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**U.S. Department
of Transportation**

1200 New Jersey Avenue, S.E.
Washington, D.C. 20590

**Pipeline and Hazardous
Materials Safety Administration**

June 3, 2022
PHMSA FOIA CONTROL #: PHMS-2022-00111

Transmitted via Electronic Mail – Read Receipt Requested

Greetings .

This letter responds to your Freedom of Information Act (FOIA) request dated May 22, 2022 and received in the Pipeline and Hazardous Materials Safety Administration's (PHMSA's) FOIA Office on May 23, 2022. You requested "A copy of each (internal) FOIA Standard Operating Procedure (SOP) at the PHMSA FOIA office."

Attached, please find PHMSA's FOIA Process Manual, 15 pages that we are releasing to you in full. Please contact us within 14 calendar days at PHMSA.FOIA@dot.gov if you seek any of the Reference Sheets referred to in the FOIA Process Manual and, if so, please identify which Reference Sheets. If we do not hear back from you within 14 calendar days, then we will assume you are satisfied with this response and close the file on your request.

If you have questions about your request, you may contact the FOA Office at PHMSA.FOIA@dot.gov or the FOIA Public Liaison by phone or email using the contact information located at https://www.phmsa.dot.gov/'foia/foia-contacts.

Sincerely,

/Karin V. Christian/
Senior Attorney
Office of Chief Counsel
Pipeline and Hazardous Materials Safety Administration (PHMSA)

Attachment: FOIA Process Manual

12/29/2021
Version 2.0

U.S. Department of Transportation
Pipeline and Hazardous Materials
Safety Administration

To Protect People and the Environment From the Risks of
Hazardous Materials Transportation

Contents

I.   How to Use

The purpose of this manual is to inform Freedom of Information Act (FOIA) Team Support Members of their roles and responsibilities at the Pipeline and Hazardous Materials Safety Administration (PHMSA).

This manual provides details on each area of the FOIA process as it pertains to FOIA Team Support Members, and provides additional references, as outline in section two below.

The manual will be updated as processes at PHMSA change or when further developments are identified that will enhance the FOIA program efficiencies at PHMSA, or when change is necessary by law. Change Control for this manual and the Reference Sheets is maintained separately.

The PHMSA FOIA Office follows all applicable laws and regulations, including the Department of Transportation (DOT) FOIA regulations, and the Freedom of Information Act, as it was amended in 2016. Refer to Reference Sheet V (DOT regulations), Reference Sheet W (FOIA Improvement Act of 2016 Summary), Reference Sheet X (redline of FOIA Improvement Act of 2016), and Reference Sheet Y (FOIA Improvement Act of 2016 chart of changes) for applicable laws and regulations. Additionally, the Department of Justice's Office of Information Policy provides guidance for FOIA Offices, including the Department of Justice Guide to the Freedom of Information Act.

II.   Reference Sheets

The reference sheets listed below should be used in conjunction with this manual. When possible, the reference sheet is mentioned in this manual, sometimes in multiple locations. For more information, go to the reference sheet.

Reference Sheet A - FOIA Process Actions by Target Timeframes Matrix

Reference Sheet B - FOIAXpress Statuses, Descriptions, and Roles

Reference Sheet C - FOIAXpress User Manual

Reference Sheet D - Acknowledgment Checklist

Reference Sheet E - Master Acknowledgment Template

Reference Sheet F - Assigning Searches

Reference Sheet G - Guidance on FOIA System Subject Entry

Reference Sheet H - Correspondence Log Subjects

Reference Sheet I - Weekly Report Instructions

Reference Sheet J - Web Postings

Reference Sheet K - Fee Schedule and Instructions on Drafting Fee Estimates

Reference Sheet L - Criteria for Complex Processing Track

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III.   Overview and Roles

The FOIA process discussed in this manual focuses on the actions completed by FOIA team support members. The Pipeline and Hazardous Materials Safety Administration's (PHMSA's) FOIA process may be broken down into the following four primary processing actions: (1) intake; (2) searches; (3) case management; and (4) response/closure. Reference Sheet A, "FOIA Process Actions by Target Timeframes Matrix," serves as a helpful overview of these four action items.

In calendar year 2021, PHMSA began using a Department-wide FOIA management and tracking system, FOIAXpress (FX). The processing statuses in FX are based on user actions and provide insight on how the request moves through the FOIA system. Status descriptions and roles of FOIA Support Team Members are listed in Reference Sheet B. A detailed user guide for FX actions is provided in Reference Sheet C. Refer to the user guide for more information on how to complete actions in FX.

A FOIA team support member manages the intake and search processes. This team member, the "Intake/Search Coordinator," coordinates process actions with the Government Information Specialist (GIS). Intake begins when a request is received and the request is logged into FX. Consult Reference Sheet G for guidance on entering request subjects into the system. FX assigns the FOIA tracking number at time of entry.

PHMSA uses a multi-track system: simple, complex, or expedited. Requests typically are assigned to the simple track at time of entry; however, requests should always be evaluated for assignment to the complex processing track. Refer to [Reference Sheet L](#) for guidance on complex processing assignment. Expedited processing must be requested and granted for a request to be assigned to this process track.

The Intake/Search Coordinator drafts the acknowledgment letter using the template in FX. Refer to [Reference Sheet D](#) (Acknowledgment Checklist) and [Reference Sheet E](#) (Master Acknowledgment Template) for more details on acknowledging a request. The Intake/Search Coordinator is responsible for managing the correspondence log in FX as the "official" FOIA file. Refer to [Reference Sheet H](#) for correspondence nomenclature. A folder in the FOIA network drive ("Y" drive) for the FOIA request is set up as a working folder.

In consultation with a PHMSA Government Information Specialist (GIS), the Intake/Search Coordinator manages and tracks the searches in FX. Additional details on assigning searches are discussed in [Reference Sheet F](#).

After discussion with a GIS, the Intake/Search Coordinator sends searches to the search office(s) by assigning the search to each FOIA Coordinator. The FOIA Coordinator is chosen by each office and established in the "Program Office" section of FX. The FOIA Coordinator serves as his/her office's FOIA point of contact and manages his/her office's FOIA searches. The Intake/Search Coordinator generates and emails a search tasker in FX to the FOIA Coordinator. Generally, each search office is provided two weeks to respond to the search tasker. Everyone who conducts a search completes a search form so that PHMSA can document the search and charge FOIA fees, as appropriate. The searching offices generally upload responsive records, if any, to their program network drive ("N" for Hazmat and "T" for Pipeline) under the designated FOIA number (this folder is also set up by the Intake/Search Coordinator). When the FOIA Coordinator notifies the Intake/Search Coordinator that the search is complete, the Intake/Search Coordinator copies search results to the "Search Results" folder for the request in the "Y" drive.

After discussion with the GIS, the FOIA team support member copies search results to the "Review" log in FX. Prior to upload to FX, the FOIA team support member may work with the GIS to ensure responsive and non-duplicative records are uploaded into FX. Particularly, larger search results may require review prior to upload into FX. Large search results may be managed using EDR in FX. Reviews alternatively may be conducted in the network drive, as appropriate, or to continue with reviews that began prior to using FX.

Additionally, FOIA Support Team Members assist with FOIA case management, reviews, responses, and closures.   The steps in the process that a FOIA Support Team Member assist with is outlined below.

IV.   FOIA Intake

PHMSA typically receives requests by e-mail to the FOIA inbox, PHMSA.FOIA@dot.gov. This includes requests generated by requesters from FOIA.gov. Sometimes requests are submitted by mail or fax. At the time this manual was drafted, the Public Access Link (PAL), was not available to PHMSA.

1. ## Receive FOIA Request
   a. Check FOIA inbox (PHMSA.FOIA@dot.gov) routinely throughout the day for new FOIA requests.
   b. Check the FOIA/FOIA Officer mailbox once a day for new requests.
   c. If request is paper, scan request in and send by email to the FOIA Team.
   d. When a new request is received, ensure that the date received and the FOIA number is recorded on the request.
      i. The FOIA request number is generated by FX. More on FX below.
      ii. Forward new requests out of the inbox with only the assigned FOIA number notated in large, bold font. When you forward the request out of the inbox, change the subject of the email to "FOIA Request 20xx-xxxx."

      Example:
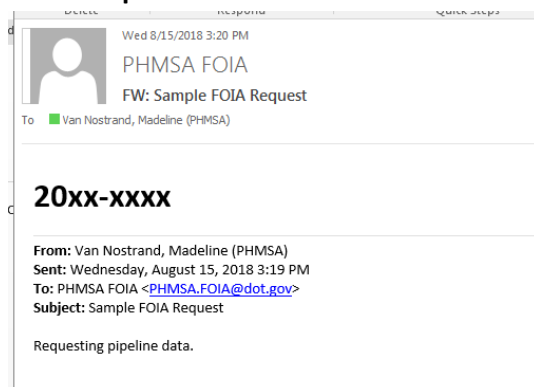
      Note 1: sometimes requests are received as email attachments, so even if you forward the new request out of the inbox with the assigned FOIA number, you need to ensure that you are recording the FOIA number/date received on the actual FOIA request in some way (e.g., use adobe to burn the FOIA number/date onto the request, or combine the email with the FOIA number and the email attachment into one document).

      Note 2: for requests received from the FOIAPortal (FOIA.gov), delete the table at the end of the request before forwarding, otherwise, the request will not print to pdf correctly. After deleting the table, insert: [TABLE DELETED BY PHMSA]
   e. You may use the Adobe program to burn the date received and FOIA number onto the FOIA request.
   f. Alternatively, you may record the date received and the FOIA number by hand-writing and/or stamping, and then scanning the record into electronic form. You may record it this way on requests received in paper form.

2. ## Log in the request

FOIAXpress (FX) is the system PHMSA uses to manage FOIA requests. The system tracks statistical reporting data. Weekly, quarterly, and annual reports are generated from FX. FX assigns tracking numbers and tracks due dates and backlogged requests. The system contains historical statistical data on FOIA requests, with the capability to search multiple FOIA fields, such as FOIA requester, subject, and exemptions applied.

a. Use your credentials to log into FX: [User Home (dot.gov)](#).
b. Go to *Requests* and select *Create Request*.

> **TIP**: first search to see if a profile exists for the requester. If a profile exists, you can re-use the requester information. However, always review the requester information to ensure it is accurate and free of typos.

c. Log the request information into FX, ensuring that data entry is accurate and free of typos.
d. At a minimum, enter the following information:
   i. *Requester Details*
      1. *Requester*
         - *First Name*
         - *Last Name*
         - *Organization*
            i. For individuals, we put their organization as "Individually" which helps us with the FOIA Log we post electronically to the public.
         - *Category*
            i. Read the request carefully to determine fee category. Ask a member of the FOIA team if you need help determining the fee category.
         - *Email Address*
         - *City*
         - *State*
      2. *Address Details Other Address Details*
         - For requester profiles that exist, this information will populate once the requester is selected. Please ensure a shipping address, name, organization, and email are entered correctly into the appropriate fields.
   ii. *Request Details*
      1. *Action Office*, *Request Type*, *Priority* are pre-populated. If "Request Type" is not pre-populated, then select "FOIA-PHMSA." There is no need to update these fields or the following fields: *Received Mode*, *Delivery Mode*, or *Method of Payment*. Exception: update *Delivery Mode* if a requester specifies a particular delivery mode.
      2. *Multi-Track Type*
         - Select *simple* as the default tracking type.
         - If a request appears complex, discuss with the FOIA team. Do not select "*Expedite*" unless expedition has been granted. Under the direction of a GIS, this field may change to *Complex* or *Expedite*.
         - See [Reference Sheet L](#) for criteria PHMSA uses to determine if the request is complex.
      3. *Requested Date*
         - *Date of request*

          i. This is the date on the request, which most times is the date of the email transmittal/date on the request.

    4. Received Date

- Use the date received by PHMSA. However, if the request is received after 5:00p, the date received is the next business day.
- If the request was referred to PHMSA by another agency, use the date PHMSA received the request. However, if the date received by PHMSA is over 10-workdays from the date received by the other agency, record the receipt date as 10-workdays from the date of receipt by the other agency. If the other agency's receipt date is unknown, use the request date.

5. *Primary Assigned*

- Assign to GIS. NOTE: Please review section on assignments. Assignments will be after "saving" the request.

    iii. *Description*

1. The request description is used in several areas including search emails, letter templates, reports, and the FOIA Log. Thus, it is important for the description to be consistent, clear, concise, accurate, sufficiently descriptive, and free of error and typos. Refer to [Reference Sheet G](#) for more information on entering the subject of the request.
    - For letter templates (and for consistency), the description should always begin with "requested" and then you should enter the request subject, *e.g.*:
        - i. requested [request subject]
2. Screen the request and do not enter PII into FX request description.
    - *E.g.*, do not enter names, birthdates, home addresses, SSNs.
    - The *Restricted* box may be checked for Privacy Act requests or any other requests that may contain sensitive information in the description. PHMSA's process, however, is to omit sensitive information from the description.
3. We do not use the "Date Range" function in the "Desription" area.
4. Ensure the subject is accurate and describes the request so that when reading the entry, the subject of the request is understandable.
    - You may copy and paste, but ensure that the subject is accurate and free of typos.
    - If the subject of the request is long, do not copy and paste. Summarize. For instance, if a requester asks for multiple items, enter: "requested__items regarding [insert description of request)." If you summarize, ensure your summary is accurate and covers all parts of the request.
5. Use the spellcheck function to help ensure your entry is free of spelling error.

6. *Drag and Drop Zone*
   - Drag and drop/attach the incoming request (with the assigned FOIA tracking number).

iv. *Expedite Requested*
   1. The status is pre-populated to *No*. If expedition was requested, change the status to *Yes*. When expedition is requested, notify the FOIA team. The request for expedited handling must be adjudicated within 10 <u>calendar</u> days.
   2. The *Start Date* is the date of the request for expedition. This date is typically the request date, but occasionally, requesters ask for expedition after the request date.
   3. At the time of adjudication, the GIS (or other team member at the direction of the GIS) will update the status with the *End Date* and *Determination*. The *End Date* will reflect the date of the determination, which should be evidenced by a letter to the requester advising the requester of the determination. Determinations are based upon the requirements in DOT's FOIA regulations.

v. *Fee Waiver Requested*
   1. The status is pre-populated to *No*. If a fee waiver was requested, change the status to *Yes*.
   2. A fee waiver request needs to be adjudicated only if a fee issue arises. At time of closure, if a fee waiver is not adjudicated, the status should be changed to "N/A." PHMSA typically does not have a need to adjudicate a fee waiver. The need usually arises if requested by an "Other" FOIA requester, the search will take longer than two hours to conduct, and PHMSA will respond within the time limits established by law.

vi. *Fee Details*
   1. *Willing Amount*
      - Enter the dollar amount the requester is willing to pay, or check *Willing to Pay All Fees*. PHMSA typically provides requesters with a dollar amount fee estimate so that a requester is aware and agrees to pay all fees, if fees will be charged.

vii. *Link Request(s)*
   1. Requests may be linked if the requests are extremely similar/same topics if we believe an overlap in the record response will exist. The GIS will typically link requests, but other FOIA support members may be asked to *Manage Link Requests*.

viii. Other Fields
   1. The following fields are available on the *Create Request Form*, but typically no updates are needed: *Sub Requests*, *Custom Fields*, *Position*, and *Comments*.

e. *Save* the request. A pop-up will notify you that the request has been saved.

3. Draft Acknowledgment and Other Letters

Use the acknowledgment templates generated from FX and follow the Acknowledgment Checklist ([Reference Sheet D](#)) when drafting Acknowledgment Letters. You should consult the "Master Acknowledgment Template" ([Reference Sheet E](#)) to supplement the FX templates. A master template that includes templates for other types of letters, may be consulted to supplement the FX templates ([Reference Sheet M](#)).

At PHMSA, in addition to providing requesters with the FOIA tracking number, the acknowledgment letter: (1) informs the requester of the FOIA processing track and the average processing time for processing in that track; (2) identifies if unusual circumstances applies (for PHMSA it does most of the time because we send searches to offices outside of PHC); (3) tells the requester that they may wish to narrow the request which would allow us to respond more quickly; and (4) identifies the requester's fee category and identifies the amount they are willing to pay, if the requester specified an amount. If a fee waiver is requested, our office informs the requester that we will make a decision on the fee waiver only if fees will apply. If expedited processing is requested, the acknowledgment letter tells the requester that we will make that decision within 10 calendar days (DOT's regulatory requirement for adjudicating expedited processing).

A high-level outline on how to use FX templates follows below:

    a. Selecting the Correspondence
        i. Go to the *Correspondence* screen. From the *Send Correspondence* tab, go to *Add From* and *Select Letter Template*
        ii. *Select Letter Template*
            1. Choose the letter template that best fits the letter you are drafting
            2. When drafting a letter for GIS signature, choose Customize for Pending
            3. At the top of the screen, change the *Subject* to the name of the letter you are drafting:
                • [Tracking number] [Letter Description] Letter [date]
                    i. Example:
                        1. PHMS-2022-00001 Acknowledgment Letter 2021.01.01
            4. Edit letter and make any necessary changes.
    b. Ensure Error-free drafting
        i. Ensure letter is free of typos and information is accurate.
        ii. If any errors are noted in the information that comes from "FOIA Request Information" fields, which includes requester name, organization, address, salutation, request date, request received date, and request subject, then make sure those errors are corrected in both the letter and the *Request Information* field.
        iii. Ensure that the header on the second page contains the page number on the left-hand side, and the request number on the right-handed side.
    c. Save as Pending

      i. Save the letter draft as pending, and notify the GIS who will sign-off on the letter that the letter is ready for signature.

      ii. The GIS will *Customize* or *Customize for Final Response* and send the letter out by email through FX. At the direction of the GIS, the FOIA Support Team Member may be tasked to send correspondence.

V.   FOIA Search

The FOIA search is managed by the FOIA Support Team Member that serves as the Intake/Search Coordinator, in consultation with a GIS. A high-level overview is listed below. Review the "Assigning Searches" reference sheet (Reference Sheet F) for more details on searches.

1. Coordinate with a GIS to identify the appropriate office(s) for the search.
2. Assign searches.
3. Ensure search results and search form are received from each searching office by due date.
   a. Follow-up with search office if search response is not received by due date.
   b. Continue to follow-up at least weekly until search response is received.
   c. You should discuss overdue searches with the GIS assigned to the case.
4. Review search responses to ensure that the search is complete.
5. Ensure search documentation is copied into the correspondence log.
6. Ensure search results are copied into the Y drive "*Search Results*" folder for the request.
   a. Generally, you will copy the search results from the T (Pipeline) or N (Hazmat) drive to the Y drive. However, you may receive search results by paper, CD, email, etc. No matter the form, ensure those records are uploaded into the Y drive.
7. Notify GIS when all searches are complete.
   a. Inform the FOIA team:
      i. Of the volume of records received (page or file count) or provide notification if no records were located.
      ii. If additional steps are required to complete the search, *e.g.*, another search office is recommended in a search form.
      iii. If fee issues arise (after reviewing search forms and fee agreement).
      iv. Record the above information in the *Notes*.
8. Ensure that the *Review Category* is updated to reflect results.
9. A separate spreadsheet may be required to help monitor and track searches.

VI.   FOIA Case Management

A FOIA Support Team Member (chiefly the Intake/Search Coordinator) is responsible for managing the FOIA Inbox and document/file management of the case file. Other items that a FOIA Support Team Member may manage include fees, Exemption 4 submitter notification process, and record reviews.

1. Manage FOIA Inbox
   a. What is the FOIA Inbox?
      i. The inbox is the place where PHMSA receives FOIA requests and other correspondence related to FOIA requests.

  ii. Requesters can email requests directly to the inbox or use the FOIA.gov portal to submit a form request directly to the inbox.

  iii. We also receive emails from our program offices regarding searches or directing requesters to the FOIA office.

 b. Who monitors the FOIA Inbox?

  i. The Intake/Search Coordinator is typically assigned to monitor and manage the FOIA inbox.

  ii. Only one person manages the inbox at a time to avoid confusion and ensure that the appropriate action is taken on all emails. A back-up will be assigned to manage the inbox as needed.

 c. How do I monitor and manage the FOIA Inbox?

  i. Mark any email received with a red flag for action, and a green check mark once action is complete. For example, when you forward a new request out of the inbox with the assigned tracking number, place a check next to the email indicating action was taken and completed.

  ii. Take action *as soon as possible* on any incoming email correspondence. You should check the inbox multiple times a day for new correspondence, *e.g.*, on an hourly basis. In particular, you should check for new emails at the beginning and end of your workday. Our overall goal is to send acknowledgment letters out within one business day of receipt of a FOIA request.

  iii. Forward email correspondence out to the FOIA Team. When forwarding emails out of the inbox, sign your name so the FOIA team can identify who sent the email out of the inbox.

  iv. Forward new requests out with just the assigned tracking number. When assigning the FOIA number on a new request, do not include your signature.

  v. Forward out all other correspondence to the FOIA Team, which includes emails received from requesters and other external parties.

  vi. Do not forward all search correspondence received. Only forward out if the searching office has questions that need assistance from a GIS. (Notify the FOIA team when all the searches are complete for a request.)

  vii. Do not forward suspicious email, spam, or junk mail out of the inbox.

  viii. Copy all email correspondence received in the inbox to the correspondence log of the request in FX.

 d. What correspondence is sent from the FOIA Inbox?

  i. Correspondence necessary for the case file should be sent from the FOIA Inbox. Typically, this includes correspondence with FOIA requesters and search offices.

  ii. Correspondence is sent in FX using the inbox in the "To" line.

   1. Correspondence also may be sent using the email account's "sent" box, but FX is the preferred method to send correspondence.

   2. A GIS sends correspondence to FOIA requesters. FOIA Support Team Members may send correspondence at the direction of a GIS. FOIA

Support Team Members routinely email PHMSA employees regarding searches.

    iii.   Autoreplies

        1.   Autoreplies were developed to automatically send an email back, depending on whether the sender is internal or external to the agency.

            a.   Internal autoreply: Thank you for your email. If you are submitting a response to a FOIA search tasker on behalf of your program office, we sincerely appreciate it. We will review your response and contact you if any further information is needed. If you are reaching out with a question for the FOIA Office, we will be in touch with you soon.

            b.   External autoreply: Thank you for contacting the PHMSA FOIA Office. If you are submitting a new FOIA request, we will provide you with an acknowledgement letter and tracking number shortly. If you are reaching out with a question for the FOIA Office, we will respond to your email as soon as possible. We sincerely appreciate your patience as we work to reply to your email.

2. Document/File Management
   a. Ensure that all correspondence received in the FOIA inbox (or that you receive directly) is uploaded and catalogued into the Correspondence Log for the request in FX.
   b. Ensure that the subject of the correspondence is clear and follows the standard nomenclature (see [Reference Sheet H](#)), which allows for consistent treatment of files and easy search and retrieval of files.
   c. Create Reminders:
      i. To help the FOIA Team manage responding back to FOIA requesters, create a reminder for the primary assignee to respond back within three days of receiving any inquiries from a FOIA requester.

3. Fees
   a. Determines fee category at time request is entered into FX.
   b. At the time the fee agreement is received, makes note of the amount agreed to pay in FX.
   c. Drafts fee estimate letters.
      i. Refer to the Department's Fee Schedule ([Reference Sheet K](#)) to determine the amount charged per fee category.
   d. Prepares invoices.
   e. Ensures documentation is saved in the Correspondence log.

4. Exemption 4 Submitter Notification Process
   a. Drafts submitter notification letters.
   b. Prepares records for submitter consultation.
   c. May send consultation to submitter and track consultation.
   d. May review submitter response.

5. Record Review
   a. May organize and/or convert files for review.

  b. May review records for
    i. duplication
    ii. responsiveness
    iii. exemption application
  c. For review guidance and exemption application, you may wish to consult the following:
    i. General guidance: Reference Sheet R - Review Best Practices
    ii. Exemption Description
      1. Exemption 3: applies to information exempt by statute. Helpful to PHMSA's decision on the application of this exemption is Reference Sheet N - PHMSA 60138 Policy and Reference Sheet O - List of DOT Exemption 3 statutes.
        a. The 60138 Policy applies to Facility Response Plans at PHMSA. The Policy, however, can serve as a good guide on the types of information that could be protected by FOIA Exemption 7(F).
      2. Exemption 4: applies to confidential commercial information. Helpful guidance is found in Reference Sheet P (Decision Tree).
      3. Exemption 5: The most common privilege we would apply under Exemption 5 is the deliberative process privilege, which applies to internal communications when there is foreseeable harm to the agency's decisionmaking process if the information were released. Separating internal communications is helpful at a preliminary review level.
      4. Exemption 6 and 7(C): applies to personal privacy information. Helpful guidance on the application of these exemptions is found in Reference Sheet Q (FAQs).
      5. Exemption 7: applies to enforcement records in certain situations. PHMSA typically applies Exemptions 7(C) and 7(F), but other parts of the exemption may be applied periodically. Exemption 7(C) applies to personal privacy, and Exemption 7(F) protects information that if released, "could reasonably be expected to endanger [an individual's] life or physical safety."

VII. FOIA Response/Closure

FOIA Team Support Members assist with FOIA responses by drafting FOIA letters and closing requests out in FX.

1. *Responses*
  a. Draft FOIA responses using template language. Templates are available in FX. The master template (Reference Sheet M) may also be consulted.
    i. Ensure letters are accurate and free of typos.
    ii. Ensure fees are addressed if response is a final response.
    iii. Ensure appeal rights are provided if response is a denial, this includes when redactions are applied, information is withheld, no records are located, or for a

> denial of expedited processing or fee waivers. Consistent with Department of Justice guidance, appeal rights may be provided with interim responses.
>
> iv. Ensure "concluding response" language is in final response letters.
> v. Ensure page counts provided if sending records; include amount containing redactions.

b. At the direction of the GIS, may send correspondence once the correspondence is finalized.

2. *File Closure*

a. After the final response is delivered, the request is closed out in FX.

i. Review steps in the FX User Guide (Reference Sheet C) for information on how to close requests out.

b. Prior to closing request, double-check that correspondence with the requester, search, and review documentation is saved in the *Correspondence Log*.

VIII.   Other

The FOIA Team Support Member may be responsible for other FOIA assignments. This may include assisting with FOIA reporting and web page postings. Refer to Reference Sheet I for more information on reporting, and Reference Sheet J for more information on reporting and web postings.

a. FOIA Reporting

i. Run weekly reports, send the report to PHMSA management, and submit to OST.
ii. Run quarterly reports and share with OST.
iii. Run annual reports and assist with ensuring integrity of the data for the annual report.
iv. Assist with any data calls received.

c. FOIA Web Postings

i. Prepare records for posting, for example, preparing FOIA logs for public posting.
ii. Assist with posting records to the Electronic Reading Room