



FEDERAL MARITIME COMMISSION
CHIEF FOIA OFFICER REPORT
FOR MARCH 2025 TO MARCH 2026

(MARCH 12, 2026)

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Section I: FOIA Leadership and Applying the Presumption of Openness

The guiding principle underlying the Department of Justice’s (DOJ) 2022 [FOIA Guidelines](#) is the presumption of openness. The Guidelines also highlight the importance of agency leadership in ensuring effective FOIA administration. Please answer the following questions about FOIA leadership at your agency and describe the steps your agency has taken to ensure that the presumption of openness is being applied to all decisions involving the FOIA.

A. Leadership Support for FOIA

1. The FOIA requires each agency to designate a Chief FOIA Officer who is a senior official at the Assistant Secretary or equivalent level. See 5 U.S.C. § 552(j)(1) (2018). Is your agency’s Chief FOIA Officer at or above this level?

Answer: Yes.

2. Please provide the name and title of your agency’s Chief FOIA Officer.

Answer: David Eng, Secretary.

3. What steps has your agency taken to incorporate FOIA into its core mission? For example, has your agency incorporated FOIA milestones into its strategic plan?

Answer: The Federal Maritime Commission (FMC or Commission) incorporates FOIA into its core mission in various ways. For example, the Commission’s regulations implementing FOIA in 46 C.F.R. §§ 503.1 and 503.11 describe various agency records, policy statements, and rules that are posted in the Federal Register or the agency website. Also, one of the agency’s strategic objectives is “enhancing public awareness of agency resources, remedies, and regulatory requirements through education and outreach.” The Commission accomplishes this objective in part by proactively disclosing and posting many types of public FOIA records on its website.

B. Presumption of Openness

4. DOJ's 2022 FOIA Guidelines provides that “agencies should confirm in response letters to FOIA requesters that they have considered the foreseeable harm standard when reviewing records and applying FOIA exemptions.” Does your agency provide such confirmation in its response letters?

Answer: Yes.

5. In some circumstances, agencies may respond to a requester that it can neither confirm nor deny the existence of requested records if acknowledging the existence of records would harm an interest protected by a FOIA exemption. This is commonly referred to as a Glomar response. If your agency tracks Glomar responses, please provide:

- the number of times your agency issued a full or partial Glomar response during Fiscal Year (FY) 2025 (please separate full and partial Glomar responses if possible);
- the number of times a Glomar response was issued by exemption during FY 2025 (e.g., Exemption 7(C) – 20 times, Exemption 1 – 5 times).

Answer: Not applicable. The Commission did not provide any *Glomar* responses during FY 2025.

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

Section II: Ensuring Fair and Effective FOIA Administration

DOJ's 2022 [FOIA Guidelines](#) provide that “[e]nsuring fair and effective FOIA administration requires . . . proper training, and a full understanding of FOIA obligations by the entire agency workforce.” The Guidelines reinforce longstanding guidance to “work with FOIA requesters in a spirit of cooperation.” DOJ also “urge[s] agency Chief FOIA Officers to undertake comprehensive review of all aspects of their agency’s FOIA administration” as part of ensuring fair and effective FOIA administration.

A. FOIA Training

1. The FOIA directs agency Chief FOIA Officers to ensure that FOIA training is offered to agency personnel. See 5 U.S.C. § 552(a)(j)(2)(F). Please describe the efforts your agency has undertaken to ensure proper FOIA training is made available and used by agency personnel.

Answer: All new employees are provided with live FOIA training as part of their onboarding. Additionally, agency personnel in responsive offices are given a link to agency FOIA training slides as a refresher when they receive notice from the FOIA program office to conduct a search for responsive records.

2. Did your FOIA professionals, or other personnel at your agency with FOIA responsibilities, attend substantive FOIA training during the reporting period, such as training provided by the Department of Justice?

Answer: Yes. During the reporting period, personnel who have responsibilities in administering the agency's FOIA program attended substantive training offered by the Department of Justice (DOJ) and other providers.

3. If yes, please provide a brief description of the type of training attended or conducted and the topics covered.

Answer:

- DOJ - Virtual Introduction to the FOIA (April 8, 2025)
- DOJ - Virtual Procedural Requirements, and Fee and Fee Waivers Training (May 6, 2025)
- DOJ - Virtual Exemption 1 and Exemption 7 Training (June 4, 2025)
- DOJ - Privacy Consideration Training (July 10, 2025)
- DOJ - Virtual Annual FOIA Report and Quarterly Reporting (November 20, 2025)
- DOJ - Virtual Exemption 4 and Exemption 5 Training (January 13, 2026)
- DOJ - Virtual Privacy Considerations Training (January 21, 2026)
- DOJ - Virtual Administrative Appeals, FOIA Compliance (January 28, 2026)
- DOJ - Virtual Advanced FOIA Training (February 4, 2026)
- Graduate School USA - Introduction to the FOIA and Privacy Act (August 2025)

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

Answer: 100%.

5. 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.

Answer: Not applicable. 100% of the Commission’s staff with duties related to FOIA administration attended substantive FOIA training in FY 2025, and they will continue to attend substantive FOIA training in FY 2026.

6. Describe any efforts your agency has undertaken to inform non-FOIA professionals of their obligations under the FOIA. In particular, please describe how often and in what formats your agency provides FOIA training or briefings to non-FOIA staff, and if senior leaders at your agency received a briefing on your agency’s FOIA resources, obligations and expectations during the FOIA process.

Answer: All new employees are provided with live FOIA training as part of their onboarding. Additionally, agency personnel in responsive offices are given a link to agency FOIA training slides as a refresher when they receive notice from the FOIA program office to conduct a search for responsive records. The Commission’s Chief FOIA Officer briefs senior leaders through meetings, and through monthly reports that include FOIA metrics (pending, received, closed, remaining pending, number of ten oldest requests closed).

B. Outreach

7. As part of the standard request process, do your FOIA professionals proactively contact requesters concerning complex or voluminous requests in an effort to clarify or narrow the scope of the request so requesters can receive responses more quickly? Please describe any such outreach or dialogue and, if applicable, any specific examples.

Answer: Yes. For example, in January 2026, the Commission’s Chief FOIA Officer reached out to a FOIA requester multiple times (by phone and email), and the outreach resulted in the requestor substantially narrowing a vague and complex request.

8. Outside of the standard request process or routine FOIA Liaison or FOIA Requester Service Center interactions, did your FOIA professionals engage in any outreach or dialogue with the requester community or open government groups regarding your administration of the FOIA? For example, did you proactively contact frequent requesters, host FOIA-related conference calls with open government groups, or provide FOIA training to members of the public? 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.

Answer: The Commission has not experienced situations which would lend itself to engaging in these types of outreach or dialogue opportunities. The Chief FOIA Officer attended the Chief FOIA Officers Council Meeting on December 15, 2025.

9. 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 Fiscal Year 2025 (please provide a total number or an estimate of the number for the agency overall).

Answer: None.

C. Other Initiatives

10. Has your agency evaluated the allocation of agency personnel resources needed to respond to current and anticipated FOIA demands? If so, please describe what changes your agency has or will implement.

Answer: Yes. Beginning January 2026, the Commission has arranged for additional staff members to partially assist with the backlogged FOIA demands, and these staff members are expected to complete their initial FOIA training modules by the end of March 2026, before they can begin substantive FOIA work.

11. How does your agency use data or processing metrics to ensure efficient management of your FOIA workload? For example, case management reports, staff processing statistics, etc. In addition, please specifically highlight any data analysis methods or technologies used.

Answer: Commission staff manually enters data into spreadsheets to compile data for quarterly and annual FOIA reports, and for case management tracking. This data is used in multiple ways, e.g., to process requests under a multitrack process (simple, complex, or expedited) and to track individual staff processing statistics.

12. Optional -- If there are any other initiatives undertaken by your agency to ensure fair and effective FOIA administration, please describe them here.

Answer: The Commission continues to look for opportunities to procure a commercial off-the-shelf (COTS) FOIA case management system to improve its administration of the FOIA, including meeting FOIA vendors at the "Annual E-

Discovery, Records and Information Management Conference” and attending virtual FOIA product demonstrations provided by vendors.

Section III: Proactive Disclosures

DOJ's 2022 [FOIA Guidelines](#) emphasize that “proactive disclosure of information is . . . fundamental to the faithful application of the FOIA.” The Guidelines direct agencies to post “records online quickly and systematically in advance of any public request” and reiterate that agencies should post records “in the most useful, searchable, and open formats possible.”

1. Please describe what steps your agency takes to identify, track, and post (a)(2) proactive disclosures.

Answer: The Commission has established processes in place to post many (a)(2) proactive disclosures, and non-FOIA staff coordinate closely with the FOIA office to ensure that these disclosures are posted in a timely manner. On its website, the Commission provides the public with many records available through five major pulldown menus for complaints and assistance, licensing and certification, proceedings, databases and publications, and news and advisories.

2. Does your agency post logs of its FOIA requests?

- If so, what information is contained in the logs?
- Are they posted in CSV format? If not, what format are they posted in?
- Please provide a link to the page where any FOIA logs are posted. If applicable, please provide component links.

Answer: Yes, FOIA logs are in PDF format with tracking number, received date, subject, and, if applicable, closed date, <https://www.fmc.gov/about/freedom-of-information-act-requests-reports/#foia-logs>.

3. Provide examples of any material (with links) that your agency has proactively disclosed during the past reporting year, including records that have been requested and released three or more times in accordance with 5 U.S.C. § 552(a)(2)(D).

Answer: Examples of material proactively disclosed by the Commission include:

- Information regarding the Commission’s various complaint and dispute resolution activities:
 - <https://www.fmc.gov/complaints-and-assistance/>

- All non-confidential filings in proceedings, including final agency decisions and orders:
 - <https://www2.fmc.gov/readingroom/ProceedingSearch>
- Information regarding certification and licensing, including weekly status updates for license applications:
 - <https://www.fmc.gov/licensing-and-certification/>
- Information regarding carrier and marine terminal operator agreements:
 - <https://www2.fmc.gov/FMC.Agreements.Web/Public>
- Press releases for significant decisions, investigations, and other rulings:
 - <https://www.fmc.gov/news-and-advisories/>
- Testimony, speeches, and appearances by the agency’s Commissioners
 - <https://www.fmc.gov/news-and-advisories/#commissioner-postings>
- Information about meetings and hearings
 - <https://www.fmc.gov/about/meeting-schedule/>
- Information regarding the Commission’s existing statutorily-created FACA committee, the National Shipper Advisory Committee:
 - <https://www.fmc.gov/about/national-shipper-advisory-committee-nsac/>
- Information regarding Plans, Budget, and Performance:
 - <https://www.fmc.gov/about/strategies-budgets-and-performance/>
- Information from our Offices of Equal Employment Opportunity and Inspector General:
 - <https://www.fmc.gov/about/bureaus-offices/inspector-general/>
 - <https://www.fmc.gov/about/bureaus-offices/office-of-equal-employment-opportunity-oeeo/>

4. Please provide a link (or component links, if applicable) where your agency routinely posts its frequently requested records.

Answer: In addition to the links provided above, other frequently-requested records would be posted to our FOIA website at <https://www.fmc.gov/about/freedom-of-information-act-requests-reports/>.

5. 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? If yes, please provide examples of such improvements, such as steps taken to post information in open and machine-readable formats. If your agency is not taking steps to make posted information more useful, please explain why.

Answer: Yes. The Commission launched a new website in late FY 2024 that improved navigability for the public. The Commission’s staff use website analytics to track the

most visited sections of the website and engage on ways to make posted information more useful; for example, staff reviewed the feasibility of incorporating interactive features for posted data sets.

6. Does your proactive disclosure process or system involve any collaboration with agency staff outside the FOIA office, such as IT or data personnel? If so, describe this interaction.

Answer: Yes, see above.

7. Optional -- Please describe the best practices used to improve proactive disclosures and any challenges your agency faces in this area.

Section IV: Steps Taken to Make Better Use of Technology

A key component of FOIA administration is using technology to make information available to the public and to gain efficiency in FOIA processing. DOJ's 2022 [FOIA Guidelines](#) emphasize the importance of making FOIA websites easily navigable and complying with the [FOIA.gov](#) interoperability requirements. Please answer the following questions to describe how your agency is using technology to improve its FOIA administration and the public's access to information.

1. Has your agency reviewed its FOIA-related technological capabilities to identify resources needed to respond to current and anticipated FOIA demands?

Answer: Yes.

2. Please briefly describe any new types of technology your agency uses to support your FOIA program.

Answer: Although the Commission currently does not use new technology to support its FOIA program, it continues to look for opportunities to procure a COTS FOIA case management system and other tools (e.g., artificial intelligence) to improve its administration of the FOIA.

3. Does your agency currently use any technology to automate request intake, customer service, or record processing? For example, does your agency use artificial intelligence or other tools to conduct searches or make redactions? If so, please describe and, if possible, estimate how much time and financial resources are saved since implementing the technology.

Answer: No.

4. 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?

Answer: Yes.

5. Did all four of your agency's [quarterly reports](#) for Fiscal Year 2025 appear on FOIA.gov?

Answer: Yes.

6. If your agency did not successfully post all quarterly reports on FOIA.gov, please explain why and provide your agency's plan for ensuring that such reporting is successful in Fiscal Year 2026.

Answer: Not applicable.

7. 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 2024 Annual FOIA Report and, if available, for your agency's Fiscal Year 2025 Annual FOIA Report.

Answer: The raw statistical data for FY 2024 and FY 2025 is included in the Commission's 2024 and 2025 FOIA Annual Reports, which is posted here: <https://www.fmc.gov/about/freedom-of-information-act-requests-reports/foia-annual-reports-and-chief-foia-officer-reports/>.

8. In February 2019, DOJ and OMB issued joint [Guidance](#) establishing interoperability standards to receive requests from the National FOIA Portal on FOIA.gov. Are all components of your agency in compliance with the guidance?

Answer: Yes, the Commission is in compliance with the guidance and regularly receives requests submitted through the National FOIA Portal.

9. Optional -- Please describe your agency best practices in better utilizing technology and any challenges your agency faces in this area.

Section V: Steps Taken to Remove Barriers to Access, Improve Timeliness in Responding to Requests, and Reduce Backlogs

DOJ's 2022 [FOIA Guidelines](#) instruct agencies "to remove barriers to requesting and accessing government records and to reduce FOIA processing backlogs." Please answer the following questions to describe how your agency is removing barriers to access, improving timeliness in responding to requests, and reducing FOIA backlogs.

A. Remove Barriers to Access

1. Has your agency established alternative means of access for any categories of first-party requested records, outside of the typical FOIA or Privacy Act process?

Answer: Yes.

2. If yes, please provide examples. If no, please indicate why not. Please also indicate if you do not know.

Answer: The Commission's electronic Reading Room for docket proceedings is available on its public website and provides access to records without a formal records request. Additionally, the Commission's procedures at 46 C.F.R. § 503.22 provide that certain records which may not be available online can be accessed, without filing a FOIA request, by contacting the Office of the Secretary.

3. Please describe any other steps your agency has taken to remove barriers to accessing government information.

Answer: While the Commission receives very few first-party requests for records, it continues to consider ways to simplify the process of requesting records and reducing the burden for first-party requesters.

B. Timeliness

4. For Fiscal Year 2025, 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 2025 Annual FOIA Report.

Answer: Not applicable. The Commission did not adjudicate any requests for expedited processing in FY 2025.

5. If your agency's average number of days to adjudicate requests for expedited processing was more than ten calendar days, according to Section VIII.A. of your agency's Fiscal Year 2025 Annual FOIA Report, please describe the steps your agency will take to ensure that requests for expedited processing are adjudicated within ten calendar days or less.

Answer: Not applicable.

6. Does your agency utilize a separate track for simple requests?

Answer: Yes.

7. If your agency uses a separate track for simple requests, according to Annual FOIA Report section VII.A, was the agency overall average number of days to process simple requests twenty working days or fewer in Fiscal Year 2025?

Answer: No.

8. If not, did the simple track average processing time decrease compared to the previous Fiscal Year?

Answer: No. The average number of days to process simple requests increased in FY 2025. This was due to the loss in FY 2025 of core staff members who assisted in handling FOIA requests and non-FOIA matters.

9. Please provide the percentage of requests processed by your agency in Fiscal Year 2025 that were placed in your simple track. Please use the following calculation based on the data from your Annual FOIA Report: (processed simple requests from Section VII.C.1) divided by (requests processed from Section V.A.) x 100.

Answer: 21.95%.

10. 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?

Answer: Not applicable.

C. Backlogs

Backlogged Requests

11. If your agency had a backlog of requests at the close of Fiscal Year 2025, according to Annual FOIA Report Section XII.D.2, did that backlog decrease as compared with the backlog reported at the end of Fiscal Year 2024?

Answer: The Commission's backlog of requests increased by 70 requests at the close of FY 2025 compared with the backlog reported at the end of FY 2024.

12. If not, according to Annual FOIA Report Section XII.D.1, did your agency process more requests during Fiscal Year 2025 than it did during Fiscal Year 2024?

Answer: No.

13. If your agency's request backlog increased during Fiscal Year 2025, 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)
- Litigation
- Any other reasons – please briefly describe or provide examples when possible

Answer: The increase in the Commission’s FOIA backlog was due to the following causes:

- For the second year in a row, the Commission received almost twice as many requests as in previous years, from 45 and 42 requests received in FYs 2022 and 2023, respectively, to 103 and 98 requests received in FYs 2024 and 2025, respectively. The same requester organization is responsible for over 50% of the FOIA requests received in FYs 2024 and 2025.
- Historically, the Commission typically received less than 50 FOIA requests per fiscal year, so there was no full-time staff member dedicated to processing only FOIA requests. Instead, multiple core staff members assisted in processing FOIA requests as needed, while also performing other non-FOIA duties. In FY 2024 and FY 2025, the Commission experienced a loss of core staff members with FOIA duties, and the remaining staff members had to help pick up both the FOIA and non-FOIA duties of the departed staff members.
- The requests received seek records that require more complex and time-consuming searches, as well as consultation with multiple offices throughout the agency.
- Lack of security access to eDiscovery software to perform consolidated keyword and domain searches for simple FOIA requests, thus requiring manual emails sent from FOIA program office to multiple responsive offices, and in turn, requiring manual searches performed by multiple personnel in multiple offices.

14. 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 2025. Please use the following calculation based on data from your Annual FOIA Report: (backlogged requests from Section XII.A) divided by (requests received from Section V.A) x 100. This number can be greater than 100%. If your agency has no request backlog, please answer with “not applicable.”

Answer: 100%.

Backlogged Appeals

15. If your agency had a backlog of appeals at the close of Fiscal Year 2025, according to Section XII.E.2 of the Annual FOIA Report, did that backlog decrease as compared with the backlog reported at the end of Fiscal Year 2024?

Answer: Not applicable, because there were no appeals filed in FY 2025.

16. If not, according to section XII.E.1 of the Annual FOIA Report, did your agency process more appeals during Fiscal Year 2025 than it did during Fiscal Year 2024?

Answer: Not applicable, because there were no appeals filed in FY 2024 and FY 2025.

17. If your agency's appeal backlog increased during Fiscal Year 2025, 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)
- Litigation
- Any other reasons – please briefly describe or provide examples when possible

Answer: Not Applicable.

18. 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 2025. Please use the following calculation based on data from your Annual FOIA Report: (backlogged appeals from Section XII.A) divided by (appeals received from Section VI.A) x 100. This number can be greater than 100%. If your agency did not receive any appeals in Fiscal Year 2025 and/or has no appeal backlog, please answer with "not applicable."

Answer: Not Applicable.

D. Backlog Reduction Plans

19. In the 2025 guidelines for Chief FOIA Officer Reports, any agency with a backlog of over 1000 requests in Fiscal Year 2024 was asked to provide a plan for achieving backlog reduction in the year ahead. Did your 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 2025?

Answer: The Commission did not have a backlog of over 1,000 requests in FY 2025.

20. If your agency had a backlog of more than 1,000 requests in Fiscal Year 2025, please explain your agency's plan to reduce this backlog during Fiscal Year 2026.

Answer: Not Applicable.

E. Reducing the Age of Requests, Appeals, and Consultations

Ten Oldest Requests

21. In Fiscal Year 2025, did your agency close the ten oldest pending perfected requests that were reported in Section VII.E. of your Fiscal Year 2024 Annual FOIA Report?

Answer: No.

22. 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 2025 Annual FOIA Report. If you had less than ten total oldest requests to close, please indicate that.

Answer: The Commission closed 3 of the 10 oldest requests by the end of FY 2025.

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

Answer: Not applicable.

Ten Oldest Appeals

24. In Fiscal Year 2025, did your agency close the ten oldest appeals that were reported pending in Section VI.C.5 of your Fiscal Year 2024 Annual FOIA Report?

Answer: Not applicable.

25. 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 2024 Annual FOIA Report. If you had less than ten total oldest appeals to close, please indicate that.

Answer: Not applicable.

26. Beyond working on the ten oldest appeals, please describe any steps your agency took to reduce the overall age of your pending appeals.

Answer: Not applicable.

Ten Oldest Consultations

27. In Fiscal Year 2025, did your agency close the ten oldest consultations that were reported pending in Section XII.C. of your Fiscal Year 2024 Annual FOIA Report?

Answer: The Commission did not have any pending consultations at the end of FY 2024.

28. 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 2024 Annual FOIA Report. If you had less than ten total oldest consultations to close, please indicate that.

Answer: Not applicable.

Additional Information Regarding Ten Oldest

29. If your agency did not close its ten oldest pending requests, appeals, or consultations, please explain why and provide a plan describing how your agency intends to close those “ten oldest” requests, appeals, and consultations during Fiscal Year 2026.

Answer: As explained above, the Commission experienced a loss in its core staff members who concurrently handled FOIA and non-FOIA duties during the reporting period, while also experiencing a second consecutive year of significant increases in the overall number of requests received. Beginning January 2026, the Commission has arranged for additional staff members to partially assist with the backlogged FOIA demands and other mission critical non-FOIA demands. These staff members are expected to complete their initial FOIA training modules by the end of March 2026, before they can begin substantive FOIA work and before they can address the “ten oldest” requests.

F. Additional Information about FOIA Processing

30. Were any requests at your agency the subject of FOIA litigation during the reporting period? If so, please describe the impact on your agency’s overall FOIA request processing and backlog. If possible, please indicate:

- The number and nature of requests subject to litigation
- Common causes leading to litigation
- Any other information to illustrate the impact of litigation on your overall FOIA administration

Answer: No. The Commission did not have any requests that were the subject of FOIA litigation during the reporting period.