



U.S. Chemical Safety and Hazard Investigation Board

Freedom of Information Act (FOIA) Report for Fiscal Year 2006

I. Basic Information Regarding This Report

A. Point of contact for questions about this report:

Christopher Kirkpatrick
FOIA Officer
U.S. Chemical Safety and Hazard Investigation Board
2175 K Street, NW
Suite 400
Washington, DC 20037
(202) 261-7600

B. Electronic address for this report on the World Wide Web:

http://www.csb.gov/index.cfm?folder=legal_affairs&page=index.

C. How to obtain a copy of the report in paper form: Please mail a written request to the point of contact listed in section I.A., above.

II. How to Make a FOIA Request

Requests for records believed to be in the possession of the U.S. Chemical Safety and Hazard Investigation Board (CSB) must be made in writing to the address listed in section II.A., below. The request itself, and the envelope containing it, should be clearly marked "FOIA Request." Improperly addressed or unclearly marked correspondence may delay the processing of a request. A request must reasonably describe the desired records in sufficient detail to enable CSB personnel to locate the records with a reasonable amount of effort. Whenever possible, a request should include specific information about each record sought, such as the date, title or name, author, recipient, and subject matter of the record. A request is considered an agreement by the requester to pay all applicable fees up to \$25, unless the requester seeks a fee waiver. Requesters may specify a willingness to pay a greater or lesser amount.

Additional information on how to make a FOIA request can be found in the [CSB FOIA Reference Guide](#), which is available by request to the address listed in section II.A., below, and on the World Wide Web at:

http://www.csb.gov/legal_affairs/docs/CSB_FOIAGuide.pdf.

- A. All FOIA requests for records believed to be in the possession of the CSB are received at the following address:

FOIA Officer
U.S. Chemical Safety and Hazard Investigation Board
2175 K Street, NW
Suite 400
Washington, DC 20037
(202) 261-7600

- B. Estimated agency response-times:

Simple request: 20 – 30 days.

Complex request: initial response within 20 days; final disposition may take from three to twelve months, depending on volume and complexity of records.

- C. Why some requests are not granted:

- The requested records are exempt from disclosure pursuant to one of the nine exemptions under the FOIA.
- The requested records do not exist or are not yet in existence.
- The requested records were properly disposed of prior to the date of the request.
- The request would require the CSB to compile or create records solely for the purpose of satisfying that request.
- The requester failed to comply with administrative requirements, e.g., reasonable description of records, agreement to pay fees.

III. Definitions of Terms and Acronyms Used in This Report

- A. Agency-specific acronyms or other terms.

CSB – the Chemical Safety and Hazard Investigation Board.

- B. Basic terms.

1. FOIA/PA request – Freedom of Information Act/Privacy Act request. A FOIA request is generally a request for access to records concerning a third party, an organization, or a particular topic of interest. A Privacy Act request is a request for records concerning oneself; such requests are also treated as FOIA requests. (All requests for access to records, regardless of which law is cited by the requester, are included in this report.)
2. Initial Request – a request to a federal agency for access to records under the FOIA.
3. Appeal – a request to a federal agency asking that it review at a higher administrative level a full denial or partial denial of access to records under the FOIA, or any other FOIA determination such as a matter pertaining to fees.

4. Processed Request or Appeal – a request or appeal for which an agency has taken a final action on the request or the appeal in all respects.
5. Multi-track processing – a system in which simple requests requiring relatively minimal review are placed in one processing track and more voluminous and complex requests are placed in one or more other tracks. Requests in each track are processed on a first-in/first out basis. A requester who has an urgent need for records may request expedited processing (see below).
6. Expedited processing – an agency will process a FOIA request on an expedited basis when a requester has shown an exceptional need or urgency for the records which warrants prioritization of his or her request over other requests that were made earlier.
7. Simple request – a FOIA request that an agency using multi-track processing places in its fastest (nonexpedited) track based on the volume and/or simplicity of records requested.
8. Complex request – a FOIA request that an agency using multi-track processing places in a slower track based on the volume and/or complexity of records requested.
9. Grant – an agency decision to disclose all records in full in response to a FOIA request.
10. Partial grant – an agency decision to disclose a record in part in response to a FOIA request, deleting information determined to be exempt under one or more of the FOIA's exemptions; or a decision to disclose some records in their entireties, but to withhold others in whole or in part.
11. Denial – an agency decision not to release any part of a record or records in response to a FOIA request because all the information in the requested records is determined by the agency to be exempt under one or more of the FOIA's exemptions, or for some procedural reason (such as because no record is located in response to a FOIA request).
12. Time limits – the time period in the FOIA for an agency to respond to a FOIA request (ordinarily 20 working days from proper receipt of a "perfected" FOIA request).
13. "Perfected" request – a FOIA request for records which adequately describes the records sought, which has been received by the FOIA office of the agency or agency component in possession of the records, and for which there is no remaining question about the payment of applicable fees.
14. Exemption 3 statute – a separate federal statute prohibiting the disclosure of a certain type of information and authorizing its withholding under FOIA subsection (b)(3).
15. Median number – the middle, not average, number. For example, of 3, 7, and 14, the median number is 7.

16. Average number – the number obtained by dividing the sum of a group of numbers by the quantity of numbers in the group. For example, of 3, 7, and 14, the average number is 8.

IV. Exemption 3 Statutes

A. Exemption 3 statutes relied on by the CSB during Fiscal Year 2006 – NONE.

1. Description of type(s) of information withheld under each statute – N/A.
2. Court approval of the use of each statute – N/A.

V. Initial FOIA/PA Access Requests

A. Numbers of initial requests.

1. Number of requests pending as of end of Fiscal Year 2005 24 .
2. Number of requests received during Fiscal Year 2006 49 .
3. Number of requests processed during Fiscal Year 2006 43 .
4. Number of requests pending as of end of Fiscal Year 2006 30 .

B. Disposition of initial requests.

1. Number of total grants 11 .
2. Number of partial grants 1 .
3. Number of denials 14 .

a. Number of times each FOIA exemption used (counting each exemption once per request):

- | | |
|--------------------|-------------|
| (1) Exemption 1 | <u>0</u> . |
| (2) Exemption 2 | <u>0</u> . |
| (3) Exemption 3 | <u>0</u> . |
| (4) Exemption 4 | <u>1</u> . |
| (5) Exemption 5 | <u>0</u> . |
| (6) Exemption 6 | <u>0</u> . |
| (7) Exemption 7(A) | <u>14</u> . |

(8) Exemption 7(B)	<u>0</u>
(9) Exemption 7(C)	<u>0</u>
(10) Exemption 7(D)	<u>0</u>
(11) Exemption 7(E)	<u>0</u>
(12) Exemption 7(F)	<u>0</u>
(13) Exemption 8	<u>0</u>
(14) Exemption 9	<u>0</u>
4. Other reasons for nondisclosure (total)	<u>17</u>
a. No records	<u>9</u>
b. Referrals	<u>1</u>
c. Request withdrawn	<u>7</u>
d. Fee-related reason	<u>0</u>
e. Records not reasonably described	<u>0</u>
f. Not a proper FOIA request for some other reason	<u>0</u>
g. Not an agency record	<u>0</u>
h. Duplicate request	<u>0</u>
i. Other (specify)	<u>0</u>

VI. Appeals of Initial Denials of FOIA/PA Requests

A. Numbers of appeals.

1. Number of appeals received during fiscal year	<u>0</u>
2. Number of appeals processed during fiscal year	<u>0</u>

B. Disposition of appeals.

1. Number completely upheld	<u>0</u>
2. Number partially reversed	<u>0</u>
3. Number completely reversed	<u>0</u>

a. Number of times each FOIA exemption used (counting each exemption once per appeal):

(1) Exemption 1	<u>0</u>
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(2) Exemption 2	<u>0 .</u>
(3) Exemption 3	<u>0 .</u>
(4) Exemption 4	<u>0 .</u>
(5) Exemption 5	<u>0 .</u>
(6) Exemption 6	<u>0 .</u>
(7) Exemption 7(A)	<u>0 .</u>
(8) Exemption 7(B)	<u>0 .</u>
(9) Exemption 7(C)	<u>0 .</u>
(10) Exemption 7(D)	<u>0 .</u>
(11) Exemption 7(E)	<u>0 .</u>
(12) Exemption 7(F)	<u>0 .</u>
(13) Exemption 8	<u>0 .</u>
(14) Exemption 9	<u>0 .</u>
4. Other reasons for nondisclosure (total)	<u>0 .</u>
a. No records	<u>0 .</u>
b. Referrals	<u>0 .</u>
c. Request withdrawn	<u>0 .</u>
d. Fee-related reason	<u>0 .</u>
e. Records not reasonably described	<u>0 .</u>
f. Not a proper FOIA request for some other reason	<u>0 .</u>
g. Not an agency record	<u>0 .</u>
h. Duplicate request	<u>0 .</u>
i. Other (specify)	<u>0 .</u>

VII. Compliance with Time Limits/Status of Pending Requests

A. Median processing time for requests processed during the year.

1. Simple requests.

a. Number of requests processed	<u>35 .</u>
b. Median number of days to process	<u>25 .</u>

2. Complex requests.	
a. Number of requests processed	<u>7</u> .
b. Median number of days to process	<u>355</u> .
3. Requests accorded expedited processing.	
a. Number of requests processed	<u>1</u> .
b. Median number of days to process	<u>7</u> .
B. Status of pending requests.	
1. Number of requests pending as of end of Fiscal Year 2006	<u>30</u> .
2. Median number of days that such requests were pending as of that date	<u>206</u> .

VIII. Comparisons with Previous Years

A. Comparison of numbers of requests received

FY 2002	<u>14</u> .
FY 2003	<u>36</u> .
FY 2004	<u>46</u> .
FY 2005	<u>57</u> .
FY 2006	<u>49</u> .

B. Comparison of numbers of requests processed

FY 2002	<u>8</u> .
FY 2003	<u>36</u> .
FY 2004	<u>40</u> .
FY 2005	<u>46</u> .
FY 2006	<u>43</u> .

C. Comparison of median numbers of days requests were pending as of end of fiscal year

FY 2002	<u>137</u> .
FY 2003	<u>20</u> .
FY 2004	<u>102</u> .

	FY 2005	<u>124 .</u>
	FY 2006	<u>206 .</u>
D.	Other statistics	
	1. Number of requests made for expedited processing	<u>1 .</u>
	2. Number of requests for expedited process granted	<u>1 .</u>
IX.	Costs/FOIA Staffing	
	A. Staffing levels.	
	1. Number of full-time FOIA personnel	<u>0 .</u>
	2. Number of personnel with part-time or occasional FOIA duties (in total work-years)	<u>0.30 .</u>
	3. Total number of personnel (in work-years)	<u>0.30 .</u>
	B. Total costs (including staff and all resources).	
	1. FOIA processing (including appeals) (estimated)	<u>\$33,500.</u>
	2. Litigation-related activities	<u>\$ 0.</u>
	3. Total costs	<u>\$33,500.</u>
X.	Fees	
	A. Total amount of fees collected by agency for processing requests	<u>\$ 84.</u>
	B. Percentage of total costs	<u>0.25%.</u>
XI.	FOIA Regulations (Including Fee Schedule)	

The CSB's FOIA regulations, which include a fee schedule, are available on the Web at:
http://www.csb.gov/legal_affairs/docs/FOIARegulation.pdf.

XII. Report on FOIA Executive Order Implementation

A. Description of supplementation/modification of agency improvement plan

Not applicable.

B. Report on agency implementation of its plan, including its performance in meeting milestones, with respect to each improvement area

Improvement Area 1: Informing the public on how to make more effective FOIA requests (including improvement of agency's FOIA Reference Guide).

The CSB's first goal for this improvement area is "to assist requesters by providing them with more detailed information about CSB investigation case files." This goal is targeted for completion by June 30, 2007, and the progress of implementation remains on track to meet that target.

The CSB met the milestone under this goal that was scheduled for completion during the reporting period and did so by the planned completion date of December 31, 2006. Specifically, the CSB has developed a procedure for producing publicly releasable records indices for investigation case files with high levels of public interest. The first step in this procedure is to obtain confirmation from the Investigator-in-Charge that all relevant records have been deposited in the appropriate records repository. As a result of an electronic records management (ERM) program being implemented by the Office of Investigations, all recent investigation case files and an increasing number of older case files are now maintained electronically. Producing a public index of these case files is accomplished simply by exporting a pre-defined set of index data into a spreadsheet, removing potentially non-public details (e.g., chemical names, witness identities) from records descriptions, and formatting the index for clarity and ease of use. The final index is produced in PDF format so that it can be sent to requesters via e-mail, allowing them more timely access to this information.

The initial phase of implementation for this goal has been very successful. The simple procedure for creating an easily accessible electronic case file index is a direct, positive outcome of collaboration between FOIA personnel and investigative personnel in the development of the investigation ERM program. This collaboration began during the earliest planning stages of the program, ensuring that the investment in the program would be leveraged to support and benefit both core mission and FOIA functions. Overall, feedback on this goal has been positive, with requesters indicating that the ability to receive more detailed information about case file contents is a welcome and useful improvement.

The CSB's second goal for this improvement area is "to prepare an updated CSB FOIA Reference Guide." This goal is targeted for completion by September 30, 2007. No milestones under this goal were scheduled for completion during the reporting period. The CSB anticipates that the upcoming milestones in June 2007 and the overall target completion date will be met. A full update on this goal will be

presented in the Executive Order implementation report contained in the CSB's Fiscal Year 2007 FOIA Report.

Improvement Area 2: Automated tracking capabilities.

The CSB's goal for this improvement area is "to purchase and install FOIA tracking and process management software." Work on this goal is underway and completion of all identified steps for the implementation of this goal is expected to occur by June 29, 2007. This is later than the original target completion date, but the measures of success identified for this goal in the FOIA Improvement Plan can still be substantially attained.

The first implementation step for this goal, "issue order to FOIA support contractor for purchase and installation of its FOIA tracking and process management software," was completed in September 2006. The second step, "install and test software," was completed at the server level in January 2007. As of the date of this report, installation and testing at the workstation level is being scheduled and should be complete by the end of May 2007. The final two steps, "train CSB FOIA personnel on the request tracking components of the software," and "begin using the software to track the processing of all newly received FOIA requests," will be scheduled and completed during June 2007. Once these steps are complete, the CSB will upload all Fiscal Year (FY) 2007 FOIA requests into the tracking program, so that it will be able to attain the identified measures of success – tracking all FY 2007 FOIA requests on the software and automatically compiling the FY 2007 FOIA report for submission on or before the deadline.

Improvement Area 3: Electronic FOIA – automated processing.

The CSB's goal for this improvement area is "to improve the efficiency of processing responsive records by implementing tools for electronic review, redaction, and production." This goal is closely tied to Improvement Area 2, because the same software program will provide electronic processing tools, in addition to request tracking/process management capabilities. Thus, work on this goal is also underway and completion of all identified steps for the implementation of this goal should also occur by June 29, 2007. This is later than the original target completion date, but the introduction of electronic review, redaction, and production tools in the processing of pending requests will still be a significant and useful improvement for the CSB FOIA program.

The first implementation step for this goal, "install and test FOIA tracking and process management software, which includes integrated electronic review, redaction, and production capabilities," is coextensive with the second implementation step for Improvement Area 2. As noted above, installation and testing of the software at the server level was completed in January 2007 and workstation installation and testing should be complete by the end of May 2007. The second implementation step for this goal, "train CSB FOIA personnel on the electronic review, redaction, and production components of the software," will be carried out simultaneously with the training on the request tracking components described under Improvement Area 2. This training will be scheduled and completed during June 2007. As soon as this training is

finished, the CSB will immediately execute the third implementation step, which is to “begin using the software’s electronic review, redaction, and production tools in the processing of complex FOIA requests for voluminous records.”

Improvement Area 4: Multi-track processing.

The CSB’s goal for this improvement area is “to improve the usefulness of the current two-track processing system by (1) distinguishing between moderately complicated and highly complicated requests within the complex track and (2) refining the definitions for each track.” This goal is targeted for completion by June 30, 2007. No milestones under this goal were scheduled for completion during the reporting period. The CSB anticipates that the completion date will be met. A full update on this goal will be presented in the Executive Order implementation report contained in the CSB’s Fiscal Year 2007 FOIA Report.

Improvement Area 5: Backlog reduction.

The CSB’s goal for this improvement area is “to reduce the number of unprocessed or partially processed FOIA requests in the CSB’s backlog by (1) making the requests in the backlog more manageable and (2) applying additional resources to the processing of backlog requests.” This goal is targeted for completion by September 30, 2008.

The CSB has substantially completed the first implementation step for this goal, which is to “contact every requester with a request in the backlog to verify their continued interest in pursuing the request. Administratively close those requests which the requester no longer wishes to pursue.” For the purpose of this step, the CSB defines its backlog as those requests which have been pending in the complex processing track for more than nine months, which is three-quarters of the outer limit of the agency’s estimated response time for complex requests (see section II.B., above). The CSB has contacted all 16 requesters who had a request pending in the backlog (as defined in the preceding sentence) at any time between June 1, 2006 (the beginning of the month in which FOIA Improvement Plans took effect), and September 30, 2006 (the milestone date for this step), and who had not previously indicated continued interest in pursuing their requests. The CSB was able to close eight of those requests and is awaiting word on the status of four others, which may yield additional closures. Thus, this improvement step is producing the intended result, i.e., the weeding of requests that are no longer of interest to the requester and the re-focusing of resources on processing the remaining backlog requests. Although the process of contacting requesters and closing requests has extended beyond the original milestone date, this step is on track to be fully completed by the end of May 2007.

The second implementation step for this goal – “where needed, produce an index of the records in each investigation case file that is the subject of a backlog request that remains open and provide these indices to the requesters” – is in progress. Again using the nine-months pending threshold, the CSB identified five requests for which an index of the relevant investigation case file should be produced. One of these indices has already been produced and provided to the requester, with excellent results. Using the index as a guide, the requester reduced the scope of her request by

over 80%. The indices for the other four requests are in various stages of production. The CSB expects to provide these indices to the requesters during April through June 2007.

The third implementation step for this goal is to “hold a telephonic scoping conference with each requester who has a pending backlog request for an investigation case file, and encourage/assist the requester to appropriately narrow the scope of their request based on the index provided.” This step is tied to the preceding step, in that the index provided in the second step is intended to be the basis for the scoping conference. Thus, the CSB will proceed with holding the conferences as soon as the four requesters who are awaiting an index receive them. In the case of the one requester to whom an index was already provided, a scoping conference proved to be unnecessary because she significantly narrowed the scope of the request without further assistance.

The CSB met the FY 2006 milestone for the fourth implementation step for this goal, which is to “for each fiscal year, identify two backlog requests for investigation case files for which a substantial amount of processing has already been done, determine what remains to be done to close out the requests, and apply additional resources (e.g., FOIA support contractor, law clerk) to complete the processing of those requests.” The CSB identified multiple backlog requests for the case files from two significant past investigations. Much processing work had already been done on those case files and some records had already been released to requesters. For each case file, the CSB reviewed the scope of the requests and the extent of work already done. Based on that review, a “punch list” was developed specifying the exact tasks that need to be done to complete processing of the requests. In turn, the CSB used the punch lists to identify and apply additional resources appropriate to the tasks. For example, the unprocessed records in each case file included a significant number of interview transcripts. Having identified review of those transcripts as a specific need, the CSB assigned the preliminary review to its FOIA support contractor, which has the necessary personnel resources to process such voluminous records. Using this approach, the preliminary review of all the transcripts was completed and many of them have been released to the requesters, more quickly than would otherwise have been possible. The CSB is now working through the final parts of the punch lists and will soon have the requests completely closed out.

C. Identification and discussion of any deficiency in meeting plan milestones

Improvement Area 2: Automated tracking capabilities.

As discussed above in section B., all of the implementation steps for the CSB’s goal in this improvement area will be completed by June 29, 2007, and the related measures of success will be substantially attained. However, the completion of these steps occurred or will occur later than the original plan milestones, causing the final implementation of this goal to be delayed from the targeted completion date.

The milestones set by the CSB for its goal in this improvement area were the earliest and some of the most ambitious in the agency’s entire FOIA Improvement Plan. The first milestone was due just several weeks after the plan was submitted and all four

milestones were set to be reached in the last three months of FY 2006. Given that timeframe, the milestones for this goal coincided with a significant amount of end-of-fiscal year and other CSB core mission support work. Because the CSB is only a 40-person agency, the personnel who were working on this improvement goal also had responsibilities for the end-of-year and other mission support work. Ultimately, it simply was not possible to complete all of that work by the required deadlines and also fully implement this goal according to the original milestones. Administrative delays in the procurement process and a continued heavy core mission support workload also slowed progress during the first quarter of FY 2007. Despite the slower than anticipated pace, work on the implementation of this improvement area goal has continued and the ultimate completion of the goal is not in jeopardy.

Improvement Area 3: Electronic FOIA – automated processing.

As discussed above in section B., the CSB's goal in this improvement area is closely tied to Improvement Area 2, because the same software program will address both goals. Accordingly, all of the implementation steps for this goal will also be completed by June 29, 2007. However, as is the case for Improvement Area 2, the completion of these steps occurred or will occur later than the original plan milestones, causing the final implementation of this goal to be delayed from the targeted completion date.

The reasons for the delay in implementing this goal are the same as those discussed immediately above for Improvement Area 2. To compensate for some of the lost time, the CSB will combine the software training planned under both Improvement Area 2 and Improvement Area 3 into a single step/milestone and deliver all training at the same time. The two training modules were originally planned as separate items to allow for the earlier implementation of the Improvement Area 2 goal. At this point, the goals for the two areas have essentially merged, so delivering the training simultaneously tracks the actual software roll-out. As is the case for Improvement Area 2, despite the slower than anticipated pace, work on the implementation of this improvement area goal has continued and the ultimate completion of the goal is not in jeopardy.

Improvement Area 5: Backlog reduction.

The CSB has substantially completed the first implementation step for its goal in this improvement area – “contact every requester with a request in the backlog to verify their continued interest in pursuing the request. Administratively close those requests which the requester no longer wishes to pursue.” As described above in section B., the CSB identified 16 requesters to be contacted for this step. Ten of those 16 were contacted, and their continued interest was verified or their request was closed, by the planned milestone date of September 30, 2006. However, because of limited staff resources and competing work priorities, the other six were contacted after the milestone date. Two of those requests have since been closed and the remaining four will be confirmed or closed by May 31, 2007, bringing this step to total completion. Notwithstanding this delay, the ultimate results of this step are a success. Half of the requests identified for follow-up in this step have already been closed and the CSB

expects that some of the remaining four also will be closed. These closures represent significant progress toward backlog reduction and set the stage for further progress by allowing the re-direction of limited resources to completing the processing of other backlogged requests.

The CSB continues to make progress on the second implementation step for its goal in this improvement area – “where needed, produce an index of the records in each investigation case file that is the subject of a backlog request that remains open and provide these indices to the requesters” – but this process has taken longer than anticipated and was not completed by the original milestone date. This delay is the result of challenges presented by indexing the relevant case files, which are from older CSB investigations and are not already comprehensively indexed. A large portion of each case file consists of paper records. In addition, there are a significant number of electronic records that have not been uploaded into the new investigation ERM program. To create a complete index in a form useful to requesters, it has been necessary to scan the paper records and integrate the electronic records, which are maintained in a separate repository. Given the amount of time and effort necessary to accomplish these tasks, the original milestone was probably overly ambitious. Nevertheless, as of the date of this report, all of the scanning necessary to produce the indices has been completed. With that done, indexing the scanned paper records will be a relatively straightforward task. Integrating the electronic records is more complicated and is progressing more slowly. To minimize further delays, the CSB will provide the indices of scanned paper records to requesters first, then follow-up with indices of the electronic records. The CSB expects to complete this process during April through June 2007.

The third implementation step for the CSB’s goal in this improvement area – hold a telephonic scoping conference with each requester who has a pending backlog request for an investigation case file, and encourage/assist the requester to appropriately narrow the scope of their request based on the index provided – depends on the completion of the second implementation step. Because the second step is still in progress, the third step has not yet been carried out, delaying its completion beyond the original milestone date. As soon as the case file indices are provided to the four requesters who still await them, the CSB will proceed with holding the conferences and close out this step.

D. Additional narrative statement regarding other executive order-related activities (optional)

Not applicable.

E. Concise description of FOIA exemptions

The nine exemptions to the FOIA authorize federal agencies to withhold information covering: (1) classified national defense and foreign relations information; (2) internal agency rules and practices; (3) information that is prohibited from disclosure by another federal law; (4) trade secrets and other confidential business information; (5) inter-agency or intra-agency communications that are protected by legal

privileges; (6) information involving matters of personal privacy; (7) records or information compiled for law enforcement purposes, to the extent that the production of those records (A) could reasonably be expected to interfere with enforcement proceedings, (B) would deprive a person of a right to a fair trial or an impartial adjudication, (C) could reasonably be expected to constitute an unwarranted invasion of personal privacy, (D) could reasonably be expected to disclose the identity of a confidential source, (E) would disclose techniques and procedures for law enforcement investigations or prosecutions, or would disclose guidelines for law enforcement investigations or prosecutions, or (F) could reasonably be expected to endanger the life or physical safety of any individual; (8) information relating to the supervision of financial institutions; and (9) geological information on wells.

F. Additional statistics:

1. Time range of requests pending, by date of request (or, where applicable, by date of referral from another agency)

September 3, 2004 to April 12, 2007.

2. Time range of consultations pending with other agencies, by date of initial interagency communication

Not applicable.

G. Attachment: Agency improvement plan (in current form)

The CSB FOIA Improvement Plan is available on the Web at:
http://www.csb.gov/legal_affairs/docs/CSBFOIAImprovementPlan.pdf.