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## Comments on the Draft Report and Recommendations to the Archivist of the United States

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Jun 2, 2020 11:46 AM

Posted in group: **FOIA Advisory Committee**

Good Morning,

We have two comments regarding the draft document.

### **Recommendation #12**

“We recommend that OGIS work together with OIP to encourage agencies to release FOIA documents to the public on their FOIA websites and in FOIA portals in open, legible, machine-readable and machine-actionable formats, to the extent feasible.”

**Comment:** If this is implemented, how will agencies ensure the data’s integrity and that the data will not be falsely represented? Data provided in the recommended formats can be manipulated.

### **Recommendation #20**

“We recommend that Congress directly address the issue of funding for FOIA offices and ensure that agencies receive and commit sufficient dedicated resources to meet their legal obligations to respond to FOIA requests in a timely manner both today and in the future.”

**Comment:** The majority of the recommendations depend on this recommendation being implemented. For example, recommendation #5 is suggesting mandatory training for all agency employees. This type of training could require additional funding from Congress. Also, recommendation #12 may require additional funding as well if new software is needed in order to convert documents.

Thank you,

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