

Selective Service System 2017 Chief FOIA Officer Report

Richard S. Flahavan, Associate Director, Public and Intergovernmental Affairs

In the interest of applying the presumption of openness, FOIA staff attended the DOJ Best Practices Workshops and training sessions. Topics included: FOIA Requester Service Center Training, Reducing Backlogs and Improving Timeliness, Proactive Disclosures & Making Online Information More Useful, Best Practices from the Requester's Perspective, FOIA Public Liaisons Training, and FOIA Litigation. One-half, 50% of the Selective Service System (SSS) FOIA staff attended training during this reporting period. SSS is committed to FOIA staff completing training annually. The FOIA staff consists of two employees for which FOIA is a collateral duty. In spite of limited resources and budget constraints, FOIA staff was able to take advantage of the excellent DOJ workshop series and reviewed posted DOJ OIP training. Additionally, the Chief FOIA Officer participates in the Chief FOIA Officers Council Meetings.

Regarding the Agency's review of records under the foreseeable harm standard the content of each requested record is examined by the program office, FOIA staff and General Counsel, to ascertain whether or not the record is classified or pertains to national security, commercial and financial information, personal privacy, or information protected by statute. If so, the record is generally not released. However, very, very few requests involve these cited categories. Second, each record is carefully reviewed to see if it fits all requirements of the exemption being considered. The age of the document is also looked at to determine if it is outdated and has been superseded by a newer version and is no longer sensitive. On the rare occasion that an exemption may apply, the FOIA staff and the Office of General Counsel determine if a partial release of any portion of the record can be made. FOIA staff looks at each request with a presumption of openness and releases portions of the record when the full release is not possible. Therefore, everything else is routinely released; in fact, the vast preponderant of requests are satisfied by release. Applying the foreseeable harm standard has been maximized through our centralized system. Since one office handles all FOIA actions, this policy is practiced uniformly. This year the Agency provided full releases in response to all requests.

The Agency continues to maximize the presentation of Informational print, radio and TV materials on the Agency's website. Further, the Agency is able to disseminate information and solicit feedback through social media venues like the SSS Facebook page and YouTube. Both are linked to our website. The Agency uses Twitter as another means of communication with and dissemination of information to the public. The public's comments are reviewed and responded to on a continual basis. The public may also contact us through our Information@sss.gov email account linked on our website.

- a. <https://www.sss.gov/media>
- b. <https://www.facebook.com/SSSregistration?ref=ts&fref=ts>
- c. <https://www.youtube.com/user/SelectiveServ?feature=watch>
- d. https://mobile.twitter.com/SSS_gov

2017 Chief FOIA Officer Report

Page 2

All requests were answered within the 20 day or less time period. Therefore, the Agency did not have any adjudicating requests for expedited processing. Given the low number of FOIA requests that the Agency receives each year and budget constraints, the Agency does not have a FOIA Requester Service Center and a FOIA Public Liaison. However, staff did review DOJ OIP training on FOIA Public Liaisons. Thus, if the need should arise, the Agency will take steps to train current FOIA staff in the collateral duty of FOIA Public Liaison, provided funding is available.

We do conduct customer feedback, internal controls, self-assessments, and other audits; the Selective Service's FOIA system has consistently operated efficiently and effectively achieving extremely short response times to our customers. While we do evaluate ourselves periodically, any changes must offer programmatic betterments which are feasible and affordable. Information is reviewed to see how often the topic is addressed or the information is requested. If it is requested more than a few times, the information is posted on our website or on our Facebook page. FOIA staff solicits information on topics of interest or on developing issues from agency staff on an ongoing basis. With agency staff input, FOIA and Public and Intergovernmental Affairs Directorate staffs post this information on our website and social media venues.

The FOIA staff determines records for proactive disclosures by means of professional judgment, public feedback, review of FOIA requests received, and analysis of correspondence and requests. Consequently, Selective Service continues to post information about the agency and individuals, policies, plans, and procedures on its public website to inform the public what records and information are available. We already know what types of information will probably be disclosed by category/type. Selective Service has a vast amount of information and records posted on the Agency's internet which affords the public easy and fast access.

The Agency has internal controls in place for Section 508 compliance. Information is given to the IT staff which is responsible for coding the data Section 508 compliant prior to posting on the agency website. Once the IT staff codes it, FOIA staff then reviews the information to ensure that it is compliant. Time spent with completing these efforts is low given the small amount of FOIA requests that the agency receives.

We have proactively disclosed the following:

- a. Annual Reports to Congress
<https://www.sss.gov/Reports/Annual-Report-to-Congress>
- b. Performance and Accountability Report
<https://www.sss.gov/Reports/Financial-Reports/Performance-Accountability-Report>

2017 Chief FOIA Officer Report

Page 3

- c. Performance Budget Justification
<https://www.sss.gov/Reports-and-Notices/Financial-Reports/Performance-Budget-Justification>
- d. Federal Employee Viewpoint Survey
<https://www.sss.gov/Reports-and-Notices/Human-Capital-Survey>
- e. Annual FOIA Report
<https://www.sss.gov/Portals/0/FOIA/FY2016%20SelectiveServiceSystemFOIAAnnualReport1.pdf>
- f. Chief FOIA Officer Report
<https://www.sss.gov/Portals/0/FOIA/SSS%20Chief%20FOIA%20Officer%20Report%202016.pdf>
- g. Additionally the agency posted all four FOIA quarterly reports for FY2016.

Information is constantly updated and expanded together with the website itself, to make it more user-friendly and easier to negotiate. Information is better grouped – concomitant components are together -- and easier to access. Information on our registration program and board member program are in one location each. The Agency FOIA staff utilizes email to communicate with requesters through our Information@sss.gov email address. With so few requests, all are handled alike – as simple requests. The average number of days to process simple requests was twenty working days or fewer and 100% of the requests were placed in the simple track. Selective Service had no backlog of appeals and had no old requests held over from FY2016, as well as no consultations pending.

This past year, Selective Service was able to grant all full requests, with no appeals, exclusions, or backlogs. All requests were completed in less than 20 days. Through social media efforts using Facebook, YouTube and Twitter, we have been able to increase transparency and open government thereby reducing the number and types of FOIA requests. The Agency has also increased the amount of subject matter covered on our website and will continue to do so.

SSS is both pleased and proud of its FOIA program and its peerless response times. We remain committed to making more information available to our customers while maintaining our public reputation for superior openness and timeliness.