



**Defense Nuclear Facilities
Safety Board**

Washington, DC 20004-2901

**Office of the
Inspector General**

May 26, 2015

MEMORANDUM TO: Mark T. Welch
General Manager

FROM: Stephen D. Dingbaum */RA/*
Assistant Inspector General for Audits

SUBJECT: STATUS OF RECOMMENDATIONS: AUDIT OF THE BOARD'S
FREEDOM OF INFORMATION ACT PROCESS
(DNFSB-14-A-02)

REFERENCE: GENERAL MANAGER, DEFENSE NUCLEAR FACILITY
SAFETY BOARD, CORRESPONDENCE DATED
May 14, 2015

Attached is the Office of the Inspector General's analysis and status of recommendations as discussed in the agency's response dated May 14, 2015. Based on this response, recommendations 1, 2, and 5 are closed and recommendations 3 and 4 remain in resolved status. Please provide an updated status of recommendations 3 and 4 by September 30, 2015.

If you have any questions or concerns, please call me at 415-5915 or Beth Serepca, Team Leader, at 415-5911.

Attachment: As stated

cc: R. Howard, OGM

Audit Report

AUDIT OF THE BOARD'S FREEDOM OF INFORMATION ACT PROCESS

DNFSB-14-A-02

Status of Recommendations

Recommendation 1: Develop and implement a quality assurance process to facilitate compliance with FOIA guidance.

Agency Response Dated
May 14, 2015:

DNFSB has completed the development and implementation of a quality assurance process to facilitate compliance with FOIA guidance. The supporting documentation is included below for the following actions:

- A Processing Checklist has been developed for following the requirements under the Statute and Board regulation for processing a FOIA request. The data is entered into the Case Notes and Worksheet Tracking System as applicable;
- Case Notes are used to provide a detailed analysis and description of the actions taken and mirror the requirements under the Processing Checklist;
- A Search Documentation form is provided with every request which, when completed, includes data used to compute a fee analysis, if applicable; and A Worksheet Tracking System (Excel spreadsheet) provides responsive data from the Case Notes and Processing Checklist to assist in completing the FOIA Annual Report.

We request closure of this recommendation based on the evidence provided.

OIG Analysis: OIG reviewed the supporting documentation and determined that a quality assurance process to facilitate compliance with FOIA guidance was developed. This recommendation is therefore considered closed.

Status: Closed.

Audit Report

AUDIT OF THE BOARD'S FREEDOM OF INFORMATION ACT PROCESS

DNFSB-14-A-02

Status of Recommendations

Recommendation 2: Develop and issue guidance for staff on how to respond to a FOIA request.

Agency Response Dated
May 14, 2015:

Guidance for staff on how to respond to a FOIA request was developed to meet the Board's needs and is included with every request for search documentation sent to the Executive Office of the Chairman, the Office of General Counsel, the Office of the General Manager, and Office of the Technical Director following receipt of a FOIA request. We request closure of this recommendation based on the evidence provided.

OIG Analysis:

OIG reviewed the guidance for staff on how to respond to a FOIA request and determined that it is comprehensive. This recommendation is therefore considered closed.

Status:

Closed.

Audit Report

AUDIT OF THE BOARD'S FREEDOM OF INFORMATION ACT PROCESS

DNFSB-14-A-02

Status of Recommendations

Recommendation 3: Obtain DOJ or comparable online FOIA training and encourage all Board staff to complete the training through annual Board communications.

Agency Response Dated
May 14, 2015: Per email correspondence on April 29, 2015 with Alexis Graves, the Department FOIA Officer for USDA, the two FOIA e-Learning Modules (developed by DOJ OIP) have not been uploaded to AgLearn yet. Implementation of this recommendation is in process.

OIG Analysis: The proposed action meets the intent of the recommendation. This recommendation will be closed when OIG receives verification that online FOIA training was obtained and also that all staff was encouraged by Board communications, to complete the training.

Status: Resolved.

Audit Report

AUDIT OF THE BOARD'S FREEDOM OF INFORMATION ACT PROCESS

DNFSB-14-A-02

Status of Recommendations

Recommendation 4: Require periodic FOIA training for staff that process FOIA requests.

Agency Response Dated
May 14, 2015:

Per email correspondence on April 29, 2015 with Alexis Graves, the Department FOIA Officer for USDA, the two FOIA e-Learning Modules (developed by DOJ OIP) have not been uploaded to AgLearn yet. Implementation of this recommendation is in process.

OIG Analysis:

The proposed action meets the intent of the recommendation. This recommendation will be closed when OIG receives verification that periodic training is required for staff that process FOIA requests.

Status:

Resolved.

Audit Report

AUDIT OF THE BOARD'S FREEDOM OF INFORMATION ACT PROCESS

DNFSB-14-A-02

Status of Recommendations

Recommendation 5: Develop and implement a documentation management plan for FOIA records and communications.

Agency Response Dated
May 14, 2015:

The Board has created an Outlook folder that is accessible by the Chief FOIA Officer, the FOIA Director, and the FOIA Specialist, and contains all ongoing correspondence for an open FOIA request. After a request is completed, a comprehensive record is created on the Board's H drive titled "FOIA Requests" which is comprised of a PDF embedded with all relevant documentation associated with that request. Legacy open hardcopy FOIA files, are in the process of being converted to electronic PDFs. We request closure of this recommendation based on the evidence provided.

OIG Analysis:

OIG reviewed the documentation and determined that the folder and the drive suffices for implementing a documentation management plan for FOIA records and communication. This recommendation is therefore considered closed.

Status:

Closed.