

U.S. General Services Administration

2025 Chief FOIA Officer Report

SECTION I: STEPS TAKEN TO APPLY THE PRESUMPTION OF OPENNESS

The guiding principle underlying the Attorney General's 2022 <u>FOIA Guidelines</u> 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. FOIA LEADERSHIP

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 this level?

Yes.

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

Rusty McGranahan, General Counsel.

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?

As one of the agency's senior political officials, GSA's General Counsel understands the importance of the FOIA and highlights that for agency leadership. This increase in visibility has resulted in better understanding of the agency's FOIA obligations, as well as more effective collaboration with service and staff offices across the agency.

Further, GSA's Office of the General Counsel ("OGC") demonstrates the importance of FOIA from the top down. Each of OGC's career Senior Executive Service ("SES") members—including the Deputy General Counsel, all Associate General Counsels, and one Regional Counsel—has a requirement in their performance plan to contribute the development of new agency-wide FOIA training opportunities and resources for employees with various levels of FOIA expertise and responsibility.

B. PRESUMPTION OF OPENNESS

4. The Attorney General's 2022 <u>FOIA Guidelines</u> provide that "agencies should confirm in response letters to FOIA requesters that they have considered the foreseeable harm standard when reviewing records and applying exemptions." Does your agency provide such

confirmation in its response letters?

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:
 - a. The number of times your agency issued a full or partial *Glomar* response (separate full and partial if possible);

Zero.

 b. The number of times a Glomar response was issued by exemption (e.g. Exemption 7(C) - 20 times, Exemption 1 - 5 times).

Zero.

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.

GSA has no other formal initiatives in this area at this time.

SECTION II: ENSURING FAIR AND EFFECTIVE FOIA ADMINISTRATION

The Attorney General'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." The Attorney General also "urge[s] agency Chief FOIA Officers to undertake a 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.

GSA provides numerous training sessions throughout the year for OGC

attorneys, Government Information Specialists, Subject Matter Experts ("SMEs"), and other GSA staff across the agency to learn more about their role in effective FOIA administration. Most of these training sessions provide a general overview of FOIA, including information about FOIA exemptions and their applications, as well as GSA's internal processes and procedures. Other more specialized training—such as training on the FOIAXpress system and related tools or aspects of FOIA more relevant to a particular office—is offered to individuals and groups on an as-needed basis.

OGC includes an annual FOIA training requirement in each attorney's performance plan. That training focuses on educating all OGC attorneys about FOIA, including on topics such as search requirements, common exemptions, and litigation considerations. As discussed above, all OGC SES also have a requirement in their performance plans to contribute to FOIA training for client offices.

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

Yes, all FOIA professionals (i.e., FOIA attorneys and Government Information Specialists) attended FOIA training. In addition, many other staff who provide program matter expertise, input, and review while processing FOIA requests also attended such training.

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

Courses offered by the Department of Justice are the primary source of training. However, OGC attorneys have also developed training courses to meet the unique needs of certain individuals or offices across GSA. Courses attended during the reporting period by FOIA professionals or GSA personnel who have FOIA responsibilities include the following:

- DOJ, FOIA Litigation Seminar;
- DOJ, Introduction to FOIA;
- DOJ, Advanced FOIA;
- DOJ, Processing a Request from Start to Finish;
- DOJ, Procedural Requirements and Fees Workshop;
- DOJ, Exemption 1 and Exemption 7 Workshop;
- DOJ, Exemption 4 and Exemption 5 Workshop;
- DOJ, Privacy Considerations Workshop;
- DOJ, Litigation Workshop;
- DOJ, FOIA Report Refresher and Quarterly Report Training;
- DOJ, Chief FOIA Officer Report Refresher Training; and
- DOJ, FOIA Summit for FOIA Professionals.

 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.

During the reporting period, 100 percent of GSA's FOIA professionals attended substantive FOIA training. Additionally, all attorneys in GSA also received substantive FOIA training. GSA does not track the percentage of GSA staff with FOIA responsibilities who attended substantive FOIA training.

5. OIP has <u>directed agencies</u> 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.

Not applicable.

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?

GSA provides numerous training sessions throughout the year for SMEs and other GSA staff to learn more about their role in effective FOIA administration. Each Government Information Specialist is assigned specific GSA program areas, Regions, and/or service lines, and regularly interacts with POCs and SMEs in those areas to answer questions and educate them on the FOIA process. When formal training is needed, GSA attorneys lead training sessions that are tailored to the specific client's needs.

The Associate General Counsel for General Law regularly briefs members of GSA leadership and the SES cadre on several key issues related to the FOIA to include FOIA-related metrics, the increase in requests received, the correlated anticipated greater resource needs, and on program office (i.e., non-FOIA staff) responsibilities and activities.

Arriving political appointees are also briefed on the agency's FOIA obligations and how FOIA requests are processed.

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.

Yes. GSA corresponds with requesters when the records sought are unclear or are likely to be voluminous requests. GSA works with requesters to understand the records sought and suggest alternative language for the request or other records that may satisfy their need. Depending on the nature of the discussions and the volume of records retrieved, GSA might provide a small sample of documents to help the requester understand the need for clarity. For example, sample documents often allow the requester to better understand the volume and type of records that a specific search might produce, as well as whether the retrieved records are actually responsive to their request. Additionally, GSA usually explains the cost and time requirements that might be associated with an overly-broad request, as those two elements may be critical to requester decision-making.

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.

No.

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 2023 (please provide a total number or an estimate of the number).

During the reporting period, GSA's FOIA Public Liaison was contacted for assistance approximately 225 times.

C. OTHER INITIATIVES

10. Has your agency evaluated the allocation of personnel resources needed to respond to current and anticipated FOIA demands? If so,

please describe what changes your agency has or will implement.

GSA is in the process of evaluating allocation of personnel resources against the capabilities of FOIAXpress, as part of the agency's transition to that system.

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.

FOIAXpress provides data in various ways to allow GSA to view and consider processing metrics. This helps identify the offices within GSA, by topic, that receive the most FOIA requests. With this information, the workload amongst the FOIA staff can be redistributed if needed. GSA can also use this information to identify areas for improvement and to concentrate resources in those areas.

- 12. The federal FOIA Advisory Committee, comprised of agency representatives and members of the public, was created to foster dialogue between agencies and the requester community, solicit public comments, and develop recommendations for improving FOIA administration. Since 2020, the FOIA Advisory Committee has issued a number of recommendations. Please answer the below questions:
 - a. Is your agency familiar with the FOIA Advisory Committee and its recommendations?

Yes

b. Has your agency implemented any of its recommendations or found them to be helpful? If so, which ones?

No

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

GSA continues to review its FOIA process to standardize the handling of FOIA requests, improve efficiency by reducing the number of touchpoints required to respond to each FOIA request, and placing even more emphasis on metrics and accountability.

SECTION III: PROACTIVE DISCLOSURES

The Attorney General's 2022 <u>FOIA Guidelines</u> 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.

GSA uses the following steps to ensure that (a)(2) disclosures are made available to the public in an appropriate and timely fashion:

- GSA handbooks and policies—excluding those that are solely directed internally to GSA staff—are available to both the public and GSA employees in the Directives Library on GSA.gov.
- Subject-specific manuals that provide regulatory, policy, and other guidance to the public on acquisition, property, technology, travel, and other issues, are posted on GSA.gov.
- All approved standard government forms and related guidance and updates are immediately available on GSA.gov, as is information on cancellation of standard forms.
- Records responsive to FOIA requests of particular interest are routinely posted to GSA's FOIA Library (see more below).
- GSA engages in regular discussions with program offices to help ensure timely and appropriate disclosure.
- As an important step in its disclosures, GSA uses established policy and procedures to ensure proper safeguarding of privacy, security, and confidentiality of unclassified information.

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

Yes. FOIA Logs contain the request type and track, the requester number, requester's name and organization (if any), a description of the request, the date the request was received and perfected, the current status, and the closed date (if applicable). The FOIA logs are posted in xls and pdf. GSA's FOIA logs can be found here.

- 3. Provide examples of any material 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). Please include links to these materials as well.
 - 2024 Presidential Transition Documents

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

GSA's FOIA Library.

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?

No.

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.

Yes. GSA's FOIA Requester Service Center coordinates ongoing conversations with GSA's key business lines, program areas, and records management staff about information and data sets that could and/or should be proactively posted for public use and consumption. Discussions will usually be initiated as a result of issues in the media, legislation, or program changes. However, for new and evolving programs, the conversations tend to be progressive in nature and advance as requirements, data sets, and informational reporting mature. The Office of Strategic Communications and GSA IT also play an important role by posting items identified for proactive disclosure on GSA websites.

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

When assessing incoming requests, GSA considers whether the agency has already received a request (or multiple requests) for information about that particular topic. When a topic of widespread interest is identified, GSA makes an effort to process the broadest request first, so that the maximum number of documents on that particular topic can be reviewed, redacted, and posted—and then quickly shared with other requesters who have also asked for information on that topic, followed generally by proactive disclosure on GSA's website. This process ensures that information of broad interest can be made available as quickly as possible. It also reduces overall processing time when multiple requests are received on a specific topic.

SECTION IV: STEPS TAKEN TO GREATER UTILIZE TECHNOLOGY

A key component of FOIA administration is using technology to make information available to the public and to gain efficiency in FOIA processing. The Attorney

General's 2022 <u>FOIA Guidelines</u> 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 utilizing 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?

Yes.

2. Please briefly describe any new types of technology your agency began using during the reporting period to support your FOIA program.

FOIAXpress has an electronic document review module that provides an efficient way to review large volumes of records to identify clusters that would contain responsive material. GSA will begin using the AI module within FOIAXpress for requests that seek common documents.

3. Does your agency currently use any technology to automate record processing? For example, does your agency use machine learning, predictive coding, technology assisted review or similar 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.

As described above, GSA has begun to use the technology tools available in FOIAXpress. GSA does not yet have enough experience with the tools to offer an estimate for time or financial resources saved by implementing this technology.

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?

Yes.

5. Did all four of your agency's quarterly reports for Fiscal Year 2024 appear on FOIA.gov?

Yes.

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

Fiscal Year 2025.

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 2023 Annual FOIA Report and, if available, for your agency's Fiscal Year 2024 Annual FOIA Report.

Reports are available on the agency's website.

8. In February 2019, DOJ and OMB issued joint <u>Guidance</u> 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?

Yes.

9. Optional—Please describe the best practices used in greater utilizing technology and any challenges your agency faces in this area.

GSA has no additional information on this topic.

SECTION V: STEPS TAKEN TO REMOVE BARRIERS TO ACCESS, IMPROVE TIMELINESS IN RESPONDING TO REQUESTS, AND REDUCE BACKLOGS

The Attorney General's 2022 <u>FOIA Guidelines</u> 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

 Has your agency established alternative means of access to first-party requested records outside of the FOIA or Privacy Act process?

No.

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

When GSA's FOIA Requester Service Center identifies an incoming request for first-party records, FOIA professionals alert GSA's Privacy Act Program Office in a timely manner. The Privacy Office then proceeds with

its normal operations to process and respond to the request.

GSA has also established a policy on releasing information relating to GSA employees, contractors, and others on whom GSA maintains certain information. The policy identifies categories of releasable and non-releasable information relating to individual employees and ensures that requests for such information are handled consistently and expeditiously.

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

None.

B. TIMELINESS

4. For Fiscal Year 2024, 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 2024 Annual FOIA Report.

14.45 days.

5. If your agency's average number of days to adjudicate requests for expedited processing was above ten calendar days, according to Section VIII.A. of your agency's Fiscal Year 2024 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.

Each request will be reviewed to determine whether a request for expedited processing has been made before the request is assigned outside of the FOIA Requester Service Center to GSA personnel for processing.

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

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 2024?

No.

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

No.

9. Please provide the percentage of requests processed by your agency in Fiscal Year 2024 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.

73.16%

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?

Not applicable.

C. BACKLOGS

11. If your agency had a backlog of requests at the close of Fiscal Year 2024, 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 2023?

Yes.

12. If not, according to Annual FOIA Report Section XII.D.1, did your agency process more requests during Fiscal Year 2024 than it did during Fiscal Year 2023?

Not applicable.

13. If your agency's request backlog increased during Fiscal Year 2024, 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 requests received (if possible, provide examples or briefly describe the types of complex requests contributing to your backlog increase), impact of COVID-19 and workplace and safety precautions, or any other reasons - please briefly describe or provide examples when possible.

Not applicable.

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 2024. 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 "N/A."

21.31%

15. If your agency had a backlog of appeals at the close of Fiscal Year 2024 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 2023?

Yes.

16. If not, according to section XII.E.1 of the Annual FOIA Report, did your agency process more appeals during Fiscal Year 2024 than it did during Fiscal Year 2023?

Not applicable.

17. If your agency's appeal backlog increased during Fiscal Year 2024, 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 requests received (if possible, provide examples or briefly describe the types of complex requests contributing to your backlog increase), impact of COVID-19 and workplace and safety precautions, or any other reasons - please briefly describe or provide examples when possible.

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 2024. 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 2024 and/or has no appeal backlog, please answer with "N/A."

12.5%

D. BACKLOG REDUCTION PLANS

19. In the 2024 guidelines for Chief FOIA Officer Reports, any agency with a backlog of over 1,000 requests in Fiscal Year 2023 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 2024?

While GSA was not required to implement a backlog reduction plan for Fiscal Year 2024, the agency made, and continues to make, a concerted effort to improve the performance of its FOIA program, including addressing the backlog.

20. If your agency had a backlog of more than 1,000 requests in Fiscal Year 2024, please explain your agency's plan to reduce this backlog during Fiscal Year 2025.

Not applicable.

- E. REDUCING THE AGE OF REQUESTS, APPEALS, AND CONSULTATIONS
 - 21. In Fiscal Year 2024, did your agency close the ten oldest pending perfected requests that were reported in Section VII.E. of your Fiscal Year 2022 Annual FOIA Report?

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 2023 Annual FOIA Report. If you had less than ten total oldest requests to close, please indicate that.

GSA was able to close 8 of the 10 oldest requests listed on the Fiscal Year 2023 Report. The remaining requests include several thousand pages of responsive records and require review by multiple agencies. Nevertheless, GSA continues to move the agency's oldest requests to closure.

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

GSA has identified its 30 oldest FOIA requests and has targeted them for closure. Additionally, GSA is closely evaluating other pending FOIA requests to identify steps in the process that can be retooled to gain efficiency.

24. In Fiscal Year 2024, did your agency close the ten oldest appeals that were reported pending in Section VI.C.5 of your Fiscal Year 2023 Annual FOIA Report?

No.

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 VI.C.(5) of your Fiscal Year 2023 Annual FOIA Report. If you had less than ten total oldest appeals to close, please indicate that.

GSA was able to close 7 of the 8 appeals pending at the end of Fiscal year 2024.

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

When GSA receives administrative appeals, they are given priority for review.

27. In Fiscal Year 2024, did your agency close the ten oldest consultations that were reported pending in Section XII.C. of your Fiscal Year 2023 Annual FOIA Report?

Yes.

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 2023 Annual FOIA Report. If you had less than ten total oldest consultations to close, please indicate that.

Not applicable.

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 2025.

GSA has made closing the "ten oldest" requests, appeals, and consultations a priority. To date, GSA has closed 6 of its 10 oldest requests, all of its pending consultations, and 9 of the 11 pending appeals. GSA continues to focus on the remaining "oldest" requests, which include several thousand pages of responsive records and requires review by multiple agencies.

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, and any other information to illustrate the impact of litigation on your overall FOIA administration.

Yes—GSA is a party to several FOIA litigation matters; however, for most of those cases GSA has completed its processing and is waiting for other agency defendants to finish responding to a request.