

**Roles and Responsibilities
Freedom of Information Act (FOIA)**

1. The **State FOIA Coordinator (SFC), or acting:**
 - a. Ensures all FOIA laws, regulations, and guidelines are followed.
 - b. Serves as the point-of-contact for the Idaho FOIA program.
 - c. Consults with FFC(s) and SME(s), as appropriate, to determine installment schedules and targeted completion dates for complex and exceptional/voluminous track requests.
 - d. Prepares/signs acknowledgement letters, as well as various interim correspondences to the requester. Prepares (or reviews) denial letters of expedited processing or fee waivers and all final responses for the State Director's signature.
 - e. Reviews FOIA workloads, determines priorities and assigns work to Idaho State Office FOIA Staff.

2. The State FOIA Office Staff:
 - a. Assigns each request a case number using the State FOIA Log. Enters request into the Department of the Interior's Electronic FOIA Tracking System (EFTS).
 - b. E-mails scanned FOIA request (with assigned number) to applicable Field FOIA Coordinators (FFC), applicable State Office Subject Matter Experts (SME), and Field Solicitor's FOIA Attorney/Advisor (SOL).
 - c. Confers and negotiates with requester as necessary.
 - d. Reviews "initial" Freedom of Information Act (FOIA) Response Worksheet Form ID-1278-2 (ID-1278-2) to determine fees and processing track placement.
 - e. Formally notifies (via e-mail) FFC(s) to begin "actual" search/pulling of documents.
 - f. Reviews all responsive records to include SME(s) recommendations (if available) for release or withholding of responsive records. Submits redacted documents to FOIA Attorney for review and approval of discretionary releases.
 - g. Calculates fees. Ensures a Bill of Collection, if applicable, is included in the final response.
 - h. Confers with the SOL on all FOIAs for legal advice and procedural issues.
 - i. Coordinates with the SOL on all denials, except "No Records." (A "no records" response is considered a denial; however, no coordination with the SOL is required). If responsive

FOIA records are related to an open lawsuit, coordinates responses with the SOL, as well as with the State Office Litigation Coordinator.

- j. Maintains official FOIA case files to include all letters to/from requester, e-mail, EFTS screen shots, actual ID-1278-2, computation sheets, progress sheets, and the compact discs (CDs) containing all responsive documents (clean, with proposed redactions, and applied redactions).
- k. Provides a weekly status report on Idaho's open FOIA requests to the Idaho Leadership team and Idaho FFCs.

2. The **Field FOIA Coordinators**:

- a. Upon receipt of a FOIA request sent directly from the requester to the field office, date stamps and scans/e-mails (or faxes) a copy of the request to the SFC (email: blm_id_FOIA@blm.gov or fax: (208) 373-3915) same day if possible, but no later than the following business day and sends the original letter with envelope to SFC.
- b. Upon receipt of a FOIA request from the State FOIA Office, immediately provides a copy of the FOIA request to the District or Field Manager (if required locally) and to the applicable SME(s) so as to determine:
 - 1) If the requested records are maintained at the district/field office, or
 - 2) If the scope of the request needs further clarification or to be narrowed.
- c. Notifies the SFC as soon as possible on ID-1278-2 if records are not maintained at their office.
- d. Notifies the SFC no later than 3 workdays from receipt if the request needs further clarification. Ensures the SME(s) coordinate with the SFC to assist with the "request for clarification" letter preparation.
- e. Creates a field FOIA case file consisting of a copy of the request, any related e-mail(s), FOIA worksheets (ID-1278-2), both "initial" and "actual." Maintains case files in a locked cabinet. Field Case Files are reference material only and can be disposed of when no longer needed. Enters information into a local office FOIA log if applicable (optional).
- f. If no clarification is required and the responsive records are maintained at FFC's office (and **without** further direction or notification), coordinates the "initial" search with the SME(s) and completes ID-1278-2. Submits ID-1278-2 to the SFC, by e-mail or fax, **within 3 workdays** of receipt of the FOIA request. The ID-1278-2 is available on the Idaho Bureau of Land Management Intranet homepage, under Idaho forms.
- g. Waits for formal notification (via e-mail) from the State Office FOIA Staff to begin the actual collection and copying/scanning of responsive records. If notification seems

delayed with no apparent clarification or fee issue, contact the SFC, as it may just be an administrative oversight.

- h. Once written notification is received from the State Office FOIA Staff to initiate the collection of documents, the FFC notifies the SME(s). The FFC provides the SME(s) guidance and a copy of “Adequate Search Tips”, “What is a responsive record?”, and Office of the Secretary Foreseeable Harm Standard memo. The Adequate Search Tips instruct the SME(s) and other individuals assisting in the response to:
 - 1) Copy only those records responsive within the date range requested.
 - 2) Track actual search time (not copy time) and the page count.
 - 3) Notate when “no records” are found and what files were searched.
 - 4) Identify what information they recommend be withheld and why.
- i. Prepares ID-1278-2 (only one per office/site) with “actual” name/grade/time and page count and submits to SFC, via email) with responsive documents on (or before) the due date. As appropriate, prepares and submits a ID-1278-3 (No Records Form) ensuring it details search information, is signed and uploaded to the SFC.
- j. Uploads one clean scanned copy of the responsive records to the Q drive (pub\admin\FOIA\assigned FOIA number) following the guidance outlined in the Idaho Freedom of Information Act Processing Checklist.
- 3. The SME or Record Custodians:
 - a. Notify the FOIA Coordinator if they need clarification to a FOIA request.
 - b. Provide a completed initial” search form ID-1278-2, outlining the search and notating the estimated hours of search and volume of records. Also provides no records documentation as appropriate.
 - c. Once written notification is received to search, completes the search for records following guidance in the “Adequate Search Tips”, “What is a responsive record?”, and as necessary the Office of the Secretary Foreseeable Harm Standard memo.
 - d. Prior to uploading to the Q drive, the SME should review the records being provided and notate the file path of any Deliberative, Attorney Client, confidential or sensitive records that would cause foreseeable harm if released. Any records not notated in this manner will be considered available for release in full.
 - e. Provides a “final” search form ID-1278-2 to be uploaded to the Q drive with the responsive records.