

# The National Security Archive

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## Via Facsimile

Delorice Price Ford  
Chief FOIA Officer and Assistant Administrator  
Officer of Hearings and Appeals (2441)  
Small Business Administration  
409 Third St., SW  
Washington, D.C. 20416

Dear Ms. Ford:

We are writing to give you advance notice of our findings about the Small Business Administration's FOIA performance. We have just completed the National Security Archive's fifth government-wide audit, "The Knight Open Government Survey."

As part of our ongoing efforts to ensure agency compliance with the FOIA, the Archive recently audited nearly 150 government agency and component Web sites to assess whether they had implemented the 1996 E-FOIA Amendments. The audit included the FOIA Web sites of all 91 agencies subject to FOIA and 58 agency components that received more than 500 FOIA requests in fiscal year 2005. The Web site reviews were completed at the end of February 2007.

Our reviewers followed a standardized methodology to assess each site. They examined whether the sites included required records in their electronic reading rooms and whether the sites provided mandatory guidance materials and other essential information for FOIA requesters. Our report, including our specific findings for each agency, will be released March 11, 2007, and will be available on our Web site at [www.nsarchive.org](http://www.nsarchive.org).

Our audit identified the Small Business Administration as one of the worst agencies with regard to E-FOIA compliance. We found several areas where your FOIA Web site fails to fulfill both the letter and the spirit of the 1996 E-FOIA Amendments. Specifically:

- The SBA FOIA Web site is poorly organized, making it very difficult for a FOIA requester to locate documents or guidance. It appears information has been uploaded, but no comprehensive Web design has been implemented.
- Guidance on how to file a FOIA request is scattered over two separate documents, and not clearly presented for requesters. We recommend you review other FOIA Web sites, such as the one maintained by the Department of Education, that are very user-friendly.
- The electronic reading room is poorly organized and difficult to navigate. For example, the Library and Resources page merely contains a list of documents that are not hyperlinked. The links to the documents are instead located on the right side of the page and are not clearly visible.

**An Independent non-governmental research institute and library located at the George Washington University, the Archive collects and publishes declassified documents obtained through the Freedom of Information Act. Publication royalties and tax deductible contributions through The National Security Archive Fund, Inc. underwrite the Archive's Budget.**

For the most part, our reviewers were unable to determine whether SBA has made available certain required documents because the organization of the site was so poor.

We hope that you will take this opportunity to review your agency's FOIA Web site and make improvements that will bring your agency in line with Congress's vision when it passed the E-FOIA amendments ten years ago. Please do not hesitate to contact us to discuss your FOIA Web site or any questions you may have regarding our audit.

Sincerely,

Thomas S. Blanton  
Executive Director

Meredith Fuchs  
General Counsel