent action at the end of the Review process to specifically review those records within the Manage Records for Proactive Disclosure process.

Supporting Services: None

User Story: As a Records Reviewer, I need to update individual responsive records to a FOIA Request with an indication that some or all records being reviewed may be a candidate for proactive disclosure and leverage the assigned FOIA Topic(s) as an aid to inform this decision, so that proactive disclosure is considered as new FOIA Requests are scoped, and before potentially less efficient responses are provided.

E.6.5 Activity: Mark Draft Redactions to Records and Sensitive Metadata

Description: Application of draft redactions that can be unmasked so others can review the proposed redaction. Draft redactions include a reference to the applicable exception.

Part of Process: Review Responsive Records
Type of Activity: Automated with human interaction
Actors: Records Reviewer
Triggers: Records Reviewer has identified potential exemptions that constitute a partial release of responsive records.
Pre-Conditions: Responsive records are available for review.
Post-Conditions: Draft redactions are applied to responsive records and/or sensitive metadata.
Supporting Services: Review and Redaction | AI/ML/HLT-Enabled Decisioning

User Stories

- As a Records Reviewer, I need to redact portions of video content, so that all types of content can be properly withheld when FOIA exemptions apply.

- As a Records Reviewer, I need to redact portions of records, so that content in responsive records can be properly withheld when FOIA exemptions apply.

E.6.6 Activity: Move to File Injunction Against Release

Description: External to the FOIA Business System, the Submitter may to file an injunction with the courts to stop the release of records until the decision has been adjudicated.

Part of Process: Review Responsive Records
Type of Activity: External to the system (no user stories in scope)
Actors: Submitter
E.6.7  **Activity: Notify Agency of Release Acceptance**

*Description:* External to the FOIA Business System, the Submitter may decide to notify the Agency that the Submitter accepts the proposed records for release.

*Part of Process:* Review Responsive Records

*Type of Activity:* External to the system (no user stories in scope)

*Actors:* Submitter

E.6.8  **Activity: Notify Agency to Reconsider Release**

*Description:* External to the FOIA Business System, the Submitter may decide to notify the Agency to reconsider the release as it is their view the records would be confidential and thus subject to Exemption b(4).

*Part of Process:* Review Responsive Records

*Type of Activity:* External to the system (no user stories in scope)

*Actors:* Submitter

E.6.9  **Activity: Notify Requester of Intent to Release Submitter’s Records**

*Description:* Once the Agency has determined which Submitter records to release (considering their position and then deciding), the Agency will inform the Requester about the decision to release Submitter records.

NOTE: Some agencies may hold this notification until a response is sent to the Requester (within the Respond to Request process).

*Part of Process:* Review Responsive Records

*Type of Activity:* Automated with human interaction

*Actors:* Request Lead

*Triggers:* The Agency has decided about the releasability of the Submitter's records after reviewing them and taking the Submitter's input into account.

*Pre-Conditions:* A decision has been made as to the release of Submitter's records.

*Post-Conditions:* A message about releasing Submitter records is sent to the Requester.

*Supporting Services:* Email Integration and Correspondence Production

*User Story:* As a Request Lead, I need to inform the Requester that the Submitter of records containing confidential commercial information (CCI) within the scope of their Request has been contacted to inform them that records will be released, so that the Requester is kept apprised of the status of their Request, including any possible delays in releasing certain records.

E.6.10  **Activity: Notify Requester of Potential Release Notification to Submitter**

*Description:* Notify Requester that responsive records may be withheld due to a b(4) exemption and a submitter's objection.

NOTE: Some agencies may hold this notification until a response is sent to the Requester (within the Respond to Request process).

*Part of Process:* Review Responsive Records
Type of Activity: Automated with human interaction
Actors: Request Lead
Triggers: Request Lead receives response from Submitter and makes b(4) exemption determination.
Pre-Conditions: Request Lead determines that Submitter's content/records are exempt from disclosure.
Post-Conditions: Requester has received notification.
Supporting Services: Email Integration and Correspondence Production

User Story: As a Request Lead, I need to inform the Requester that there are records with confidential commercial information (CCI) in the scope of their Request and that the Submitter of those records has been contacted to obtain their position prior to their release, so that the Requester is kept apprised of the status of their Request, including any possible delays in releasing certain records.

E.6.11 Activity: Notify Requester of Submitter’s Injunction Against Release of Records

Description: If the Submitter files an injunction with the Courts, the Agency will notify the Requester of this action and its possible delay in releasing the records in dispute.

Part of Process: Review Responsive Records
Type of Activity: Automated with human interaction
Actors: Request Lead
Triggers: The Agency learns that an injunction has been filed by the Submitter to temporarily hold the release of records until the dispute has been settled in or out of court.
Pre-Conditions: The Submitter filed an injunction with the courts within the required timeframe from receiving the Agency’s proposed release of records, e.g., within 10 days.
Post-Conditions: A message is sent to the Requester informing them of the delay in the release of the commercial Submitter’s records while the court case is pending.
Supporting Services: Email Integration and Correspondence Production

User Story: As a Request Lead, I need to inform the Requester that a commercial Submitter has filed a lawsuit (injunction) against the Agency to stop the release of records containing confidential commercial information (CCI), so that the Requester is kept apprised of the status of their Request, including any possible delays in releasing certain records.

E.6.12 Activity: Notify Submitter of Intent to Release Responsive Records

Description: Notify Submitter of the intent to release records that the agency has discussed with the Submitter but ultimately determined that the records are not covered by exemption b(4).

Part of Process: Review Responsive Records
E.6.13 Activity: Notify Submitter of Potential Release of Responsive Records

Description: Reach out to Submitters and notify them that records they provided to the agency are responsive to a request. These notifications may take a prescribed form, such as a substantiation letter.

Part of Process: Review Responsive Records
Type of Activity: Automated with human interaction
Actors: Request Lead
Triggers: Submitter content identified in responsive records.
Pre-Conditions: None
Post-Conditions: Submitter has received notification.
Supporting Services: Email Integration and Correspondence Production

User Stories

- As a Request Lead, I need to identify and obtain the contact information for the commercial Submitter, so that I can notify them of the potential release of responsive records for which they may have an exemption b(4) concern.

- As a Request Lead, I need to notify Submitters of potential release of responsive records containing confidential commercial information (CCI), so that the agency provides the Submitter the opportunity make a commercial interest, (b)4, claim over a portion or all the responsive records.

E.6.14 Activity: Receive Notification from Agency

NOTE: This is a recurrent activity. For a complete definition and associated user stories refer to the activity within the Conduct Request Intake process in Appendix E.1.13.
E.6.15 Activity: Receive Submitter’s Response to Potential Release

Description: Receives and updates information about the Submitter’s review of the Agency’s potential release of the Submitter’s commercial records. Typically, the response may include an acceptance of release, a request to reconsider the release with justification information, or an intent to file an injunction. Note that the last option may not come through directly from the Submitter, but rather may be a notification from the US Courts.

Part of Process: Review Responsive Records
Type of Activity: Automated with human interaction
Actors: Request Lead
Triggers: A message is received from the Submitter regarding the Agency’s potential release of records.
Pre-Conditions: The Submitter has received a notice of the Agency’s potential release of records.
Post-Conditions: The agency receives information from the Submitter as to the results of their review of the Agency’s potential release of records.
Supporting Services: Email Integration and Correspondence Production

User Story: As a Request Lead, I need to record the official view from the Submitter on their position related to the release of records containing confidential commercial information (CCI) related to a FOIA Request, so that the Agency can take appropriate action on those records, to include either holding them from release (and therefore acknowledging a b(4) exemption), releasing them (and therefore disagreeing with a b(4) exemption, or pursuing further discussion with the Submitter.

E.6.16 Activity: Review Agency Potential Release of Submitter’s Records

Description: External to the FOIA Business System, the Submitter will review the Agency’s potential release of the Submitter’s records.

Part of Process: Review Responsive Records
Type of Activity: External to the system (no user stories in scope)
Actors: Submitter

E.6.17 Activity: Review Records for Full/Partial Release or Denial

Description: Examine records for the presence of content that is exempt from release, prompting a full or partial denial.

Part of Process: Review Responsive Records
Type of Activity: Automated with human interaction
Actors: Records Reviewer
Triggers: Responsive records are collected in FOIA system and are ready for review.
Pre-Conditions: Responsive records are available for review.
Post-Conditions: Initial determination of full release, partial release, or full denial of responsive records is made.
Supporting Services: Review and Redaction | AI/ML/HLT-Enabled Decisioning
User Story: As a Records Reviewer, I need to review records for Full/Partial Release or Denial, so that an initial determination is made on the releasability of responsive records.

E.6.18 Activity: Review Records for Responsiveness

Description: The specialist will review the set of records from the search results to verify they are responsive to the Request. This is a precursor step to determining whether any exemptions or exclusions may need to be applied.

Part of Process: Review Responsive Records
Type of Activity: Automated with human interaction
Actors: Records Reviewer
Triggers: The Reviewer begins an action to review records after the search activity has been completed.
Pre-Conditions: Search results for responsive records has been associated with a Request Item.
Post-Conditions: Responsive records have been confirmed by the specialist.
Supporting Services: Review and Redaction

User Story: As a Records Reviewer, I need to confirm the responsiveness of the set of records emanating from the search process, so that the records produced from the Search are appropriate for the Request and complete (i.e., all valid recordkeeping systems have been included).

E.7 Process: Create Referral, Coordination or Consultation

User Stories

- As a Request Item Lead, I need the ability to log and track status, and retain relevant records, for outgoing consultations and coordinations, so that an audit trail is maintained for all actions and communications taken on a request and information is available to support ongoing interactions with other involved agencies.

- As a Request Item Lead, I need to capture one or more responses from another agency pertaining to my request for coordination or consultation, so that a record of the other agency’s position on the equity and releasability of records pertaining to that agency is documented.

E.7.1 Activity: Add Point of Contact (POC)

NOTE: This is a recurrent activity. For a complete definition and associated user stories refer to the activity within the Perform Supplemental Case Activities process in Appendix E.13.1.

E.7.2 Activity: Attach Responsive Records to Consultation Inquiry

Description: As applicable, attaches any responsive records that are the subject of the consultation request.
**Part of Process:** Create Referral, Coordination or Consultation  
**Type of Activity:** Automated with human interaction  
**Actors:** Request Lead  
**Triggers:** A Consultation with Another Agency has been initiated (drafted) but not yet sent to the consulted agency.  
**Pre-Conditions:** A Consultation Inquiry to Another Agency has been created.  
**Post-Conditions:** Responsive records are attached to the Consultation Inquiry, as applicable.  
**Supporting Services:** None  

**User Story:** As a Request Lead, I need to optionally attach the set of responsive records to the Consultation Inquiry that are the subject of the Consultation to the Other Agency, so that the Other Agency can properly review those records as part of their FOIA processing.

### E.7.3 Activity: Attach Responsive Records to Coordination Inquiry

**Description:** As applicable, attaches any responsive records that are the subject of the coordination request.  
**Part of Process:** Create Referral, Coordination or Consultation  
**Type of Activity:** Automated with human interaction  
**Actors:** Request Lead  
**Triggers:** A Coordination of records to Another Agency has been initiated (drafted) but not yet sent to the coordinating agency.  
**Pre-Conditions:** A Coordination Inquiry to Another Agency has been created.  
**Post-Conditions:** Responsive records are attached to the Coordination Inquiry, as applicable.  
**Supporting Services:** None  

**User Story:** As a Request Lead, I need to optionally attach the set of responsive records to the Coordination Inquiry that are the subject of the Coordination to the Other Agency, so that the Other Agency can properly review those records as part of their FOIA processing.

### E.7.4 Activity: Attach Responsive Records to Referral Package

**Description:** Adds the responsive records for referral to the referral package.  
**Part of Process:** Create Referral, Coordination or Consultation  
**Type of Activity:** Automated with human interaction  
**Actors:** Request Lead  
**Triggers:** A referral of records to Another Agency has been initiated (drafted) but not yet sent to the Referred To agency.  
**Pre-Conditions:** A Referral package has been created.  
**Post-Conditions:** Responsive records are attached to the Referral package.  
**Supporting Services:** None  

**User Story:** As a Request Lead, I need to attach the set of responsive records to the Referral package that are the subject of the referral to the Other Agency, so that the Other Agency can properly review those records as part of their FOIA processing.
E.7.5 Activity: Close Case

NOTE: This is a recurrent activity. For a complete definition and associated user stories refer to the activity within the Perform Supplemental Case Activities process in Appendix E.13.6.

E.7.6 Activity: Determine Action with Another Agency Having Equity Interest in Responsive Records

Description: If responsive records are identified that another Agency has equity in, a decision will be made as to whether those records should be referred to the other Agency or whether a coordination or consultation request to the other Agency is needed.

Part of Process: Create Referral, Coordination or Consultation
Type of Activity: Automated with human interaction
Actors: Request Lead
Triggers: A decision is made to work with Another Agency regarding the appropriate release of responsive records held within the Agency.
Pre-Conditions: Responsive records have been confirmed for a FOIA Request.
Post-Conditions: The appropriate action, including a Referral, Coordination, or Consultation, is selected as an inter-agency action.
Supporting Services: None

User Story: As a Request Lead, I need to decide the appropriate inter-agency action to take, including a Referral, Coordination or Consultation, depending on the nature of the responsive records found, so that the correct mechanism is used to interact with the Other Agency.

E.7.7 Activity: Initiate Consultation with Another Agency

Description: Creates the initial consultation inquiry record, including information about the inquired Agency, the date, context for the consultation, and other administrative information.

Part of Process: Create Referral, Coordination or Consultation
Type of Activity: Automated with human interaction
Actors: Request Lead
Triggers: The type of inter-Agency action has been determined to be a Consultation.
Pre-Conditions: An action determination has been made to Consult with Another Agency as part of the Review process.
Post-Conditions: A new Consultation action is started.
Supporting Services: None

User Story: As a Request Lead, I need to prepare a draft Consultation action to Another Agency, so that the information about the action can be updated, statused, and documented to provide an audit trail of all aspects of the Consultation.
E.7.8 Activity: Initiate Coordination Inquiry with Another Agency

Description: Creates the initial coordination inquiry record, including information about the inquired Agency, the date, context for the coordination, and other administrative information.

Part of Process: Create Referral, Coordination or Consultation
Type of Activity: Automated with human interaction
Actors: Request Lead
Triggers: The type of inter-Agency action has been determined to be a Coordination.
Pre-Conditions: An action determination has been made to coordinate with Another Agency as part of the Review process.
Post-Conditions: A new Coordination action is started.
Supporting Services: None

User Story: As a Request Lead, I need to prepare a draft Coordination action to Another Agency, so that the information about the action can be updated, statused, and documented to provide an audit trail of all aspects of the Coordination.

E.7.9 Activity: Initiate Referral to Another Agency

Description: Creates the initial referral record, including information about the referral to the Other Agency, the date, context for the referral and other administrative information.

Part of Process: Create Referral, Coordination or Consultation
Type of Activity: Automated with human interaction
Actors: Request Lead
Triggers: The type of inter-Agency action has been determined to be a Referral.
Pre-Conditions: An action determination has been made to make a Referral of records as part of the Review process.
Post-Conditions: A new Referral is started.
Supporting Services: None

User Story: As a Request Lead, I need to prepare a draft Referral action to Another Agency, so that the information about the action can be updated, statused, and documented to provide an audit trail of all aspects of the Referral.

E.7.10 Activity: Maintain Copy of Referred Records and Inter-Agency Communications

Description: Captures the entire referral package, including the responsive records in the referral.

Part of Process: Create Referral, Coordination or Consultation
Type of Activity: Automated with human interaction
Actors: Request Lead
Triggers: A Referral package is sent to the “Referred to” Agency.
Pre-Conditions: A Referral package is prepared, including attaching the Responsive records to the package.
Post-Conditions: The Referral package is captured and saved for recordkeeping and audit trail purposes.
Supporting Services: None

User Story: As a Request Lead, I need to store a copy of the Referral action once it's been accepted by the Other Agency, so that an audit trail of all aspects of the Referral can be maintained and subsequently referred to, should there ever be a question about what was referred.

E.7.11 Activity: Notify Requester of Referral to Another Agency

Description: Informs the Requester that some or all responsive records have been referred to Another Agency.
Part of Process: Create Referral, Coordination or Consultation
Type of Activity: Automated with human interaction
Actors: Request Lead
Triggers: The request has been referred to another agency.
Pre-Conditions: A perfected request was created in the FOIA system.
Post-Conditions: The Requester is notified of the referral.
Supporting Services: Email Integration and Correspondence Production

User Story: As a Request Lead, I need to notify requester of their request being referred to another agency, so that the requester knows what agency is now handling their request.

E.7.12 Activity: Prepare Consultation Inquiry

Description: Completes the documentation of the consultation inquiry so it is ready to be sent to the consulting Agency.
Part of Process: Create Referral, Coordination or Consultation
Type of Activity: Automated with human interaction
Actors: Request Lead
Triggers: A Consultation with Another Agency has been initiated (drafted) but not yet sent to the consulted agency.
Pre-Conditions: A Consultation Inquiry to Another Agency has been initiated.
Post-Conditions: The Consultation Inquiry is prepared.
Supporting Services: None

User Story: As a Request Lead, I need to collect all pertinent information pertaining to an inter-agency Consultation, including the contextual information about the nature of the Consultation, etc., so that the Consultation Inquiry is readied to be sent to the Other Agency.

E.7.13 Activity: Prepare Coordination Inquiry

Description: Completes the documentation of the coordination inquiry so it is ready to be sent to the coordinating Agency.
Part of Process: Create Referral, Coordination or Consultation
Type of Activity: Automated with human interaction
Actors: Request Lead

Triggers: A Coordination with Another Agency has been initiated (drafted) but not yet sent to the coordinating agency.

Pre-Conditions: A Coordination Inquiry to Another Agency has been initiated.

Post-Conditions: The Coordination Inquiry is prepared.

Supporting Services: None

User Story: As a Request Lead, I need to collect all pertinent information pertaining to an inter-agency Coordination, including the contextual information about the nature of the Coordination, etc., so that the Coordination Inquiry is readied to be sent to the Other Agency.

E.7.14 Activity: Prepare Disclosure Recommendations

Description: As part of preparing a referral of records to Another Agency, the referring Agency may provide its own perspective on records disclosure. This is not a required activity and depends on the nature of the Referral.

Part of Process: Create Referral, Coordination or Consultation

Type of Activity: Automated with human interaction

Actors: Request Lead

Triggers: A referral of records to Another Agency has been initiated (drafted) but not yet sent to the Referred To agency.

Pre-Conditions: The initial (draft) Referral package is assembled.

Post-Conditions: Disclosure recommendations are documented as part of the Referral record.

Supporting Services: None

User Story: As a Request Lead, I need to optionally document recommendations regarding the disclosure of records being referred to Another Agency, as appropriate, so that the Other Agency can benefit from reviewing disclosure recommendations.

E.7.15 Activity: Prepare Referral Package

Description: Assembles the referral package, including the background and intent of the referral, disclosure recommendations (as applicable), etc.

Part of Process: Create Referral, Coordination or Consultation

Type of Activity: Automated with human interaction

Actors: Request Lead

Triggers: A referral of records to Another Agency has been initiated (drafted) but not yet sent to the Referred To agency.

Pre-Conditions: A Referral to Another Agency has been initiated.

Post-Conditions: The initial (draft) Referral package is assembled.

Supporting Services: None

User Story: As a Request Lead, I need to collect all pertinent information pertaining to an inter-agency referral, including the contextual information about the nature of the referral, any disclosure recommendations (if applicable), etc., so that the referral package is readied to be sent to the Other Agency.
E.7.16 Activity: Receive Confirmation of Inter-Agency Referral Receipt

**Description:** Receives a record of confirmation from the referred to Agency.

**Part of Process:** Create Referral, Coordination or Consultation

**Type of Activity:** Automated with human interaction

**Actors:** Request Lead

**Triggers:** Another Agency sends confirmation that it has received an inter-agency Referral.

**Pre-Conditions:** A Referral action is sent to Another Agency or Component.

**Post-Conditions:** A confirmation of referral receipt is recorded.

**Supporting Services:** Standardized Data Exchange | Email Integration and Correspondence Production

**User Story:** As a Request Lead, I need to capture the Other Agency’s acknowledgement of its receipt and acceptance of responsive records referred to them, so that the Agency can close the referral from requiring further action by the Agency.

E.7.17 Activity: Receive Consultation Response from Another Agency

**Description:** Receives the releasability response from the consulted Agency. Note the response may lead the initiating Agency to subsequently make a referral to Another Agency, including the consulted Agency.

**Part of Process:** Create Referral, Coordination or Consultation

**Type of Activity:** Automated with human interaction

**Actors:** Request Lead

**Triggers:** Another Agency sends their response to a Consultation Inquiry. Note that this may take the form of a phone or email conversation.

**Pre-Conditions:** A Consultation Inquiry is sent to Another Agency.

**Post-Conditions:** The Other Agency’s response to the Consultation is documented as part updating the Inquiry. This may take the form of uploading an electronic response and/or the Agency capturing the response manually, such as the result of a phone or email conversation.

**Supporting Services:** Standardized Data Exchange | Email Integration and Correspondence Production

**User Stories**

- As a Request Lead, I need to be able to document Another Agency’s response to a Coordination Inquiry through a user interface, so that if no standardized data exchange is available between the two Agencies, the case worker can capture the Other Agency's response and associate it with the Consultation Inquiry.

- As a Request Lead, I need to receive and capture Another Agency’s response to a Consultation Inquiry through a standardized data exchange, so that a Consultation Inquiry Response from Another Agency can be
loaded into the Agency’s system as efficiently as possible and with minimal risk of error.

**E.7.18 Activity: Receive Coordination Response from Another Agency**

**Description:** Receives the releasability response from the coordinating Agency. Note the response may lead the initiating Agency to subsequently make a referral to Another Agency, including the coordinating Agency.

**Part of Process:** Create Referral, Coordination or Consultation

**Type of Activity:** Automated with human interaction

**Actors:** Request Lead

**Triggers:** Another Agency sends their response to a Coordination Inquiry. Note that this may take the form of a phone or email conversation.

**Pre-Conditions:** A coordination Inquiry is sent to Another Agency.

**Post-Conditions:** The Other Agency’s response to the Coordination is documented as part updating the Inquiry. This may take the form of uploading an electronic response and/or the Agency capturing the response manually, such as the result of a phone or email conversation.

**Supporting Services:** Standardized Data Exchange | Email Integration and Correspondence Production

**User Stories**

- As a Request Lead, I need to be able to document Another Agency’s response to a Coordination Inquiry through a user interface, so that if no standardized data exchange is available between the two Agencies, the case worker can capture the Other Agency’s response and associate it with the Coordination Inquiry.

- As a Request Lead, I need to receive and capture Another Agency’s response to a Coordination Inquiry through a standardized data exchange, so that a Coordination Inquiry Response from Another Agency can be loaded into the Agency’s system as efficiently as possible and with minimal risk of error.

**E.7.19 Activity: Receive Notification from Agency**

**NOTE:** This is a recurrent activity. For a complete definition and associated user stories refer to the activity within the Conduct Request Intake process in Appendix E.1.13.

**E.7.20 Activity: Send Consultation Inquiry to Another Agency**

**Description:** Sends the consultation inquiry package to Another agency so they can support the consultation request.

**Part of Process:** Create Referral, Coordination or Consultation

**Type of Activity:** Automated with human interaction

**Actors:** Request Lead
**Triggers:** The Agency determines the Consultation Inquiry is complete and ready for review by Another Agency.

**Pre-Conditions:** A Consultation Inquiry is prepared, including attaching the Responsive records to the package, as applicable.

**Post-Conditions:** A Consultation Inquiry is sent to Another Agency.

**Supporting Services:** Standardized Data Exchange | Email Integration and Correspondence Production

**User Story:** As a Request Lead, I need to create and send a Consultation Inquiry to another agency using an automated data exchange, so that a Consultation Inquiry that is sent to another agency can be loaded into their system as efficiently as possible and with minimal risk of error.

**E.7.21 Activity: Send Coordination Inquiry to Another Agency**

**Description:** Sends the coordination inquiry package to Another agency so they can support the coordination request.

**Part of Process:** Create Referral, Coordination or Consultation

**Type of Activity:** Automated with human interaction

**Actors:** Request Lead

**Triggers:** The Agency determines the Coordination Inquiry is complete and ready for review by Another Agency.

**Pre-Conditions:** A Coordination Inquiry is prepared, including attaching the Responsive records to the package, as applicable.

**Post-Conditions:** A coordination Inquiry is sent to Another Agency.

**Supporting Services:** Standardized Data Exchange | Email Integration and Correspondence Production

**User Story:** As a Request Lead, I need to create and send a Coordination Inquiry to another agency using an automated data exchange, so that a Coordination Inquiry that is sent to another agency can be loaded into their system as efficiently as possible and with minimal risk of error.

**E.7.22 Activity: Send Referral Package to Another Agency**

**Description:** Sends the referral package to the referred Agency.

**Part of Process:** Create Referral, Coordination or Consultation

**Type of Activity:** Automated with human interaction

**Actors:** Request Lead

**Triggers:** The Agency determines the Referral Package is complete and ready for review by Another Agency.

**Pre-Conditions:** A Referral package is prepared, including attaching the Responsive records to the package.

**Post-Conditions:** A Referral package is sent to the “Referred to” Agency.

**Supporting Services:** Standardized Data Exchange | Email Integration and Correspondence Production
**User Stories**

- As a Request Lead, I need to create and send a request referral to another agency using an automated data exchange, so that a request that is referred to another agency can be loaded into their system as efficiently as possible and with minimal risk of error.

- As a Request Lead, I need to create and send request referral to another agency using a manual method, such as via a government email containing the pertinent set of request data, so that a request can be referred to another agency, which does not currently possess the ability to accept a structured electronic record for a referral.

- As a Request Lead, I need to track the status of referrals made to another agency, such as their acknowledgement of receipt and acceptance of the requests, so that the process can be proactively managed in the most efficient manner possible.

**E.8 Process: Request Payment**

**User Story:** As a Fee Specialist, I need to determine appropriate fees, prepare a request for payment (i.e., an invoice) to the Requester, and send a request for payment prior to the release of records in those cases where a pre- or advance payment is required, so that fees are determined according to permissible statute and regulation.

**E.8.1 Activity: Accrue Interest on Fees Owed**

**Description:** Creates interest due transactions and associates them with a Requester’s account. Note that this activity is external to the FOIA system.

**Part of Process:** Request Payment

**Type of Activity:** External to the system (no user stories in scope)

**Actors:** Accounts Receivable System

**E.8.2 Activity: Apply FOIA Transaction to A/R**

**Description:** A payment or accounts receivable (A/R) system applies an invoice transaction to the Requester’s account. Note that this activity is external to the FOIA system.

**Part of Process:** Request Payment

**Type of Activity:** External to the system (no user stories in scope)

**Actors:** Accounts Receivable System

**E.8.3 Activity: Determine Billable and Unbillable Costs**

**Description:** Review and complete fee and billing items and pull them together in an invoice.

**Part of Process:** Request Payment

**Type of Activity:** Automated with human interaction
Actors: Fee Specialist | Policy Manager

Triggers: Records review and release approval is completed.

Pre-Conditions: Preliminary invoice is available.

Post-Conditions: Finalize costs determined.

Supporting Services: None

User Stories

- As a Fee Specialist, I need to determine which costs can be billed to the requester and which costs cannot be billed to the requester, so that the processing fees can be finalized.

- As a Policy Manager, I need to be able to configure a data-driven processing rule that will set the number of hours of search time that are free for non-commercial requesters (e.g., 2 hours), which is based on the requester type, fee category (search, review, duplication, etc.) (this may be best handled as part of the fee tables themselves), so that the rule can be easily modified as laws, regulations, and/or Agency policies change, and the result of the change will dynamically modify the related business activity.

- As a Policy Manager, I need to be able to configure a data-driven processing rule that will set the number of pages that are free duplication (e.g., 100 pages), which is based on the number of pages, so that the rule can be easily modified as laws, regulations, and/or Agency policies change, and the result of the change will dynamically modify the related business activity.

- As a Policy Manager, I need to be able to configure a data-driven processing rule that will set the page number threshold to charge search fees to non-commercial requesters (e.g., 5,000 or more pages to review), so that the rule can be easily modified as laws, regulations, and/or Agency policies change, and the result of the change will dynamically modify the related business activity.

- As a Policy Manager, I need to be able to configure a data-driven processing rule that will set the fees to be charged, which is based on the fee category / requester type, processing time, number of pages to review, number of pages duplicated for response, minimum billable threshold (separate rule), failure to respond in time required (separate rule), so that the rule can be easily modified as laws, regulations, and/or Agency policies change, and the result of the change will dynamically modify the related business activity.

- As a Policy Manager, I need to be able to configure a data-driven processing rule that will set the price to charge per page of duplication (e.g., $0.10/page), which is based on the agency policy, so that the rule can be easily modified as laws, regulations, and/or Agency policies...
change, and the result of the change will dynamically modify the related business activity.

- As a Policy Manager, I need to be able to configure a data-driven processing rule that will set the rate to charge for each hour of work, which is based on the category of the staff performing the work, so that the rule can be easily modified as laws, regulations, and/or Agency policies change, and the result of the change will dynamically modify the related business activity.

### E.8.4 Activity: Finalize Processing Fees

**Description:** Produces a final set of charges on a payment request. Some items on an invoice may not be billable to the Requester, such as items that total less than $25.

**Part of Process:** Request Payment

**Type of Activity:** Automated with human interaction

**Actors:** Fee Specialist

**Triggers:** Records review and release approval is completed.

**Pre-Conditions:** Invoice is prepared

**Post-Conditions:** Finalized fees and invoice.

**Supporting Services:** None

**User Story:** As a Fee Specialist, I need to finalize processing fees, so that the Fee Specialist can complete the payment request.

### E.8.5 Activity: Prepare Payment Request

**Description:** Uses the “draft” fee estimates and updates them and their status to form an official invoice. 

NOTE: Invoices are only pertinent for certain types/sizes of requests and/or only for certain types of Requesters.

**Part of Process:** Request Payment

**Type of Activity:** Automated with human interaction

**Actors:** Fee Specialist

**Triggers:** The case worker determines the need to prepare an invoice, such as having an open Task to complete the invoice.

**Pre-Conditions:** Estimated fees have been prepared for the Request.

**Post-Conditions:** The status of a draft invoice with estimated fees is updated to reflect an active invoice. Invoice entries would need to be created for all Request Items associated in the Request.

**Supporting Services:** None

**User Story**

- As a Fee Specialist, I need to change the status of a payment request to final based on a review of the payment request and its items, so that a final payment request is based on an appropriate review of the items to be charged.
• As a Fee Specialist, I need to create or modify a payment request with new, updated, or removed payment request items, so that the final payment request is accurate, based on the identified and applicable fee amounts.

• As a Fee Specialist, I need to finalize the set of fees, so that a final payment request can be constructed from the applicable fee amounts.

E.8.6 Activity: Provide Current FOIA Fee Balance

Description: A payment or accounts receivable (A/R) system will calculate the sum of all prior fees owed that have not yet been paid and send that information to the FOIA Business System.

Part of Process: Request Payment
Type of Activity: External to the system (no user stories in scope)
Actors: Accounts Receivable System

E.8.7 Activity: Receive Payment Request

Description: If a pre-payment or advance payment was required, the Requester will receive a notification of the fees that are due prior to the completion of their Request.
NOTE: If the Requester is not a registered user with the Agency’s FOIA system, the receipt will take the form of an email notification.

Part of Process: Request Payment
Type of Activity: Automated with human interaction
Actors: Requester
Triggers: A pre- or advance payment request is sent to the Requester.
Pre-Conditions: A pre- or advance payment request is sent to the Requester.
Post-Conditions: The Requester receives a Payment Request.
Supporting Services: Email Integration and Correspondence Production

User Story: As a Requester, I need to obtain a request for payment (invoice) from the Agency for all applicable FOIA-related fees, so that I will know how much to pay for my FOIA Request.

E.8.8 Activity: Review Fee Balance Due

NOTE: This is a recurrent activity. For a complete definition and associated user stories refer to the activity within the Estimate Fees process in Appendix E.4.13.

E.8.9 Activity: Send Payment Request to A/R System

Description: Sends a payment due (invoice) transaction to a payment or accounts receivable (A/R) system, such as Pay.gov.

Part of Process: Request Payment
Type of Activity: Automated with human interaction
Actors: Fee Specialist

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**Triggers:** Invocation by a case worker.

**Pre-Conditions:** An invoice has been prepared and approved by a Fee Specialist.

**Post-Conditions:** A payment due transaction for the Requester is sent from the FOIA tracking system to a payment or A/R system, such as Pay.gov.

**Supporting Services:** Standardized Data Exchange

**User Story:** As a Fee Specialist, I need to transmit payment request data to financial systems, such as Pay.gov, so that an accounting system processes payment request information for the requester as a debit to their accounts receivable.

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**E.8.10 Activity: Send Pre- or Advance Payment Request to Requester**

**Description:** Sends invoice information to the Requester for a specific FOIA Request, either through a portal to the Requester's account or in an email.  
NOTE: If a Requester’s invoice is sent to their account, it will probably be necessary to also email the Requester informing them that the invoice can be found there.

**Part of Process:** Request Payment

**Type of Activity:** Automated with human interaction

**Actors:** Fee Specialist

**Triggers:** The completion of preparing an invoice.

**Pre-Conditions:** An invoice has been prepared for the Request.

**Post-Conditions:** A notification is sent to the Requester as an email and may also include a notification within the portal for the Requester to review the invoice there.

**Supporting Services:** Email Integration and Correspondence Production

**User Story:** As a Fee Specialist, I need to notify the Requester that they are required to pay either a pre-payment (due before the Agency will respond) or an advance payment (due before the Agency will commence a search for responsive records), so that a payment from the Requester will be received by the Agency at the appropriate time to complete their FOIA Request.

---

**E.9 Process: Receive Payment**

**User Story:** As The System, I need to capture payment receipt information from Requesters, typically from an accounts receivable (A/R) system, so that a Requester’s “account” balance is complete and accurate with respect to amounts owed and paid.

---

**E.9.1 Activity: Apply Payment to FOIA Case(s)**

**Description:** Records a payment (credit) to a Requester’s account upon receipt of information from a payment or accounts receivable system, e.g., Pay.gov. When relevant, it may include an offsetting transaction to a Requester’s account that reduces the amount owed, such as if an overpayment was made.

**Part of Process:** Receive Payment

**Type of Activity:** Automated with human interaction
Actors: Fee Specialist
Triggers: Payment receipt information is received by the system from a payment system, such as Pay.gov.
Pre-Conditions: None.
Post-Conditions: A credit is applied to the Requester’s account balance.
Supporting Services: FOIA Processing “Clock” Starts and Stops (Tolling)

User Stories

- As a Fee Specialist, I need to initiate a refund payment to a requester in the case of overpayment or a change in fees that results in a net balance due to the requester, so that the requester’s account balance remains accurate and reflects all appropriate payments due and no more than what is due.

- As a Fee Specialist, I need to integrate a combination of manual payments and pay.gov payments, so that a complete record of all payments is accounted for to determine the correct balance due from a requester.

- As a Fee Specialist, I need to manage and update a “payment ledger” that provides a complete audit trail of all payments made by a Requester, so that the correct balance due from a requester can be determined.

E.9.2 Activity: Process Requester Payment

Description: The accounts receivable (A/R) system will apply the Requester’s payment to their “account” and send the payment information to the FOIA Business System to be applied to the Requester’s FOIA case(s).

Part of Process: Receive Payment
Type of Activity: External to the system (no user stories in scope)
Actors: Accounts Receivable System

E.9.3 Activity: Receive Payment Info from A/R System

Description: Receives a payment transaction from a payment or accounts receivable (A/R) system.

Part of Process: Receive Payment
Type of Activity: Fully automated with no human interaction
Actors: The System
Triggers: Externally triggered by a payment system, such as Pay.gov.
Pre-Conditions: None.
Post-Conditions: A Requester’s payment receipt transaction from a payment system, such as Pay.gov, is added to the FOIA tracking system.
Supporting Services: Standardized Data Exchange

User Story: As The System, I need to receive payment data from financial systems, such as Pay.gov, so that an accounting system processes receipt information for the requester as a credit to accounts receivable.
E.9.4 Activity: Send FOIA Request Payment

*Description:*  A Requester makes a payment to a payment system, such as Pay.gov.

*Part of Process:*  Receive Payment

*Type of Activity:*  External to the system (no user stories in scope)

*Actors:*  Requester

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E.10 Process: Respond to Request

*User Story:*  As a Response Completion Staff, I need to prepare and send a response package to the Requester, including a cover letter, responsive records (or a link to retrieve them from a location, e.g., portal), and the final payment request, if applicable, so that the Requester obtains the information they were seeking and the FOIA can thus be closed as completed.

---

E.10.1 Activity: Accept or Reject Response Package

*Description:*  The Requester will review the FOIA response package, including responsive records provided by the Agency, and determine whether to accept it or file an appeal.

*Part of Process:*  Respond to Request

*Type of Activity:*  Manual (no user stories in scope)

*Actors:*  Requester

*Triggers:*  A response package is sent to the Requester.

*Pre-Conditions:*  A response package is sent to the Requester.

*Post-Conditions:*  The Requester either does nothing (accepts) or files an Appeal within the allotted timeframe (e.g., 90 days from the date of the response).

*Supporting Services:*  None

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E.10.2 Activity: Attach Releasable Records to Package

*Description:*  As part of the work of preparing the response package, the Response Completion Staff add the releasable records to the release package, including those being released in full and those that will contain redactions.

*Part of Process:*  Respond to Request

*Type of Activity:*  Automated with human interaction

*Actors:*  Response Completion Staff

*Triggers:*  Response staff are ready to attach the releasable records to the response.

*Pre-Conditions:*  A Response Package has been created for a Request.

*Post-Conditions:*  The set of records are attached to the Request and may be contained within a zip (compressed) or other file type.

*Supporting Services:*  None

*User Story:*  As a Response Completion Staff, I need to attach releasable records to the response package, so that releasable records can be sent to the requestor with supporting materials, such as the response letter.
E.10.3 Activity: Close Case

NOTE: This is a recurrent activity. For a complete definition and associated user stories refer to the activity within the *Perform Supplemental Case Activities* process in Appendix E.13.6.

E.10.4 Activity: Close Sub-Case (Request Item)

NOTE: This is a recurrent activity. For a complete definition and associated user stories refer to the activity within the *Perform Supplemental Case Activities* process in Appendix E.13.7.

E.10.5 Activity: Conduct Quality Review of Response Package

*Description:* Review release package to ensure it is complete and accurate.

*Part of Process:* Respond to Request

*Type of Activity:* Automated with human interaction

*Actors:* Policy Manager | Response Release QC Staff

*Triggers:* Response Package created.

*Pre-Conditions:* None

*Post-Conditions:* Either the response package meets the standards of the quality review and is ready to be sent to the Requester, or the response package does not meet the standards of the quality review and the package is sent back to the Response Completion Staff for adjustments.

*Supporting Services:* None

*User Stories*

- As a Policy Manager, I need to be able to configure a data-driven processing rule that will set the percentage of responses for quality control review/audit (e.g., 10%), which is based on the agency policy, so that the rule can be easily modified as laws, regulations, and/or Agency policies change, and the result of the change will dynamically modify the related business activity.

- As a Response Release QC Staff, I need to view all components of a response, including the original request, the responsive records, exemptions, redactions, response letter, etc., and be able to update the draft Response to reflect the results of my quality review, so that the response is appropriate per FOIA guidance and the original request from the Requester.

E.10.6 Activity: Determine Need for Multiple Responses

*Description:* Response Completion Staff may determine that a response needs to be conveyed in multiple response packages, usually because the set of responsive records is too large to process in a single communication but also in the case where a request comprising multiple request items could be completed more expeditiously via multiple responses.
Part of Process: Respond to Request
Type of Activity: Automated with human interaction
Actors: Response Completion Staff
Triggers: Response Complete Staff begins to prepare response package.
Pre-Conditions: Responsive and releasable records are available for review.
Post-Conditions: A decision is made as whether the response to a request is packaged in one or more response packages.
Supporting Services: None

User Story: As a Response Completion Staff, I need to accommodate the interim release or “rolling release” of released records for complex FOIA requests, so that requesters can obtain a portion of the records they requested without unnecessary delay.

E.10.7 Activity: Generate Redacted Records for Release

Description: This activity creates the exportable set of records to be released, inclusive of the defined content redactions, to the Requester and reflects a key part of assembling the response package.

Part of Process: Respond to Request
Type of Activity: Automated with human interaction
Actors: Response Completion Staff
Triggers: Records review and release approval is completed.
Pre-Conditions: There are responsive records that are partially releasable and have approved draft redactions.
Post-Conditions: Releasable records with finalized redactions that are not reversable (content under the redactions are not recoverable).
Supporting Services: None

User Story: As a Response Completion Staff, I need to create a machine-readable set of records (e.g., a PDF file) that have been reviewed and approved for release to the Requester and comport with the approved exemptions and redactions, so that the response to the Requester contains only properly redacted content without the possibility of being able to view that protected content.

E.10.8 Activity: Notify Requester of Closed Case

NOTE: This is a recurrent activity. For a complete definition and associated user stories refer to the activity within the Perform Supplemental Case Activities process in Appendix E.13.8.

E.10.9 Activity: Prepare Response Letter

Description: As part of the work of preparing the response package, the Response Completion Staff creates a response letter explaining the response, including a description of the records being released, the records or portions of records that are being withheld, the applicable exemptions applied for redactions and withholdings, and an enumeration of the
Requester’s rights under the FOIA. Response letters and exclusion descriptions are usually created through the assembly of standardized response language.

**Part of Process:** Respond to Request  
**Type of Activity:** Automated with human interaction  
**Actors:** Response Completion Staff  
**Triggers:** Records review and release approval is completed.  
**Pre-Conditions:** All necessary response documentation is available.  
**Post-Conditions:** Response letter is completed and incorporated into the response package.  
**Supporting Services:** Email Integration and Correspondence Production

**User Stories**

- As a Response Completion Staff, I need to create the response letter, so that the Requester understands what records the agency is sending to them, if the request is completed or if there are further parts to the response, and, if applicable, why the agency is withhold responsive records from them.

- As a Response Completion Staff, I need to select the response letter template that aligns to the request, so that response letters are consistent, appropriate, and efficiently created.

**E.10.10 Activity: Prepare Response Package**

**Description:** The response package is the set of materials, usually a letter and releasable records, that Response Completion Staff assemble in a manner that can be transmitted to a Requester. For full denial responses, a response package would just include a response letter.

**Part of Process:** Respond to Request  
**Type of Activity:** Automated with human interaction  
**Actors:** Response Completion Staff  
**Triggers:** Records review and release approval is completed.  
**Pre-Conditions:** Responsive and releasable records, if any, are available for packaging.  
**Post-Conditions:** Response package is ready for quality review.  
**Supporting Services:** None

**User Story:** As a Response Completion Staff, I need to prepare the Response package, so that it is ready to send to the Requester.

**E.10.11 Activity: Receive Notification from Agency**

NOTE: This is a recurrent activity. For a complete definition and associated user stories refer to the activity within the Conduct Request Intake process in Appendix E.1.13.

**E.10.12 Activity: Receive Response Package**

**Description:** The Requester may receive a response package through a range of modes, including a Requester portal, email, or postal mail.
Part of Process: Respond to Request
Type of Activity: Automated with human interaction
Actors: Requester
Triggers: Response Complete Staff send response package to Requester.
Pre-Conditions: None
Post-Conditions: The Requester has the response package.
Supporting Services: Email Integration and Correspondence Production

User Story: As a Requester, I need to receive the response package, so that I have the records I sought from the agency.

E.10.13 Activity: Send Response Package to Requester

Description: Convey the completed response package to the Requester or Requester Representative through a range of modes, including a Requester portal, email, or postal mail.

Part of Process: Respond to Request
Type of Activity: Automated with human interaction
Actors: The System
Triggers: The response package is completed, and it has passed its quality review.
Pre-Conditions: Response package that meets quality control standards is ready for delivery.
Post-Conditions: The Requester receives the response package.
Supporting Services: Email Integration and Correspondence Production

User Story: As The System, I need to support an interface that enables Response Completion Staff to upload released records to the requester online, so that records can be delivered and obtained the most efficiently.

E.11 Process: Appeal Request-Related Decision

User Story: As an Appeal Lead, I need to define, assign, and oversee the completion of one or more tasks, so that the process can be completed, and activities can be tracked and analyzed.

E.11.1 Activity: Assign Case to Lead

NOTE: This is a recurrent activity. For a complete definition and associated user stories refer to the activity within the Perform Supplemental Case Activities process in Appendix E.13.2.

E.11.2 Activity: Attach Supporting Documents to Appeal

Description: Requester includes documentation as part of their written administrative appeal.

Part of Process: Appeal Request-Related Decision
Type of Activity: Automated with human interaction
Actors: Requester
Triggers: Requester prepares appeal.
Pre-Conditions: None
Post-Conditions: Appeal contains supporting documentation.
Supporting Services: Document Management

User Story: As a Requester, I need to be able to attach supporting documents to my appeal, so that all supporting evidence can be considered as part of my appeal.

E.11.3 Activity: Close Case

NOTE: This is a recurrent activity. For a complete definition and associated user stories refer to the activity within the Perform Supplemental Case Activities process in Appendix E.13.6.

E.11.4 Activity: Decide Expedited-Related Appeal

Description: Authorized Official accepts or rejects expedited status appeal. This includes updating the status of the request accordingly.

Part of Process: Appeal Request-Related Decision
Type of Activity: Automated with human interaction
Actors: Authorized Official for Expedited Decision
Triggers: Receive appeal to reverse and adverse expedited status decision.
Pre-Conditions: Have access to appeal, the original decision, and supporting documentation for the decision.
Post-Conditions: Expedited request-related appeal decision.
Supporting Services: None

User Story: As an Authorized Official for Expedited Decision, I need to decide whether to grant or deny an expedited request appeal, so that a determination can be made on the expedited status of the request.

E.11.5 Activity: Decide Fee-Related Appeal

Description: Authorized Official accepts or rejects fee waiver administrative appeal. This includes updating the status of the request accordingly.

Part of Process: Appeal Request-Related Decision
Type of Activity: Automated with human interaction
Actors: Authorized Official for Fee-Related Appeals
Triggers: Receive appeal to reverse an adverse fee waiver decision.
Pre-Conditions: Have access to appeal, the original decision, and supporting documentation for the decision.
Post-Conditions: Fee-related appeal decision.
Supporting Services: None

User Story: As an Authorized Official for Fee-Related Appeals, I need to decide whether to grant or deny a fee-related appeal, so that a determination can be made on the fee status of the request.
E.11.6 Activity: Decide Records-Related Appeal

Description: Authorized Official accepts or rejects an appeal related to either the scope of records found to be responsive, records partially or fully withheld, and/or the format of the records in the response. This includes updating the status of the request accordingly.

Part of Process: Appeal Request-Related Decision
Type of Activity: Automated with human interaction
Actors: Authorized Official for Records-Related Appeals
Triggers: Receive appeal to reverse (or modify) an adverse release decision.
Pre-Conditions: Have access to appeal, the original decision, and supporting documentation for the decision.
Post-Conditions: Records-related appeal decision.
Supporting Services: None

User Story: As an Authorized Official for Records-Related Appeals, I need to decide whether to grant or deny a records-related appeal, so that a determination can be made on the releasability of records responsive to a request, the scope of records that are responsive to a request, or the format of the records released.

E.11.7 Activity: Determine Process Queue

NOTE: This is a recurrent activity. For a complete definition and associated user stories refer to the activity within the Manage Tasks process in Appendix E.12.8.

E.11.8 Activity: Evaluate for Appealable Determination

Description: An initial assessment of the Requester’s appeal is conducted to ensure it is valid and comports with the FOIA statute and Agency regulations and policy.

Part of Process: Appeal Request-Related Decision
Type of Activity: Automated with human interaction
Actors: Appeals Intake Specialist
Triggers: An appeal has been submitted to the Agency.
Pre-Conditions: One or more Requests exist for the Requester.
Post-Conditions: A determination is made as to the appropriateness of the appeal. This does not mean the appeal will be granted; only that the Requester has complied with the appeal process, challenged an appealable adverse determination, and provided sufficient information from which to decide.
Supporting Services: None

User Story: As an Appeals Intake Specialist, I need to review the initial appeal from the Requester to determine whether the request for appeal is appropriate given the Requester’s situation, so that only appropriate appeals are considered and processed by the Agency.
E.11.9 Activity: Notify Parties of Appeal Decision

Description: The Requester, the authorized official(s), the Request Lead, and other participants as applicable are notified of the outcome of the administrative appeal related to fees, expedited status, or the release of records.

Part of Process: Appeal Request-Related Decision
Type of Activity: Automated with human interaction
Actors: Appeal Lead | Policy Manager
Triggers: An appeal decision has been made.
Pre-Conditions: None
Post-Conditions: Requester and other roles receive appeal decision.
Supporting Services: Email Integration and Correspondence Production

User Stories

- As an Appeal Lead, I need to notify all parties (e.g., Request Lead, authorized official(s) for appeals, Requester, etc.) of the appeal decision, so that each participant knows how to proceed with the Appeal and any impacts to a FOIA Request.

  NOTE: Notified participants likely include the Authorized Official for Fee-Related Appeals, Authorized Official for Expedited-Related Appeals, Authorized Official for Records-Related Appeals, Request Lead, Appeal Lead, and Requester.

- As a Policy Manager, I need to be able to configure a data-driven processing rule that will set the due date to respond to a Requester’s appeal to be within 20 business days after the Requester has submitted their appeal if no unusual circumstances apply, so that the rule can be easily modified as laws, regulations, and/or Agency policies change, and the result of the change will dynamically modify the related business activity.

E.11.10 Activity: Notify Parties of Withdrawn Appeal

Description: Upon a Requester withdrawing their appeal, the system will notify the Request Lead about the withdrawal action.

Part of Process: Appeal Request-Related Decision
Type of Activity: Automated with human interaction
Actors: Appeal Lead
Triggers: A withdrawal decision from the Requester is received by the Agency and the Appeal case is updated to reflect the change in status.
Pre-Conditions: The Agency is notified that a Requester is withdrawing their Appeal. The Appeals case is closed.
Post-Conditions: All parties to the Appeal are notified with an in-system notification and/or an email.
Supporting Services: Email Integration and Correspondence Production
User Story: As an Appeal Lead, I need to inform all parties to an Appeal that the appeal has been withdrawn by the Requester, so that no further actions will be taken on the Appeal.

E.11.11 Activity: Notify Requester of Non-Actionable Appeal

Description: If an appeal is evaluated to be non-actionable, the Requester will be notified.

Part of Process: Appeal Request-Related Decision
Type of Activity: Automated with human interaction
Actors: Appeals Intake Specialist
Triggers: A Requester’s appeal has been determined as non-actionable.
Pre-Conditions: An appeal has been submitted to the Agency as related to one or more FOIA Requests from the Requester.
Post-Conditions: The Requester is sent a message that their appeal is determined to be non-actionable.
Supporting Services: None

User Story: As an Appeals Intake Specialist, I need to notify the Requester in the event their appeal is not appropriate, so that the Requester understands that their appeal, as presented, will not be considered.

E.11.12 Activity: Prepare Analysis of Appeal and Recommendation

Description: An important input to the appeal decision by an Agency authorized official, the appeal is evaluated, additional documentation may be gathered, and a recommendation prepared for their decision.

Part of Process: Appeal Request-Related Decision
Type of Activity: Automated with human interaction
Actors: Appeal Lead
Triggers: An Agency staff person initiates the review of an appeal.
Pre-Conditions: An actionable appeal has been submitted to the Agency and it has been accepted as a valid appeal for subsequent determination. Note this does not mean the appeal will be approved; only that the Requester has complied with the appeal process and provided sufficient information from which to decide.

Post-Conditions: An analysis of the Appeal is prepared, including reviewing the Request content that is the subject of the appeal, gathering additional information (e.g., policies, regulations, etc.), and when appropriate, preparing a recommendation to the authorized official responsible for approving or denying the appeal.
Supporting Services: None

User Story: As an Appeal Lead, I need to review the Requester’s appeal, including all relevant documentation related to the FOIA Request(s) involved, and make a recommendation to the authorized official (AO) on an appeal decision, so that the AO is prepared to make a sound decision on whether to grant or deny the appeal.

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E.11.13  Activity: Prepare Appeal

Description: Creates an administrative appeal of an adverse determination related to a fee waiver decision, an expedited request decision, or a response decision (i.e., related to scope of records provided, partially or fully withheld, and/or the format of the records in the response).

Part of Process: Appeal Request-Related Decision
Type of Activity: Automated with human interaction
Actors: Policy Manager | Requester
Triggers: Requester receives an adverse decision.
Pre-Conditions: There is an adverse fee waiver, expedited status, or release decision.
Post-Conditions: Appeal
Supporting Services: None

User Stories

- As a Policy Manager, I need to be able to configure a data-driven processing rule that will set the appeal period threshold (e.g., 90 days) for a Requester to submit an appeal, which is based on the number of days after final FOIA determination, so that the rule can be easily modified as laws, regulations, and/or Agency policies change, and the result of the change will dynamically modify the related business activity.

- As a Requester, I need to appeal the agency’s fee waiver decision, so that the agency may consider reversing its decision to deny my fee waiver request.

- As a Requester, I need to appeal the agency’s partial or full records denial decision (including a “no-response” from the Agency), so that the agency may consider reversing or modifying its decision to deny me full or partial access to the records I requested.

- As a Requester, I need to be able to appeal the agency’s expedited status decision, so that the agency may consider reversing its decision to deny my expedited request.

E.11.14  Activity: Receive Appeal Withdrawal from Requester

Description: If a Requester withdraws their appeal, the specialist will update the appeal with that information and close the appeal case.

Part of Process: Appeal Request-Related Decision
Type of Activity: Automated with human interaction
Actors: Appeal Lead
Triggers: A Requester withdraws their appeal.
Pre-Conditions: A Requester withdraws their appeal.
Post-Conditions: The Agency is notified that a Requester is withdrawing their Appeal. The Appeals case is closed.
Supporting Services: None
User Story: As an Appeal Lead, I need to capture an appeal withdrawal provided by the Requester, so that the appeal can be properly closed.

E.11.15 Activity: Receive Notification from Agency

NOTE: This is a recurrent activity. For a complete definition and associated user stories refer to the activity within the Conduct Request Intake process in Appendix E.1.13.

E.11.16 Activity: Receive Notification of Appeal Withdrawal

Description: If a Requester decides to withdraw their appeal, the Agency staff are notified upon receipt of the withdrawal.

Part of Process: Appeal Request-Related Decision
Type of Activity: Automated with human interaction
Triggers: The Appeal Lead is notified by the Requester of their appeal withdrawal.
Pre-Conditions: The Requester has withdrawn their appeal.
Post-Conditions: Parties to the Appeal (i.e., Requester, Authorized Officials for appeal decisions, and others as applicable) are notified of the Requester’s withdrawal of their appeal,

Supporting Services: None

User Stories

- As an Authorized Official for Expedited-Related Appeals, I need to receive information that an appeal has been withdrawn by the Requester, so that I know that no further action will be required on the Appeal.

- As an Authorized Official for Fee-Related Appeals, I need to receive information that an appeal has been withdrawn by the Requester, so that I know that no further action will be required on the Appeal.

- As an Authorized Official for Records-Related Appeals, I need to receive information that an appeal has been withdrawn by the Requester, so that I know that no further action will be required on the Appeal.

E.11.17 Activity: Save Draft Appeal

Description: Save a partially created or draft administrative appeal before submitting it to an agency.

Part of Process: Appeal Request-Related Decision
Type of Activity: Automated with human interaction
Actors: Requester
Triggers: Requester drafts appeal but it is not ready to submit.
Pre-Conditions: None
Post-Conditions: Draft appeal.
Supporting Services: None

User Story: As a Requester, I need to save a draft of my appeal, so that I can prepare my appeal over a period and submit it to the Agency when I believe it is ready.

E.11.18 Activity: Submit Appeal

Description: The Requester completes and delivers their administrative appeal to the agency through one of various possible modes, including a Requester portal, email, or postal mail.

Part of Process: Appeal Request-Related Decision
Type of Activity: Automated with human interaction
Actors: Requester
Triggers: Draft appeal is ready to submit.
Pre-Conditions: None
Post-Conditions: Agency receives Requester’s appeal.
Supporting Services: None

User Story: As a Requester, I need to submit my appeal, so that the agency official receives my appeal and thus can respond to it.

E.11.19 Activity: Withdraw Appeal

Description: Withdraw an active administrative appeal that the Requester had submitted to the agency.

Part of Process: Appeal Request-Related Decision
Type of Activity: Automated with human interaction
Actors: Requester
Triggers: Requester has new information or has received an explanation that has prompted them to withdraw the appeal.
Pre-Conditions: An appeal is open and not yet decided.
Post-Conditions: Appeal is closed.
Supporting Services: None

User Story: As a Requester, I need to withdraw my appeal, so that I do not have an open appeal that I no longer want or have a need to pursue.

E.12 Process: Manage Tasks

User Story: As a Task Manager, I need to identify, include, and track tasks that need to be completed by specific individuals, so that the processing of the Request can proceed in the most efficient manner possible and track the effort applied to the work.

E.12.1 Activity: Add or Remove Individual Tasks to Case

Description: Creates a new Task from an available list of Task Types and associates it with an existing case, or removes an existing task associated with a case.
Part of Process: Manage Tasks
Type of Activity: Automated with human interaction
Actors: Task Manager
Triggers: A case worker (other than a Task Lead) determines that additional tasks are needed to complete the case, or an existing task is not needed.
Pre-Conditions: A case exists for the Request.
Post-Conditions: A new task is added, or an existing task is removed from a case.
Supporting Services: Configurable Workflow

User Story: As a Task Manager, I need to add or remove individual tasks associated with a case, so that I can customize the relevant tasks needed to complete the case.

E.12.2 Activity: Annotate Case with Notes
Description: Adds an internal note to a case for recordkeeping purposes.
Part of Process: Manage Tasks
Type of Activity: Automated with human interaction
Actors: Task Lead | Task Manager
Triggers: Case worker decides a note is needed to express and record a condition about the case.
Pre-Conditions: A case exists for the Request.
Post-Conditions: A new note is linked to the case with the case worker’s identification and date.
Supporting Services: None

User Story: As a Task Lead or Task Manager, I need to enter notes associated with a case, including the person, date, and notes fields, so that an audit trail is captured with qualitative information about the request and/or the process.

E.12.3 Activity: Apply Task Template to Case
Description: As part of defining tasks to complete a Request Item, a template may be applied, which will automatically create a set of Tasks based on a predefined processing scenario.
NOTE: A task template is first used when a specific Process Queue is assigned to a case. Thus, this activity, which applies a task template, is an additional mechanism to add tasks to a case, but most likely is an infrequent scenario.

Part of Process: Manage Tasks
Type of Activity: Automated with human interaction
Actors: Task Manager
Triggers: A case worker (other than a Task Lead) determines that additional tasks are needed to complete the case and decides to use an existing Task Template as the default set of tasks to add to the case.
Pre-Conditions: A case exists for the Request.
Post-Conditions: New tasks are created based on the selected template and linked to a case (Request, Request Item, Appeal, etc.).
**Supporting Services:** Configurable Workflow

**User Story:** As a Task Manager, I need to select an existing task template corresponding to the appropriate process to be executed and automatically create the set of tasks to be conducted to complete the request item, so that I don’t have to manually select each task that is relevant to the processing of a case.

**E.12.4 Activity: Assign Task Leads**

**Description:** Creates an assignment of a person to a defined Task in a case.

**Part of Process:** Manage Tasks

**Type of Activity:** Automated with human interaction

**Actors:** Task Manager | The System

**Triggers:** Request Item Lead or Request Lead determines a Task is not currently assigned and decides to make an assignment or a new assignment must be made to replace an existing Task Lead.

**Pre-Conditions:** A Task has been created for a Case.

**Post-Conditions:** A staff person is linked to a Task as the assigned individual, and the individual is notified via email of the new assignment. A previously assigned and replaced Task Lead would also receive a notification that they are no longer responsible for the Task.

**Supporting Services:** None

**User Stories**

- As a Task Manager, I need to assign a defined Request Item task to a Task Lead, so that each activity pertaining to a request item is allocated to a responsible person for completion.

- As The System, I need to notify new and replaced Task Leads of their assignment changes, so that each person working on a case is informed of their responsibilities.

**E.12.5 Activity: Capture Case-Related Correspondence**

**Description:** Captures in-bound and out-bound communications and associates each with a Request case.

**Part of Process:** Manage Tasks

**Type of Activity:** Automated with human interaction

**Actors:** Task Lead | Request Lead | Request Item Lead

**Triggers:** Correspondence would be captured any time an incoming communication is received, or outgoing communication is sent to a Requester, a Requester’s representative, or other party related to a FOIA Request case.

**Pre-Conditions:** A Request case has been defined as part of the Intake function.

**Post-Conditions:** A communication record is linked to a case or sub-case (i.e., Request Item), including the content of the message, the recipient(s), the sender, date, and subject.

**Supporting Services:** Email Integration and Correspondence Production

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User Story: As a Task Lead or Request Lead or Request Item Lead, I need to associate all incoming and outgoing correspondence with a case (i.e., request, request item, appeal, referral, consultation, coordination, etc.), so that actions can be taken pertaining to correspondence received about a case and a complete audit trail of all interactions (email, letter, system notifications) are maintained related to each case.

E.12.6 Activity: Capture Staff Work Time

Description: Creates a “timesheet” record for a case worker to capture the type of activities and amount of time spent working the activities for one or more cases within a defined time-period.

Part of Process: Manage Tasks
Type of Activity: Automated with human interaction
Actors: Policy Manager | Task Lead
Triggers: Processing rule determines the due date for completing staff timesheets.
Pre-Conditions: Case worker has performed work on one or more Requests within the timesheet period.
Post-Conditions: Completed timesheet with one or more entries identifying the hours spent on one or more Requests during the period.
Supporting Services: None

User Stories

- As a Policy Manager, I need to be able to configure data-driven processing rules that will set the timesheet due frequency and schedule (e.g., Bi-weekly on Fridays starting on 1/13/2023), so that the rule can be easily modified as laws, regulations, and/or Agency policies change, and the result of the change will dynamically modify the related business activity.

- As a Task Lead, I need to record the time I worked on a task related to a case, so that billing information that is based on level of effort is as accurate as possible and overall processing performance can be accurately measured.

E.12.7 Activity: Define Tasks to Complete Case

Description: Provides an overall administrative capability to manage the set of tasks associated with a case. Note that several other supporting activities extend the functionality by permitting the user to apply a task template, add or remove individual tasks, assign task leads, and create consultation or coordination actions with other agencies.

NOTE: The initial set of tasks would generally be applied by a template because of assigning the case to a particular Process Queue.

Part of Process: Manage Tasks
Type of Activity: Automated with human interaction
Actors: Task Manager
Triggers: A case worker (other than a Task Lead) determines the need to manage the set of tasks to process a case.

Pre-Conditions: A case exists for the Request.

Post-Conditions: The set of tasks associated with a case are updated.

Supporting Services: Configurable Workflow

User Stories

- As a Task Manager, I need to be able to customize the set of tasks and review actions associated with a request item, including task assignments, dependencies, the next task to be performed when completed, and status updates, so that unique situations can be supported that don't necessarily follow a pre-determined process (as defined by the process workflow).

- As a Task Manager, I need to instantiate (create) the set of tasks and actions for a case based on the assigned Process Queue for the case, so that all appropriate tasks and actions are utilized in the workflow when completing a case.

E.12.8 Activity: Determine Process Queue

Description: Permits the user to assign a pre-defined process type, also referred to as a “track” or “queue” to each Request Item. Process types are defined and managed by a Process Administrator. Some examples include Simple and Complex, however, many variations could be defined, such as to address different types of responsive records involved or the nature of the request (e.g., first-person requests of a certain type). Selecting a Process Queue would preload a set of pre-defined tasks, actions, and statuses, which can then be further customized, as needed by a Request Item Lead. The activity could apply artificial intelligence (AI), machine learning (ML), and/or human language technology (HLT) to interpret from the Request text what types of records the Requester is seeking and then assign an initial processing queue based on the heuristic.

Part of Process: Manage Tasks

Triggers: Request has been perfected.

Pre-Conditions: Request has been perfected.

Post-Conditions: A process has been associated with each Request Item, which creates a default task list, actions, and defined status transitions for each item.

Supporting Services: Configurable Workflow | AI/ML/HLT-Enabled Decisioning

User Stories

- As a Perfection Specialist or Request Lead or Request Item Lead or Appeal Lead or Coordination & Consultation Coordinator, I need to assign and/or override the default assignment Process Queue for EACH case, so
that an appropriate Process Queue is selected based on considering all factors pertaining to the request.

- As a Perfection Specialist or Request Lead or Request Item Lead or Appeal Lead or Coordination & Consultation Coordinator, I need to use a process wizard that guides me to select the most appropriate Process Queue for a case (e.g., each item in a request), so that the template tasking associated with the Process Queue can be applied to the request items.

- As a Process Administrator, I need to manage the sequence of cases in a process queue, so that higher priority items will be sequenced ahead of lower-priority items to be completed.

- As The System, I need to apply artificial intelligence (AI), machine learning (ML), and/or HLT (human language technology) in conjunction with additional information gathered from the Requester to make an initial determination of the processing queue for the Request, so that the queue assignment requires less human involvement and can be made more efficient and less error prone.

- As The System, I need to automatically assign the initial Process Queue for EACH Request case and sub-case (i.e., request item) based on the request text and metadata, so that a default process is determined and thereby enhance the timeliness and accuracy of assigning cases to processes/queues.

**E.12.9 Activity: Notify Case Worker of Tasks and Cases Coming Due**

*Description:* Sends a notification to the Task Lead their tasks coming due, using the number of days prior as defined in the processing rules.

*Part of Process:* Manage Tasks

*Type of Activity:* Fully automated with no human interaction

*Actors:* Policy Manager | Task Lead | The System

*Triggers:* System triggers notification based on number of days prior to due date, as defined in the processing rules.

*Pre-Conditions:* A task assignment exists for the case worker.

*Post-Conditions:* A notification is sent, such as an in-system notification to the case worker's inbox or action item list, an email, or other similar action.

*Supporting Services:* Configurable Workflow | Email Integration and Correspondence Production

*User Stories*

- As a Policy Manager, I need to be able to configure a data-driven processing rule that will set the number of days (e.g., 5 days) prior to requests coming/over due to remind the Request Lead, so that the rule can be easily modified as laws, regulations, and/or Agency policies change, and the result of the change will dynamically modify the related business activity.
NOTE: It may be useful to define more granular rules with settable reminders based on other factors, e.g., type of request/requester, expedited request, etc.

- As a Policy Manager, I need to be able to configure a data-driven processing rule that will set the # days (e.g., 5 days) prior to tasks coming/over due to remind a Task Lead of their action items, so that the rule can be easily modified as laws, regulations, and/or Agency policies change, and the result of the change will dynamically modify the related business activity.

- As a Policy Manager, I need to be able to configure a data-driven processing rule that will set the # default days prior to due date to remind task assignee (e.g., 2 days), which is based on the date task is due, so that the rule can be easily modified as laws, regulations, and/or Agency policies change, and the result of the change will dynamically modify the related business activity.

- As a Task Lead, I need to manually send an alert to a Task Lead as a reminder to complete their task by the due date, so that the process doesn’t fall behind schedule.

- As The System, I need to automatically issue a reminder to Task Leads, Request Leads, and Request Item Leads to follow-up on case-related tasks and case completion actions, so that tasks and cases are completed in a timely manner to meet overall request response due dates.

E.12.10 Activity: Override Routing for Next Task

**Description:** Permits a case worker to modify the default successor dependency for the next task(s) in the sequence to complete the case.

**Part of Process:** Manage Tasks

**Type of Activity:** Automated with human interaction

**Actors:** Task Manager | Request Lead | Request Item Lead

**Triggers:** A case worker determines that subsequent task(s) to be completed should either be initiated sooner or later.

**Pre-Conditions:** An active case exists with at least one subsequent task to be completed.

**Post-Conditions:** The status or start date of subsequent tasks is updated manually by the case worker.

**Supporting Services:** Configurable Workflow

**User Story:** As a Task Manager or Request Lead or Request Item Lead, I need to manually update task status (completion or initiation), task assignment, or other related task information, so that the currently defined process sequence can be overridden to address unexpected exceptions or other changes to how the case will be processed.

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E.12.11  Activity: Review Staff Work Time for QC

Description: Reviews and approves a timesheet submitted by a case worker. It is presumed the reviewer/approver of the timesheet would be at higher level role designation, such as a Request Item Lead reviewing the Task Leads’ timesheet, the Request Lead reviewing the Request Item Lead timesheet, etc.

Part of Process: Manage Tasks
Type of Activity: Automated with human interaction
Actors: Task Manager
Triggers: A timesheet has been submitted by a case worker for review.
Pre-Conditions: A timesheet has been submitted by a case worker for review.
Post-Conditions: A timesheet is either approved or rejected (and sent back to the case worker) for changes.
Supporting Services: None

User Stories

- As a Task Manager, I need to be able to modify a previously approved timesheet and include rationale for changes made, so that corrections can be applied when they are discovered.
- As a Task Manager, I need to review and approve or reject the case-related work time submitted by Task Leads, so that errors in level of effort are scrutinized to ensure the most accurate record possible for billing and performance analysis purposes.

E.12.12  Activity: Trigger Next Task and Route to Task Lead

Description: One or more tasks associated with a case are updated to reflect an “active” status, depending on the conditions met after a predecessor task is marked as completed, and a notification is sent to each of the new active task leads.

Part of Process: Manage Tasks
Type of Activity: Automated with human interaction
Actors: The System
Triggers: A case worker indicates a task is complete.
Pre-Conditions: A case worker indicates a task is complete and there are successor tasks associated with the case.
Post-Conditions: One or more successor tasks are marked as “active” and for each, a notification is sent to the assigned task leads.
Supporting Services: Configurable Workflow

User Stories

- As The System, I need to automatically send an alert to the individual(s) with a new pending task action or review based on their task assignment, so that the process doesn't fall behind schedule.
As The System, I need to automatically trigger the next task(s) in the process based on the tasking template, defined task dependencies, and status changes of each case, so that the workflow is substantively streamlined and requires less human intervention to ensure the right tasks are completed in the right sequence.

**E.12.13 Activity: Update Task Completion Information**

*Description:* Permits the user to record the status for a single Task associated with a case.

NOTE: A person with higher-level authority than a Task Lead (e.g., Request Item Lead, Request Lead) should also be able to update Task status on behalf of the Task Lead.

*Part of Process:* Manage Tasks

*Type of Activity:* Automated with human interaction

*Actors:* Request Item Lead | Request Lead | Task Lead | The System

*Triggers:* A case worker determines that a Task needs to be updated.

*Pre-Conditions:* A Task exists and is assigned to the case worker who will update it.

*Post-Conditions:* The information about a Task is updated, such as the status (completed, delayed, etc.), the completion date, the expected completion date, etc.

*Supporting Services:* None

*User Stories*

- As a Request Item Lead, I need to update case record information on behalf of the Task Leads assigned to my Request Item, including status, based on the completion of my assigned tasks/actions, so that the workflow for other tasks and actions can proceed and thus work toward the completion of the case.

- As a Request Lead, I need to update case record information on behalf of the Task Leads and Request Item Leads assigned to my Request, including status, based on the completion of my assigned tasks/actions, so that the workflow for other tasks and actions can proceed and thus work toward the completion of the case.

- As a Task Lead, I need to update case record information, including status, based on the completion of my assigned tasks/actions, so that the workflow for other tasks and actions can proceed and thus work toward the completion of the case.

- As The System, I need to automatically update case record metadata, including status, based on the completion of workflow tasks/actions, so that the workflow is substantively streamlined and requires less human intervention to ensure the right tasks are completed in the right sequence.
E.13 Process: Perform Supplemental Case Activities

User Stories

- As a Request Lead, I need to view and manage all data, documentation, and correspondence about a case (Request, Request Item, Appeal) from a single place, so that I have everything I need to process and manage a case without having to find relevant information.
  
  NOTE: This single view could be analogous to presenting the user with a logical case “folder”.

- As The System, I need to create a logical “case folder” for a FOIA case, so that all data and correspondence associated with a case can be tracked as a unit, including any sub-cases (Request Items), related appeal cases, etc.

E.13.1 Activity: Add Point of Contact (POC)

Description: Creates a new Person record, which may be either an internal or external point of contact.

Part of Process: Perform Supplemental Case Activities
Type of Activity: Automated with human interaction
Actors: Request Item Lead | The System
Triggers: A case worker determines the need to add a point of contact, such as a result from receiving correspondence from a related party to a case.
Pre-Conditions: None
Post-Conditions: A new contact is added to the list of people, including their association with an organization.
Supporting Services: None

User Stories

- As a Request Item Lead, I need to identify and record the point of contact (POC) associated with a new coordination or consultation action I am making to another agency as part of completing a given request item, so that I can follow-up with the appropriate personnel in another agency as part of completing a coordination or consultation action that I am invoking.

- As The System, I need to capture and log the source agency point of contact (POC) for incoming referrals, consultations, and coordinations, so that there is a designated person in the source agency with whom the receiving agency can correspond to complete the action.

E.13.2 Activity: Assign Case to Lead

Description: Designates an individual as the “owner” of a case, including the possibility of “re-assigning”, if for example, the request was sent to the wrong internal organization or assigned to the wrong person.

Part of Process: Perform Supplemental Case Activities
Type of Activity: Automated with human interaction
**Actors:** Perfection Specialist  
**Triggers:** Request has been perfected.  
**Pre-Conditions:** Request has been perfected.  
**Post-Conditions:** A Request Lead is assigned to the overall Request.  
**Supporting Services:** Configurable Workflow

**User Story:** As a Perfection Specialist, I need to assign or reassign a case to a FOIA staff person as the lead, so that each case will be “owned” and managed by an accountable individual (i.e., Request Lead, Request Item Lead, Appeal Lead, etc.).

**E.13.3 Activity: Assign Item to Request Item Lead**

**Description:** Designates an individual as the “owner” of a Request Item (sub-case), including the possibility of “re-assigning”, if for example, the Request Item was sent to the wrong internal organization or assigned to the wrong person.

**Part of Process:** Perform Supplemental Case Activities  
**Type of Activity:** Automated with human interaction  
**Actors:** Request Lead  
**Triggers:** Request Items have been defined and a Request Lead has been assigned.  
**Pre-Conditions:** Request Items have been defined and a Request Lead has been assigned.  
**Post-Conditions:** A Request Item Lead has been assigned to each Item in the Request.  
**Supporting Services:** Configurable Workflow

**User Story:** As a Request Lead, I need to assign or reassign each item in a request to a FOIA staff person as the Request Item Lead, so that each item can be tasked and statused independently to complete all actions associated with the request.

**E.13.4 Activity: Assign Organizational Ownership to Request**

**Description:** Assign a FOIA Request to the appropriate component or further subdivision with an agency. This particularly applies to agencies and large FOIA programs. Includes reassigning, as necessary.

**Part of Process:** Perform Supplemental Case Activities  
**Type of Activity:** Automated with human interaction  
**Actors:** Perfection Specialist  
**Triggers:** A request is perfected.  
**Pre-Conditions:** A request, not yet confirmed as perfected, was created in the FOIA system.  
**Post-Conditions:** Agency organization is assigned responsibility for the request.  
**Supporting Services:** None

**User Story:** As a Perfection Specialist, I need to assign or reassign a request to an office, component, or other part of an agency, so that the request is routed to the correct part of the agency for processing.
E.13.5 Activity: Assign Organizational Ownership to Request Items

Description: Assign a FOIA Request Item (sub-case) to the appropriate component or further sub-division with an agency. This particularly applies to agencies and large FOIA programs. Includes reassigning, as necessary.

Part of Process: Perform Supplemental Case Activities
Type of Activity: Automated with human interaction
Actors: Sizing & Scoping Specialist
Triggers: The case worker has been assigned a perfected request.
Pre-Conditions: There is an active, perfected request from the Requester.
Post-Conditions: An internal agency organization with FOIA “ownership” responsibilities is linked to the FOIA Request as the owning organization.
Supporting Services: None

User Story: As a Sizing & Scoping Specialist, I need to assign or reassign ownership of a request item to an office, component, or other part of an agency, so that the request item can be tasked for processing.

E.13.6 Activity: Close Case

Description: Changes the status of the case to Closed so that no further work on it can be completed. A case can be closed for multiple reasons—refer to the Triggers for more information.

Part of Process: Perform Supplemental Case Activities
Type of Activity: Automated with human interaction
Actors: Policy Manager | Request Lead
Triggers: Multiple triggers exist for closing a case, including the Requester's withdrawal of their Request, an Administrative Closing due to the Requester being non-responsive when additional information or payment is required, or when the case is completed.
Pre-Conditions: A case exists for the Request.
Post-Conditions: The status of the case becomes Closed with an appropriate Request Disposition code describing the reason for its closing.
Supporting Services: None

User Stories

- As a Policy Manager, I need to be able to configure a data-driven processing rule that will set the number of days before auto-closing a request when a pre-payment or advance payment is not received (e.g., 30 days), which is based on the date when advance payment was requested of the requester, so that the rule can be easily modified as laws, regulations, and/or Agency policies change, and the result of the change will dynamically modify the related business activity.

- As a Request Lead, I need to close a case and thus halt any further processing, such as when a requester withdraws their request, so that only active cases remain in an active status and thus maintain the accuracy and
efficiency in the process.
NOTE: A close action can only be permitted in certain circumstances, such as when a requester withdraws their request. Closing a completed case would occur when sufficient response processing has been completed.

- As a Request Lead, I need to electronically save all completed and finalized cases, so that past requests can be searched, analyzed, and viewed to support future case work, compare performance over time, and provide the public with appropriate information about prior requests.
- As a Request Lead, I need to initiate the closing of the Request when all responsive records were referred to Another Agency, so that the Agency maintains accurate information about the current set of actions remaining on a Request.

E.13.7 Activity: Close Sub-Case (Request Item)

Description: Closes one specific Request Item (also called a sub-case) within a FOIA Request. The functionality of closing a Request Item is used across other process areas and could be invoked for various reasons (see the triggers description). When a Request Item is closed, no further processing would take place on that portion of the Request.

Part of Process: Perform Supplemental Case Activities
Type of Activity: Automated with human interaction
Actors: Request Lead
Triggers: Closing a sub-case (Request Item) could be triggered for several reasons: (1) a resizing (modification) to a Request no longer includes that portion or (2) the Request Item was completed as part of a multi-response effort.
Pre-Conditions: The Request Item exists.
Post-Conditions: The Request Item status is set to closed, a close disposition is recorded, and no further action can be taken on the Item unless it is administratively reopened by the Agency.
Supporting Services: None

User Story: As a Request Lead, I need to close a sub-case within a case (i.e., a Request Item), such as when the item has a completed FOIA response associated with it (i.e., for a multi-phase release) or the Request has been modified to exclude the Item, so that any further processing is halted on that item.

User Story: As a Request Lead, I need to initiate the closing of one or more Request Items (sub-cases) if responsive records were referred to Another Agency, so that the Agency maintains accurate information about the current set of actions remaining on a Request.

E.13.8 Activity: Notify Requester of Closed Case

Description: Sends a message to the Requester that their case has been closed along with the disposition reason for closing the case.
Part of Process: Perform Supplemental Case Activities
Type of Activity: Automated with human interaction
Actors: Request Lead
Triggers: A case has been closed.
Pre-Conditions: A case has been closed.
Post-Conditions: The Requester receives a message that their case has been closed and thus no further processing will occur.
Supporting Services: Email Integration and Correspondence Production

User Story: As a Request Lead, I need to inform the Requester that their case (FOIA Request) has been closed, including the reason for its closure, and the Requester’s appeal rights, so that the Requester is kept informed of the status of their case.

E.13.9 Activity: Notify Requester of Reopened Case

Description: Sends a message to the Requester that their case has been reopened.

Part of Process: Perform Supplemental Case Activities
Type of Activity: Automated with human interaction
Actors: Request Lead
Triggers: A Request case is reopened.
Pre-Conditions: A case has been reopened after it was closed.
Post-Conditions: The Requester receives a message that their case has been reopened.
Supporting Services: Email Integration and Correspondence Production

User Story: As a Request Lead, I need to inform the Requester that their case (FOIA Request) has been reopened, so that the Requester is kept informed of the status of their case.

E.13.10 Activity: Receive Notification from Agency

NOTE: This is a recurrent activity. For a complete definition and associated user stories refer to the activity within the Conduct Request Intake process in Appendix E.1.13.

E.13.11 Activity: Reopen Closed Case

Description: Permits the Agency to change the status of a case from closed to open. There are various reasons why this might occur. Refer to the Triggers below.

Part of Process: Perform Supplemental Case Activities
Type of Activity: Automated with human interaction
Actors: Request Lead
Triggers: Several different triggers may case a case to be reopened, including but not limited to an accidental closing, a request from a Requester to reopen after they change their mind about withdrawing their Request, the Agency agrees to reopen a case, a remand decision comes out of a litigation, etc.
Pre-Conditions: The Request case is closed and therefore locked from further processing.
**Post-Conditions:** The Request case is reopened and no longer closed, and thus can be further processed by the Agency.

**Supporting Services:** None

**User Story:** As a Request Lead, I need to reopen a case that was previously closed, so that cases closed in error can be reopened, or Requester’s cases previously closed because they withdrew their Request can be reopened at the discretion of the Agency, or for any other reason deemed appropriate by the Agency.

**User Story:** As a Request Lead, I need to reset the processing clock for a reopened case in accordance with the FOIA and DOJ requirements and Agency guidelines, so that the Agency will reflect the appropriate timeframe for responding to the case.

### E.13.12 Activity: Withdraw Request

**Description:** Cancels a FOIA Request regardless of what stage it is in. Note that a Requester may still have fees to pay, depending on the fee determinations and what work has been completed prior to the withdrawal by the Requester.

**Part of Process:** Perform Supplemental Case Activities

**Type of Activity:** Automated with human interaction

**Actors:** Requester

**Triggers:** Notification from a Requester (or Requester's Representative) to withdraw their Request.

**Pre-Conditions:** A case exists for the Request.

**Post-Conditions:** The Request is in a closed state with a Withdrawal reason.

**Supporting Services:** None

**User Story:** As a Requester, I need to be able to withdraw my Request at any time and thus stop all agency activity pertaining to a request that I no longer wish to process, so that only requests made by requesters (or requester representatives) are processed.

### E.14 Process: Maintain Policy and Process Rules

**User Story:** As a Policy Manager, I need to maintain, in the form of data, the set of FOIA-related policies (e.g., rules, reference data, fee schedule data, FOIA guidance, etc.) and process accelerators (e.g., processes and task templates, communications templates), so that appropriate rules and capabilities are utilized by the system and by users as part of completed FOIA activities.

### E.14.1 Activity: Administer Processing Rules

**Description:** Includes case type definitions, required response timeframes (e.g., expedited, non-expedited), notification timings, clock stoppage rules (holds/pending), etc.
Part of Process: Maintain Policy and Process Rules
Type of Activity: Automated with human interaction
Actors: Policy Manager
Triggers: User determines need to update policies, such as if the regulations or agency-specific guidance changes.
Pre-Conditions: None.
Post-Conditions: Policy rules are updated.
Supporting Services: None

User Story: As a Policy Manager, I need to provide values for the pre-defined processing rules that implement Federal and/or agency policies, so that the system can use the rules during the process and complete appropriate actions based on those values.

E.14.2 Activity: Define Valid Documentation for First Person Request Authentication

Description: Creates document types that are considered acceptable forms of identification to authenticate first-person requests.

Part of Process: Maintain Policy and Process Rules
Type of Activity: Automated with human interaction
Actors: Policy Manager
Triggers: User determines the need to update the types of documentation for authentication that may be presented by a Requester (or Requester Representative) when seeking first-person records.
Pre-Conditions: None.
Post-Conditions: The list of valid types of documentation and their presentation conditions (e.g., quantity of each required) are updated.
Supporting Services: None

User Story: As a Policy Manager, I need to define the types and quantities of documents (e.g., driver’s license, passport, birth certificate, etc.) that a Requester (or Requester Representative) must present when seeking first-person information as part of a FOIA request, so that the agency can properly authenticate that the person making the request is who they say they are.

E.14.3 Activity: Maintain Agency FOIA Regulations and Guidance

Description: Creates a repository of documentation (or links to documentation) useful for understanding the rules and processes governing the Agency’s processing of FOIA requests and maintains that content within a dedicated library for access by users and the public.

Part of Process: Maintain Policy and Process Rules
Type of Activity: Automated with human interaction
Actors: Policy Manager
Triggers: User determines need to update the set of Agency FOIA Regulations and Guidance.
Pre-Conditions: None.
Post-Conditions: Library of Regulations and Guidance is updated within the system and on the public web site or “Reading Room”.
Supporting Services: Content Management

User Story: As a Policy Manager, I need to curate and provision the Agency’s FOIA guidance and procedural documentation, both internally to the FOIA staff and externally to the public, such as on the agency’s web site, so that a current set of FOIA documentation is available for understanding the FOIA process and creating proper FOIA requests.

E.14.4 Activity: Maintain Communications Templates

Description: Defines default correspondence text and data field insertions (e.g., using mail merge) for various communication types.

Part of Process: Maintain Policy and Process Rules
Type of Activity: Automated with human interaction
Actors: Process Administrator
Triggers: User determines need to add or modify a communication template.
Pre-Conditions: None.
Post-Conditions: Templates are updated.
Supporting Services: Email Integration and Correspondence Production

User Stories

- As a Process Administrator, I need to create and customize communication templates with mail merge (or similar) functionality, such as acknowledgement “letters”, fee-related communications, expedited status decisions, appeal rights, etc., so that I can work more productively by having various communication templates available when I need them.

- As a Process Administrator, I need to map the defined communication templates to the related activities, so that only the relevant templates are available when completing a particular activity, which streamlines users’ effort and reduces the possibility of sending the wrong type of notification to a person.

E.14.5 Activity: Maintain DOJ Guidance and Case Law Resources

Description: Creates a repository of documentation (or links to documentation) useful for the Agency to make appropriate decisions based on Federal guidelines and case law and maintains the content in a dedicated library for use by Agency staff.

Part of Process: Maintain Policy and Process Rules
Type of Activity: Automated with human interaction
Actors: Policy Manager
Triggers: User determines need to update the set of DOJ Guidance and Case Law resources.
Pre-Conditions: None.
Post-Conditions: DOJ Guidance and Case Law resources content is updated and made available to case workers, such as through the internal FOIA Repository or other knowledge management environment.

Supporting Services: Content Management

User Story: As a Policy Manager, I need to curate and maintain the set of DOJ and case law documentation, for use by FOIA staff, so that a current set of externally mandated and related documentation is available to all Agency staff involved in the FOIA process.

E.14.6 Activity: Maintain Fee Schedule

Description: Maintains fees that are imposed on Requesters to process different types of requests

Part of Process: Maintain Policy and Process Rules
Type of Activity: Automated with human interaction
Actors: Policy Manager
Triggers: User determines the need to update the fee schedules, such as if Federal rules change for how much to charge Requesters.
Pre-Conditions: None.
Post-Conditions: Fee values and rules are updated.
Supporting Services: None

User Story: As a Policy Manager, I need to maintain the standard “price list” to be charged to certain types of requesters and for certain chargeable aspects of requests (e.g., copying/duplication, search, review, etc.), so that only and all applicable fees are correctly charged for FOIA requests.

E.14.7 Activity: Maintain Processes / Queues

Description: Defines Task Types, Status Types, Action Types, and their relationships to each other and to Processes/Queues for use as template workflow patterns.

Part of Process: Maintain Policy and Process Rules
Type of Activity: Automated with human interaction
Actors: Process Administrator
Triggers: User determines need to update the workflow types and rules.
Pre-Conditions: None.
Post-Conditions: Workflow templates are updated, including the types of tasks, actions, and status changes associated with each defined Process Queue type.
Supporting Services: Configurable Workflow

User Stories

- As a Process Administrator, I need to be able to clone and customize a process workflow, so that I can use and customize existing definitions without having to create each from scratch.

- As a Process Administrator, I need to be able to define a new Process Queue type that defines the set of tasks and actions to be performed, task
dependencies, action triggers and default recipients (persons or groups), default task assignees (persons or groups), and related status changes, so that the defined process can be selected as part of scoping each Request Item (sub-case) or each Appeals case and thus initiate the appropriate case workflow.

- As a Process Administrator, I need to define a hierarchy of process queue types, such that one type of process may be a subset of another (e.g., the simple request process can be further divided into variations of a simple request process, such as an “immigration records first-person simple request”), so that performance measures can be rolled up not only to the defined process, but also to Process Queue parent categories.

**E.14.8 Activity: Maintain Recordkeeping System Inventory and POCs**

*Description:* Manage and keep up to date an inventory of data sources that manage and store records that are likely to be responsive to FOIA requests.

*Part of Process:* Maintain Policy and Process Rules

*Type of Activity:* Automated with human interaction

*Actors:* Process Administrator

*Triggers:* Change to data source(s) or point(s) of contact or scheduled maintenance activity, such as a periodic review of the inventory.

*Pre-Conditions:* None

*Post-Conditions:* Updated data source inventory and list of data source points of contact, e.g., recordkeeping system subject matter experts (SMEs).

*Supporting Services:* None

**User Stories**

- As a Process Administrator, I need to associate an organizational entity with a records source, so that the correct organization is defined as the “custodian” and point of contact for searching for responsive records.

- As a Process Administrator, I need to identify the recordkeeping system SMEs of data sources, so that responsive records in sources can be accessed and discovered.

- As a Process Administrator, I need to view, filter, and select from data sources by various attributes of the source, including the “custodian” organization, FOIA topic(s), recordkeeping system SME, etc., so that the data source inventory can be parsed when needing to limit a search to certain types of records and systems.

**E.14.9 Activity: Maintain Reference Data**

*Description:* Populates and updates data tables used to validate the entry of various data attributes. These are controlled vocabularies.

*Part of Process:* Maintain Policy and Process Rules

*Type of Activity:* Automated with human interaction
**Actors:** Policy Manager | The System

**Triggers:** User determines the need to update any of the various controlled vocabularies used to restrict the valid set of domain values for a data attribute.

**Pre-Conditions:** None.

**Post-Conditions:** Reference data values are updated.

**Supporting Services:** None

**User Stories**

- As a Policy Manager, I need to maintain the list of valid values for each data attribute that is governed by a controlled vocabulary as its domain, so that users and the system in general are using the most current list of values to govern the content of certain data attributes.

- As The System, I need to enable the maintenance of controlled vocabularies and metadata types, so that records in the repository are consistently described and easily discoverable.

- As The System, I need to maintain the effective dates of valid values for each data attribute, so that both past and current FOIA data can coexist with appropriate assurances of data integrity.

**E.14.10 Activity: Maintain Task and Action Templates**

**Description:** Defines Task and Action Types and defaults for various task-specific attributes, such as expected task duration and the target group or person to perform the task or receive the action.

**Part of Process:** Maintain Policy and Process Rules

**Type of Activity:** Automated with human interaction

**Actors:** Process Administrator

**Triggers:** User determines need to update the workflow types and rules.

**Pre-Conditions:** None.

**Post-Conditions:** Workflow templates are updated, including the types of tasks and actions associated with each type of status change for a given Process Queue type.

**Supporting Services:** Configurable Workflow

**User Story:** As a Process Administrator, I need to create and update groupings of, and dependencies between, the set of tasks associated with each defined process (e.g., simple expedited, complex expedited, or any agency-defined process), so that case managers (e.g., Request Item Lead) can quickly select and apply a template to a case and it will populate the initial set of tasks and actions, dependencies, status triggers and status changes for a selected FOIA case.
E.14.11 **Activity: Maintain Topics and Mappings to Processes/Queues**

*Description:* Assigns one or more topics to a Process Queue to be used in support of automatically identifying and defaulting a Process Queue to a Request Item (sub-case) during the Request Intake process or to an Appeals case.

*Part of Process:* Maintain Policy and Process Rules  
*Type of Activity:* Automated with human interaction  
*Actors:* Process Administrator  
*Triggers:* User determines the need to update the mapping between Process Queue and topic.

*Pre-Conditions:* None.  
*Post-Conditions:* The mapping between Process Queue and topic is updated.  
*Supporting Services:* None

*User Story:* As a Process Administrator, I need to maintain the list of valid topics and their relationships to the types of Process Queues, so that the system can prompt case workers with an appropriate Process Queue based on the selected topics for a case.

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E.15 **Process: Manage Human Resources**

**NOTE:** From “Manage Human Interactions”

*User Story:* As a Resource Administrator, I need to maintain the set of resource-related information (e.g., organization, people, role assignments, skills, training requirements, workdays) that is needed to operate and manage the FOIA process, so that a data-driven process can be utilized to ensure a highly efficient business process.

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E.15.1 **Activity: Allocate Staff to FOIA Roles**

*Description:* Assigns one or more Role Types to a Staff Person.

*Part of Process:* Manage Human Resources  
*Type of Activity:* Automated with human interaction  
*Actors:* Resource Manager  
*Triggers:* The Resource Manager determines a need to define or update staffing roles to those who will work on cases with varying privileges.

*Pre-Conditions:* One or more Role Types are defined, and one or more Staff have been defined.  
*Post-Conditions:* Relationships are created, updated, or removed between Staff and the Roles (Role Types) they can assume.  
*Supporting Services:* None

*User Story:* As a Resource Manager, I need to establish role-based access control (RBAC) by assigning one or more roles to each Agency staff person involved in FOIA processing, so that only appropriate activities are performed by each assigned role.
E.15.2 Activity: Define FOIA Organizational Entities

Description: Defines the organizations of interest to the FOIA system, such as other agencies the agency will correspond with and the relevant sub-organizations (e.g., components, divisions, offices) within the agency.

Part of Process: Manage Human Resources
Type of Activity: Automated with human interaction
Actors: Resource Administrator
Triggers: An organization needs to be defined to the FOIA system.
Pre-Conditions: None.
Post-Conditions: A new organizational entity has been added to the system, including sub-organizations that roll-up to higher-level organizations.
Supporting Services: None

User Story: As a Resource Administrator, I need to maintain the list of organizational entities (stakeholders) who need to be referenced within the FOIA process, such as lists of other agencies and their sub-organizations and the sub-organizations within my agency, and maintain the relationships (e.g., management structure) amongst those entities, so that the Agency can assign FOIA-related work and communications to those entities and at the appropriate levels of the referenced organization.

E.15.3 Activity: Define FOIA Organizational Staff

Description: Defines the people within the FOIA system.

Part of Process: Manage Human Resources
Type of Activity: Automated with human interaction
Actors: Resource Manager
Triggers: A person needs to be added to the list of staff participating in the FOIA system.
Pre-Conditions: None.
Post-Conditions: A new person is added to the system and associated with an organizational entity at the appropriate level (i.e., lowest level), or a person is removed from an organization, or an organizational assignment for a person is updated.
Supporting Services: None

User Story: As a Resource Manager, I need to maintain the list of staff persons who are either active FOIA “performers” or support FOIA processes as subject matter experts (SMEs), each of which may become registered Users of the FOIA system and mapped to an Organizational Entity, so that an inventory of people can be leveraged as part of supporting the FOIA system.

E.15.4 Activity: Define Overall Work Calendar

Description: Defines the official workdays and non-working days for each year.

Part of Process: Manage Human Resources
Type of Activity: Automated with human interaction
Actors: Resource Administrator

Triggers: The working calendar needs to be updated.

Pre-Conditions: None.

Post-Conditions: The working calendar is updated to reflect official holidays, weekends, and hours per day.

Supporting Services: None

User Story: As a Resource Administrator, I need to define the working and non-working days (e.g., Federally observed holidays) for each fiscal year, so that request response and individual Task due dates take only working days into account.

E.15.5 Activity: Define Skill Requirements by Role

Description: Define the knowledge and skills FOIA staff need to have by Role Type.

Part of Process: Manage Human Resources

Type of Activity: Automated with human interaction

Actors: Resource Administrator

Triggers: The Resource Administrator determines a need to update the skill requirements related to a Role Type.

Pre-Conditions: A Role Type has been defined.

Post-Conditions: One or more Skill Types are associated with a Role Type, and new Skill Types may be added.

Supporting Services: None

User Story: As a Resource Administrator, I need to define a taxonomy of the required skills needed by each staff role, so that I can better track and manage the resources assigned and ensure adequate training is provided to address skill gaps.

E.15.6 Activity: Define Staff-Specific Work Calendars

Description: Defines staff-specific calendars to reflect personal days off and thus reflect the actual availability of the people.

Part of Process: Manage Human Resources

Type of Activity: Automated with human interaction

Actors: Resource Manager

Triggers: The Resource Manager determines a need to update a staff person's availability.

Pre-Conditions: The staff person has been defined to the system.

Post-Conditions: The staff person's calendar (i.e., list of days available or unavailable) is updated.

Supporting Services: None

User Stories

- As a Resource Manager, I need to customize staff calendars with their planned leave time, so that individual task assignments and possible reassignments take each person's availability into account.
As a Resource Manager, I need to indicate the expected number of hours per day available for FOIA-related work by staff person, so that individual task assignments and possible reassignments take each person’s availability into account.

**E.15.7 Activity: Define Training Requirements by Role**

*Description:* Define the Training Types and associations between the Training Types and Role Type.

*Part of Process:* Manage Human Resources

*Type of Activity:* Automated with human interaction

*Actors:* Resource Administrator

*Triggers:* The Resource Administrator determines a need to update the training requirements related to a Role Type.

*Pre-Conditions:* A Role Type has been defined.

*Post-Conditions:* One or more Training Types are associated with a Role Type, and new Training Types may be added.

*Supporting Services:* None

*User Story:* As a Resource Administrator, I need to define the set of training needed by each staff role, so that I can better track and manage the resources assigned and ensure adequate training is provided to address skill gaps.

**E.15.8 Activity: Determine Resource Gaps**

*Description:* This activity produces analyses to understand and highlight areas of over- or under-utilization of staff as related to prior, current, and projected workloads. These analyses would need to be analyzed by defined role, FOIA process area, type of case, various characteristics of a Request (e.g., expedited), and various characteristics of staff (e.g., level, skill type).

*Part of Process:* Manage Human Resources

*Type of Activity:* Automated with human interaction

*Actors:* Resource Administrator

*Triggers:* The Resource Administrator determines a need to review the past, current, and projected work levels against the current staffing pool and mix.

*Pre-Conditions:* None.

*Post-Conditions:* One or more analyses are produced that illustrates how well the past, current, and projected resources are aligned with the past, current, and projected workload.

*Supporting Services:* None

*User Story:* As a Resource Administrator, I need to analyze and compare the resources available to FOIA with the utilization requirements to complete work, including past, current, and future projections, so that adjustments to resources can be made, such as obtaining more resources, reducing resources, and/or reallocating existing resources across the FOIA process areas.
E.15.9 Activity: Maintain Staff Groups for Processes and Tasks/Actions

Description: Defines groups (or teams) of staff who are expected to work on similar cases and thus can be maintained as a “pool” for allocating cases and tasks and/or receiving notifications or other actions.

Part of Process: Manage Human Resources
Type of Activity: Automated with human interaction
Actors: Resource Manager
Triggers: The Resource Administrator determines a need to define or update staffing groups who will work on case tasks.
Pre-Conditions: None.
Post-Conditions: Staffing groups are created or updated (e.g., staff added or removed from an existing group).
Supporting Services: None

User Story: As a Resource Manager, I need to define groups (i.e., teams) of staff who may be assigned a task for completion, so that when applicable, a pool of resources may be assigned a task, rather than a single individual, thus permitting the group to either self-select in getting their work completed or be assigned based on another heuristic (e.g., round robin, highest availability, etc.).

E.15.10 Activity: Maintain Staff Skills and Training

Description: Ensure FOIA staff acquire and maintain the required knowledge and skills. The activity associates one or more Skill Types and Training Types with a particular Staff Person. The association includes the status of the skill and training acquired, such as a need exists, or a training has been completed.

Part of Process: Manage Human Resources
Type of Activity: Automated with human interaction
Actors: Resource Manager
Triggers: The Resource Manager determines the need to update the skills and/or training associated with a Staff Person.
Pre-Conditions: Skill Types and Trainings have been defined.
Post-Conditions: Relationships between a Staff Member and Skill Types and Trainings are updated.
Supporting Services: None

User Story: As a Resource Manager, I need to keep a current inventory of the skills and training planned for and completed by each person supporting the FOIA process, so that gaps in skills and training can be identified and addressed, and resources are appropriately considered for the defined roles.

E.15.11 Activity: Rebalance Workload

Description: Permits the user to reassign work from one person to another, including the ability to select multiple assignments and reassign them as a set. The
reassignments can include reassigning cases (Requests, Request Items, Appeals, etc.) and individual Tasks.

**Part of Process:** Manage Human Resources  
**Type of Activity:** Automated with human interaction  
**Actors:** Resource Manager  
**Triggers:** The Resource Manager has viewed the Case Workload and determines a need to make reassignments amongst the staff.  
**Pre-Conditions:** One or more assignments exist to the staff overseen by the Resource Manager (or Resource Administrator).  
**Post-Conditions:** One or more Cases and/or Tasks are reassigned from one person to another person.  
**Supporting Services:** None  

**User Story:** As a Resource Manager, I need to move case and/or individual task assignments from a currently assigned individual to another person, so that resource utilization is more efficient (e.g., when too much work is assigned to one person, a person is going on or is on leave).

### E.15.12 Activity: Review Case Workload

**Description:** Presents the user with a view of the current and expected workload (based on staffing assignments) by person and role.

**Part of Process:** Manage Human Resources  
**Type of Activity:** Automated with human interaction  
**Actors:** Resource Manager  
**Triggers:** The Resource Manager determines a need to review the current workload for their assigned staff.  
**Pre-Conditions:** None  
**Post-Conditions:** A view is provided showing the current and upcoming work assigned to the Resource Manager (or Resource Administrator).  
**Supporting Services:** None  

**User Story:** As a Resource Manager, I need to view, such as with lists, charts, and graphs, the current distribution of case work across teams and individuals, so that I can determine whether staff are utilized efficiently and if reallocations (rebalancing) of the work would be useful.

### E.16 Process: Manage FOIA Records Environments

**User Stories**

- As a FOIA Records Environment Manager, I need to search, process and review email from a wide variety of formats, such as, PST, MSG, NSF, EML and DBX, so that the system can accommodate various sources where releasable records may be stored.

- As The System, I need to capture an audit (log) of all actions taken in a FOIA record environment, so that every action taken in the environment can be reviewed for compliance.
• As The System, I need to keep documents in their native formats (e.g., Excel), rather than having to convert to another format, such as PDF, so that the process will be more efficient.

• As The System, I need to log changes made to record metadata, so that data in the environment is auditable.

• As The System, I need to uniquely number native files, email messages, and attachments during the data loading process and store the unique number, so that each part of a record can be tracked as a possible releasable item.

E.16.1 Activity: Apply Final Disposition of Repository Records

Description: This activity addresses the disposal of temporary records no longer needed to conduct agency business, usually by destruction or occasionally by donation. Records in the FOIA Repository will most likely “expire” after a defined number of years, per government policy (e.g., NARA). Upon expiration, records may need to be permanently purged, transferred to agency storage facilities or NARA records centers, or transferred from one Federal agency to another.

Part of Process: Manage FOIA Records Environments
Type of Activity: Automated with human interaction
Actors: FOIA Records Environment Manager | Policy Manager | The System
Triggers: Either the expiration date for a record in the Repository is approaching (e.g., within x days), the expiration date has passed with no disposition action, or a record exists in the repository without any disposition information.

Pre-Conditions: A record is in the FOIA Repository.
Post-Conditions: A record’s retention information, such as the status, date of expiration, etc. are updated to reflect the disposition action to be applied upon expiration.

Supporting Services: None

User Stories

• As a FOIA Records Environment Manager, I need to be able to purge multiple records at a time when their retention period has expired and the retention action for those records is designated as destroy, so that only appropriate records are maintained within the Agency.

• As a FOIA Records Environment Manager, I need to review and approve records for final disposition action of records in a FOIA records environment, so that the retention of records in the repository follow the records retention schedule.

• As a Policy Manager, I need to be able to configure a data-driven processing rule that will set the number of years to retain FOIA requests before setting aside or destroying after final adjudication if appealed (e.g., 3 years), which is based on the date original request was received by
responding agency, so that the rule can be easily modified as laws, regulations, and/or Agency policies change, and the result of the change will dynamically modify the related business activity.

- As a Policy Manager, I need to be able to configure a data-driven processing rule that will set the number of years to retain FOIA requests before setting aside or destroying if not appealed (e.g., 6 years), which is based on the date original request was received by responding agency, so that the rule can be easily modified as laws, regulations, and/or Agency policies change, and the result of the change will dynamically modify the related business activity.

- As a Policy Manager, I need to be able to configure a data-driven processing rule that will set the number of years to retain responsive records in the FOIA Repository before setting aside or destroying (e.g., 25 years), which is based on the date of original record creation, so that the rule can be easily modified as laws, regulations, and/or Agency policies change, and the result of the change will dynamically modify the related business activity.

- As The System, I need to alert the FOIA Records Environment that records in the FOIA repository have met their disposition date, so that records past their disposition in the FOIA repository are not overlooked.

- As The System, I need to automatically calculate reminder dates for case deletion based on retention guidelines, so that records retention policies are consistently met with less human intervention and opportunities for error.

- As The System, I need to calculate the disposition date of records in the repository based on their assigned records category, so that the date for acting on the disposition of records in the repository is clear.

- As The System, I need to destroy records that should no longer be retained, so that they are gone and not recoverable.

- As The System, I need to execute the disposition of records in the FOIA repository whose disposition actions are approved by the Repository Manager, so that records are not unnecessarily kept in the repository.

**E.16.2 Activity: Maintain Repository Metadata**

*Description:* Updates the values of metadata for records within the FOIA record environments, i.e., the FOIA Repository and FOIA Library.

*Part of Process:* Manage FOIA Records Environments

*Type of Activity:* Automated with human interaction

*Actors:* FOIA Records Environment Manager | The System

*Triggers:* Ongoing, as needed.

*Pre-Conditions:* The existence of a FOIA records environment.
**Post-Conditions:** Metadata for records within the environment has been updated to reflect the current state.

**Supporting Services:** AI/ML/HLT-Enabled Metadata Extraction

**User Stories**

- As a FOIA Records Environment Manager, I need to assign records in a FOIA records environment to a records category as part of a records retention schedule, so that the period of required retention and disposition action for records in the repository is clear.

- As a FOIA Records Environment Manager, I need to designate one or more records at a time with an appropriate retention disposition, so that records retention policies are consistently met with less human intervention and opportunities for error.

- As The System, I need to extract and index metadata from native files stored in the repository without modifying the original file, so that records stored in the repository are not unintentionally altered.

- As The System, I need to extract and index metadata from native files stored in the repository, so that records stored in the repository can be discovered.

**E.16.3 Activity: Manage Repository Access**

**Description:** Maintains access privileges for the two main FOIA Record Environments, including (1) the FOIA Repository, which comprises all responsive records resulting from FOIA search and review activities, and (2) the FOIA Library, which comprises all records deemed to be accessible by the public and resulting from proactive disclosure activities. Appropriate access to those records must be carefully controlled, as some may be sensitive or contain sensitive data or metadata (information about the data).

**Part of Process:** Manage FOIA Records Environments

**Type of Activity:** Automated with human interaction

**Actors:** FOIA Records Environment Manager

**Triggers:** A new user or user group either needs access to a FOIA Repository or a change to their existing access, such as removing or downgrading permissions within the Repository.

**Pre-Conditions:** A record is in a FOIA Repository.

**Post-Conditions:** Access control information is applied to records in a FOIA Repository. These controls may take various forms, such as defined user groups and privilege settings by group and specific record assignments to groups and/or individuals for viewing and updating (e.g., changing exemptions and/or redaction information). Typically, these designations are characterized as part of role-based access controls (RBAC) and/or attribute-based access control (ABAC).

**Supporting Services:** None

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User Stories

- As a FOIA Records Environment Manager, I need to assign levels of record and attribute-based access control (ABAC) within a FOIA records environment to each Agency staff person that will interact with FOIA records, so that information is accessible only to appropriate individuals.

- As a FOIA Records Environment Manager, I need to map repository folders to multiple custodians with multiple levels of permissions, so that the system can manage access permissions to records in the repository that are organized into folders.

E.17 Process: Respond to Referral

User Story: As a Perfection Specialist, I need to prepare a FOIA response to the Requester related to those records that have been referred by Another Agency, so that records for which my Agency is considered the originating source are properly handled.

E.17.1 Activity: Assign Case to Lead

NOTE: This is a recurrent activity. For a complete definition and associated user stories refer to the activity within the Perform Supplemental Case Activities process in Appendix E.13.2.

E.17.2 Activity: Assign Organizational Ownership to Request

NOTE: This is a recurrent activity. For a complete definition and associated user stories refer to the activity within the Perform Supplemental Case Activities process in Appendix E.13.4.

E.17.3 Activity: Associate Responsive Records with Request Item

NOTE: This is a recurrent activity. For a complete definition and associated user stories refer to the activity within the Search for Responsive Records process in Appendix E.5.1.

E.17.4 Activity: Determine Process Queue

NOTE: This is a recurrent activity. For a complete definition and associated user stories refer to the activity within the Manage Tasks process in Appendix E.12.8.

E.18 Process: Respond to Coordination or Consultation Inquiry

User Story: As a Request Lead, I need to prepare a Coordination or Consultation response to Another Agency that has initiated such an action with my Agency, so that records for which my Agency may have an equity interest are properly handled by Another Agency.
E.18.1 Activity: Assign Case to Lead

NOTE: This is a recurrent activity. For a complete definition and associated user stories refer to the activity within the Perform Supplemental Case Activities process in Appendix E.13.2.

E.18.2 Activity: Assign Organizational Ownership to Request

NOTE: This is a recurrent activity. For a complete definition and associated user stories refer to the activity within the Perform Supplemental Case Activities process in Appendix E.13.4.

E.18.3 Activity: Close Case

NOTE: This is a recurrent activity. For a complete definition and associated user stories refer to the activity within the Perform Supplemental Case Activities process in Appendix E.13.6.

E.18.4 Activity: Determine Process Queue

NOTE: This is a recurrent activity. For a complete definition and associated user stories refer to the activity within the Manage Tasks process in Appendix E.12.8.

E.18.5 Activity: Evaluate Coordination or Consultation Inquiry from Another Agency

Description: A coordination or consultation inquiry sent to the Agency is evaluated for an appropriate response.

Part of Process: Respond to Coordination or Consultation Inquiry
Type of Activity: Automated with human interaction
Actors: Request Lead
Triggers: A Coordination or Consultation Inquiry is received from Another Agency.
Pre-Conditions: A Coordination or Consultation Inquiry is received from Another Agency.
Post-Conditions: An Agency response is prepared for a Coordination or Consultation Inquiry from Another Agency.
Supporting Services: None

User Story: As a Request Lead, I need to review a coordination or consultation action received from Another Agency for possible concerns related to my Agency's equities in the set of responsive records found within their recordkeeping systems, so that our Agency can determine how to respond to the Other Agency as to our position related to their responsive records.

E.18.6 Activity: Respond to Coordination or Consultation Inquiry from Another Agency

Description: Once the Agency has evaluated a coordination or consultation inquiry from Another Agency, it will send its response back to that agency.

Part of Process: Respond to Coordination or Consultation Inquiry
Type of Activity: Automated with human interaction
Actors: Request Lead
Triggers: The Agency determines a response is ready to be sent to Another Agency.
Pre-Conditions: A response has been prepared.
Post-Conditions: The response is sent to the requesting Agency.
Supporting Services: Standardized Data Exchange | Email Integration and Correspondence

User Story: As a Request Lead, I need to send a response to a coordination or consultation action received from Another Agency for possible concerns related to my Agency's equities in the set of responsive records found within their recordkeeping systems, so that the Other Agency will know how they should proceed with respect to the release of records.

E.19 Process: Modify Scope of Request

User Stories

- As a Request Lead, I need to be able to review and propose scope modifications to the Requester at any time and for any reason, such as to reduce the fees or time to prepare responsive records, so that the Request can be tailored to meet the Requester’s needs.

- As a Requester, I need to be able to modify the scope of my request at any time and for any reason, such as to reduce the fees or time to receive responsive records, so that my Request can be tailored to meet my needs.

E.19.1 Activity: Close Case

NOTE: This is a recurrent activity. For a complete definition and associated user stories refer to the activity within the Perform Supplemental Case Activities process in Appendix E.13.6.

E.19.2 Activity: Confirm Change in Request Scope

Description: Prior to updating Request Items, a confirmation from the Requester that the scope should be changed is provided.

Part of Process: Modify Scope of Request
Type of Activity: Automated with human interaction
Actors: Requester
Triggers: The Requester confirms a specific change to the scope of their Request.
Pre-Conditions: A draft change in scope has been defined.
Post-Conditions: The Requester confirms a change in scope.
Supporting Services: Automated & Human (Tolling) | Email Integration and Correspondence

User Story: As a Requester, I need to finalize a change in the scope of my Request before the Agency commits to making the change, so that there is an explicit acknowledgement from me that a change should be made and that an audit trail of that decision can be recorded.
E.19.3 Activity: Determine Estimated Completion Date

Description: Provides an estimate for the completion date.

Part of Process: Modify Scope of Request
Type of Activity: Automated with human interaction
Actors: Sizing & Scoping Specialist | The System
Triggers: The case worker has been assigned a perfected request.
Pre-Conditions: There is an active, perfected request from the Requester.
Post-Conditions: The Estimated Completion Date is updated, if applicable, to reflect the time it will take to complete the search and response.
Supporting Services: None

User Stories

- As a Sizing & Scoping Specialist, I need to set an Estimated Completion Date when there are unusual circumstances that will extend beyond 10 additional business days (e.g., 30 days total), so that I can be prepared to inform the Requester of an EDC, should he/she request it.

- As The System, I need to track each change in the estimated completion date (ECD), so that performance and other types of analysis can be conducted across the set of FOIA Requests.

E.19.4 Activity: Estimate Processing Effort and Other Fee-Based Items

NOTE: This is a recurrent activity. For a complete definition and associated user stories refer to the activity within the Scope and Size Request process in Appendix E.3.13.

E.19.5 Activity: Evaluate Possible Impact to Fees and/or Estimated Completion Date

Description: Given input from a Search result, Review effort, or a Requester’s desire to modify the scope of their request, the Agency will evaluate impacts to Fees or to being able to complete the Request within the compliance period (e.g., 20 days).

Part of Process: Modify Scope of Request
Type of Activity: Automated with human interaction
Actors: Request Lead
Triggers: The Agency's search and review activities result in a greater or smaller workload than originally estimated.
Pre-Conditions: A search for responsive records has been completed.
Post-Conditions: The Agency will decide whether to engage the Requester to see if they would prefer to make a change in scope.
Supporting Services: None

User Story: As a Request Lead, I need to compare the initial fee and level of effort estimates against the results of a search effort, so that if there’s a significant discrepancy in scope and/or cost, the Requester can be
contacted to determine whether they would prefer to make a change to the scope of their Request.

E.19.6 Activity: Initiate Change to Request Scope

Description: The Requester may initiate a change in the scope of their request, such as to reduce fees or obtain a faster response. In addition, if the change in scope was suggested by the Agency, this activity permits the Requester to confirm that change.

Part of Process: Modify Scope of Request
Type of Activity: Automated with human interaction
Actors: Requester
Triggers: A Requester contacts the Agency to change the scope of their Request or has received a notification from the Agency about possibly changing the scope of their Request.
Pre-Conditions: A Request is confirmed as perfected.
Post-Conditions: A documented “draft” change to the scope of the Request.
Supporting Services: Email Integration and Correspondence Production

User Story: As a Requester, I need to prepare a draft change to the scope of my open FOIA Request, so that the draft can be reviewed with the Agency and an appropriate and useful change in scope can be defined.

E.19.7 Activity: Notify Requester of Unusual Circumstances

NOTE: This is a recurrent activity. For a complete definition and associated user stories refer to the activity within the Scope and Size Request process in Appendix E.3.18.

E.19.8 Activity: Receive Notification from Agency

NOTE: This is a recurrent activity. For a complete definition and associated user stories refer to the activity within the Conduct Request Intake process in Appendix E.3.19.

E.19.9 Activity: Review Possible Change to Scope

Description: If a Requester asks to modify the scope of their Request, this activity will review and document the requested change.

Part of Process: Modify Scope of Request
Type of Activity: Automated with human interaction
Actors: Request Lead
Triggers: An evaluation of either a difference in expected effort or volume in responsive records than what was produced or by the Requester to modify the scope of the Request.
Pre-Conditions: A possible change in scope is identified either by the Requester or the results of a search effort that, for example, produced more records than originally anticipated.
Informal ideas are discussed between the Agency and Requester to help the Requester determine whether they would like to make a change in scope to their Request.

**Supporting Services:** FOIA Processing “Clock” Starts and Stops (Tolling)

**User Story:** As a Request Lead, I need to coordinate a possible change to the scope of a FOIA Request with the Requester, such as a discrepancy between the initial estimate and the results stemming from the search for responsive records, so that the Requester can provide input to what changes they may want, such as to reduce the scope of their request.

**E.19.10 Activity: Update Request Items**

**Description:** If there is a change in scope, one or more Request Items (sub-cases) will need to be modified, to include revising the definition of each and/or removing or adding a new Request Item for processing.

**Part of Process:** Modify Scope of Request

**Type of Activity:** Automated with human interaction

**Actors:** Request Lead | The System

**Triggers:** A change in scope is confirmed.

**Pre-Conditions:** The Requester confirms a change in scope.

**Post-Conditions:** One or more Request Items are updated, added, and/or removed (closed without completion) based on the confirmed change.

**Supporting Services:** None

**User Stories**

- As a Request Lead, I need to either modify a defined Request Item (sub-case), close an existing Request Item, or add a new Request Item, so that the scope change is defined within the case management constructs.

- As The System, I need to track all changes to Request Items as an audit trail, so that if questions arise later there is clear documentation regarding the change in scope.

**E.19.11 Activity: Withdraw Request**

NOTE: This is a recurrent activity. For a complete definition and associated user stories refer to the activity within the Perform Supplemental Case Activities process in Appendix E.13.12.

**E.20 Process: Monitor Litigation**

**User Stories**

- As a Litigation Lead, I need to define, assign, and oversee the completion of one or more tasks, so that the process can be completed, and activities can be tracked and analyzed.
As a Litigation Lead, I need to keep track of legal actions that impact the completion of FOIA Requests, such as those pertaining to Requesters who may be looking for the release of records the Agency does not believe should be released or commercial Submitters who may file an injunction against the Agency to prevent records pertaining to confidential business information (CBI) from being released (e.g., claiming a (b)4 exemption that the Agency disputes), so that processing delays are understood and required remand actions related to a FOIA response can be addressed.

**E.20.1 Activity: Capture Litigation Decision or Order**

*Description:* Document the litigation decision or intermediate court order and update the status of the case. This often include adjusting an agency’s request response. Litigation decisions may include remands from the court or agreements between parties. Court orders may come from litigation cases that are still ongoing.

*Part of Process:* Monitor Litigation

*Type of Activity:* Automated with human interaction

*Actors:* Litigation Lead

*Triggers:* Agency receives decision or agreement from a litigation case.

*Pre-Conditions:* None

*Post-Conditions:* Implementation of the remand or agreement documented in the decision as needed.

*Supporting Services:* None

**User Stories**

- As a Litigation Lead, I need to capture each court decision made, including a final decision on the legal case and any interim court orders that may need to be followed, so that there is a well-documented account of actions that will be required to remand the situation with the Requester.

- As a Litigation Lead, I need to review the litigation decision, so that we can take the appropriate remand actions as needed and update the status of the case.

**E.20.2 Activity: Capture Litigation Related to Request**

*Description:* This activity documents a litigation activity, including a Requester-led lawsuit or an injunction by a commercial Submitter and associates the litigation record with one or more FOIA Request cases.

*Part of Process:* Monitor Litigation

*Type of Activity:* Automated with human interaction

*Actors:* Litigation Lead

*Triggers:* Requester brings a FOIA lawsuit against the agency, or a commercial Submitter files an injunction to temporarily prevent the release of records in a FOIA request response.

*Pre-Conditions:* None
Post-Conditions: Litigation case is documented. Note that this may be handled within the FOIA system and/or a litigation case management system. If the latter, it is presumed some trackable information, such as the legal case number would be correlated within the FOIA system.

Supporting Services: None

User Story: As a Litigation Lead, I need to capture a litigation case related to one or more requests, so that we know if a FOIA case and its response will be impacted during and after the litigation action.

E.20.3 Activity: Close Litigation

Description: Once the final litigation determination has been completed by the courts and captured within the FOIA system, the litigation action status is set to closed.

Part of Process: Monitor Litigation
Type of Activity: Automated with human interaction
Actors: Litigation Lead
Triggers: A final litigation determination has been received by the Agency.
Pre-Conditions: An existing, open litigation action record exists.
Post-Conditions: The status of the litigation action is set to closed.
Supporting Services: None

User Story: As a Litigation Lead, I need to update the status of a litigation action to closed once the courts have provided a final decision, so that the Agency can proceed with completing the FOIA Request and/or taking action to close the case as applicable.

E.20.4 Activity: Identify and Flag Responsive Records Subject to Injunction

Description: All records related to a commercial Submitter's injunction to stop the release of their records (e.g., they are pushing for exemption 4) will be flagged such that they will not be released to a Requester until the matter has been resolved in the courts.

Part of Process: Monitor Litigation
Type of Activity: Automated with human interaction
Actors: Litigation Lead
Triggers: A commercial Submitter has filed an injunction with the courts to temporarily stop the release of one or more of their records held by the Agency.
Pre-Conditions: A Request is in the Review process with one or more Submitter records that are the subject of an injunction filed by the Submitter.
Post-Conditions: The status of one or more responsive records to a Request are updated to suspend their release until the courts determine whether their release to a Requester is appropriate.
Supporting Services: None

User Story: As a Litigation Lead, I need to update the status of specific responsive records associated with a Request based on a Submitter’s injunction, so
that no further activity can continue with the Request until the litigation action has been resolved.

E.20.5 Activity: Provide Litigation Decision or Court Order Information

**Description:** Generally, the Agency’s Office of General Counsel (OGC) will inform the FOIA staff (Litigation Lead role) of the court’s decision on a lawsuit or injunction against the Agency.

**Part of Process:** Monitor Litigation

**Type of Activity:** Manual (no user stories in scope)

**Actors:** Agency General Counsel

**Triggers:** The Agency’s General Counsel informs the Litigation Lead of information about either a court order or the court’s final litigation decision.

**Pre-Conditions:** An open litigation exists.

**Post-Conditions:** Court order or final court litigation decision information related to an existing litigation is captured and associated with one or more FOIA Requests.

**Supporting Services:** None

E.20.6 Activity: Provide Litigation Information

**Description:** Generally, the Agency’s Office of General Counsel (OGC) will inform the FOIA staff (Litigation Lead role) of a new legal action taken by a Requester (or their representative) or a commercial Submitter.

**Part of Process:** Monitor Litigation

**Type of Activity:** Manual (no user stories in scope)

**Actors:** Agency General Counsel

**Triggers:** The Agency’s General Counsel informs the Litigation Lead of a new litigation action taken by a Requester or commercial Submitter.

**Pre-Conditions:** A FOIA Request exists, which is the subject of a new litigation action.

**Post-Conditions:** Information about a new litigation action is captured and associated with one or more FOIA Requests.

**Supporting Services:** None

E.20.7 Activity: Resume Case Based on Litigation Result

**Description:** If the case was previously suspended while a litigation is active, this activity resumes work on the FOIA Request and updates the status of the case to active.

**Part of Process:** Monitor Litigation

**Type of Activity:** Automated with human interaction

**Actors:** Litigation Lead

**Triggers:** An outcome of a litigation (i.e., the court decision) has been made.

**Pre-Conditions:** An outcome of a litigation (i.e., the court decision) has been made for a Requester’s litigation action or a commercial Submitter's injunction.

**Post-Conditions:** Either the status of the Requester's case or the status of some or all the Submitter’s responsive records is updated to remove the suspension.

**Supporting Services:** None
**User Story:** As a Litigation Lead, I need to update the status to resumed for a FOIA Request or update the status of specific responsive records associated with a Request based on the litigation being closed (resolved), so that further activity may continue with the Request.

**E.20.8 Activity: Suspend Case Due to Litigation**

*Description:* When a Requester files a lawsuit with the courts, the Request(s) related to that litigation may be suspended such that no more action will be taken until the matter has been resolved in the courts.

NOTE: In some circumstances, the case will remain open and proceed while the litigation is active.

*Part of Process:* Monitor Litigation  
*Type of Activity:* Automated with human interaction  
*Actors:* Litigation Lead  
*Triggers:* The Agency learns that a Requester or their Representative has filed a court case related to one or more FOIA Requests.  
*Pre-Conditions:* Litigation information related to one or more Requests has been captured.  
*Post-Conditions:* The FOIA Request status is updated to reflect an active litigation. This effectively suspends further actions related to the FOIA Request until the litigation is resolved.  
*Supporting Services:* None

**User Story:** As a Litigation Lead, I need to update the status of a FOIA Request to suspended based on its association with an open (not yet resolved) litigation, so that no further activity can occur on the Request until the litigation decision is made or a court order has been determined.

**E.21 Process: Manage Account**

*User Story:* As a User Account Manager, I need to ensure that Users can access the system through appropriate authentication and individuals who no longer require access are precluded from system access, so that the integrity of access to the FOIA system is assured.

**E.21.1 Activity: Check for Existing User Account**

*Description:* Verifies whether an existing user account already exists for the person trying to register a new account, such as by checking for the existence of the email address being used.

*Part of Process:* Manage Account  
*Type of Activity:* Fully automated with no human interaction  
*Actors:* The System  
*Triggers:* A user is trying to register a new account.  
*Pre-Conditions:* None.  
*Post-Conditions:* If an existing account exists for the user, such as based on the email address associated with the account, then the user will be notified that the account already exists, and no new registration will occur. If no existing
account exists, the system will return with an OK status to complete the registration.

**Supporting Services:** None

**User Story:** As The System, I need to verify that a user trying to register for a new account isn’t already a registered user, so that each requester can be uniquely identified to the FOIA system and thereby ensure the integrity of correspondence and other shared information between the agency and the requester.

### E.21.2 Activity: Close User Account

**Description:** Permanently closes a user account (e.g., Requester, agency staff) so they can no longer access the FOIA system.

**Part of Process:** Manage Account

**Type of Activity:** Automated with human interaction

**Actors:** User Account Manager

**Triggers:** The User Account Manager determines a user no longer requires an account to access the FOIA system (e.g., the staff person is no longer affiliated with the agency).

**Pre-Conditions:** An active user account exists.

**Post-Conditions:** The user’s account is permanently closed, thereby disabling access to the FOIA system.

**Supporting Services:** None

**User Story:** As a User Account Manager, I need to permanently close a user’s account, so that the user is no longer able to gain access to the FOIA system.

### E.21.3 Activity: Deactivate User Account

**Description:** Updates the status of a user’s account as non-active and thus cannot be used to gain access to the FOIA system.

**Part of Process:** Manage Account

**Type of Activity:** Automated with human interaction

**Actors:** Policy Manager | The System | User Account Manager

**Triggers:** A threshold is met within the system processing rules for the account to become deactivated.

**Pre-Conditions:** An active user account exists.

**Post-Conditions:** The user’s account is placed in an expired status, thereby disabling access to the FOIA system.

**Supporting Services:** None

**User Stories**

- As a Policy Manager, I need to be able to configure a data-driven processing rule that will set the number of days of inactivity to deactivate user (e.g., 90 days), which is based on the last date of system activity for the user, so that the rule can be easily modified as laws, regulations, and/or
Agency policies change, and the result of the change will dynamically modify the related business activity.

- As The System, I need to deactivate a user’s account, which is a temporary setting after a defined threshold period of unuse, so that the user is unable to gain access to the system during periods when they no longer require it.

- As a User Account Manager, I need to deactivate a user’s account, which is a temporary setting, so that the user is unable to gain access to the system during periods when they no longer require it.

**E.21.4 Activity: Expire User Password**

**Description:** Renders a user’s password to be expired and thus no longer usable to login to the user's account.

**Part of Process:** Manage Account

**Type of Activity:** Automated with human interaction

**Actors:** Policy Manager | The System

**Triggers:** A threshold is met within the system processing rules for the password to expire.

**Pre-Conditions:** An active user account exists.

**Post-Conditions:** The user’s account is temporarily disabled until a new password is updated by the user.

**Supporting Services:** None

**User Stories**

- As a Policy Manager, I need to be able to configure a data-driven processing rule that will set the number of days before a password expires (e.g., 60 days), which is based on the last date password was set for or by user, so that the rule can be easily modified as laws, regulations, and/or Agency policies change, and the result of the change will dynamically modify the related business activity.

- As The System, I need to expire a user’s password after a defined threshold period has passed without the user changing their password, so that only active users continue to have access to the system and old passwords are updated to maximize security.

- As The System, I need to remind a user to update their password after a defined threshold period has passed, so that a user’s password is not easily guessed, and any new password requirements are met.

**E.21.5 Activity: Login to FOIA Account**

**Description:** This is an optional activity for those who have previously registered with the Agency’s FOIA system and therefore set up a user account.
NOTE: Note that a Requester may submit a FOIA Request without logging in, however, their functionality will be more limited (e.g., they will not have access to a dashboard of their existing and prior requests).

**Part of Process:** Manage Account
**Type of Activity:** Automated with human interaction
**Actors:** Policy Manager | User
**Triggers:** A user decides to login to their account to perform FOIA-related functionality.
**Pre-Conditions:** The user has previously registered with the agency’s FOIA system.
**Post-Conditions:** A user is authenticated (e.g., username, password, two-factor authentication, etc.) to the agency’s FOIA system.
**Supporting Services:** None

**User Stories**

- As a Policy Manager, I need to be able to configure a data-driven processing rule that will set the number of user login attempts before lockout (e.g., 5 attempts), which is based on the count of unsuccessful login attempts, so that the rule can be easily modified as laws, regulations, and/or Agency policies change, and the result of the change will dynamically modify the related business activity.

- As a User, I need to login to my account with credentials (e.g., password), so that my information is protected, and I am only permitted to perform actions that have been assigned to me.

### E.21.6 Activity: Logout of FOIA System

**Description:** Terminates the user’s active session with the FOIA system.

**Part of Process:** Manage Account
**Type of Activity:** Automated with human interaction
**Actors:** Policy Manager | User
**Triggers:** The user determines their current session is complete and will not require access until a subsequent login event.
**Pre-Conditions:** The user is currently logged in to the FOIA system.
**Post-Conditions:** The user has been logged off the system, which ends their current session.
**Supporting Services:** None

**User Stories**

- As a Policy Manager, I need to be able to configure a data-driven processing rule that will set the # minutes (e.g., 30 minutes) of inactivity to force a logout, so that the rule can be easily modified as laws, regulations, and/or Agency policies change, and the result of the change will dynamically modify the related business activity.
• As a User, I need to logout of my current online session with the agency’s FOIA system, so that I am no longer authenticated to perform FOIA-related activities until I re-authenticate with proper credentials.

**E.21.7 Activity: Notify User of Upcoming PasswordExpiration**

*Description:* A user is notified by the system that their password will expire within a timeframe defined within the processing rules of the system.

*Part of Process:* Manage Account  
*Type of Activity:* Automated with human interaction  
*Actors:* Policy Manager | The System  
*Triggers:* A threshold is met within the system processing rules for the number of days prior to password expiration.  
*Pre-Conditions:* An active user account exists.  
*Post-Conditions:* A notification is sent to the user with instructions for updating their password by the defined expiration date.  
*Supporting Services:* Email Integration and Correspondence Production

**User Stories**

• As a Policy Manager, I need to be able to configure a data-driven processing rule that will set the number of days before each password expiration notice (e.g., 15 days prior, 10 days prior, 5 days prior, etc.), which is based on the date of password expiration, so that the rule can be easily modified as laws, regulations, and/or Agency policies change, and the result of the change will dynamically modify the related business activity.

• As The System, I need to notify a user that their password will expire within X days (where X is defined by processing rules), so that passwords are routinely changed to enhance security protections in the system.

**E.21.8 Activity: Register with Agency’s FOIA System**

*Description:* Creates an authorized and named user of the FOIA system who will need to be authenticated before using FOIA-related functionality.

*Part of Process:* Manage Account  
*Type of Activity:* Automated with human interaction  
*Actors:* The System | User  
*Triggers:* A user decides to register and thus create a new account to perform FOIA-related functionality.  
*Pre-Conditions:* None.  
*Post-Conditions:* A new user account is created for the user.  
*Supporting Services:* None

**User Stories**

• As The System, I need to enforce password requirements, such as the length, number of letters, numbers, capitalization, special characters, etc.
are used, so that passwords are not possible to be guessed as part of attempted security breaches.

- As a User, I need to register with a username, email address, and password (at a minimum) with the agency’s FOIA system, so that I am uniquely identified by the system and can be assured that all communications and information are properly directed to me as needed.

**E.21.9 Activity: Reset User Password**

*Description:* Updates a user’s password to a string created by the system so the user can update it to a new one.

*Part of Process:* Manage Account

*Type of Activity:* Automated with human interaction

*Actors:* Policy Manager | The System | User Account Manager

*Triggers:* A user needs to have their password reset in the case they forgot it, or a user account manager decides to manually reset it.

*Pre-Conditions:* An active user account exists.

*Post-Conditions:* The user’s password is reset to a default string with a limited expiration (e.g., 24 hours or less), thereby permitting the user to update their password.

*Supporting Services:* None

*User Stories*

- As a Policy Manager, I need to be able to configure a data-driven processing rule that will set the number of minutes for a reset password to remain active (e.g., 30 minutes), which is based on the time that password reset was initiated for the user, so that the rule can be easily modified as laws, regulations, and/or Agency policies change, and the result of the change will dynamically modify the related business activity.

- As The System, I need to require a user to change their password from a temporary password provided by an account manager to a new password, so that the user can continue to login to the system with a password of their choosing and one that only they know.

- As a User Account Manager, I need to reset a user’s password to a new temporary password, so that the user can continue to login to the system if they have forgotten their password.

**E.21.10 Activity: Update User Account Profile**

*Description:* Permits a user to update their contact information associated with their account, such as their name, phone, address, email address, etc.

*NOTE:* Permit both Requester and agency to update info, such as contact data

*Part of Process:* Manage Account
**Type of Activity:** Automated with human interaction

**Actors:** User

**Triggers:** A user decides to update their profile information.

**Pre-Conditions:** An active user account exists for the user, and they were able to login to their account.

**Post-Conditions:** The user’s profile information is updated.

**Supporting Services:** None

**User Story:**
As a User, I need to update my profile information, such as contact data, associated with my registered account, so that the agency will have the most current contact information for me when corresponding during the records review and release process.

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**E.21.11 Activity: Update User Password**

**Description:** Changes the user’s password.

**Part of Process:** Manage Account

**Type of Activity:** Automated with human interaction

**Actors:** Policy Manager | User

**Triggers:** A user decides to update their password.

**Pre-Conditions:** An active user account exists for the user, and they were able to login to their account.

**Post-Conditions:** The user’s password is updated.

**Supporting Services:** None

**User Stories**

- As a Policy Manager, I need to be able to configure a data-driven processing rule that will set the number of prior passwords that are unusable (e.g., 5 prior passwords), so that the rule can be easily modified as laws, regulations, and/or Agency policies change, and the result of the change will dynamically modify the related business activity.

- As a User, I need to update my password associated with my user registration, so that I can continue to protect my information and user privileges.

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**E.22 Process: Provide Pre-Request Support**

**User Story:**
As a Requester, I need information about how to submit a FOIA Request, whether there are agency records already disclosed that may obviate the need for me to submit a FOIA Request, and a list of Agencies and/or Agency Components with whom to submit a FOIA Request based on the type of records I am seeking, so that I am best prepared to submit a FOIA Request to the right Agency or Component and only submit a request when necessary.
E.22.1 Activity: Identify Non-FOIA Methods for Accessing Agency’s Records

Description: Provides a Requester or the public in general with information about various Agency sources of information that can be queried without the need to file a FOIA Request.

Part of Process: Provide Pre-Request Support
Type of Activity: Automated with human interaction
Actors: Requester
Triggers: A Requester or the public in general is looking for alternative ways to readily obtain information without having to file a FOIA Request.
Pre-Conditions: None
Post-Conditions: Search results are provided to the Requester or public in general.
Supporting Services: None

User Story: As a Requester, I need to know if there are public records already disclosed or available through other agency request mechanisms that may obviate the need for me to submit a FOIA Request, so that I can obtain the records I need in the most efficient and rapid manner possible.

E.22.2 Activity: Identify Potential Agency(ies) and Components with Responsive Records

Description: Provides a Requester or the public in general with information about which agencies and/or agency components with which to file a FOIA Request to, given a particular topic of interest or type of record sought.

Part of Process: Provide Pre-Request Support
Type of Activity: Automated with human interaction
Actors: Requester
Triggers: A Requester or the public in general is looking for the appropriate Agency or Component to submit a FOIA Request to.
Pre-Conditions: One or more topics of interest are selected as input to the search.
Post-Conditions: Search results are provided to the Requester or public in general.
Supporting Services: None

User Story: As a Requester, I need to know which Agency or Component to submit a FOIA Request to, so that I can be sure to submit my FOIA Request to the appropriate organization and therefore avoid having to resubmit or be redirected to a different component.

E.22.3 Activity: Review Agency FOIA Guidance and Procedures

Description: Provides Requesters and the public in general with information about the Agency's FOIA process.

Part of Process: Provide Pre-Request Support
Type of Activity: Automated with human interaction
Actors: Requester
**Triggers:** A Requester or the public in general has interest in Agency FOIA information.

**Pre-Conditions:** None

**Post-Conditions:** The Requester or public in general is presented with Agency FOIA information.

**Supporting Services:** Content Management

**User Story:** As a Requester, I need to be able to read the Agency’s FOIA guidance and procedures for submitting and processing a FOIA Request, so that I am informed about how to support the FOIA process in the most efficient and effective manner possible.

**E.22.4 Activity: Search Agency’s Openly Available Records**

**Description:** Provides Requesters or the public in general with search functionality against the Agency's available public records, which may meet their needs without having to file a FOIA Request.

**Part of Process:** Provide Pre-Request Support

**Type of Activity:** Automated with human interaction

**Actors:** Requester

**Triggers:** A Requester or the public in general is looking for alternative ways to readily obtain information without having to file a FOIA Request.

**Pre-Conditions:** None

**Post-Conditions:** Search results are provided to the Requester or public in general.

**Supporting Services:** Document Management | AI/ML/HLT-Enabled Search

**User Story:** As a Requester, I need to conduct searches of the Agency’s proactively disclosed records for public access, including using filters, keywords, and other search techniques, so that I can obtain the records I need that are already in the public domain.

**E.22.5 Activity: Select Topic(s) to Identify Sources with Responsive Records**

**Description:** Permits a Requester or the public in general with the ability to select topics that may be of interest to search and filter content from the Agency's openly available records, including the FOIA Library (aka “Public Reading Room”).

**Part of Process:** Provide Pre-Request Support

**Type of Activity:** Automated with human interaction

**Actors:** Requester

**Triggers:** A Requester or the public in general is looking for the appropriate Agency or Component to submit a FOIA Request to.

**Pre-Conditions:** None

**Post-Conditions:** One or more topics of interest are selected as input to searching for the appropriate Agency or Component to file a Request to.

**Supporting Services:** None

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User Story: As a Requester, I need to view, filter, and select one or more topics related to the types of records I am seeking, so that a list of appropriate Agencies and/or Components can be presented to me based on those topics and I can be sure to submit my FOIA Request to the appropriate organization and therefore avoid having to resubmit or be redirected to a different component.

E.23 Process: Manage Records for Proactive Disclosure

User Story: As a FOIA Library Manager, I need to ensure that records in the FOIA Library and the user interface to obtaining those records meet the requirements of section 508 of the American with Disabilities Act, so that public records are as accessible as possible.

E.23.1 Activity: Approve or Deny Records for Proactive Disclosure

Description: An authorized official for public release will consider the results of the review activity to determine whether records will be released or not.

Part of Process: Manage Records for Proactive Disclosure
Type of Activity: Automated with human interaction
Actors: Authorized Official for Proactive Records Disclosure
Triggers: A review of records in the FOIA Repository flagged for proactive disclosure has been completed.
Pre-Conditions: One or more records in the FOIA Repository are ready for a proactive disclosure approval decision.
Post-Conditions: One or more records are either approved or denied for proactive disclosure.
Supporting Services: Review and Redaction

User Story: As an Authorized Official for Proactive Records Disclosure, I need to approve records for public release, so that those records accessed by the public without requiring a FOIA request.

E.23.2 Activity: Capture Agency Criteria for Proactive Disclosure

Description: This activity documents the Agency’s intended types of records for proactive disclosure. The information is then subsequently used within other activities within the Manage Records for Proactive Disclosure process. One possible mechanism for capturing these criteria (and there may be multiple methods at work at the same time) is to update the set of FOIA topics with an indicator for “target for proactive disclosure” (or something to that effect). Thus, when Topics are assigned to a Request, that information can be made readily available to review staff to determine whether proactive disclosure of any of the responsive records should be made.

Part of Process: Manage Records for Proactive Disclosure
Type of Activity: Automated with human interaction
Actors: Proactive Disclosure Lead
Triggers: As needed and determined by the Agency, especially when there are updates to the Agency’s view on what records should be proactively disclosed.

Pre-Conditions: None.

Post-Conditions: Documented criteria for the types of records that should be considered for proactive disclosure. Also, if implemented using FOIA Topics, each relevant topic would be updated with a “target for proactive disclosure” indicator.

Supporting Services: None

User Stories

- As a Proactive Disclosure Lead, I need to capture and share content about the types of Agency records that are either definitively targeted for or are potential for proactive disclosure, so that proactive disclosure is based in part on the Agency’s determination of the types of records that should be released to the public and thereby obviate the need for future FOIA Requests.

- As a Proactive Disclosure Lead, I need to update the FOIA Topics with an indicator of “targeted for public disclosure” and/or with different degrees of indication, such as “definitive”, “potential”, etc., so that proactive disclosure decisions can leverage structured information pertaining to the FOIA Topics and thereby streamline the analysis and determination of proactive disclosure.

E.23.3 Activity: Identify Records from Recordkeeping Systems for Possible Proactive Disclosure

Description: Identification of records that should be proactive released, either because they have been requested three times, the agency anticipates the records will be subject to FOIA requests, it is in the public's interest that the records are released, or the agency is otherwise obligated to publicly release these records.

Part of Process: Manage Records for Proactive Disclosure
Type of Activity: Automated with human interaction
Actors: FOIA Library Manager | FOIA Repository Manager | The System
Triggers: Records have been requested three times, or a requirement for public disclosure exists, or a determination has been made that a review of records for proactive disclosure should or must be made.

Pre-Conditions: None
Post-Conditions: Records identified for proactive disclosure.
Supporting Services: None

User Stories
• As a FOIA Library Manager, I need to identify records that likely should be released to the public preemptively, so that an authorized official can review and approve those records for public release.

• As a FOIA Repository Manager, I need to identify records not currently captured in the FOIA Repository that are targeted for proactive disclosure, so that the Agency can conduct a Review of those records for possible proactive disclosure in the FOIA Library (i.e., the “public reading room”).

• As The System, I need to automatically detect new recordkeeping sources based on a previously identified storage location, so that searching for responsive records will use the new source.

E.23.4 Activity: Identify Records Meeting Multiple Release Rule for Public Disclosure

**Description:** Sometimes referred to as the “3 times rule”, this activity scans through records, other than first-person records, from the FOIA Repository to determine whether it meets the defined rule (currently that agencies proactively disclose to the public records that it has released to FOIA requesters 3 times) for making the record public. The specific number of times a record has been released to determine whether it should be public is reflected as a configurable rule within a related user story.

**Part of Process:** Manage Records for Proactive Disclosure

**Type of Activity:** Automated with human interaction

**Actors:** Policy Manager | The System

**Triggers:** This activity could be triggered either upon the completion of a Request or on a timer, such as nightly.

**Pre-Conditions:** None

**Post-Conditions:** Records in the FOIA Repository are tagged as meeting the multiple release rule (e.g., released 3 times).

**Supporting Services:** None

**User Stories**

• As a Policy Manager, I need to be able to configure a data-driven processing rule that will define the number of times (e.g., 3 times) after which a record that is not a first-person record has been released via FOIA responses to make it publicly releasable, so that the rule can be easily modified as laws, regulations, and/or Agency policies change, and the result of the change will dynamically modify the related business activity.

• As The System, I need to identify and flag records within the FOIA Repository that meet a defined rule pertaining to multiple FOIA releases to Requesters, e.g., the “X times released rule” (currently 3 times) and are not first-person records, for inclusion into the FOIA Library, so that records that should be made public may be accessed without requiring a
FOIA Request and thereby increase operational efficiency and Agency transparency.

E.23.5 Activity: Ingest Records from Recordkeeping Systems into FOIA Repository for Review

Description: This activity would be invoked for collections of records that have been deemed as “proactively releasable” from source recordkeeping systems. Once reviewed, these records may be then moved to the FOIA Library (aka “FOIA reading room”) for access by the public.

Part of Process: Manage Records for Proactive Disclosure
Type of Activity: Fully automated with no human interaction
Actors: The System
Triggers: The Agency would periodically decide to ingest records from recordkeeping systems that are considered releasable.
Pre-Conditions: None
Post-Conditions: New records are loaded into the FOIA Repository.
Supporting Services: None

User Story: As The System, I need to enable the selection of a particular recordkeeping source and ingestion into a collection of records into a Repository, so that collections of newly identified records that are considered releasable can be loaded as a group to the Repository.

E.23.6 Activity: Ingest Reviewed Records into FOIA Library

Description: Uploads records into the FOIA Library which, as a result, provides the data to the public such as through an Agency’s web portal.

Part of Process: Manage Records for Proactive Disclosure
Type of Activity: Automated with human interaction
Actors: FOIA Library Manager
Triggers: The Agency periodically determines to proactively disclose records. This may be the result of efforts that examine the public’s interest in non-sensitive records and the results of identifying records that have previously been released to Requesters at least X times, where X is currently 3 times.
Pre-Conditions: Records have been approved for disclosure.
Post-Conditions: The FOIA Library is updated with additional records that are accessible by the public, such as through an Agency portal or website.
Supporting Services: None

User Story: As a FOIA Library Manager, I need to load records into the FOIA Library that have been approved for proactive disclosure and ensure they are accessible to the public, so that the public can obtain those records as part of a self-service capability.

E.23.7 Activity: Provide Records to Other Agency Public Repository

Description: This activity transfers selected records from the FOIA Repository to an agency repository that is external to FOIA and specifically not the FOIA
Library. This is important because agencies are increasingly providing non-FOIA means to make certain records public, which is expected to reduce FOIA demands and align with the government’s open data initiatives.

**Part of Process:** Manage Records for Proactive Disclosure  
**Type of Activity:** Automated with human interaction  
**Actors:** FOIA Library Manager  
**Triggers:** Records have been approved for proactive disclosure.  
**Pre-Conditions:** At least one record has been approved for proactive disclosure and has not yet been reviewed for 508 compliance.  
**Post-Conditions:** Records are made available to non-FOIA repositories, such as with a data feed or other data integration mechanism, as determined appropriate by the agency.  
**Supporting Services:** None

**User Story:** As a FOIA Library Manager, I need to identify, provide (e.g., via data extracts), and track records approved for public disclosure within non-FOIA repositories (e.g., via other Agency web sites), so that public disclosure is proactively managed not only within FOIA environments (e.g., the public facing FOIA Library) but also within other Agency sites that provide the public with records.

**E.23.8 Activity: Publish Records in Other Agency Public Repository**

**Description:** A repository that is external to the FOIA system will ingest and make public selected records that have been provided to it from the FOIA Repository.

**Part of Process:** Manage Records for Proactive Disclosure  
**Type of Activity:** External to the system (no user stories in scope)  
**Actors:** Other Publicly Accessible Agency Repository

**E.23.9 Activity: Review Records in FOIA Repository for Proactive Disclosure**

**Description:** Approval or denial of the records that have been identified for preemptive disclosure.

**Part of Process:** Manage Records for Proactive Disclosure  
**Type of Activity:** Automated with human interaction  
**Actors:** FOIA Library Manager  
**Triggers:** Records reviewed and identified as ones that should be proactively released.  
**Pre-Conditions:** Records that should be proactively released are identified.  
**Post-Conditions:** Approval or denial to proactively release records.  
**Supporting Services:** Review and Redaction

**User Story:** As a FOIA Library Manager, I need to support a workflow that exports records from the FOIA Repository identified for public access, e.g., those meeting the “X times released” rule (e.g., 3 times) and not first-person
records, and ingests those records, in a searchable format, into the “Reading Room” repository, so that the process to push records to the Public Repository is streamlined and minimizes human error.

E.23.10 Activity: Update Records’ Metadata to Facilitate Discovery

Description: Prior to moving records to the externally facing FOIA Library, the metadata associated with the records are updated to provide multiple ways for the public to search and locate records of interest. The types of metadata that are relevant could vary from agency to agency. Example might include type of record; Agency program data; locational data; dates such as creation, effective periods; and others.

Part of Process: Manage Records for Proactive Disclosure
Type of Activity: Automated with human interaction
Actors: FOIA Library Manager
Triggers: Records have been approved for proactive disclosure.
Pre-Conditions: At least one record has been approved for proactive disclosure and has not yet been reviewed for 508 compliance.
Post-Conditions: Record metadata are populated to facilitate searching and locating records.
Supporting Services: AI/ML/HLT-Enabled Metadata Extraction

User Story: As a FOIA Library Manager, I need to apply updates to the metadata that describes individual records approved for public disclosure enable the public to use various search techniques, such as filters, keywords, etc., so that records are easily found by the public using metadata.

E.23.11 Activity: Update Records to Meet 508 Compliance

Description: As part of making records available to the public, this activity applies specific Section 508 compliance criteria to aid the public with accessibility features. For example, some types of records might be enhanced with “alternative text” or additional annotations to portray content if colors were prevalent in the source record.

Part of Process: Manage Records for Proactive Disclosure
Type of Activity: Automated with human interaction
Actors: FOIA Library Manager
Triggers: Records have been approved for proactive disclosure.
Pre-Conditions: At least one record has been approved for proactive disclosure and has not yet been reviewed for 508 compliance.
Post-Conditions: Records are updated, enhanced, and/or annotated to meet 508 compliance.
Supporting Services: None

User Story: As a FOIA Library Manager, I need to apply updates to records that are approved for public disclosure that will ensure they comply with Section 508 for accessibility, such as providing alternate text, resizing images/text, adjusting colorations, etc., so that people with accessibility challenges are able to understand the records provided for disclosure.
E.24 Process: Maintain Requester Dashboard

User Story: As a Requester, I need to be able to interact electronically with the agency for which I have submitted (or will submit) a FOIA request(s) via a single portal environment and dashboard, so that my experience is easy to obtain the information I need.

E.24.1 Activity: Check for Existing User Account

NOTE: This is a recurrent activity. For a complete definition and associated user stories refer to the activity within the Manage Account process in Appendix E.21.1.

E.24.2 Activity: Login to FOIA Account

NOTE: This is a recurrent activity. For a complete definition and associated user stories refer to the activity within the Manage Account process in Appendix E.21.5.

E.24.3 Activity: Obtain Current Request Status and Estimated Date of Completion

Description: Provides a Requester or Requester Representative with view access to information about their current (open) cases (requests, appeals), including the estimated date of response and related communications.

Part of Process: Maintain Requester Dashboard
Type of Activity: Automated with human interaction
Actors: Requester
Triggers: Requester or representative determines need to review the information.
Pre-Conditions: Login to FOIA account
Post-Conditions: Display of current request information
Supporting Services: None

User Stories

- As a Requester, I need to view and act upon tasks waiting for my action, so that steps waiting for me can proceed quickly using online tools.

- As a Requester, I need to view the status of my current requests, so that I am kept informed of the processing of my requests.

E.24.4 Activity: Register with Agency's FOIA System

NOTE: This is a recurrent activity. For a complete definition and associated user stories refer to the activity within the Manage Account process in Appendix E.21.8.

E.24.5 Activity: Reset User Password

NOTE: This is a recurrent activity. For a complete definition and associated user stories refer to the activity within the Manage Account process in Appendix E.21.9.
E.24.6 Activity: Retrieve Responsive Records

Description: Enables the Requester to select and download the set of responsive records that has been reviewed and approved for the FOIA Request and referenced in a Response Package.

Part of Process: Maintain Requester Dashboard
Type of Activity: Automated with human interaction
Actors: Requester
Triggers: Requester or representative determines need to download the responsive records from the Requester’s dashboard (portal).
Pre-Conditions: A Response Package has been created, reviewed, and approved for a FOIA Request (or for a partial request).
Post-Conditions: Responsive records are downloaded to the Requester’s computer.
Supporting Services: None

User Story: As a Requester, I need to locate and download the set of approved responsive records, provisioned through Response Package, to my computer, so that I have an efficient and effective means of obtaining the records pertaining to and resulting from my FOIA Request.

E.24.7 Activity: Review Fee Balance and Payment Information

Description: Provides a Requester or Requester Representative with view access to fee, invoice, and balance due information, including any unpaid requests.

Part of Process: Maintain Requester Dashboard
Type of Activity: Automated with human interaction
Actors: Requester
Triggers: Requester or representative determines need to review the information.
Pre-Conditions: Login to FOIA account
Post-Conditions: Display of fee and invoice balances and details
Supporting Services: None

User Story: As a Requester, I need to view my historical FOIA request payment requests, payment, and balance information, so that I have a self-service ability to view my historical FOIA request data associated with the agency without requiring FOIA staff resources.

E.24.8 Activity: Review Request and Communications History

Description: Provides a Requester or Requester Representative with view access to information about their historical (completed) requests, including their dispositions and communications history.

Part of Process: Maintain Requester Dashboard
Type of Activity: Automated with human interaction
Actors: Requester
Triggers: Requester or representative determines need to review the information.
Pre-Conditions: Login to FOIA account
Post-Conditions: Display of historical requests and associated communications
Supporting Services: None

User Story: As a Requester, I need to view my historical requests and appeals, including their dispositions and associated communications, so that I have a self-service ability to view my historical FOIA request data associated with the agency without requiring FOIA staff resources.

E.25 Process: Provide Customer Service

User Story: As a Requester, I need to submit a question to the agency’s FOIA Requester Service Center or FOIA Public Liaison about any topic and receive a response back to my question, so that requesters may obtain answers to their questions as part of submitting Requests or other FOIA-related matters.

E.25.1 Activity: Capture and Log Mediation Inquiry

Description: This activity documents the Requester’s request for mediation support from NARA OGIS, pertaining to an issue involving the Agency.

Part of Process: Provide Customer Service
Type of Activity: Automated with human interaction
Actors: FOIA Public Liaison
Triggers: Agency receives notification of mediation
Pre-Conditions: None.
Post-Conditions: Mediation request is documented and as applicable, linked to one or more related FOIA Requests.
Supporting Services: None

User Story: As a FOIA Public Liaison, I need to document a Requester’s mediation action taken with NARA, including linking that action to one or more related FOIA Requests as applicable, so that the Agency can keep track of mediation activity that may impact the timing and effort to respond to a FOIA Request.

E.25.2 Activity: Capture and Log Requester’s Inquiry

Description: When a Requester submits an inquiry, it will be logged and captured with additional metadata to support its resolution.

Part of Process: Provide Customer Service
Type of Activity: Automated with human interaction
Actors: FOIA Requester Service Center Staff
Triggers: A Requester has submitted an inquiry.
Pre-Conditions: None
Post-Conditions: The inquiry is given a tracking identification number, assigned to an individual for resolution, and supplemented with additional information to support its understanding and resolution.
Supporting Services: Email Integration and Correspondence Production
User Story: As a FOIA Requester Service Center Staff, I need to document a Requester's inquiry about the FOIA process, their specific Request, or any other FOIA-related question, so that the Agency can track and analyze FOIA inquiries as input to continuous process improvement and to ensure each inquiry responded to in a timely manner.

E.25.3 Activity: Escalate Inquiry to FOIA Public Liaison
Description: If an inquiry cannot be addressed by FOIA Requester Service Center Staff, it is escalated and placed into an inbox for the FOIA Public Liaison to respond directly to the Requester.

Part of Process: Provide Customer Service
Type of Activity: Automated with human interaction
Actors: FOIA Public Liaison | FOIA Requester Service Center Staff
Triggers: Agency staff determine a need to escalate an inquiry to the Public Liaison.
Pre-Conditions: An active (not closed) Inquiry has been submitted to the FOIA office.
Post-Conditions: The inquiry is updated to reflect its position within a FOIA Public Liaison inbox for their response.
Supporting Services: None

User Stories
- As a FOIA Public Liaison, I need to receive a notification of a new inquiry that has been escalated for me to address, so that I am aware of the action items I need to complete, and Requesters receive timely responses to their questions.
- As a FOIA Requester Service Center Staff, I need to raise an inquiry to the FOIA Public Liaison for their response when the customer service staff are unable to answer a Requester’s question, so that all inquiries can be responded to in a timely manner.

E.25.4 Activity: Evaluate Mediation Inquiry
Description: An activity external to the FOIA Business System, this activity is for NARA OGIS to evaluate the Requester's dispute in support of working toward an amenable solution and one that might mitigate the need for either an Appeal or a lawsuit.

Part of Process: Provide Customer Service
Type of Activity: External to the system (no user stories in scope)
Actors: NARA OGIS

E.25.5 Activity: Participate and Capture Mediation Resolution
Description: Document the outcome of the mediation and update the status of the FOIA case based on the mediation outcome.

Part of Process: Provide Customer Service
Type of Activity: Automated with human interaction
Actors: FOIA Public Liaison

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**Triggers:**
Agency receives outcome from a mediation case at OGIS.

**Pre-Conditions:**
A mediation inquiry exists

**Post-Conditions:**
The results of the mediation action with NARA are documented and associated with the original need for mediation.

**Supporting Services:**
None

**User Story:**
As a FOIA Public Liaison, I need to capture the mediation result and update the request status, so that the Agency can take the appropriate remand actions as needed and update the status of the case.

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**E.25.6 Activity: Participate in Mediation Resolution**

**Description:**
An activity external to the FOIA Business System, both the Requester and NARA OGIS will meet to discuss how the dispute might be settled out of the courts.

**Part of Process:**
Provide Customer Service

**Type of Activity:**
External to the system (no user stories in scope)

**Actors:**
NARA OGIS | Requester | FOIA Public Liaison

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**E.25.7 Activity: Receive Response to FOIA-Related Inquiry**

**Description:**
The Requester will obtain a response to their inquiry, either through an Agency FOIA system (e.g., FOIA portal) or via email depending on the mechanism used to submit the inquiry.

**Part of Process:**
Provide Customer Service

**Type of Activity:**
Automated with human interaction

**Actors:**
Requester

**Triggers:**
The Requester opens an email or an in-system message about the response to their inquiry.

**Pre-Conditions:**
An inquiry response has been sent to the Requester, either through the system or via email.

**Post-Conditions:**
The Requester has opened (e.g., “read”) the response. This would be tracked either as an email read receipt or within the system as a status update to the Agency’s notification message to the Requester.

**Supporting Services:**
Email Integration and Correspondence Production

**User Story:**
As a Requester, I need to obtain the Agency’s response to my question, so that I will know how to proceed based on my FOIA-related question.

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**E.25.8 Activity: Respond to Requester’s Inquiry**

**Description:**
Creates a response record to a previously submitted Inquiry from a Requester. This may be provided via the Agency’s FOIA portal, via email, or other designated mechanism.

**Part of Process:**
Provide Customer Service

**Type of Activity:**
Automated with human interaction

**Actors:**
FOIA Public Liaison | FOIA Requester Service Center Staff

**Triggers:**
A FOIA Public Liaison determines the need to respond to an open Inquiry.

**Pre-Conditions:**
An active (not closed) Inquiry has been submitted to the FOIA office.

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**Post-Conditions:** A response record is created and sent to the initiating Requester.

**Supporting Services:** Email Integration and Correspondence Production

**User Stories**

- As a FOIA Public Liaison, I need to respond to Requester’s inquiries that have been escalated to me about a specific submitted request or any other topic, so that the agency is responsive to questions and is proactive in resolving questions and disputes with less dependence on appeals and 3rd party mediation processing.

- As a FOIA Requester Service Center Staff, I need to respond to a requester’s inquiry to the agency about a prior or in-process FOIA request that relates to their inquiry, so that there is an efficient mechanism for an agency to support requester’s questions and where possible, avoid appeals and 3rd party mediation processing.

**E.25.9 Activity: Submit FOIA-Related Inquiry**

**Description:** Creates a record of a Requester’s question either about a specific FOIA Request they submitted, a Request they are considering submitting (Pre-Request), or other related topic pertaining to FOIA.

**Part of Process:** Provide Customer Service

**Type of Activity:** Automated with human interaction

**Actors:** Requester

**Triggers:** A Requester has a question or other inquiry either related to an existing FOIA Request, an Appeal, or any other reason.

**Pre-Conditions:** None

**Post-Conditions:** A new inquiry is created and associated with a person.

**Supporting Services:** None

**User Story:** As a Requester, I need to create and submit an inquiry to the agency and reference a prior or in-process FOIA request that relates to my inquiry, so that there is an efficient mechanism for an agency to support requester’s questions and where possible, avoid appeals and third-party mediation processing.

**E.25.10 Activity: Submit Mediation Request to NARA**

**Description:** An activity external to the FOIA Business System, a Requester may engage directly with NARA OGIS to assist with mediating a dispute, either before, during or after an Appeal is made.

**Part of Process:** Provide Customer Service

**Type of Activity:** External to the system (no user stories in scope)

**Actors:** Requester
E.26 Process: Monitor, Analyze and Report FOIA Performance

User Story: As an Analytics User, I need to evaluate performance across FOIA processing using pre-defined metrics as outlined in supplemental requirements pertaining to analytical needs, so that I can understand, convey, and work to improve process efficiency and effectiveness, and ensure the capability to produce all required reports, such as to FOIA.gov, Congress, etc.

E.26.1 Activity: Produce Mandated Reports

Description: Creates official reports and/or produces data exchanges that are required by DOJ for periodic Agency reporting.

Part of Process: Monitor, Analyze and Report FOIA Performance

Type of Activity: Automated with human interaction

Actors: Agency Reporting Manager

Triggers: Reporting to DOJ/OIP is currently required each quarter end and end of year.

Pre-Conditions: None

Post-Conditions: Reported data is submitted electronically to foia.gov using predefined formats, such as NIEM-XML or manually entering data on the foia.gov site.

Supporting Services: Standardized Data Exchange

User Story: As an Agency Reporting Manager, I need to prepare and deliver Annual and Quarterly FOIA reports as required by DOJ (e.g., reporting to FOIA.gov), so that official request counts and other key measures are available for government-wide reporting and analysis.

E.27 FOIA Business System

Description: The entire FOIA business system, referred to as “The System” (i.e., the actor) for some user stories. The System encapsulates all functionality, actors (roles), and requirements. Some requirements may be cross-cutting to the entire system and thus aligned to this level of the functional decomposition.

User Stories

- As The System, I need to track the history of all status changes to records, so that the data can support (1) the analysis of status changes, such as to the amount of time records are within a particular “state” or the frequency of changes from one state to another, and (2) a full audit trail of the status changes, including the date/time of each change.

- As The System, I need to enable the storage and processing of [X] number of requests and appeals per [UNIT TIME], so that the system does not become a bottleneck to meeting processing deadlines.
• As The System, I need to interoperate within the agency’s existing customer-facing portal, so that an agency can foster a one-stop-shop for its constituents, rather than having to stand up independent portal sites.

E.28 Process: Common Services

User Story: As The System, I need to define and enable common functionality that can be shared across different functions and activities, so that the same functionality required across multiple areas within the FOIA Business System is reused and appropriate technologies and tools can be employed across the system where possible and practical.

E.28.1 Common Service: AI/ML/HLT-Enabled Decisioning

Description: Applies advanced analytical technologies, such as artificial intelligence (AI), machine learning (ML), and/or human language technology (HLT) to either make automated decisions or recommend decisions to Agency staff as part of the FOIA process. Examples of its application could include making or suggesting a decision about the appropriate Process Queue the Request should be placed in; determining which recordkeeping systems should be included to search for responsive records; and highlighting or applying exemptions and redactions to a document or corpus.

User Story: As The System, I need to support AI/ML/HLT-enabled decisions and recommendations, such as to identify potential records for exemption and exclusion, recommend record content that should be redacted, determining which Process Queue a Request should be placed in, etc., so that case workers are provided with capabilities that reduce human effort, save time, and enhance the consistency of FOIA-related decisioning.

E.28.2 Common Service: AI/ML/HLT-Enabled Metadata Extraction

Description: Applies advanced analytical technologies, such as artificial intelligence (AI), machine learning (ML), and/or human language technology (HLT) to find and extract information about a potentially responsive record or from a FOIA Request. The results of the extraction could add metadata to the item, which would then provide enhanced searching and decision-making such as with additional tags.

User Story: As The System, I need to support AI/ML/HLT-enabled extraction of metadata (i.e., data about the records) from various types of records (e.g., a FOIA Request, a record within the Agency's recordkeeping system, a responsive record), so that metadata that can be used for searching and characterizing the data within a group of records can be automatically derived without requiring a fully manual human effort.

E.28.3 Common Service: AI/ML/HLT-Enabled Search

Description: Applies advanced analytical technologies, such as artificial intelligence (AI), machine learning (ML), and/or human language technology (HLT)
to conduct various types of searching. Searching may be applied to locating responsive records within a repository or recordkeeping system; locating similar or duplicate requests, documents, and emails (within email threads); finding and cataloging new recordkeeping systems within the Agency; etc. These technologies typically rely on models and algorithms and through their use, improve results over time.

User Story:  
As The System, I need to support AI/ML/HLT-enabled search, so that responsive records can be more accurately and efficiently discovered than what could be done through manual or “traditional” search means.

E.28.4 Common Service: Configurable Workflow

Description: Provides a comprehensive capability to define and tailor process workflows (aligned with processing queues) that automate the sequencing of tasks, status changes, and actions. Workflow definition is an essential component of case management. Provides in-system notifications to case workers and others regarding upcoming actions, actions taken, and other alerts.

User Stories

- As The System, I need to automatically calculate due dates based on configurable criteria, such as request type, so that high accuracy of due dates is achieved, and less human effort is required to determine when responses are due.

- As The System, I need to automatically send email to the Requester and other stakeholders based on workflow steps/actions, so that the process is as efficient as possible and with minimal human intervention.

- As The System, I need to support customizable workflows using a non-programmable interface, so that the agency can quickly adapt to process changes and define process steps that are unique to how they process cases.

- As The System, I need to support digital signature of forms, so that appropriate approvals can be authenticated.

E.28.5 Common Service: Content Management

Description: Manages unstructured content, such as on web sites, including web site designs. Example uses include the process of maintaining the public facing FOIA Library and the Requester Dashboard.

User Story: As The System, I need to support the capture and maintenance of unstructured content to be used by Requesters, FOIA staff, and the public, and typically found on agency web sites, so that contextual information needed by process performers are available to them as needed.
E.28.6 Common Service: Document Management

*Description:* Stores, manages, categorizes, tracks, retrieves, shares, and protects electronic documents, which are often the subject of FOIA records. Document types span a wide gamut, such as MS Office documents (e.g., MS Word, Excel, PowerPoint), PDF files, images, videos, and other types that hold potentially releasable content.

*User Story:* As The System, I need to enable the process of capturing, tracking, protecting, using (retrieval and workflow), and storing electronic documents (e.g., Office documents, PDFs, presentations, scanned images), so that unstructured record content in the form of electronic documents can be effectively managed and used within the FOIA process.

E.28.7 Common Service: Email Integration and Correspondence Production

*Description:* Provides bi-directional interfaces with an email system to capture emails relevant to the FOIA process, send out notifications to external and internal parties, and support the preparation of emails, such as by using standardized communication templates, which are defined in Policy and Process Management. Such templates become important not only for streamlining the process, but also to ensure greater consistency in how information is communicated (e.g., an adverse determination, a response to an appeal) to key stakeholders, particularly the Requester.

*User Stories*

- As The System, I need to accommodate the receipt and send of attachments larger than what email accommodates (e.g., 20MB), so that large data files can be exchanged between requesters and the agency.

- As The System, I need to automatically attach certain types of documents to outbound email messages, based on the current workflow, using record metadata, so that an email correspondence includes all appropriate documents. NOTE: Examples include attaching the final response letter to a response email, a letter denying an expedition request, etc.

- As The System, I need to automatically convert inbound and outbound emails between Requesters and the agency to PDF format and save it in the administrative record, so that all communications are retained within the administrative record and are available to support any possible downstream actions, e.g., appeals.

- As The System, I need to automatically create a draft email based on actions completed within a workflow, using case record metadata and templated language, so that the case worker’s effort is the most efficient and there is greater consistency within the correspondence.
- As The System, I need to automatically generate acknowledgement letters at stages of a case process, so that less human effort is needed to ensure proper correspondence is prepared.

- As The System, I need to encrypt communications that contain PII, so that personal information is properly protected.

- As The System, I need to store and associate agency’s correspondence to the requester with the requester’s case information, so that an audit trail is maintained for all communications with the requester.

- As The System, I need to store and associate correspondence from the requester with their case, so that an audit trail is maintained for all communications with the requester.

- As The System, I need to support a user's ability to manually edit a letter that has been generated from a template, so that it can be customized, when appropriate.

- As The System, I need to support digitally signing a letter, so that the amount of paper can be reduced by not requiring a “wet” signature.

- As The System, I need to support letter creation using templated language, so that the process of producing letters is highly efficient.

- As The System, I need to support a user's ability to manually create, review, and edit email, and associated it with a requester’s case, so that unique situations can be supported that don't necessarily utilize standard, templated email or communications that are exceptions from the normal process.

- As The System, I need to support users with adding document attachments to an email, so that documents can be shared in correspondence and tracked as part of the requester's case.

- As The System, I need to create 508-compliant correspondence, so that recipients who require 508-compliant content can read and/or understand what has been communicated.

**E.28.8 Common Service: FOIA Processing "Clock" Starts and Stops (Tolling)**

*Description:* Provides functionality to toll (stop) the clock and capture the start and stop periods, beginning with the Perfected Request. Generally, a request will be perfected upon receipt. However, current FOIA rules dictate the clock may stop one time (toll) if a case worker needs clarification about a perfected request from the Requester. The clock may also stop (toll) as many times as needed to clarify a fee-related issue with the Requester. Note the durations reflected by the start and stop periods are to be excluded from determining the due date and thus counting the number of days until a Request is due (or overdue).
**User Stories**

- As a Policy Manager, I need to be able to configure a data-driven processing rule that will set the number of clock stops permitted after a request has been considered perfected (currently set as "one"), so that the rule can be easily modified as laws, regulations, and/or Agency policies change, and the result of the change will dynamically modify the related business activity.
  
  NOTE: A Request may be designated as perfected based on the date of receipt if it arrived in a perfected condition.

- As a Policy Manager, I need to be able to configure a data-driven processing rule that will set the number of times the clock can stop for clarification (e.g., 1 time), so that the rule can be easily modified as laws, regulations, and/or Agency policies change, and the result of the change will dynamically modify the related business activity.

- As a Policy Manager, I need to be able to configure a data-driven processing rule that will set the number times the clock can stop for fee-related issues (e.g., no limit), which is based on the fee-related issue identified, so that the rule can be easily modified as laws, regulations, and/or Agency policies change, and the result of the change will dynamically modify the related business activity.

- As The System, I need to automatically start or stop clock based on case record metadata and/or workflow steps/actions (e.g., waiting for requester clarification or fee acceptance), so that certain regulatory-based time periods are excluded from determining the due date and response times.

- As The System, I need to start the processing clock once a request is perfected, so that the agency can track how much time it has remaining to complete the request.

- As The System, I need to track the time expended and days elapsed on individual requests considering the set of starts and stops that may have occurred, so that the agency knows how much time it has left to process a request to remain in compliance.

**E.28.9 Common Service: Review and Redaction**

*Description:* Provides capabilities to search, filter, categorize, and review large sets of records within the FOIA Repository for responsiveness to FOIA Requests and for possible proactive disclosure; and identify, review, and approve exemptions, exclusions, and redactions related to those records. The capability includes reviewing all prior applied exemptions, exclusions, and redactions.

*User Stories*

- As The System, I need to provide the capability to easily review records resulting from the search for responsive records, so that all responsive records are traceable within the FOIA Repository, maintain linkages to the
FOIA Request (Request Item level), and are immutable once the records are approved for release.

- As The System, I need to provide the capability to indicate which records are releasable with no exemptions or exclusions, so that all responsive records are traceable within the FOIA Repository, maintain linkages to the FOIA Request (Request Item level), and are immutable once the records are approved for release.

- As The System, I need to provide the capability to indicate the specific FOIA exemption(s) and/or exclusions(s) that apply to each record and/or to parts of a record, so that all responsive records are traceable within the FOIA Repository, maintain linkages to the FOIA Request (Request Item level), and are immutable once the records are approved for release.

- As The System, I need to provide the capability to redact portions of the content that are exempted or excluded, so that all responsive records are traceable within the FOIA Repository, maintain linkages to the FOIA Request (Request Item level), and are immutable once the records are approved for release.

- As The System, I need to provide the capability to retain the responsive records, exemptions, and redactions in perpetuity within the FOIA Repository, so that all responsive records are traceable within the FOIA Repository, maintain linkages to the FOIA Request (Request Item level), and are immutable once the records are approved for release.

- As The System, I need to provide the capability to modify the set of responsive records, exemptions, and redactions prior to the content being approved for release, so that all responsive records are traceable within the FOIA Repository, maintain linkages to the FOIA Request (Request Item level), and are immutable once the records are approved for release.

**E.28.10 Common Service: Standardized Data Exchange**

*Description:* Leverages standard formats, structure, and protocols for enabling system-to-system data exchanges, such as those between two different agencies' FOIA systems (e.g., to support FOIA Request referrals, consultations, or coordinations); transmitting financial payment information between a FOIA system and an accounts receivables (A/R) system (e.g., pay.gov); and sending required reporting data to the government's central FOIA reporting environment (e.g., FOIA.gov). Typically, exchanges will specify the application programming interface (API) to achieve this capability.

*User Story:* As The System, I need to specify the standard protocols and data formats for exchanging data electronically between systems and organization, such as with a standard application programming interface (API), so that automated data exchanges are made possible with the least amount of human intervention needed and the integrity of data passed from one system to another is ensured.
# Appendix F  Abbreviations and Acronyms

<table>
<thead>
<tr>
<th>Term</th>
<th>Definition</th>
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<tbody>
<tr>
<td>AI</td>
<td>Artificial Intelligence</td>
</tr>
<tr>
<td>AO</td>
<td>Authorized Official</td>
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<tr>
<td>API</td>
<td>Application Programming Interface</td>
</tr>
<tr>
<td>A/R</td>
<td>Accounts Receivable</td>
</tr>
<tr>
<td>AVI</td>
<td>Audio Video Interleave Document</td>
</tr>
<tr>
<td>BMP</td>
<td>Bitmap Image File Document</td>
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<tr>
<td>BPMN</td>
<td>Business Process Modeling Notation</td>
</tr>
<tr>
<td>CFO</td>
<td>Chief FOIA Officer</td>
</tr>
<tr>
<td>CRUD</td>
<td>Create, Read, Update and Delete</td>
</tr>
<tr>
<td>CSV</td>
<td>Comma-Separated Values Document</td>
</tr>
<tr>
<td>DOCX</td>
<td>Microsoft Word Document</td>
</tr>
<tr>
<td>DOD</td>
<td>Department of Defense</td>
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<tr>
<td>DOJ</td>
<td>Department of Justice</td>
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<tr>
<td>FOIA</td>
<td>Freedom of Information Act</td>
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<tr>
<td>FRM</td>
<td>FOIA Reference Model</td>
</tr>
<tr>
<td>GIF</td>
<td>Graphics Interchange Format Document</td>
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<tr>
<td>HLT</td>
<td>Human Language Technology</td>
</tr>
<tr>
<td>JPG or JPEG</td>
<td>Joint Photographic Experts Group Document</td>
</tr>
<tr>
<td>LOE</td>
<td>Level of Effort</td>
</tr>
<tr>
<td>MB</td>
<td>Megabytes</td>
</tr>
<tr>
<td>ML</td>
<td>Machine Learning</td>
</tr>
<tr>
<td>MOV</td>
<td>QuickTime Multimedia File Format Document</td>
</tr>
<tr>
<td>MP3</td>
<td>MPEG-1 Audio Layer 3 Document</td>
</tr>
<tr>
<td>MP4</td>
<td>MPED-V Advanced Video Coding Document</td>
</tr>
<tr>
<td>MPEG</td>
<td>Moving Picture Experts Group Document</td>
</tr>
<tr>
<td>MS</td>
<td>Microsoft</td>
</tr>
<tr>
<td>NARA</td>
<td>National Archives and Records Administration</td>
</tr>
<tr>
<td>OCR</td>
<td>Optical Character Recognition</td>
</tr>
<tr>
<td>ODT</td>
<td>OpenDocument Text (file format)</td>
</tr>
<tr>
<td>OGC</td>
<td>Office of General Counsel</td>
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<table>
<thead>
<tr>
<th>Term</th>
<th>Definition</th>
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<tbody>
<tr>
<td>OGIS</td>
<td>Office of Government Information Services within NARA</td>
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<tr>
<td>OIP</td>
<td>Office of Information Policy within DOJ</td>
</tr>
<tr>
<td>OPSEC</td>
<td>Operations Security</td>
</tr>
<tr>
<td>PDF</td>
<td>Portable Document Format (Adobe ISO 32000 standard)</td>
</tr>
<tr>
<td>PNG</td>
<td>Portable Network Graphics Document</td>
</tr>
<tr>
<td>POC</td>
<td>Point of Contact</td>
</tr>
<tr>
<td>PPTX</td>
<td>Microsoft PowerPoint Document</td>
</tr>
<tr>
<td>QC</td>
<td>Quality Control</td>
</tr>
<tr>
<td>SME</td>
<td>Subject Matter Expert</td>
</tr>
<tr>
<td>TIFF</td>
<td>Tag Image File Format Document</td>
</tr>
<tr>
<td>TXT</td>
<td>Text Document</td>
</tr>
<tr>
<td>USC</td>
<td>United States Code of laws</td>
</tr>
<tr>
<td>WAV</td>
<td>Waveform Audio File Format Document</td>
</tr>
<tr>
<td>WMV</td>
<td>Windows Media Video Document</td>
</tr>
<tr>
<td>XLSX</td>
<td>Microsoft Excel Document</td>
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