

FOIA Bulletin Number: 20-02

Subject: FOIAonline Electronic Tracking and Case Management System

1. Purpose. This FOIA Bulletin establishes FOIAonline as the Department of the Interior (Department or DOI) FOIA request tracking and case management system and outlines certain requirements governing the use of the system by Department personnel.

2. Effective Date. This policy is effective August 12, 2020.

3. Authorities.

- [Title 5 of the United States Code, Section 552](#)
- [Secretary's Order No. 3371](#)
- [Secretary's Order No. 3378](#)

4. Coverage. This policy applies to all personnel within the bureaus/offices of the Department who process or review FOIA requests, including personnel who do so as a collateral duty. This policy supersedes any conflicting Departmental or bureau/office policies or procedures. Bureaus/offices may issue implementing procedures consistent with this policy after the Departmental FOIA Office (DFO) reviews and approves all such procedures in writing. The FOIA office in the Office of the Inspector General will continue to use its own separate tracking and case management system for FOIA request processing and use the FOIAonline system only for the limited purpose of entering anonymized data necessary for the Department's annual report to the Department of Justice (DOJ) pursuant to §552(a)(7)(e)(1) of Title 5.

5. Background. FOIAonline is a multi-agency web application managed by the U.S. Environmental Protection Agency (EPA) that enables the public to submit FOIA requests to participating agencies, track the progress of an agency's response to a request, and search for information previously made available. FOIAonline is also a workflow system and repository that enables FOIA staff to receive, manage, track, and respond to FOIA requests in one system and to generate reports, including the annual FOIA report that is submitted to the DOJ and the National Archives and Records Administration.

6. Policy. FOIAonline is the Department's only authorized electronic tracking and case management system for FOIA requests. All bureaus/offices must use FOIAonline when processing FOIA requests consistent with this policy and other directives issued by the DFO.

DOI access to FOIAonline is limited to staff who have been assigned FOIA processing, review, or oversight responsibilities. System access is restricted to the lowest level (Department/Bureau/Sub-bureau/individual request) where the staff member has a legitimate business need to know the information.

7. Responsibilities.

A. Deputy Chief FOIA Officer (DCFO)

The DCFO is the DOI system owner of FOIAonline and is responsible for:

1. Managing DOI's use of FOIAonline;
2. Issuing policies and guidance that govern the use of FOIAonline by DOI personnel;
3. Granting access to the system to Bureau FOIA Officers and users who have a legitimate business need for access at the Department level;
4. Liaising with EPA on FOIAonline issues (other than routine issues sent directly to the FOIAonline Help Desk); and
5. Representing DOI before the FOIAonline Change Control Board.

B. Bureau FOIA Officers

Bureau FOIA Officers are responsible for:

1. Granting FOIAonline access on an individual basis to bureau/office FOIA processing staff as appropriate, ensuring that users are assigned to the correct organization, billing rate, and role necessary for them to conduct their work while restricting their access to only those requests that they have a legitimate business need to see;
2. Ensuring that each system user within their bureau/office executes the FOIAonline Access Form and retaining the approved forms;
3. Deactivating FOIAonline user accounts whenever users no longer have a legitimate business need for them;
4. Ensuring that requests received by the bureau/office are appropriately assigned, processed, reviewed, and closed in FOIAonline; and
5. Addressing non-technical FOIAonline questions from their bureau/office system users.

C. FOIAonline System Users

FOIAonline system users are responsible for:

1. Completing the FOIAonline Access Form, submitting it for approval to their Bureau FOIA Officer (or the DFO for Bureau FOIA Officers and Department-level users), and abiding by the FOIAonline Rules of Behavior;
2. Notifying their Bureau FOIA Officer when their organization, billing rate, or role needs to change, and when their account needs to be deactivated;
3. Promptly and accurately entering requests in FOIAonline that are not directly submitted into the system by the requester;

4. Promptly and accurately completing all applicable system fields, consistent with the requirements set forth in this FOIA Bulletin and any supplemental directives issued by the DFO or their respective bureau/office;
5. Facilitating the production of FOIA logs by marking both the requester's name and the description of the request as "available to the public," *except*:
 - a. For first-party requests (where the requester is seeking their own information or represents someone seeking their own information), leaving the name of the requester hidden and making only a modified generic description visible to indicate that the request is a first-party request; and
 - b. For requests that are not first-party requests but include sensitive personally identifiable information (PII) about a third party, making only a modified generic description visible to the public to indicate that the request contains sensitive PII.
6. Uploading records that are released to requesters in FOIAonline in the form in which they were released; and
7. Ensuring that correspondence sent to requesters via FOIAonline reflects the Department's Required Language for FOIA Responses at <https://www.doi.gov/foia/news/guidance>.

8. Distribution. This policy will be distributed to all FOIA personnel upon issuance. Bureau FOIA Officers are responsible for distributing it to all FOIA personnel new to the Department as part of their orientation materials. This policy will also be made available to all FOIA personnel on the Department's FOIA website accessible at <https://www.doi.gov/foia/news/guidance/>, which provides additional FOIA resources.

9. Rights and Benefits. This policy is not intended to, and does not, create any right or benefit, substantive or procedural, enforceable at law or equity by a party against the United States, its departments, agencies, instrumentalities or entities, its officers or FOIA personnel, or any other person.