

2026 Chief FOIA Officer Report
Federal Deposit Insurance Corporation
Matthew P. Reed, General Counsel and Chief FOIA Officer
March 2025 - March 2026

SECTION I: FOIA LEADERSHIP AND APPLYING THE PRESUMPTION OF OPENNESS

The guiding principle underlying the Department of Justice’s (DOJ) 2022 [FOIA Guidelines](#) 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. Leadership Support for FOIA

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 or above this level?

Answer: Yes

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

Answer: Matthew P. Reed, 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?

Answer: The FDIC is committed to incorporating FOIA in its core mission. Approximately three weeks before the start of the reporting period, the FDIC’s then-Acting (now current) Chairman released a statement that reflects the FDIC’s commitment to enhance transparency.¹ The FDIC also allocates substantial time and resources to educating its employees about the importance of the FOIA. In 2025, the FDIC’s FOIA/Privacy Act Group held bi-annual FOIA training seminars for its FOIA coordinators, who represent most FDIC divisions and offices. Over 75 employees attended each seminar in person or online. The first seminar discussed FOIA Exemption 8, a reasonable search under the FOIA, FOIA fees and fee estimates, and various technical matters relating to our FOIA request management system. The second seminar discussed the history of the FOIA and FOIA administration, a reasonable search under the FOIA, FOIA Exemptions, and the foreseeable harm analysis; the second seminar also included a panel discussion on best practices.

¹ [FDIC Releases Documents Related to Supervision of Crypto-Related Activities | FDIC.gov](#).

B. Presumption of Openness

4. DOJ's 2022 FOIA Guidelines provides that "agencies should confirm in response letters to FOIA requesters that they have considered the foreseeable harm standard when reviewing records and applying FOIA exemptions." Does your agency provide such confirmation in its response letters?

Answer: 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:

- the number of times your agency issued a full or partial Glomar response during Fiscal Year (FY) 2025 (please separate full and partial Glomar responses if possible);

Answer: Four Times

- the number of times a Glomar response was issued by exemption during FY 2025 (e.g., Exemption 7(C) – 20 times, Exemption 1 – 5 times).

Answer: Exemption 3 – two times; Exemption 6 – four times; Exemption 7(A) – four times; Exemption 7(C) – four times; Exemption 7(D) – two times; Exemption 7(E) – two times; and Exemption 8 – two times. The four Glomar responses pertained to multiple exemptions.

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.

Answer: As explained above, three weeks before the start of the reporting period, the FDIC's then-Acting (now current) Chairman released a statement that reflects the FDIC's commitment to enhance transparency, and the FOIA/Privacy Act Group made a series of releases consistent with this statement. During the reporting period, the FOIA/Privacy Act Group posted records that are the subject of public interest in the FDIC FOIA Reading Room. For example, the FOIA/Privacy Act Group posted ten records pertaining to the FDIC's supervisory approach for crypto-related activities and six records concerning the FDIC Board of Directors' decision to recommend use of the systemic risk exception in response to the March 2023 bank failures. The FOIA/Privacy Act Group also publishes quarterly FOIA logs and the Chairman's and Vice Chairman's schedules in the FDIC FOIA Reading Room.

SECTION II: ENSURING FAIR AND EFFECTIVE FOIA ADMINISTRATION

DOJ'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.” DOJ also “urge[s] agency Chief FOIA Officers to undertake 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.

Answer: The FDIC provides and promotes two substantive FOIA trainings for agency personnel on the FDIC intranet from the DOJ Office of Information Policy (OIP) e-Learning modules: “FOIA Training for All Employees” and “FOIA Training for Professionals.” Additionally, and as described above, the FOIA/Privacy Act Group conducts bi-annual training seminars for FOIA coordinators, who do not work in the FOIA/Privacy Act Group, that are approximately three hours long. These seminars consist of substantive FOIA issues and administrative procedures. The FOIA/Privacy Act Group also holds bi-weekly office hours that provide an opportunity for additional training. During each office hour, the FOIA coordinators are given an opportunity to ask system-related and substantive FOIA questions. Finally, the FOIA/Privacy Act Group’s designated training coordinator conducted training for staff in the Division of Depositor and Consumer Protection during the reporting period.

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

Answer: Yes

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

Answer: FDIC FOIA professionals or staff with FOIA responsibilities participated in virtual training provided by DOJ OIP on the following topics: “Advanced FOIA Training,” “Procedural Requirements, Fees and Fee Waivers,” and “Exemptions 4 and 5.” Additionally, some members of the FOIA/Privacy Act Group attended the American Society of Access Professionals’ virtual training on Court Case Updates in March 2025. FOIA/Privacy Act Group members and FOIA coordinators also attended the bi-annual FOIA training seminars described above.

4. 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.

Answer: 100%

5. OIP has [directed agencies](#) 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.

Answer: N/A. All FDIC FOIA professionals and staff with FOIA responsibilities attended substantive FOIA training during the reporting period.

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.

Answer: During the reporting period, FOIA/Privacy Act Group leadership provided a presentation to incoming Legal Division employees on FOIA basics and their role in the FOIA process. The FOIA/Privacy Act Group also conducted training for some non-FOIA staff in the Division of Depositor and Consumer Protection.

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.

Answer: Yes. When the FOIA/Privacy Act Group receives requests that do not comply with the FOIA or FDIC regulations, such as requests that are overbroad, we routinely contact requesters and provide them with an opportunity to clarify and refine their requests so the requests can be processed in the most time efficient manner. For voluminous requests, we also make rolling productions where feasible.

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.

Answer: The FOIA/Privacy Act Group did not engage in additional outreach or dialogue outside of the standard request process with the requester community; however, the FOIA/Privacy Act Group confers with the requester community to explain the FDIC's FOIA processes. This dialogue helps ensure that the FDIC is processing its FOIA requests as accurately, thoroughly, and timely as possible.

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 2025 (please provide a total number or an estimate of the number for the agency overall).

Answer: Requesters sought assistance from the FDIC's FOIA Public Liaison 46 times during the reporting period.

C. Other Initiatives

10. Has your agency evaluated the allocation of agency personnel resources needed to respond to current and anticipated FOIA demands? If so, please describe what changes your agency has or will implement.

Answer: Yes. FDIC management, including the Chief FOIA Officer, are proactive and supportive of agency FOIA operations—allocating agency personnel from all parts of the FDIC to respond to the increase in total and complex requests. For example, an Acting Supervisory Counsel joined the FOIA/Privacy Act Group for a four-month detail, an attorney with broad FDIC experience transferred to the Group permanently, and a detailee served as a Government Information Specialist for the entire reporting period. Further, the FOIA/Privacy Act Group hosted three Honors Attorneys from the FDIC's Honors Attorney Program, while one additional attorney performed collateral FOIA assignments. Lastly, the FOIA/Privacy Act Group worked closely with personnel from the FDIC's Legal Information Technology Unit to better operate the FOIA request management system and to search for and process records. The FOIA/Privacy Act Group's broad use of available personnel resources reduced its backlog despite the significant increase in requests.

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.

Answer: The FDIC's FOIA request management system allows the FOIA/Privacy Act Group to create and review various types of reports and analytics pertaining to all requests. For example, FOIA staff can quickly identify requests asking for expedited processing, overdue requests, requests in litigation, and requests assigned to certain divisions or offices. Additionally, the FDIC's system organizes data in pie charts and graphs, which allows management to quickly assess metrics including, but not limited to, the workload of each Government Information Specialist, the age of requests, and the status of requests. The FOIA/Privacy Act Group uses these metrics to provide regular updates to Legal Division management and other stakeholders, as described below.

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

Answer: In order to ensure efficiency and effectiveness, the FOIA/Privacy Act Group produces regular reports for senior management so that they can monitor the timely and proper processing of requests. Likewise, the FOIA/Privacy Act Group continues to develop new and improved

ways to refine the FDIC's FOIA program, including through increased training opportunities and regular communication with FOIA coordinators. Lastly, members of the FOIA/Privacy Act Group attend standing monthly meetings with our sister banking agencies to share and gather information.

SECTION III: PROACTIVE DISCLOSURES

DOJ's 2022 [FOIA Guidelines](#) 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.

Answer: The FDIC's FOIA request management system identifies and tracks any documents that the FDIC has released three or more times for proactive disclosures. The FOIA/Privacy Act Group also manually identifies and tracks our (a)(2) postings throughout the year. Lastly, while drafting the FOIA Annual Report, the FOIA/Privacy Act Group reaches out to each of the FDIC's divisions and offices to get an accounting of their yearly (a)(2) postings.

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

Answer: Yes

- If so, what information is contained in the logs?

Answer: The FDIC's FOIA logs contain a list of all closed requests during the reporting period (by quarter) and provide the request number, organization name, received date, description of records sought, disposition, and closed date.

- Are they posted in CSV format? If not, what format are they posted in?

Answer: No. The FOIA logs are posted in PDF format.

- Please provide a link to the page where any FOIA logs are posted. If applicable, please provide component links.

Answer: [FOIA Reading Room | FDIC.gov](#)

3. Provide examples of any material (with links) 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).

Answer: Information proactively posted on the FDIC's website during the reporting period includes:

FDIC Chairman's/Acting Chairman's Schedules:

Monthly through December 2025

[FOIA Chairman's/Acting Chairman's Schedules | FDIC.gov](#)

FDIC Vice Chairman's Schedules:

Monthly through January 2025

[FOIA Vice Chairman's Schedule | FDIC.gov](#)

FDIC FOIA Logs:

Fiscal Year 2025 Quarters 1, 2, 3, and 4

[FOIA Reading Room | FDIC.gov](#)

Documents pertaining to the FDIC Board of Directors' decision to recommend use of the systemic risk exception:

[Systemic Risk Exception Recommendation Memorandum](#)

[Transcript of Closed Special Meeting of the Board of Directors](#)

[Minutes of Closed Special Meeting of the Board of Directors](#)

[Certified Copy of Adopted Board Resolution to Recommend Use of Systemic Risk Exception](#)

[Letter from Gruenberg to Yellen Transmitting the Board Resolution to Recommend use of the Systemic Risk Exception for Signature Bank](#)

[Letter from Gruenberg to Yellen Transmitting the Board Resolution to Recommend use of the Systemic Risk Exception for Silicon Valley Bank](#)

Documents pertaining to the FDIC's supervisory approach for crypto-related activities:

[Pause Letters](#)

[Correspondence Related to Crypto-Related Activities](#)

[Additional Correspondence Related to Crypto-Related Activities](#)

[Additional Correspondence Related to Crypto-Related Activities - Revised](#)

[Additional Correspondence Related to Crypto-Related Activities](#)

[FDIC Correspondence for History Associates Inc. v. FDIC](#)

[FDIC Memorandum: Procedures for Reviewing Notifications of Engagement in Crypto-Related Activities](#)

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

Answer: [FOIA Reading Room | FDIC.gov](#)

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? If yes, please provide examples of such improvements, such as steps taken to post information in open and machine-readable formats. If your agency is not taking steps to make posted information more useful, please explain why.

Answer: Yes. The FDIC has taken steps to make information posted on its website more useful to the public. The FDIC's web specialists periodically review and ensure that the FDIC's FOIA webpages, including the FOIA Reading Room, are easily navigable. Additionally, during the reporting period, the FDIC has continued its initiative to ensure complete Section 508 compliance of all documents posted in our FOIA Reading Room. Lastly, the FDIC has several open, machine-readable databases on its website that assist the public. Examples include BankFind (the searchable FDIC Institution Directory), Institution Financial Reports, and Deposit Market Share Reports. These can be found at [Data Tools | FDIC.gov](#).

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.

Answer: The FOIA/Privacy Act Group collaborates with FDIC web specialists when making proactive disclosures. The web specialists work with the FOIA/Privacy Act Group staff to post the proactive disclosures to the appropriate location in the FDIC's FOIA Reading Room. Other FDIC divisions and offices post their own proactive disclosures and keep the FOIA/Privacy Act Group updated for reporting purposes.

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

Answer: The FDIC continually strives to be transparent. Approximately three weeks before the start of the reporting period, the FDIC's then Acting (now current) Chairman released a statement that reflects the FDIC's commitment to enhance transparency. Many of the proactive disclosures above reflect this commitment, and we are not aware of any challenges to this effort.

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. DOJ's 2022 [FOIA Guidelines](#) 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 using 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?

Answer: Yes. The FOIA/Privacy Act Group reviewed the FDIC's FOIA-related technological capabilities to identify resources needed to respond to current and anticipated FOIA demands.

2. Please briefly describe any new types of technology your agency uses to support your FOIA program.

Answer: In response to an increased number of requests during the reporting period, the FOIA/Privacy Act Group relied on the analytical expertise of the FDIC's e-Discovery Group (eDG). Specifically, when a request warrants, eDG conducts expansive FOIA searches, refines those searches, and analyzes the resulting data before transmitting it to the FOIA/Privacy Act Group for review and disposition. Additionally, the FOIA/Privacy Act Group utilizes the analytics feature within the FDIC's FOIA request management system and, for certain requests, Relativity. Running analytics on search results has allowed the FOIA/Privacy Act Group to de-duplicate emails and capture all-inclusive email threads, which helps streamline the review process.

3. Does your agency currently use any technology to automate request intake, customer service, or record processing? For example, does your agency use artificial intelligence or other 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.

Answer: Yes. The FDIC's FOIA request management system, built on an e-discovery platform, allows users to automate portions of the redaction process. For example, the system provides the capability to redact records by: (1) copying redactions from similar requests, (2) copying redactions from established redaction templates, (3) automatically redacting text based on keyword searches, and (4) redacting text based on established keyword lists. Users can save a redacted document as a template that can be used to redact similar documents. The request management system also streamlines records processing by attaching redacted records from other requests to new requests that are seeking the same records (there are multiple levels of staff review to ensure that all redactions are legally supported). Finally, the request management system can de-duplicate and capture all-inclusive email threads. The FOIA/Privacy Act Group also leverages various e-discovery systems and tools, such as Relativity, in the search, review, and analysis stages. Used separately or in combination with the request management system, tools like Relativity have substantially decreased the final volume of potentially responsive records. Together, these technologies have saved a significant amount of initial review time, thereby decreasing processing and response times for requesters.

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?

Answer: The FDIC web specialists periodically review and ensure proper functioning of the FDIC’s FOIA website, including making sure that the FOIA Reading Room is easily navigable. The FDIC has an annual webpage review process, which includes a review of the FDIC’s FOIA website. Based on the results of the review, modifications are made as necessary to make the website as informative and user-friendly as possible.

5. Did all four of your agency's [quarterly reports](#) for Fiscal Year 2025 appear on FOIA.gov?

Answer: Yes

6. If your agency did not successfully post all quarterly reports on FOIA.gov, please explain why and provide your agency’s plan for ensuring that such reporting is successful in Fiscal Year 2026.

Answer: N/A

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 2024 Annual FOIA Report and, if available, for your agency’s Fiscal Year 2025 Annual FOIA Report.

Answer: [FOIA Reports | FDIC.gov](#)

8. In February 2019, DOJ and OMB issued joint [Guidance](#) 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?

Answer: Yes

9. Optional -- Please describe your agency best practices in better utilizing technology and any challenges your agency faces in this area.

Answer: The FOIA/Privacy Act Group has developed and is continuing to develop training and instructional resources for the FDIC’s FOIA request management system. Additionally, we are in the process of updating and revising the FDIC’s internal FOIA webpage to further enhance and clarify the FOIA and the FOIA process for all FDIC employees. Lastly, the FOIA/Privacy Act Group continues to provide bi-weekly office hours to FOIA coordinators regarding the FOIA request management system—giving FOIA coordinators updates to the system and an opportunity to ask questions.

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

DOJ’s 2022 [FOIA Guidelines](#) 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

1. Has your agency established alternative means of access for any categories of first-party requested records, outside of the typical FOIA or Privacy Act process?

Answer: No. The FDIC receives first-party requests for Office of Inspector General records, security background investigations, and personnel files. Because many of these frequently requested records are protected under the Privacy Act, the FDIC cannot use alternative means of access outside of the FOIA/Privacy Act process.

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

Answer: The FOIA/Privacy Act Group is the most experienced FDIC staff to work with these records. There are no plans at this time to develop alternative means of access.

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

Answer: The FOIA/Privacy Act Group continues to explore, where appropriate, various tools to improve our level of service to requesters.

B. Timeliness

4. For Fiscal Year 2025, 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 2025 Annual FOIA Report.

Answer: 6.98 days compared to 9.79 days in Fiscal Year 2024

5. If your agency's average number of days to adjudicate requests for expedited processing was more than ten calendar days, according to Section VIII.A. of your agency's Fiscal Year 2025 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.

Answer: N/A

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

Answer: 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 2025?

Answer: Yes, 15.86 days compared to 23.90 days in Fiscal Year 2024.

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

Answer: N/A

9. Please provide the percentage of requests processed by your agency in Fiscal Year 2025 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.

Answer: 9.61% compared to 19.9% in Fiscal Year 2024

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?

Answer: N/A

C. Backlogs

Backlogged Requests

11. If your agency had a backlog of requests at the close of Fiscal Year 2025, 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 2024?

Answer: Yes. The FDIC's Fiscal Year 2025 backlog (222) decreased compared with the FDIC's end of Fiscal Year 2024 backlog (252).

12. If not, according to Annual FOIA Report Section XII.D.1, did your agency process more requests during Fiscal Year 2025 than it did during Fiscal Year 2024?

Answer: N/A. Notably, the FDIC processed 1,613 requests in Fiscal Year 2025 compared to 873 requests in Fiscal Year 2024. Thus, the FDIC processed almost double the requests as the prior year, reduced the backlog, and increased the processing time.

13. If your agency's request backlog increased during Fiscal Year 2025, 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 the requests received (if possible, please provide examples or briefly describe the types of complex requests contributing to your backlog increase)
- Litigation
- Any other reasons – please briefly describe or provide examples when possible

Answer: N/A

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 2025. 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.”

Answer: The percentage of requests that make up the backlog reported at the end of Fiscal Year 2025 is 14.4% (222 out of 1536).

Backlogged Appeals

15. If your agency had a backlog of appeals at the close of Fiscal Year 2025, 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 2024?

Answer: The FDIC had zero (0) backlogged appeals for both Fiscal Year 2024 and Fiscal Year 2025.

16. If not, according to section XII.E.1 of the Annual FOIA Report, did your agency process more appeals during Fiscal Year 2025 than it did during Fiscal Year 2024?

Answer: N/A

17. If your agency’s appeal backlog increased during Fiscal Year 2025, 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 appeals
- A loss of staff
- An increase in the complexity of the requests received (if possible, please provide examples or briefly describe the types of complex requests contributing to your backlog increase)
- Litigation
- Any other reasons – please briefly describe or provide examples when possible

Answer: N/A

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 2025. 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 2025 and/or has no appeal backlog, please answer with “N/A.”

Answer: N/A

D. Backlog Reduction Plans

19. In the 2025 guidelines for Chief FOIA Officer Reports, any agency with a backlog of over 1000 requests in Fiscal Year 2024 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 2025?

Answer: N/A

20. If your agency had a backlog of more than 1,000 requests in Fiscal Year 2025, please explain your agency’s plan to reduce this backlog during Fiscal Year 2026.

Answer: N/A

E. Reducing the Age of Requests, Appeals, and Consultations

Ten Oldest Requests

21. In Fiscal Year 2025, did your agency close the ten oldest pending perfected requests that were reported in Section VII.E. of your Fiscal Year 2024 Annual FOIA Report?

Answer: 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 2025 Annual FOIA Report. If you had less than ten total oldest requests to close, please indicate that.

Answer: Two (2)

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

Answer: As discussed above, the FDIC has allocated personnel resources to the FOIA program from other areas of the FDIC.

Ten Oldest Appeals

24. In Fiscal Year 2025, did your agency close the ten oldest appeals that were reported pending in Section VI.C.5 of your Fiscal Year 2024 Annual FOIA Report?

Answer: Yes

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 VII.C.(5) of your Fiscal Year 2024 Annual FOIA Report. If you had less than ten total oldest appeals to close, please indicate that.

Answer: N/A

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

Answer: N/A

Ten Oldest Consultations

27. In Fiscal Year 2025, did your agency close the ten oldest consultations that were reported pending in Section XII.C. of your Fiscal Year 2024 Annual FOIA Report?

Answer: No

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 2024 Annual FOIA Report. If you had less than ten total oldest consultations to close, please indicate that.

Answer: Five (5)

Additional Information Regarding Ten Oldest

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 2026.

Answer: During the reporting period, the FDIC experienced a significant increase in the volume of potentially responsive records requiring review. During Fiscal Year 2025, the FDIC reviewed approximately 289,088 pages—93,774 more pages than it reviewed in Fiscal Year 2024 (when the agency reviewed approximately 195,314 pages). The FDIC’s ten oldest requests and consultations are complex and require coordination with multiple divisions, offices, or other agencies that have a substantial interest in the requested information. For some of these requests, the FDIC provided interim responses. Although the FDIC was unable to close all ten, it

continues to make them a priority and has demonstrated great gains in responding to voluminous and complex requests since the last reporting period.

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
- Any other information to illustrate the impact of litigation on your overall FOIA administration

Answer: Yes. During the reporting period, the FDIC had fifteen (15) FOIA requests that were the subject of five (5) litigation matters. Only one of these litigation matters was filed during the reporting period. There is no common cause for these litigation matters. Notwithstanding the burden associated with litigation, the FDIC was able to process almost twice as many requests as last year while reducing processing times and the backlog. All of these matters are complex, have resulted in a voluminous number of records requiring review and analysis, and necessitate multiple levels of inter and intra-agency coordination and consultation.