United States Postal Service
Executive Order 13,392 Report and Improvement Plan

A. Characterize overall nature of agency's FOIA operations

The Records Office is responsible for the Postal Service's compliance with the Freedom of Information Act, except for records maintained by the Postal Inspection Service and the USPS Office of Inspector General (OIG).   The General Counsel's office is responsible for FOIA appeals for the Records Office and the Inspection Service.

Accordingly, this report consists of 4 parts, which represent responses from the following FOIA program offices:
- USPS FOIA Program,
- US Postal Inspection Service FOIA Program,
- USPS OIG FOIA Program, and
- Appeals Process for USPS and US Postal Inspection Service

The first three offices above serve as FOIA Requester Service Centers. This information has been posted at http://www.usps.com/foia/servicecenters.htm.

FOIA Policies and Procedures

USPS regulations which implement the FOIA are found at 39 Code of Federal Regulations, Part 265. The USPS also has a handbook, Handbook AS-353, *Guide to Privacy and the Freedom of Information Act*, which describes USPS policies regarding the FOIA & Privacy Act (PA). It provides guidance to requesters who wish to submit a FOIA request, and to records custodians on how to process requests for records. Additional guidance concerning the FOIA/PA is communicated to agency personnel through training and communication via various media, such as newsletters, electronic bulletin boards, and policy documents.

The Inspection Service and OIG publish additional guidance specific to their FOIA Programs. This includes the Inspection Service Manual, Chapter 2, and the OIG FOIA Reference Guide, respectively.

USPS FOIA Program

A. Characterize overall nature of agency's FOIA operations

The Manager, USPS Records Office, is responsible for the administration of the USPS FOIA Program for the Postal Service. The Records Office reports to the Chief Privacy Officer, who reports to the Vice-President, Consumer Advocate. The Consumer Advocate was designated as the agency's Chief FOIA Officer by the Postmaster General. The Records Office is staffed by the Manager and three analysts. The Manager serves as a FOIA Public Liaison.

Under the Records Office, the FOIA program is decentralized. FOIA requesters can submit FOIA requests to the Records Office or directly to the records custodian. If submitted to the Records Office, the Records Office will either manage processing the request or will refer it to the correct custodian. If submitted directly to the records custodian, the custodian who processes the request must provide the Records Office all relevant documentation upon completion. In 2005, the Postal Service processed 1698 requests, of which 794 were managed by the Records Office. The median number of days for response was 16 days agency-wide.

In addition to processing and tracking requests, the Records Office is responsible for developing a program and framework to assist custodians to process FOIA requests. At Headquarters, Vice-Presidents are designated as records custodians who, in turn, assign FOIA requests to personnel within their department for processing. The Purchasing function is the only Headquarters unit with a designated FOIA Coordinator. The Postal Service also has a large and complex field operation. The Postal Service manages approximately 37,000 facilities, including post offices, administrative offices, and processing plants, each of which may maintain agency records. In the field, records custodians are postmasters or other heads of postal facilities or departments where records are maintained. FOIA Coordinators have been designated to assist field records custodians in each one of the USPS' 10 Area and 80 District Offices. When the responsibility for the FOIA program moved under the Consumer Advocate, the FOIA Coordinators designated in the field were moved to Consumer Affairs offices to align with the Headquarters' structure. Consumer Affairs managers are also appropriate personnel to serve as FOIA Coordinators, since they have a developed relationship with postmasters and other postal officials, and are experienced with customer communications. The Records Office and legal counsel provide assistance to Headquarters and field records custodians and FOIA Coordinators.

The Records Office is also responsible for developing reference guides, policy documents, and other tools to support the FOIA program. As examples, the Records Office manages the tracking system, website, reading room, policy guidance and standard operating procedures (SOPs), and other tools to support the FOIA program. The Office also compiles the Annual Report to Congress.

In 2004 and 2005, the Records Office took a number of steps to improve its FOIA program. As a main goal in 2004 and 2005, the Office focused on FOIA backlogs. The backlog of 134 requests was eliminated. The Records Office also began updating SOPs and developing standardized letter templates to streamline processes, ensure compliance, and maintain consistency. In 2003 the Postal Service issued its first stand-alone privacy and FOIA handbook, which includes best practices and requirements of the public and private sector. The Records Office is in the process of updating the handbook to include updated records management and retention policies.

In 2005, the Records Office and the Inspection Service collaborated to replace their two legacy FOIA tracking systems. The purpose for replacing the legacy systems was to improve the administration and tracking of FOIA activities, streamline procedures, and improve efficiency. The system is used by the Records Office and the Postal Inspection Service, and FOIAs are entered upon receipt. Requests received by field offices or other Headquarters offices, however, are not entered or tracked in the FOIA/PA Tracking System at the time of receipt. Rather, these offices complete a PS Form 8170, FOIA/PA Tracking Sheet, at the time a final response has been made. The completed Form 8170s are submitted to the designated FOIA Coordinator. After review by the FOIA Coordinator, the completed PS Form 8170s are forwarded to the Records Office, which then enters the FOIA into the tracking system. For those requests that are referred to field or Headquarters custodians for response, the request remains in an "open" status in the tracking system until a copy of the final response has been received by the Records Office.

Challenges

The Postal Service faces a number of challenges, especially given its size and complexity. There are over 37,000 facilities where agency records are maintained. Because the USPS has a decentralized program, requests that are received directly by records custodians are not tracked and accounted for until after the request has been completed. Although the Records Office conducts training and sends out reminders, achieving consistent and thorough reporting is a challenge. This also poses challenges on providing status updates to requesters and in the overall management of the program. Also, although the USPS has designated FOIA Coordinators in non-Headquarters units, only the Purchasing Department has a designated FOIA Coordinator at Headquarters.   Once a request has been referred to a records custodian for response, the name of the individual or office within a department to whom a request has been assigned may not be tracked. Consequently, the Records Office can spend a considerable amount of time in determining the status and disposition of requests that are pending closure.

The tracking system continues to present challenges. The Records Office selected a commercial off-the-shelf tracking system intended to provide a comprehensive, web-based application for processing FOIA/PA requests. The goal was to assist automated compliance with FOIA regulations, and to transform paper-intensive manual processes to automated processes. The new system underwent a certification for implementation within the USPS computing infrastructure. After implementation, however, a number of problems were experienced by the Records Office staff. Examples include slow performance of the application, system lockouts, and the inability of the scanners to interface with the application. The Office has not yet been able to use the application as intended. Full utilization of the system should allow for automatic generation of the Annual Report; tracking and monitoring of all entered requests; electronic data management (including storage, retrieval, redaction and printing); and use of correspondence templates to generate letters.

The Records Office also faces challenges in updating its websites and tools to assist the FOIA program. Not only is the USPS a large decentralized organization, it develops and creates numerous reports, records, and other documents. Existing records can quickly become obsolete. The Records Office works to ensure that its website, SOPs, and policy guidance tools are up to date, while continuing its core function to ensure FOIA requests are timely processed.

Background of Report

The Records Office took the following steps to prepare this report:
- Established a process review team which included representatives from the Records Office, USPS OIG, Postal Inspection Service, General Counsel, Internal Control Group, and Information Technology.
- Developed and distributed a comprehensive online survey to records custodians and FOIA Coordinators (described below).
- Documented processes to create workflow charts and used charts to identify areas for improvement.
- Surveyed other agencies' FOIA personnel to identify best practices and examine use of technology.
- Reviewed the results of a prior study of the Records Office administration of the FOIA program.

As part of the process review, the Records Office conducted an online survey. The objective of the survey was to determine the effectiveness of the FOIA program and to determine what aspects of the program needed consideration in the improvement plan. The survey was sent to all agency Vice-Presidents and the 80 district managers. Recipients were asked to complete the survey, and to forward the survey to all records custodians and FOIA Coordinators within their area of responsibility. The survey was completed by over 5000 respondents throughout all levels of the organization. The Records Office used results from the survey to help develop the improvement plan.

B. List all areas selected for review

The Records Office reviewed all 27 areas identified in the FOIA report template.

1. Affirmative disclosure under subsection (a)(2).
2. Proactive disclosure of information.
3. Overall FOIA Web site improvement.
4. Improvement of agency's FOIA Reference Guide.
5. Automated tracking capabilities.
6. Electronic FOIA -- automated processing.
7. Electronic FOIA -- receiving/responding to requests electronically.
8. Multi-track processing.
9. Troubleshooting of any existing problems with existing request tracking.
10. Case-by-case problem identification.
11. Expedited processing.
12. Backlog reduction/elimination.
13. Politeness/courtesy.
14. Forms of communication with requesters.
15. Acknowledgment letters.
16. System of handling referrals.
17. System of handling consultations.
18. Process by which necessary cooperation is obtained from agency "program personnel."
19. Improvement ideas from field office personnel (where applicable).
20. Additional training needed (formal and/or on-the-job).
21. In-house training on "safeguarding label"/FOIA exemption distinctions.
22. Increased staffing (where applicable).
23. Changes to personnel practices (job series, grades, etc.) needed.
24. Contracting out/hiring of contract employees.
25. Purchase of new equipment needed.
26. Centralization/decentralization.
27. Recycling of improvement information gleaned from FOIA Requester Service Centers.

C. Include narrative statement summarizing results of review

The 27 items listed in section B are grouped into four (4) major categories as a result of the review. These include:
- FOIA Processing and Tracking
- Websites
- Reference Guides, Training, and other Tools
- FOIA Program

Under each of these four headings below, the report lists which of the items are covered by that heading.

FOIA Processing and Tracking

This heading covers all items related to processing and tracking requests, including the tracking system. This addresses 12 of the 27 areas:
5. Automated tracking capabilities.
6. Electronic FOIA -- automated processing.
7. Electronic FOIA -- receiving/responding to requests electronically.
8. Multi-track processing.
9. Troubleshooting of any existing problems with existing request tracking.
11. Expedited processing.
12. Backlog reduction/elimination.
13. Politeness/courtesy.
14. Forms of communication with requesters.
15. Acknowledgment letters.
16. System of handling referrals.
17. System of handling consultations.

As part of the review, the Records Office examined the functionality of the tracking system; how requests are received, processed and tracked by the Records Office and custodians; and communications with requesters. The review revealed some areas for improvement, and some areas that were sufficient.

Regarding the central issue of communication with requesters, considerable improvements have been made already. The Records Office eliminated its backlog of requests last year. The backlog has since risen to 48, although it is expected to be significantly reduced, if not eliminated, when the Office is fully staffed in the near future. Records custodians do not report a backlog. One of the strongest areas of compliance revealed by the survey is responsiveness – almost 99% of respondents indicated they responded to requests within the statutory timeframes. Consequently, a need for multi-track processing is not warranted. In addition, the Records Office issues acknowledgment letters and manages expedited processing requests. Referrals and consultations are well managed, and within statutory timeframes. Finally, given the service nature of our agency, the Records Office, custodians, and coordinators think of requesters as customers, and treat them with courtesy and respect.

With regard to receiving FOIA requests, requesters are advised to submit them in writing to the appropriate records custodian or to the Records Office. Requests are typically sent via US mail or facsimile. Due to the casual nature of requests received electronically, the Records Office has observed that these requests expend more time in perfecting these requests. A web-form, with required fields, may be considered in the future to move towards electronic requests.

The review did reveal certain areas for improvement. First, the automated tracking system is not functioning as well as planned. This is a key tool to improve processing, and the Records Office plans to focus on its functionality. Second, the ability to track requests could be improved. The Records Office tracks the requests it receives, but does not have a process in place to track receipt of requests sent directly to custodians. It also has difficulty tracking the status of requests when they have been subsequently referred onward. Although almost 60% of survey respondents indicated they could provide a status update to a requester within a day, only 30% of requests were tracked by some method. The Records Office consequently plans to explore ways to improve coordination and tracking.

Website

The review of the USPS FOIA website addresses the following 3 of the 27 areas:
 1. Affirmative disclosure under subsection (a)(2).
 2. Proactive disclosure of information.
 3. Overall FOIA Web site improvement.

The USPS FOIA home page may be found at http://www.usps.com/foia/welcome.htm. The FOIA home page provides links to access:
- FOIA Requester Service Centers and Public Liaisons
- FOIA Reading Room
- FOIA Regulations
- FOIA Annual Report
- Major Information Systems
- Frequently Asked Questions (FAQs)

The review resulted in various areas for improvement. First, the link to the FOIA website is not as readily accessible as it should be. There is not a link on the home page. It may be accessed using the search function on the home page, or via three clicks from the home page. Also, material on the website needs to be updated. The FAQs were recently updated in 2005. However, the information contained under Major Information Systems and several portions of the FOIA Reading Room have not been updated in the past few years. Likewise, there is no process in place to identify frequently requested records to ensure affirmative disclosure under § (a)(2). The Records Office accordingly plans to focus on website improvement. This includes improvements to the external site for FOIA requesters, as well as improvements in the intranet site for records custodians and FOIA Coordinators.

Reference Guides, Training, and other Tools

This topic covers all guidance the Records Office provides the agency to administer the FOIA program, including written references and guides, SOPs, training, and communications. This covers 4 of the 27 areas as follows:
 4. Improvement of agency's FOIA Reference Guide.
10. Case-by-case problem identification.
20. Additional training needed (formal and/or on-the-job).
21. In-house training on "safeguarding label"/FOIA exemption distinctions.

The review revealed various areas for improvement. Written guidance needs to be updated. The Records Office has been in the process of developing SOPs, correspondence templates, and guidance, especially where the same issue arises repeatedly. Correspondence templates will allow for timely and consistent responses. Survey results show better and more targeted training would be helpful to records custodians. Only 40% considered they received adequate training. In addition, the survey showed which topics need focus, like appeal rights and reporting requirements.

FOIA Program

This covers items related to managing and staffing the program, including 8 of the 27 areas:
18. Process by which necessary cooperation is obtained from agency "program personnel."
19. Improvement ideas from field office personnel (where applicable).
22. Increased staffing (where applicable).
23. Changes to personnel practices (job series, grades, etc.) needed.
24. Contracting out/hiring of contract employees.
25. Purchase of new equipment needed.
26. Centralization/decentralization
27. Recycling of improvement information gleaned from FOIA Requester Service Centers.

The review revealed some areas that were sufficient, and other areas that could be improved. Regarding staffing, the Records Office is in the process of filling vacancies and a newly created higher level position. Once the office is fully staffed, we will reevaluate resource needs. As part of the survey of custodians and FOIA Coordinators, most respondents also indicated that staffing was sufficient.

Other areas could be improved. We plan to continue to learn from field personnel and from the Service Centers areas for improvement. As an example, as a result of the survey, we know that we have to provide better training and tools to ensure required components of FOIA responses, like appeal rights. The Records Office tracking system is not functioning well, and we plan to purchase better scanners. Finally, the review demonstrated that the USPS could enhance cooperation from program personnel, and should explore how or whether the centralization / decentralization framework could be improved. At the Headquarters level, it could help to create FOIA Coordinators in each function to ensure FOIAs are processed timely and accurately, and reported properly. The Records Office also plans to explore how best to calibrate the centralized versus decentralized process. The vision for the future is for the Records Office to be able to track all FOIAs; manage complex FOIAs; and provide guidance, tools, and training for records custodians, while records custodians can provide timely quality processing for the hundreds of typical FOIA requests received.

D. List all areas chosen as improvement areas for agency plan

The plan is organized into the four major groups identified above. Listed under each are the specific areas to be targeted for improvement.

FOIA Processing and Tracking

5. Automated tracking capabilities.
6. Electronic FOIA – automated processing.
9. Troubleshooting of any existing problems with existing request tracking.
13. Politeness/courtesy.
14. Forms of communication with requesters.

Website

1. Affirmative disclosure under subsection (a)(2).
3. Overall FOIA Web site improvement.

Reference Guides, Training, and other Tools

4. Improvement of agency's FOIA Reference Guide
10. Case-by-case problem identification.
20. Additional training needed.

FOIA Program

18. Process by which necessary cooperation is obtained from agency "program personnel."
19. Improvement ideas from field office personnel (where applicable).
22. Increased staffing.
25. Purchase of new equipment needed.
26. Centralization/decentralization.
27. Recycling of improvement information gleaned from FOIA Requester Service Centers.

E. Improvement Plan

FOIA Processing and Tracking

5. Improve Automated Tracking Capabilities
Improve the ability of the USPS to provide timely status updates on requests.

Planned steps and milestones:

1.	Designate the Records Office to either receive FOIA requests, or be copied on FOIA requests, for USPS records except for records under the designation of USPS Inspector General and the Chief Postal Inspector	Oct 06
2.	Identify FOIA activity trends for specific offices or areas	Oct 07
3.	Based on FOIA trend data, identify whether to expand the number of Service Centers	Dec 07
4.	As applicable, expand access to tracking system for new Centers and train personnel	After Dec 07

Means of measurement of success:
80% of status requests are responded to within 48 hours.

6. Electronic FOIA – automated processing
Convert the Records Office from a paper-based, manual process to fully automated electronic process. The Records Office utilizes the existing FOIA/PA application to track incoming requests; however, the application is designed to fully automate FOIA processing.

Planned steps and milestones:

1.	Complete testing of existing FOIA/PA application	Sep 06
2.	Develop new business rules	Dec 06
3.	Implement	Feb 07

Means of measurement of success:
Percent completion

9. Troubleshooting of any existing problems (even minor ones) with existing request tracking
Improve the ability of the USPS to track requests and their status.

Planned steps and milestones:

1.	Map new process of tracking requests by the Records Office	Dec 06
2.	Determine tool to use with FOIA Coordinators and custodians to track status	Mar 07
3.	Communicate and implement tool with Coordinators and custodians	May 07

Means of measurement of success:
Percent completion

13. Politeness/courtesy
Continue and enhance customer service focus in responding to and handling FOIA requests.

Planned steps and milestones:

1.	Incorporate customer service policy within written procedures on FOIA	Oct 06
2.	Incorporate customer service policy into FOIA training	Jul 07
3.	Expand library of letter templates incorporating customer service policy	Aug 07
4.	Establish SOP for sending acknowledgment and requester notification letters, as applicable	Oct 07
5.	Create articles for publication in internal communications	Dec 07

Means of measurement of success:
Online survey tool to determine requesters' satisfaction with FOIA experience

14. Forms of communication with requesters
Improve overall communication with FOIA requesters.

Planned steps and milestones:

1.	Review and update procedural guidance regarding communications with requesters	Apr 07
2.	Emphasize importance of communicating with FOIA requesters through training	Jul 07
3.	Review library of letter templates for clarity	Aug 07
4.	Amend letter templates as needed	Oct 07
5.	Make letter templates available to FOIA Coordinators	Nov 07

Means of measurement of success:
Percent completion

Websites

1. Affirmative disclosure under subsection (a)(2)
Improve posting of records in Reading Room to ensure compliance with FOIA
Planned steps and milestones:

Planned steps and milestones:

1.	Review Reading Room for needed updates	Sep 06
2.	Review statutory requirements and perform gap analysis	Oct 06
3.	Review and identify accuracy and relevancy of information in USPS Reading Room	Dec 06
4.	Develop SOP to include a process to identify and post records meeting statutory requirements	Mar 07
5.	Develop process to update posting of Major Information Systems by incorporating requirements into the USPS' Privacy Impact Assessment tool	Mar 07
6.	Submit documents to IT for posting in USPS Reading Room, as applicable	Ongoing

Means of measurement of success:
Percent completion of review and updates of USPS Reading Room.

3. Overall FOIA Web site improvement
Improve accessibility and availability of FOIA information on usps.com

Planned steps and milestones:

1.	Follow established agency process to make link for FOIA webpage easier to locate on usps.com	Aug 06
2.	Submit proposal for management approval	Sep 06
3.	Update website with new link	Oct 06
4.	Verify and update information contained in the external FOIA website for relevancy and accuracy	Apr 07
5.	Ensure links to all available information are current	Ongoing

Means of measurement of success:
New link posted on usps.com; percent completion of updated FOIA website

Reference Guides, Training and other Tools

4. Improvement of Agency's FOIA Reference Guide
Update Handbook AS-353, Guide to Privacy and the Freedom of Information Act, as the USPS source of information for the FOIA.

Planned steps and milestones:

1.	Review 39 CFR Part 265 and AS-353 to determine if any changes are needed to implement the improvement plan	Oct 06
2.	Draft changes and circulate for clearance	Dec 06
3.	Publish a Federal Register notice for CFR changes and update Handbook AS-353	Feb 07
4.	Publish changes in internal communications and training material	Apr 07
5.	Update external websites	May 07

Means of measurement of success:
Percent completion

10. Case-by-case problem identification
Establish internal website with FAQs to assist records custodians to comply with FOIA

Planned steps and milestones:

1.	Analyze inquiries received on internal FOIA email account based on key word searches	Aug 07
2.	Draft FAQs for new issues identified	Oct 07
3.	Submit for management approval	Nov 07
4.	Finalize and post	Dec 07

Means of measurement of success:
Number and frequency of new FAQs posted on internal FOIA web page

20. Additional training needed
Develop training for timeliness and relevancy

Planned steps and milestones:

1.	Review training needs	Oct 06
2.	Develop project plan	Nov 06
3.	Explore and select methods to deliver training (e.g., instructor-led, web-based, video, etc.)	May 07
4.	Develop training content	Jul 07
5.	Follow process to include training on the list of USPS training courses from which employees can fulfill mandatory training hours	Sep 07
6.	Publish and disseminate training	Dec 07

Means of measurement of success:
Establishment of training as an official training course, and evaluation of training

FOIA Program

18. Process by which necessary cooperation is obtained from agency "program personnel"
Designate HQ FOIA Coordinators and an improved process to determine appropriate records custodian

Planned steps and milestones:

1.	Develop HQ FOIA Coordinator responsibilities and amend Field Coordinator responsibilities	Sep 06
2.	Draft management directive to HQ/HQ-related offices to designate FOIA Coordinators	Oct 06
3.	Develop and publish HQ and Field FOIA Coordinator guidelines	Nov 06
4.	Train Records Office staff and FOIA Coordinator on electronic Records Information System as a research tool to identify records custodians	Dec 06

Means of measurement of success:
Percent completion

19. Improvement ideas from field office personnel (where applicable)
Improve FOIA processing for field offices

Planned steps and milestones:
1.	Review suggestions from online FOIA survey and internal FOIA email account	Jul 06
2.	Create team of FOIA Coordinators and records custodians	Mar 07
3.	Establish team's process for review, approval and implementation of suggestions	May 07
4.	Implement initial changes	Sep 07
5.	Publish improvements on internal website and communications	Oct 07

Means of measurement of success:
Percent completion

22. Increased staffing (where applicable)
Make selection of qualified candidate to fill newly approved mid-level position within the Records Office

Planned steps and milestones:
1.	Post approved position in bi-weekly vacancy announcement	May 06
2.	Review board to meet and forward names of qualified candidates to selecting official	May 06
3.	Make selection	Jun 06
4.	Selected candidate to begin	Jun 06

Means of measurement of success:
Percent completion

25. Purchase of new equipment needed
Purchase scanners to expand use of existing FOIA/PA tracking system by Records Office

Planned steps and milestones:
1.	Determine capability of scanning hardware/software with FOIA/PA application	Jul 06
2.	Develop quick reference guides to facilitate transition to paperless environment	Jul 06
3.	Submit requisition to purchase high speed scanners	Aug 06
4.	Coordinate installation of hardware/software with IT Support	Sep 06
5.	Train staff	Sep 06

Means of measurement of success:
Percent completion

26. Centralization/decentralization
Improve overall administration of the USPS FOIA program

Planned steps and milestones:
1.	Benchmark with other agencies of similar size and structure for best practices	Oct 06
2.	Determine if any process changes are needed and circulate for review	Dec 06
3.	Publish needed changes to CFR and Handbook AS-353	Feb 07
4.	Publish changes in internal communications	Apr 07
5.	Update external websites	Apr 07

Means of measurement of success:
Percent completion

27. Recycling of improvement information gleaned from FOIA Requester Service Centers

Improve overall experience of requesters with USPS FOIA program

Planned steps and milestones:

1. Establish team from all Service Centers — Dec 07
2. Establish process to use requester feedback to identify areas of improvements — Mar 08
3. Establish team's process for review, approval and implementation of suggestions — May 08
4. Implement initial changes — Sep 08
5. Publish improvements on external FOIA website — Sep 08

Means of measurement of success:

Percent completion

F. For the entire plan, group the improvement areas into the following time periods:

1. Areas anticipated to be completed by December 31, 2006
FOIA Processing and Tracking – N/A

Website – N/A

Reference Guides, Training, and other Tools – N/A

FOIA Program
18. Process by which necessary cooperation is obtained from agency "program personnel."
22. Increased staffing (where applicable).
25. Purchase of new equipment needed.

2. Areas anticipated to be completed by December 31, 2007
FOIA Processing and Tracking
5. Automated tracking capabilities.
6. Electronic FOIA -- automated processing
9. Troubleshooting of any existing problems with existing request tracking.
13. Politeness/courtesy.
14. Forms of communication with requesters.

Website
1. Affirmative disclosure under subsection (a)(2).
3. Overall FOIA Web site improvement.

Reference Guides, Training, and other Tools
4. Improvement of agency's FOIA Reference Guide.
10. Case-by-case problem identification.
20. Additional training needed.

FOIA Program
19. Improvement ideas from field office personnel (where applicable).
26. Centralization/decentralization.

3. Areas anticipated to be completed after December 31, 2007
FOIA Processing and Tracking – N/A

Website – N/A

Reference Guides, Training, and other Tools – N/A

FOIA Program
27. Recycling of improvement information gleaned from FOIA Requester Service Centers.

US Postal Inspection Service FOIA Program

A. Characterize overall nature of agency's FOIA operations

The United States Postal Inspection Service (USPIS), Office of Counsel, manages the Freedom of Information Act (FOIA) program for the Inspection Service.

The Inspection Service governs a centralized FOIA program. The office is staffed with one specialist and three technicians.

Upon receipt of a request for USPIS records, the FOIA staff enters the appropriate information into the FOIA/PA database within 24 hours of receipt. An internal search is conducted utilizing the Inspection Service Integrated Information System (ISIIS) to determine if records may or may not exist as well as other applicable electronic databases. If records exist an email is sent to the appropriate field office to search for responsive records. If no records exist a response is sent to the requester informing them of the negative search results. Because Inspection Service records are not centrally located at the Rosslyn office, a delay letter is sent to all requesters allowing ample time to locate the records, duplicate the necessary copies and transmit to the FOIA/PA Unit for processing.

Upon receipt of the copies, the responsive records are scanned into the FOIA/PA database and ultimately reviewed with the appropriate exemptions applied for inclusion in the annual report.

Challenges

The USPIS FOIA/PA Unit has (18) Divisions and (3) Service Centers nationwide. Responsive records are retrieved from Inspection Service field offices. Inspection Service field offices must then in turn request the records from a federally-operated off-site storage center.

All existing case files are not in electronic format. Consequently, they must be manually retrieved, photocopied and mailed to the FOIA/PA Unit for scanning into the FOIA/PA database.

B. List all areas selected for review

The USPIS reviewed all 27 areas identified in the FOIA report template.

C. Include narrative statement summarizing results of review

1. **Affirmative disclosure under subsection (a)(2)** – see #3.

2. **Proactive disclosure of information** – see #3.

3. **Overall FOIA Web site improvement** – These functions are currently being performed by the Records Office. However, if required, they can be accomplished separately by the Inspection Service.

4. **Improvement of agency's FOIA Reference Guide** - See www.usps.com for USPS and/or USPIS

5. **Automated tracking capabilities** – this function can be performed utilizing the FOIA/PA database

6. **Electronic FOIA** – this function can be performed utilizing the FOIA/PA database

7. **Electronic FOIA** – this function can be performed utilizing the FOIA/PA database

8. **Multi-Track Processing** – the Inspection Service currently has no backlog, so no multi-track system needs to be established. Routine requests are processed on a first-in/first-out basis.

9. **Troubleshooting of any existing problems** – this can be accomplished utilizing the FOIA/PA database

10. **Case-by-Case problem identification** – No action required at this time. Currently, whenever problems arise they are immediately brought to the attention of the appropriate personnel for resolution.

11. **Expedited processing** – No action required. The USPIS is in compliance with this law

12. **Backlog reduction/elimination** – No action required. The USPIS currently has no backlog of requests

13. **Politeness/courtesy** – No action required. It is a standard practice for USPIS personnel to conduct themselves in a professional manner at all times when dealing with postal customers.

14. **Forms of communication with requesters** – No action required.

15. **Acknowledgment Letters** – No action required. This function is already being performed by the USPIS.

16. **System of handling referrals** – No action required. This function is already being performed by the USPIS.

17. **System of handling consultations** – No protocols exist.

18. **Process by which necessary cooperation is obtained from agency "program personnel"** – There is concern regarding the thoroughness of searches within the agency (field personnel).

19. **Improvement ideas from field office personnel (where applicable).** – Not applicable

20. **Additional training needed (formal and/or on-the-job)** – No action required.

21. **In-house training on "safeguarding label"/FOIA exemption distinctions** – No action required.

22. **Increased staffing (where applicable)** – No action required.

23. **Changes to personnel practices (job series, grades, etc.)** – Action required.

24. **Contracting out/hiring of contract employees** – No action required.

25. **Purchase of new equipment needed** – No action required at this time.

26. **Centralization/decentralization** – No action required. The USPIS is currently operating on a centralized basis.

27. **Recycling of improvement information gleaned from FOIA Requester Service Centers** – No protocol exists.

D. List all areas chosen as improvement areas for agency plan

17. System of Handling Consultation
18. Process by which necessary cooperation is obtained by agency "program personnel"
23. Changes to personnel practices (job series, grades, etc.)
27. Recycling of improvement information gleaned from FOIA Requester Service Centers

E. Improvement Plan

17. System of Handling Consultation

Goal(s)/objective(s):
- Establish process on the proper handling of these requests

Distinct steps planned to be taken:
1. Draft procedural instructions
2. Provide a contact list of FOIA agencies to staff

Time milestones:
- Submit instructions to management for review and approval – July 2006
- Finalize instructions – August 2006
- Distribute instructions to affected employees – September 2006

Means of measurement of success:
- Number of successfully completed consultations
- Number of referrals timely processed

18. Process by which necessary cooperation is obtained by agency "program personnel"

Goal(s)/objective(s):
- There is concern regarding the thoroughness of the searches conducted in the field. Establish instructions to the field, recommending specific search areas that may not normally be considered when searching for responsive records. This should eliminate FOIA staff having to spend time sending multiple emails to field personnel and/or inspectors to determine if a specific area was searched.

Distinct steps planned to be taken:
1. Create a generic email that incorporates all possible search areas based on the category of the case.
2. Conduct a teleconference with Inspection Service FOIA contact personnel to ensure there is an understanding across the board on what we hope to accomplish with this process.

Time milestones:
- Create document -- August 31, 2006
- Coordinate schedule with FOIA contact personnel – September 15, 2006
- Conduct teleconference – September 22, 2006

Means of measurement of success:
- Number of complete document searches received from Inspection Service Divisions/Service Centers

23. Changes to personnel practices (job series, grades, etc.)

Goal(s)/objective(s):
- Upgrade FOIA Specialist position
- Upgrade and change the title of the FOIA Technician position so that they are comparable to similar-type positions in the Postal Service, Office of Inspector General and the federal government.

Distinct steps planned to be taken:
1. Draft memo to management justifying the need to upgrade positions

Time Milestones:
- Submit memo to management -- July 2006
- Obtain management approval – July 2006
- Submit memo to HR for review – August 2006
- Submit memo to the Office of Organizational Requirements for final determination and approval – August 2006

Means of measurement of success:
- FOIA Specialist position reclassification completed
- FOIA Technician position reclassification completed

27. Recycling of improvement information gleaned from FOIA Requester Service Centers
Goal(s)/objective(s):
- Identify potential problem areas with the FOIA processes
- Implement solutions

Distinct steps planned to be taken:
1. Conduct staff meeting to identify what areas may need to be addressed
2. Develop form that will address complaints and identify problem areas

Time Milestones:
- Conduct staff meeting -- July 2006
- Develop form – August 2006

Means of measurement of success:
Quantitative assessment of complaints and/or areas of concern

F. For the entire plan, group the improvement areas into the following time periods:

1. Areas anticipated to be completed by December 31, 2006
All areas anticipated to be completed by December 31, 2006

2. Areas anticipated to be completed by December 31, 2007
N/A

3. Areas anticipated to be completed after December 31, 2007
N/A

USPS OIG FOIA Program

A. Characterize overall nature of agency's FOIA operations

The OIG FOIA Office receives and processes initial requests and appeals, assures agency compliance with e-FOIA procedures, and trains agency personnel on FOIA and Privacy Act compliance. This is a centralized unit with 2.5 full-time employees assigned, including a newly created position to assure compliance with FOIA request response requirements.

The OIG FOIA Office works closely with other USPS units to assure that records originating in other units are properly referred for processing. Monthly requests to the OIG FOIA Office are increasing, with monthly average numbers of requests rising from 9 in FY 04 to 14.5 in FY 05 and 23.5 in FY 06 (October – April). The increase appears closely linked to an expansion of agency investigative jurisdiction and activity.

The OIG FOIA Office had no backlog as of May 1, 2006. As of that date, the Office had processed 98% of FY 06 initial request responses within the 20-business-day statutory timeframe.

B. List all areas selected for review

The OIG reviewed all 27 areas identified in the FOIA report template.

C. Include narrative statement summarizing results of review

1. Affirmative disclosure under subsection (a)(2). USPS OIG complies with (a)(2) by routine posting on the OIG external website, www.uspsoig.gov. Innovations in technology and realignments within the agency can pose opportunities to review content and methods and to update facilities consistent with E-FOIA requirements.

2. Proactive disclosure of information. See #1, above.

3. Overall FOIA Web site improvement. USPS OIG complies with (a)(2) by routine posting on the OIG external website, www.uspsoig.gov.   See #1, above.

4. Improvement of agency's FOIA Reference Guide. The USPS OIG reference guide complies with the requirements of subsection (g) of the Act and, from usage, appears to be an effective tool for increasing public awareness. The agency makes routine, minor updates. The agency might undertake a more in-depth review now, coinciding with other agency work on the external page.

5. Automated tracking capabilities. Existing database resources allow USPS OIG to provide instant request tracking. Improvements planned for FY 2006 will allow USPS OIG FOIA Office to report more efficiently annual statistics.

6. Electronic FOIA -- automated processing. Program areas provide varying types of records, but increasingly can provide the FOIA Office electronic versions that in many cases can be processed more efficiently. FOIA Office personnel have identified no present need for upgrading these systems.

7. Electronic FOIA -- receiving/responding to requests electronically.   For some years the USPS OIG FOIA Office has received FOIA requests via U.S. Mail, fax, and email. We often, but not always, are able to provide responses via email. We have identified further improvements to better focus electronic requests to ensure they comply with the FOIA.

8. Multi-track processing. Congress encouraged agencies with backlogs of pending requests to establish multi-track systems. Since backlogs have seldom occurred at this FOIA Office, no system has been established.

9. Troubleshooting of any existing problems with existing request tracking. The USPS OIG FOIA Office has identified no issues with existing request tracking. Centralization of the FOIA function and database design insure instant access to request status and determination.

10. Case-by-case problem identification. A non-hierarchical management system in the FOIA Office, with great reliance on shared experience, brainstorming, and open communication, produces constant opportunity for issue identification and resolution. Recent efficiencies identified by staff have helped the small staff respond to the rapidly increasing number of requests.

11. Expedited processing. The USPS OIG FOIA Office finds requestors genuinely confused about the availability of and eligibility for expedited processing upon demand. Through improvements (see 4, above) to the FOIA guide, we hope to give requestors a more realistic understanding of the process. We plan to review requirements to assure that our communications on expedited processing meet the requirements of the law.

12. Backlog reduction/elimination. As of May 1, USPS OIG had no backlog of requests not answered within 20 business days. For the current FY 06, 98% of responses have been issued on time. The Office is constantly seeking efficiencies, but does not believe any are required for the purpose of eliminating or reducing backlogs.

13. Politeness/courtesy. The USPS OIG has no data from which to conclude this is an area for improvement. We will monitor contacts through our FOIA Requestor Service Center and plan improvements at a later date if we find that to be necessary.

14. Forms of communication with requesters. The USPS OIG has strived over many years to use emerging technology in its public interface. To the extent that we can do so while fully protecting data as necessary under the FOIA, we commit to working with requestors to provide usable data in accessible formats or media.

15. Acknowledgment letters. The USPS OIG FOIA Office has identified no data either through customer feedback or on-time performance statistics to support a review of its acknowledgment letter procedures.

16. System of handling referrals. The USPS and USPIS FOIA units are the most frequent referring and receiving units for USPS OIG FOIA requests. Leadership in each of these units has established clear, consistent, and efficient means for handling referrals at the interagency level.

17. System of handling consultations. The nature of the records of the USPS OIG results in infrequent consultations, and most of those are a part of our compliance with E-FOIA requirements of posting audit reports. To the extent that the OIG Office consults, it does so most often with records custodians who are also the principal program managers, able to provide instant responses. USPS OIG has little data to support that consultations have slowed our processes, but, to the contrary, that they enrich our ability to understand the exemption-related concerns of record content.

18. Process by which necessary cooperation is obtained from agency "program personnel." Improvements devised by agency program personnel, and especially by the OIG Office of Investigations, have streamlined our records search and processing work. We have no data to support that program personnel response is more than an isolated and infrequent issue.

19. Improvement ideas from field office personnel (where applicable).   Not applicable, due to the centralized work of the USPS OIG FOIA Office.

20. Additional training needed (formal and/or on-the-job). USPS OIG FOIA personnel are encouraged by top management to seek refresher training, provide in-house and outside training themselves as issue experts, and use *ad hoc* case reviews as a means of continual on-the-job training. In addition, the USPS OIG FOIA Office strives to recruit personnel with extensive FOIA experience. No data support a need for additional training above and beyond what the OIG currently provides.

21. In-house training on "safeguarding label"/FOIA exemption distinctions. The USPS OIG FOIA Officer trains all new-hires and other personnel, as necessary, and the Office Manager frequently reviews and helps to revise program area labels in consultation with management. The FOIA Office is clearly delineated as the locus for release determinations despite footers or labels applied by program areas. Staff stresses FOIA statutory and case law as the basis for determining release of records.

22. Increased staffing (where applicable). No improvement necessary as the agency has already responded to FOIA request increases by adding at least one staff position.

23. Changes to personnel practices (job series, grades, etc.) needed. The USPS OIG reviewed this matter, upgraded the level of experience required for FOIA positions, and placed the positions in attractive paybands, all in an effort to recruit top performers.

24. Contracting out/hiring of contract employees. USPS OIG management has already addressed staffing needs through other means.

25. Purchase of new equipment needed.   USPS OIG FOIA Office managers reviewed but have not identified capital expenditures necessary to speed work.

27. Recycling of improvement information gleaned from FOIA Requester Service Centers.   As the prominence of the Service Center grows, it will become an important 'customer feedback' loop. FOIA Office staff will develop the means to track, record, and use the data to improve customer service.

D. List all areas chosen as improvement areas for agency plan

USPS OIG FOIA Program

1. Affirmative disclosure under subsection (a)(2).
2. Proactive disclosure of information.
3. Overall FOIA Web site improvement.
4. Improvement of agency's FOIA Reference Guide.
7. Electronic FOIA -- receiving/responding to requests electronically.
11. Expedited processing.
27. Recycling of improvement information gleaned from FOIA Requester Service Centers.

E. Improvement Plan
 1. Affirmative disclosure under subsection (a)(2).
 2. Proactive disclosure of information.
 3. Overall FOIA Web site improvement.
 4. Improvement of agency's FOIA Reference Guide.
 7. Electronic FOIA -- receiving/responding to requests electronically.
    Goal: Update, improve accessibility of, assure maximum posting of content
    Steps: Incorporate FOIA concerns in on-going redesign of OIG external website
    Milestones: FY 06 – complete assessment
                FY 07 – complete development
                     complete validation
                     complete (beta) test phase
                     public release
    Metrics: DNA

11. Expedited processing.
    Goal: Clarify existing policy with respect to non-qualifying requestors
    Steps: Develop standard response letter for non-qualifying requestors
                Develop SOP to identify subsequent requests for expedition
    Milestones: FY 06 – letter approval
                FY 06 – implement as requests are received
    Metrics: We expect to measure success by a decrease in communications from those with requests pending

27. Recycling of improvement information gleaned from FOIA Requester Service Centers.
    Goal: Improve customer service through feedback loop
    Steps: Establish log of contacts
                Characterize issues
                Review quarterly
                    Determine issues in need of attention through communications vehicles
    Milestones: FY 06 – Create log
                FY 06 – Implement use by FOIA Service Center
                FY 06 – Analyze feedback quarterly
    Metrics: We expect to measure success by a decrease in complaints by FOIA requestors.

F. For the entire plan, group the improvement areas into the following time periods:
1. Areas anticipated to be completed by December 31, 2006
11. Expedited Processing
27. Recycling of improvement information gleaned from FOIA Requester Service Centers.

2. Areas anticipated to be completed by December 31, 2007
 1. Affirmative disclosure under subsection (a)(2).
 2. Proactive disclosure of information.
 3. Overall FOIA Web site improvement.
 4. Improvement of agency's FOIA Reference Guide.
 7. Electronic FOIA -- receiving/responding to requests electronically.

3. Areas anticipated to be completed after December 31, 2007
N/A

Appeals Process for USPS and US Postal Inspection Service

A. Characterize overall nature of agency's FOIA operations

The Law Department processes appeals for requests for records under the Freedom of Information Act (FOIA) and Privacy Act (PA).   FOIA and PA appeals are usually received by letter mail. Once received, they are date stamped and assigned to a paralegal specialist. The paralegal specialist consults with the record custodian, reviews documentation, and prepares an initial draft decision. The draft decision is reviewed by a designated attorney and then sent to the Chief Counsel, Customer Programs, for signature. A spreadsheet is maintained by the office to track the following fields:

- Appeal number
- Requester
- Date stamped
- Date any Interim Response Sent
- Type (FOIA or Privacy Act)
- Date Response Sent
- Number of Days
- Date due to Chief Counsel
- Description of Request
- FOIA Exemptions Used
- Other Reasons for Nondisclosure

B. List all areas selected for review

The Law Department reviewed the following areas identified in the FOIA report template which were relevant to appeals processing:
- 5. Automated tracking capabilities.
- 12. Backlog reduction/elimination.
- 14. Forms of communication with requesters.
- 20. Additional training needed (formal and/or on-the-job).
- 22. Increased staffing (where applicable).
- 23. Changes to personnel practices (job series, grades, etc.) needed.

C. Include narrative statement summarizing results of review

As described below, the Law Department has already implemented improvements in the FOIA appeal program.

A. Over two years ago, Law Department management established overall targets for improvement in on-time performance by setting pay-for-performance goals for FOIA/PA appeal processing. In addition, the Law Department began committing staff resources to updating spreadsheets to track the progress of FOIA/PA appeal decisions and holding assigned personnel accountable for on-time performance. As a result, on-time performance has improved dramatically, as indicated by the statistics below.

FOIA/PA Appeals FY04 % on time: 57.75%
FOIA/PA Appeals FY05 % on time: 65.63%
FOIA/PA Appeals FY06% on time (as of 05/15/2006): 97.8%

These results are plotted below.
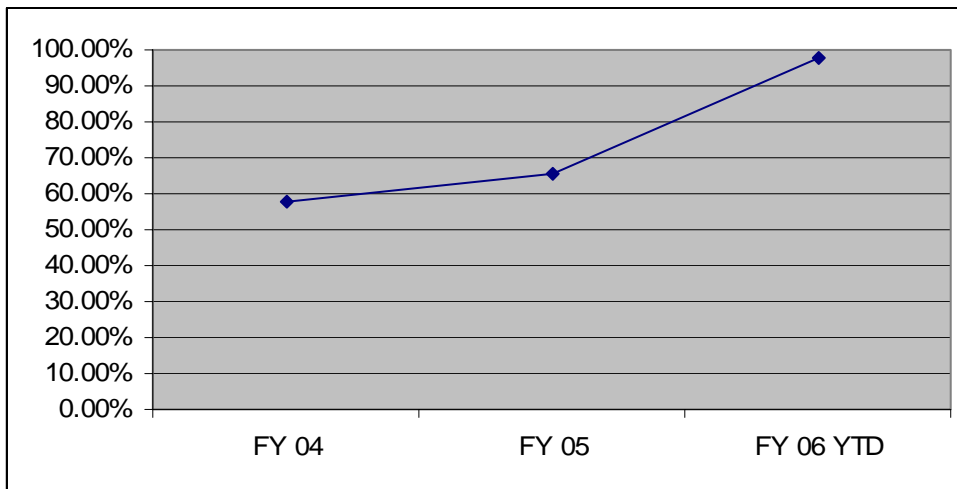
In addition, turnaround times for appeals have improved dramatically.

Average # of days FY05: 24.1 days per appeal
Average # of days FY06: 16.5 days per appeal

As of May 15, 2006, there were no backlogged cases. Only two FOIA/PA appeal decisions in FY06 were completed beyond the statutory time frames.

B. This year, Law Department management set goals to increase the overall quality of appeal decisions. Management has emphasized quality by establishing new staff goals for error-free decisions, sending staff to writing and CLE training courses, and expanding the fact summaries in appeal decisions.

C. As part of an overall effort to review grades of personnel assigned to FOIA/PA appeals, grade levels for career paralegal specialists were increased from EAS level 16 to EAS level 17, and incumbents in these positions received a 2 percent increase in base compensation.

D. Due to staff turnover in FY06, management has identified a need to enhance information law expertise in the Department. New personnel are expected to join the Law Department's information law practice in the near term. Management has accordingly prioritized training of assigned personnel. Towards that end, management has sought to commit additional budgetary resources and workhours towards training in FOIA/PA topics and writing courses.

E. In order to streamline FOIA/PA appeal processing operations, management has directed staff to improve and update internal research tools to promote consistency in decision making. This includes updating an internal website with directories of recent appeal decisions and posting text-searchable copies of recent decisions to facilitate drafting of future decisions on related topics.

D. List all areas chosen as improvement areas for agency plan

20. Additional training needed.

E. Improvement Plan

20. Additional training needed.
Goal: Develop in-house expertise on FOIA and Privacy Act practice areas.
Steps & Milestones:
- Assign personnel to task (completed).
- Send personnel to information law, privacy, and writing courses as needed.
- Develop in-house research tools by Fall 2006.
- Develop in-house website by Fall 2006 for FY06 appeal decisions
- Develop in-house website for FY05 appeal decisions in FY07.

Measurement of success:
- Enhance number of error-free decisions presented to Chief Counsel, Customer Programs, for signature.
- Reduce number of hours spent by personnel on drafting FOIA appeal decisions.
- Completion and use of website.

F. For the entire plan, group the improvement areas into the following time periods:
1. Areas anticipated to be completed by December 31, 2006
Except as indicated below, all areas expected to be completed by December 31, 2006.

2. Areas anticipated to be completed by December 31, 2007
FY05 appeal decision posted on internal website

3. Areas anticipated to be completed after December 31, 2007
N/A