

Neighborhood Reinvestment Corporation

d/b/a NeighborWorks America

2017 Chief FOIA Officer Report

By

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## Who We Are

Established by an act of Congress as a nonpartisan nonprofit corporation, NeighborWorks America has created places of opportunity in communities across the country for nearly 40 years. We build the skills, supplement the funding and amplify the reach of grassroots organizations so they can leverage additional resources to achieve their missions.

We strengthen distressed urban, suburban and rural communities through a formal national network of local community-based partnership organizations composed of community residents, private sector and local government entities – known collectively as the NeighborWorks network.

[Our network of more than 245 independent, nonprofit organizations](#) helps individuals, families and communities thrive through comprehensive approaches to affordable housing and community development.

We support our network and the broader field through:

- **Grants.** In fiscal year 2016, NeighborWorks network members reported more than \$7 billion of investment in their communities. This level of investment is possible because for every \$1 of federal appropriation we award, NeighborWorks organizations are able to attract another \$91 to expand local impact.
- **Technical assistance.** We offer multiple grant, capacity-building and peer-exchange opportunities designed to help our members expand their work, pilot and replicate new approaches, build new partnerships, and improve their performance and governance.
- [Training and leadership development.](#) NeighborWorks America is the nation’s leading trainer of community-development and affordable-housing professionals, awarding nearly 19,000 certificates in fiscal year 2016. Our offerings serve residents, network organizations and the field generally. All courses are regularly updated to reflect industry standards and current trends.
- [Organizational assessment.](#) To ensure that our network organizations are strong and healthy in their operations—and remain that way—we conduct rigorous assessments before their acceptance into NeighborWorks and every year thereafter. We also help our members incorporate evaluation into their own “ethos” through [Success Measures](#), a NeighborWorks social enterprise that helps nonprofits and their funders measure the impact of their community-development efforts and investments.

Congress established NeighborWorks America as a non-profit corporation by passing the Neighborhood Reinvestment Corporation Act, Pub. L. 95-557 (1978). The enabling legislation states that NeighborWorks America is subject to the FOIA statute, 5 U.S.C. §552.

The enabling legislation also states that the corporation shall not be considered a federal agency, department or instrumentality of the Federal Government.

## Introduction

The demands of FOIA requests on NeighborWorks America have increased significantly over the past two years. We are working to expand how our FOIA operation integrates the directives communicated in the DOJ's [2009 FOIA Guidelines](#) and other FOIA policy guidance. We are guided by the principle of openness in our decisions involving FOIA. Last year we proactively published several reports on our website and plan to increase the number of disclosures this year. We have employed new technologies to manage the increase in demands of FOIA requests and improve timeliness of our responses.

## Presumption of Openness

NeighborWorks America strives to fulfill the guiding principle of the presumption of openness. The presumption of openness is a priority that influences NeighborWorks America's decisions involving FOIA activities.

This guiding principle has been communicated to staff members at all levels of the organization who have been involved in FOIA requests. To ensure we collect all of the information relevant to a request, we instruct staff that the FOIA statute requires the presumption of openness. This communication results in thorough search results for information related to requests.

NeighborWorks America's Annual FOIA Report for fiscal year 2016 is available in our [FOIA Reading Room](#).

## Proactive Disclosures

NeighborWorks America proactively discloses information about our internal operations and program performance on a regular basis. Each year since 2008, we have posted several internal audit reports regarding internal operations. Last year we posted internal audit reports, a review of the National Foreclosure Mitigation Counseling Program (NFMC), and Congressional Updates on the NFMC Program. In fiscal year 2017, we plan to increase the amount of information proactively disclosed on our website.

## Greater Use of Technology

Prior to the increase in demands on our FOIA operation, we received a small number of requests that involved a moderate amount of information. The volume of documents involved in earlier requests was sufficiently handled by common office computer applications.

Recent requests have been more far reaching and involve very large amounts of information. The volume was so large that the demands of document management and redaction far exceeded the capabilities of common office computer applications.

We incorporated the use of new technology in our FOIA review process to enable us to respond to the requests in a reasonable amount of time. Use of cloud-based data management services and special document review software enabled us to process large amounts of data more efficiently. This technology has greatly improved our efficiency in managing large amounts of data, ensure thoroughness and quality in document processing, and enable us to respond to requests much sooner.

## Commitment to a Spirit of Cooperation

Guided by the presumption of openness, NeighborWorks America is committed to a spirit of cooperation with parties requesting information. To ensure we are responsive to the requester's interests, we work hard to understand what they are looking for and help them understand the nature of our programs and internal operations. This exchange occurs in a transparent and cooperative way.

In processing FOIA requests, we communicate on a regular basis with the requester. We promptly respond to all requester inquiries about the status of their request. To improve our responsiveness to requesters, we have formally established a FOIA Requester Service Center call-in number. Requesters can call our Requester Service Center contact to find out the status of their request. This service provides an additional layer of support to fulfill our commitment to cooperation.

## Conclusion

NeighborWorks America is committed to integrating the directives communicated in the DOJ's [2009 FOIA Guidelines](#) into our FOIA operations. We believe this guidance will result in continuation of our open and responsive FOIA operation in the coming year.