U.S. Department of Housing and Urban Development

2019 Chief FOIA Officer Report

Section 1: Steps Taken to Apply the Presumption of Openness

The guiding principle underlying DOJ's FOIA Guidelines is the presumption of openness.

Please answer the following questions in order to describe the steps your agency has taken to ensure that the presumption of openness is being applied to all decisions involving the FOIA. You may also include any additional information that illustrates how your agency is working to apply the presumption of openness.

A. FOIA Leadership

1. The FOIA requires each agency to designate a Chief FOIA Officer who is a senior official at least at the Assistant Secretary or equivalent level. Is your agency's Chief FOIA Officer at or above this level?
Yes

2. Please provide the name and title of your agency's Chief FOIA Officer.
Chad Cowan – Principal Deputy Assistant Secretary for Administration

B. FOIA Training

3. Did your FOIA professionals or the personnel at your agency who have FOIA responsibilities attend any substantive FOIA training or conference during the reporting period such as that provided by the Department of Justice?
Yes

4. If yes, please provide a brief description of the type of training attended or conducted and the topics covered.
HUD employees participated in substantive FOIA training provided externally by the Department of Justice (Introduction to the Freedom of Information Act, FOIA for Attorneys and Access Professionals, FOIA Litigation Seminar) and the American Society of Access Professionals (national conference encompassing FOIA and Privacy Act components).

Internal training was provided to regional and field office staff by the Department's Office of the Executive Secretariat and Office of General Counsel (OGC). Additionally, many employees completed online courses offered through HUD's intranet training portals (for

example, **"Freedom of Information Act Training for Federal Employees," offered through HUD's InCompass human resources platform.**

5. Provide an estimate of the percentage of your FOIA professionals and staff with FOIA responsibilities who attended substantive FOIA training during this reporting period.

85%

6. OIP has directed agencies to "take steps to ensure that all of their FOIA professionals attend substantive FOIA training at least once throughout the year." If your response to the previous question is that less than 80% of your FOIA professionals attended training, please explain your agency's plan to ensure that all FOIA professionals receive or attend substantive FOIA training during the next reporting year.
N/A

C. Outreach

7. Did your FOIA professionals engage in any outreach or dialogue with the requester community or open government groups regarding your administration of the FOIA? Please describe any such outreach or dialogue, and, if applicable, any specific examples of how this dialogue has led to improvements in your agency's FOIA administration.

HUD FOIA professionals regularly engaged with the requester community regarding administration of the FOIA. For example, Region 8 employees in Denver have worked with frequent requesters, such as union representatives and construction companies, to better inform the requester community about strategies for consolidating requests and locating information more easily. This has reduced the number of incoming requests, but also enables staff to ensure timely responses. Region 2 staff in New York have cited increased effective communication with news media requesters, advocacy groups, and high-profile law firms regarding the FOIA process, applicable fees, statutory timeframes, and the agency's advanced search capabilities. They highlight the requester community's better overall understanding of FOIA, as well as more efficient processing.

D. Other Initiatives

8. Describe any efforts your agency has undertaken to inform non-FOIA professionals of their obligations under the FOIA. In 2016, the Department publicized FOIA-related performance standards for employees that have any role in administering the FOIA, including non-FOIA professionals. Please also indicate whether your agency has considered including FOIA-related performance standards in employee work plans for employees who have any role in administering the FOIA.

Beginning in FY17, HUD made Department-wide FOIA training a priority. This included developing FOIA e-learning training modules, made available to all Department staff, including non-FOIA professionals. Employees can remotely access online classes related to FOIA policies and procedures through both the HUD Virtual University and the HUD Integrated Human Resources and Training System.

In addition to the staff of the FOIA Branch, the employees who play a role in administering the FOIA primarily fall into two categories: (a) employees working in the correspondence units of various program offices at Headquarters, and (b) employees working in regional and field offices around the country. Program office staff have requirements written into their performance plans that detail the proper management of incoming correspondence. Such performance plans include routing FOIA requests to appropriate staff for collection of responsive records, and delivery of those records to the FOIA Branch for processing in a timely fashion. As for employees in the field, several regions have written FOIA-specific language into the performance plans of their employees who play any role in administering the FOIA. While this is currently done on a region-by-region basis, the Department's Office of Field Policy and Management, which oversees the work of employees in those offices, has confirmed that it is in the process of rewriting performance plans to encompass the FOIA-related work that employees around the country perform for fiscal year 2020.

9. If there are any other initiatives undertaken by your agency to ensure that the presumption of openness is being applied, please describe them here.

HUD FOIA professionals have been both trained and advised to follow the presumption of openness. For example, OGC has continued to counsel FOIA specialists at the Department to make discretionary disclosures of information, when possible. OGC has advised that unless the agency reasonably foresees that disclosure would harm an interest protected by one of the statutory exemptions or the disclosure is prohibited by law, a full or partial discretionary disclosure is preferred. Specialists are advised that they must articulate a foreseeable harm that would be caused by the release of such information, this most often cited when considering the application of Exemption 5. Even if a record, or a portion thereof, falls within the technical scope of a specific FOIA exemption, in absence of any foreseeable harm, specialists will err on the side of disclosure.

Section II: Steps Taken to Ensure that Your Agency Has an Effective System in Place for Responding to Requests

DOJ's FOIA Guidelines emphasize that "[a]pplication of the proper disclosure standard is only one part of ensuring transparency. Open government requires not just a presumption of disclosure, but also an

effective system for responding to FOIA requests." It is essential that agencies effectively manage their FOIA program.

Please answer the following questions to describe the steps your agency has taken to ensure that the management of your FOIA program is effective and efficient. You should also include any additional information that that describes your agency's efforts in this area.

1. For Fiscal Year 2018, what was the average number of days your agency reported for adjudicating requests for expedited processing? Please see Section VIII.A. of your agency's Fiscal Year 2018 Annual FOIA Report.
5.57 days

2. If your agency's average number of days to adjudicate requests for expedited processing was above ten calendar days, please describe the steps your agency will take to ensure that requests for expedited processing are adjudicated within ten calendar days or less.
N/A

3. During the reporting period, did your agency conduct a self-assessment of its FOIA program? If so, please describe the methods used, such as reviewing Annual Report data, using active workflows and track management, reviewing and updating processing procedures, etc.

- Note: In September 2017, OIP released a FOIA Self-Assessment Toolkit as a resource for agencies conducting a self-assessment of their FOIA program. The Toolkit is available on OIP's website for all agencies to use.

While no formal, agency-wide self-assessment was conducted during the fiscal year, several components within the Department established practices to better monitor and evaluate FOIA processing. The FOIA Branch at Headquarters continued its practice of running weekly statistical reports of requests received, closed, appealed, etc. Over the past year, this information was made more widely available to both office staff (via a dedicated bulletin board in the office lobby) and agency leadership (through wider circulation and distribution amongst the Department's senior management). Maintaining a consistently-current reporting mechanism allows for the ability to better track progress, identify issues, and compare processing efficiencies over weeks, months, and years.

Additionally in 2018, three regional offices (Boston, Chicago, and San Francisco) conducted the re-evaluations of their FOIA standard operating procedures, implementing revisions when necessary.

4. The FOIA Improvement Act of 2016 requires additional notification to requesters about the services provided by the agency's FOIA Public Liaison. Please provide an estimate of the number of times requesters sought assistance from your agency's FOIA Public Liaison during FY 2018 (please provide a total number or an estimate of the number).

Estimate = 25-30 times

5. Please describe the best practices used to ensure that your FOIA system operates efficiently and effectively and any challenges your agency faces in this area.

HUD's use of technology has proven a significant factor in effectively processing requests, as well as a significant challenge to efficiency. The two primary programs utilized for the processing of FOIA requests are the FOIA Express tracking system (FMS2) and an electronic discovery (eDiscovery) platform. The use of FMS2 allows for the seamless integration of a case's intake, its assignment out for collection of records, review and redaction of those records, legal clearance, final approval, and closure. The proliferation of this system's use, particularly amongst employees not solely dedicated to FOIA, has better equipped the Department to maintain a consistent approach to FOIA processing and to ensure a robust and accurate administrative record for each request.

The Department's use of an eDiscovery platform for collection of electronic records from employees' .gov email accounts allows specialists to bypass custodial self-searches and to ensure that each such collection is conducted both objectively and completely. However, a surge in the number of requests for email-based records—thus, a surge in the required use of the eDiscovery collection system—has significantly challenged our ability to complete such collections expeditiously. The turnaround time for collection of records through eDiscovery is now in excess of five months.

Another challenge the Department consistently faces is that of limited personnel. Many field offices around the country, and several program offices within HUD Headquarters, rely on the efforts of a single employee (for whom FOIA is one of many responsibilities) to facilitate the collection of records responsive to incoming FOIA requests. This, coupled with significant turnover across the agency, has proved to be a noteworthy hurdle in both maintaining consistent practices and closing FOIA requests efficiently.

<u>**Section III: Steps Taken to Increase Proactive Disclosures**</u>

The Department of Justice has long focused on the need for agencies to work proactively to post information online without waiting for individual requests to be received.

Please answer the following questions to describe the steps your agency has taken to increase the amount of material that is available on your agency websites. In addition to the questions below, you should also describe any additional steps taken by your agency to make and improve proactive disclosures of information.

1. Provide examples of material that your agency has proactively disclosed during the past reporting year, including links to the posted material
HUD has not proactively disclosed any materials during the past reporting year.

2. Please describe how your agency identifies records that have been requested and released three or more times (and are therefore required to be proactively disclosed pursuant to 5 U.S.C. § 552(a)(2)(D)).
The Department has a limited ability to identify such records. HUD's FOIA tracking system will flag language in an incoming request if it sufficiently matches that of a pre-existing request. However, this mechanism is somewhat inconsistent and relies on the presence of exact verbiage, which may not be present despite the same records being requested. The Department is actively considering more effective mechanisms by which to link related requests and identify materials to proactively post online.

3. Beyond posting new material, is your agency taking steps to make the posted information more useful to the public, especially to the community of individuals who regularly access your agency's website?
See III.1 above

4. If yes, please provide examples of such improvements.
N/A

5. Please describe the best practices used to improve proactive disclosures and any challenges your agency faces in this area.
See III.2 above

Section IV: Steps Taken to Greater Utilize Technology

A key component of FOIA administration is using technology to make information more accessible. In addition to using the internet to make proactive disclosures, agencies should also be exploring ways to utilize technology in responding to requests.

Please answer the following questions to describe how your agency is utilizing technology to improve its FOIA administration and the public's access to information. You should also include any additional information that that describes your agency's efforts in this area.

1. Is your agency leveraging technology to facilitate efficiency in conducting searches, including searches for emails? If so, please describe the type of technology used. If not, please explain why and please

describe the typical search process used instead.

See II.5 above, detailing the Department's use of technology to assist in FOIA administration. Our eDiscovery system allows for the automated collection of emails in a consistent manner by eliminating the need for custodians to conduct self-searches. This ensures that collections are both complete (including deleted and archived files that custodians may not have the ability to locate) and objective (removing the subject of a request from the process of responding to it).

2. OIP issued guidance in 2017 encouraging agencies to regularly review their FOIA websites to ensure that they contain essential resources and are informative and user-friendly. Has your agency reviewed its FOIA website(s) during the reporting period to ensure it addresses the elements noted in the guidance?

Yes. The Department performs quarterly reviews of each component of its internet and intranet websites. This includes a review of the FOIA website. This information is used to better inform HUD leadership about necessary updates, and to ensure that the website is functional and that its content is up-to-date, straightforwardly presented, and easily accessible. The FOIA Division is continuing to work on website updates and improvements in accordance with the guidance.

3. Did your agency successfully post all four quarterly reports for Fiscal Year 2018?
Yes.

4. If your agency did not successfully post all quarterly reports, with information appearing on FOIA.gov, please explain why and provide your agency's plan for ensuring that such reporting is successful in Fiscal Year 2019.
N/A

5. The FOIA Improvement Act of 2016 requires all agencies to post the raw statistical data used to compile their Annual FOIA Reports. Please provide the link to this posting for your agency's Fiscal Year 2017 Annual FOIA Report and, if available, for your agency's Fiscal Year 2018 Annual FOIA Report.

Located on HUD's FOIA Reports page at:
https://www.hud.gov/program_offices/administration/foia/foiarpts

Direct Link: https://www.hud.gov/sites/dfiles/OCHCO/documents/2018RAWData.xlsx

6. Please describe the best practices used in greater utilizing technology and any challenges your agency faces in this area.
See II.5 above

Section V: Steps Taken to Improve Timeliness in Responding to Requests and Reducing Backlogs

The Department of Justice has emphasized the importance of improving timeliness in responding to requests. This section of your Chief FOIA Officer Report addresses both time limits and backlog reduction. Backlog reduction is measured both in terms of numbers of backlogged requests or appeals and by looking at whether agencies closed their ten oldest requests, appeals, and consultations.

For the figures required in this Section, please use the numbers contained in the specified sections of your agency's 2018 Annual FOIA Report and, when applicable, your agency's 2017 Annual FOIA Report.

A. Simple Track

Section VII.A of your agency's Annual FOIA Report, entitled "FOIA Requests – Response Time for All Processed Requests," includes figures that show your agency's average response times for processed requests. For agencies utilizing a multi-track system to process requests, there is a category for "simple" requests, which are those requests that are placed in the agency's fastest (non-expedited) track, based on the low volume and/or simplicity of the records requested.

1. Does your agency utilize a separate track for simple requests? If your agency uses a multi-track system beyond simple, complex, and expedited to process requests, please describe the tracks you use and how they promote efficiency.
HUD utilizes simple, complex, and expedited tracks.

2. If your agency uses a separate track for simple requests, was the agency overall average number of days to process simple requests twenty working days or fewer in Fiscal Year 2018?
No. The average overall number of days to process simple requests was 40.17.

3. Please provide the percentage of requests processed by your agency in Fiscal Year 2018 that were placed in your simple track.
64.1%

4. If your agency does not track simple requests separately, was the average number of days to process all non-expedited requests twenty working days or fewer? **N/A**

B. Backlogs

Section XII.A of your agency's Annual FOIA Report, entitled "Backlogs of FOIA Requests and Administrative Appeals" shows the numbers of any backlogged requests or appeals from the fiscal year. You should refer to these numbers from your Annual FOIA Reports for both Fiscal Year 2016 and Fiscal Year 2017 when completing this section of your Chief FOIA Officer Report.

BACKLOGGED REQUESTS

5. If your agency had a backlog of requests at the close of Fiscal Year 2018, did that backlog decrease as compared with the backlog reported at the end of Fiscal Year 2017?
No. The backlog at the end of FY17 was 527. The backlog at the end of FY18 was 860.

6. If not, did your agency process more requests during Fiscal Year 2018 than it did during Fiscal Year 2017?
No. HUD processed 2,299 requests during FY17 and 2,245 requests during FY18.

7. If your agency's request backlog increased during Fiscal Year 2018, please explain why and describe the causes that contributed to your agency not being able to reduce its backlog. When doing so, please also indicate if any of the following were contributing factors:

- An increase in the number of incoming requests.
- A loss of staff.
- An increase in the complexity of the requests received. If possible, please provide examples or briefly describe the types of complex requests contributing to your backlog increase.
- Any other reasons – please briefly describe or provide examples when possible.

The Department's backlog increase is due in large part to an increase in both the number and complexity of requests received in FY18 as compared to FY17. In FY17, HUD received 2,296 requests. In FY18, that number grew to 2,383 requests. More significantly, the following are true of the requests received during FY18:

1. **More requests were received from members of the news media and government oversight ("watchdog") groups.**
   - **Because these organizations do not pay FOIA processing fees, they are more likely to file a greater number of requests, and those requests are more likely to be complex, involve voluminous records, or both.**
2. **A greater number of requests required the utilization of eDiscovery for data collection.**
   - **See II.5 above.**
3. **A greater number of FOIA requests proceeded to litigation.**
   - **A combination of items 1 and 2 above - requesters who are more sophisticated, and whose organizations have the necessary resources, are more likely to request information that takes more time to collect and review (such as through eDiscovery). These requesters are then more capable of suing when the 20-day deadline is not met.**

- **Due to federal court production schedules and filing deadlines, FOIA litigation must often be prioritized, drawing additional resources (including staff) away from the processing of traditional requests.**

8. If you had a request backlog please report the percentage of requests that make up the backlog out of the total number of requests received by your agency in Fiscal Year 2018. If your agency has no request backlog, please answer with "N/A."
Backlog at the end of FY18 – 860
Requests received in FY18 – 2,383

860/2383 = 36%

BACKLOGGED APPEALS

9. If your agency had a backlog of appeals at the close of Fiscal Year 2018, did that backlog decrease as compared with the backlog reported at the end of Fiscal Year 2017?
No. HUD had a backlog of 5 appeals at the end of FY17, and 14 appeals at the end of FY18.

10. If not, did your agency process more appeals during Fiscal Year 2018 than it did during Fiscal Year 2017?
No. HUD processed 61 appeals during FY17, and 50 appeals during FY18.

11. If your agency's appeal backlog increased during Fiscal Year 2018, please explain why and describe the causes that contributed to your agency not being able to reduce its backlog. When doing so, please also indicate if any of the following were contributing factors:

- An increase in the number of incoming appeals.
- A loss of staff.
- An increase in the complexity of the requests received. If possible, please provide examples or briefly describe the types of complex requests contributing to your backlog increase.
- Any other reasons – please briefly describe or provide examples when possible.

An increase in the complexity of requests, and related appeals, contributed to our backlog increase during FY18. Of particular note, the Department experienced a surge in the receipt of requests related to agency leadership, particularly political appointees. The most frequently-requested records related to these officials were emails, phone logs, text messages, calendars, and other types of records specific to individual employees. The organizations most likely to make such requests are also more likely to appeal and/or sue

to have fees waived, processing expedited, or redacted/withheld materials released. See V.B.7 above.

12. If you had an appeal backlog please report the percentage of appeals that make up the backlog out of the total number of appeals received by your agency in Fiscal Year 2018. If your agency did not receive any appeals in Fiscal Year 2018 and/or has no appeal backlog, please answer with "N/A."
Appeal backlog at the end of FY18 – 14
Appeals received in FY18 – 52

14/52 = 27%

C. Backlog Reduction Plans

13. In the 2018 guidelines for Chief FOIA Officer Reports, any agency with a backlog of over 1000 requests in Fiscal Year 2017 was asked to provide a plan for achieving backlog reduction in the year ahead. Did you agency implement a backlog reduction plan last year? If so, describe your agency's efforts in implementing this plan and note if your agency was able to achieve backlog reduction in Fiscal Year 2018?
No. HUD had a backlog of less than 1,000 requests in FY17 (527).

14. If your agency had a backlog of more than 1,000 requests in Fiscal Year 2018, what is your agency's plan to reduce this backlog during Fiscal Year 2019?
N/A (HUD's backlog in FY18 was 860).

D. Status of Oldest Requests, Appeals, and Consultations

Section VII.E, entitled "Pending Requests – Ten Oldest Pending Requests," Section VI.C.(5), entitled "Ten Oldest Pending Administrative Appeals," and Section XII.C., entitled "Consultations on FOIA Requests – Ten Oldest Consultations Received from Other Agencies and Pending at Your Agency," show the ten oldest pending requests, appeals, and consultations. You should refer to these numbers from your Annual FOIA Reports for both Fiscal Year 2016 and Fiscal Year 2017 when completing this section of your Chief FOIA Officer Report.

OLDEST REQUESTS

15. In Fiscal Year 2018, did your agency close the ten oldest requests that were reported pending in your Fiscal Year 2017 Annual FOIA Report?
No.

16. If no, please provide the number of these requests your agency was able to close by the end of the fiscal year, as listed in Section VII.E of your Fiscal Year 2017 Annual FOIA Report. If you had fewer than ten

total oldest requests to close, please indicate that.

In FY18, the Department closed seven of the ten oldest requests reported in the FY17 Annual FOIA Report.

17. Of the requests your agency was able to close from your ten oldest, please indicate how many of these were closed because the request was withdrawn by the requester. If any were closed because the request was withdrawn, did you provide any interim responses prior to the withdrawal?

Of the seven requests closed from the ten oldest, two of the seven were withdrawn. No interim responses were provided for either request prior to withdrawal.

18. Beyond work on the ten oldest requests, please describe any steps your agency took to reduce the overall age of your pending requests.

The most important step that the Department took toward reducing the overall age of pending requests was to effectuate more consistent dialogue with requesters earlier in the processing timeline. In FY18, there was a significant uptick in the receipt of requests seeking voluminous records, particularly records to be gathered via electronic discovery or requiring the work of multiple HUD components to complete. Our FOIA specialists focused on having proactive conversations with requesters, advising them upfront of the potential hurdles to an efficient closure of their request and suggesting alternatives. Many requesters were willing to work with our staff to reduce the scope or reconsider the breadth of their requests. Having such conversations early enabled the Department to eliminate unnecessary work before it had been done, saving both our staff and the requesters valuable time and helping to avoid potential delays down the line.

TEN OLDEST APPEALS

19. In Fiscal Year 2018, did your agency close the ten oldest appeals that were reported pending in your Fiscal Year 2017 Annual FOIA Report?
No.

20. If no, please provide the number of these appeals your agency was able to close by the end of the fiscal year, as listed in Section VII.C.(5) of your Fiscal Year 2017 Annual FOIA Report. If you had fewer than ten total oldest appeals to close, please indicate that.
In FY18, the Department closed nine of the ten oldest requests reported in the FY17 Annual FOIA Report.

21. Beyond work on the ten oldest appeals, please describe any steps your agency took to reduce the overall age of your pending appeals.
See V.D.18 above. The same weekly reporting mechanism used to keep staff abreast of the age and status of pending FOIA requests is used to monitor the state of pending FOIA

appeals and litigation. This ensures that, first and foremost, our staff is aware of the age of each appeal and its current processing status. Additionally, the FOIA Branch has taken steps to increase rapport with OGC's Ethics and Appeals Law Division, which makes the final determination of each FOIA appeal. This enables the appeals attorneys to work more closely with the FOIA specialist overseeing the request underlying each appeal, to gather information and documentation regarding the initial determination, and to help inform the decision-making process when issuing a final appeal determination.

TEN OLDEST CONSULTATIONS

22. In Fiscal Year 2018, did your agency close the ten oldest consultations that were reported pending in your Fiscal Year 2017 Annual FOIA Report?
N/A (HUD had no pending consultations reported in the FY17 Annual FOIA Report).

23. If no, please provide the number of these consultations your agency was able to close by the end of the fiscal year, as listed in Section XII.C. of your Fiscal Year 2017 Annual FOIA Report. If you had fewer than ten total oldest consultations to close, please indicate that.
N/A

E. Additional Information on Ten Oldest Requests, Appeals, and Consultations & Plans

24. Briefly explain any obstacles your agency faced in closing its ten oldest requests, appeals, and consultations from Fiscal Year 2018.
The most significant obstacle HUD has faced in closing its ten oldest requests and appeals continues to be the increased complexity and scope of incoming requests (detailed throughout this report) relative to the size and capability of the staff processing those requests.

25. If your agency was unable to close any of its ten oldest requests because you were waiting to hear back from other agencies on consultations you sent, please provide the date the request was initially received by your agency, the date when your agency sent the consultation, and the date when you last contacted the agency where the consultation was pending. **N/A**

26. If your agency did not close its ten oldest pending requests, appeals, or consultations, please provide a plan describing how your agency intends to close those "ten oldest" requests, appeals, and consultations during Fiscal Year 2018.
The plan to close our oldest requests and appeals is twofold. First, we strive to maintain awareness of the age of our requests and appeals through our weekly reporting mechanism (See II.3 above). Generating and distributing these weekly reports ensures that the Department, at all levels, remains mindful of our oldest requests and appeals and,

accordingly, dedicates appropriate attention to facilitating their closure. Second, we strive to apply consistent, dedicated processing efforts to our oldest requests and appeals, including consistent rapport with requesters and appellants, interim releases of responsive records whenever feasible, and open lines of communication amongst all components of our FOIA processing staff.

F. Success Stories

Out of all the activities undertaken by your agency since March 2018 to increase transparency and improve FOIA administration, please briefly describe here at least one success story that you would like to highlight as emblematic of your agency's efforts. The success story can come from any one of the five key areas. As noted above, OIP will highlight these agency success stories during Sunshine Week. To facilitate this process, all agencies should use bullets to describe their success story and limit their text to a half page. The success story is designed to be a quick summary of key achievements. A complete description of all your efforts will be contained in the body of your Chief FOIA Officer Report.

- **A great success story comes from employees of the Department's Region 10 office in Seattle. Conducting an inter-regional training program, Region 10 staff worked with employees of Region 6 in Ft. Worth, with the objective of familiarizing Region 6 with new systems and capabilities, demonstrating Region 10's best practices in processing requests, and sharing ideas amongst attorneys and FOIA liaisons. Of particular note, this training program was initiated at the regional level. With no top-down directive from Department Headquarters, regional staff facilitated the training in the spirit of collaboration. Following this successful training, Region 10 went on to share information and techniques with two additional regions. This is a great example of how employees across the Department are working collaboratively to better the entire agency's processes and practices of FOIA administration.**