### Approach to Project Management [PWS 5.1]

Or approach to Project Management has been proven in the successful delivery of multiple projects of similar size and scope within the federal market. Details of our specific approach that complies with the delivery dates for deliverables specified in the schedule can be found in Section 3.1 below.

### Approach to the Processing and Administration of FOIA Requests [PWS 5.2]

Our Team’s FOIA processing approach is based on the application of proven Standard Operating Procedures (SOP) tailored to existing processes.

Our FOIA process SME and FOIA Analyst will:

* Review existing SOPs to understand their overall intent and clarify what could be changed/remain the same.
* Develop proposed SOPs that reflect the work requirements developed in interviews with appropriate Department managers/staff.
* Develop proposed SOPs that provide an aggressive/achievable schedule and a sound process for transitioning from previous arrangements to that required by the PWS.
* Use knowledge of the VA, FOIA, and SOPs from other Federal agencies, developed for similar tasks, as well as industry best practices, to provide practical, cost-effective processes to ensure adequate staffing. All proposed SOPs will contain performance standards/metrics to provide the PWS services required.
* Work with the Department to develop a management process for rewriting/updating/implementing SOPs.
* Train all employees in the best practices of using FOIAXpress to process requests.

Specific tasks required to process and administer FOIA requests include:

* Receive FOIA requests via the VA web site, email, mail or fax
* Utilize the FOIAXpress tool to assign each request to an available FOIA Analyst
* The analyst will read and interpret the request, determine the subject matter, and assign it to the correct reviewer utilizing the FOIAXpress workflow tool
* Maintain detailed case notes
* Prepare draft responses, utilizing templates held in the FOIAXpress tool
* Submit drafts to, and take work assignments from the VA FOIA lead as required
* Interact with VA staff to make required changes
* Interact with the requestor when necessary (only when approved by VA FOIA staff
* Complete memo, cost recovery sheet, and correspondence log.
* Load redacted documents.
* Submit to the government representative for final review.

**Technical Support (Tracking, Reporting and Redacting)(PWS reference) -** The proposed Deceris Team is well-versed in all aspects of FOIA processing and will use this experience and FOIAXpress to correctly redact documents for all applicable FOIA exemptions, prepare final response letters, and deliver responsive documents to requesters. Our staff members are experts in FOIA legislation, policies, guidance and regulations and the majority of our staff members are experts in the FOIAXpress system.

**Our Key Personnel are experts in FOIAXpress**

If it is determined that any staff member requires additional FOIAXpress training, it be be provided by our FOIAXpress SME. Training includes training on every step of the FOIA process from request receipt to delivery of responsive documents. Our proposed training will leverage our most knowledgeable SME’s extensive experience to spot-train supporting FOIA staff in the correct use of the software. A FOIA Public Liaison is assigned to each FOIA request. Tracking is also monitored through various reports. Additional information on reporting and tracking can be found in Section 3.1.2 below.

### Approach to Backlog Reduction(PWS reference)

Our proposed team brings with it an unparalleled record of bringing backlogs under control in minimum time while still ensuring full compliance with the FOIA. As previously mentioned Mr. McEachin led a team that successfully reduced a previous VA FOIA Backlog by over 80%.

Our proposed Backlog solution will consist of a three-pronged approach with the following major components:?

1. **Expert Personnel** – Team Deceris understands that the first critical step in any FOIA backlog reduction effort is putting the best FOIA Analysts to work on the existing backlogged cases. We are proposing a team that includes 5 highly trained and experiencedFOIA Analysts. This team of seasoned experts will focus on eliminating current FOIA backlog while managing the incoming requests. Each of our proposed team members has experience not only in processing new FOIA requests but also, in taking over uncompleted existing cases and quickly moving them through the process to conclusion. Each of our team members will be prepared on day one to take on or take over even the most complex of cases. In addition, our team is expert in processing multiple FOIA requests simultaneously. We understand that there are interruptions in processing many cases for such things as: review by supervisors, fee issues, clarifications by the requester, or completion of the submitter notice process. Our team members will take full advantage of any of these gaps to process other assigned cases.
2. **FOIA SOP Expertise**– We propose leveraging Mr. McEachin’s previous VA FOIA expertise to recommend enhancements to the VA’s FOIA processing SOPs. We understand that personnel whose primary duties are other than their FOIA responsibilities do much of VA’s FOIA processing and conduct virtually all of the records searches. As such, Mr. McEachin will thoroughly review the current FOIA SOPs, interview key stakeholders, and compare against best practices. He will then make recommendations for any needed changes to make the FOIA process more efficient and more easily understood by all personnel. We fully expect that this effort will provide substantial long-term benefits to FOIA processing Department-wide and will be key to preventing future backlogs.
3. **FOIA Xpress Process Improvement** – Finally, we propose leveraging Mr. McEachin’s expertise to maximize the power of the FOIAXpress solution as implemented by the VA.. He is well qualified to analyze an agency’s use of FOIAXpress and then tailoring the tool to fit the agency’s unique needs. We expect that once maximized by VA, the power of FOIAXpress can significantly reduce processing time for all FOIA requests and continue to provide permanent improvements.

### Approach to Requestor and Fee Categorization (PWS 5.2)

Our proposed team has substantial experience (including over 10 years of FOIA processing experience at the VA) in categorizing FOIA requests into the appropriate fee category. Because of this deep experience, each of our team members fully understands these categories as follows:

* Commercial use requesters seek the records to further the commercial interests of the requester. These requesters must pay for all search time, review time, and the cost of duplication.
* News media requesters are actively gathering news for an entity that is organized and operated to publish or broadcast news to the public. These requesters pay for the cost of duplication after the first 100 pages.
* Representatives of scientific or educational organizations represents a school or educational institution operating a program of scholarly research, or a noncommercial scientific organization operating solely for the purpose of conducting scientific research and not intended to promote a particular product or industry. These requesters pay for the cost of duplication after the first 100 pages.
* All others requesters are individuals seeking information for personal, not-for-profit, use and do not fall into any of the three categories above. These requesters pay for search time after the first two hours and the cost of duplication after the first 100 pages.

Team Deceris has the experience to accurately determine if a FOIA requester meets the criteria for fee waivers. Our team members will present proposed determinations to the VA OPRM responsible for a final determination as to fee waiver based solely on the requesters’ justification fully describing the criteria below:

* How the subject matter of the requested records concerns the operations or activities of the government.
* How the disclosure is likely to contribute to an understanding of Federal government operations or activities.
* How disclosure of the requested information will contribute to the understanding of the public at large, as opposed to the individual understanding of the requester or a narrow segment of interested persons.
* How the contribution to the public understanding of Federal government operations or activities will be significant.
* How the requester has a commercial interest that would be furthered by the requested disclosure.
* How the magnitude of any identified commercial interest to the requester is sufficiently large in comparison with the public interest in disclosure that disclosure is primarily in the commercial interest of the requester.

# Management Methodology

## 3.1 Project Management ( PWS 5.1.1)

Our approach to managing projects has been refined with over 60 collective years of Government contracting. It is built upon the methodologies detailed in the Project Management Body of Knowledge (PMBOK) produced by the Project Management Institute (PMI). We have successfully applied these methodologies on similar client engagements at the Department of Veterans Affairs (VA), Drug Enforcement Agency (DEA), the Federal Deposit Insurance Corporation (FDIC), the United States Agency for International Development (USAID) and the Department of Defense. Our proposed Project Manager, working with our Senior FOIA Analyst/Task Order Manager will leverage their expertise in the required report generation and the FOIAXpress reporting module to produce required reports for the COR and all key stakeholders as requirements are understood. These reports will be comprehensive and include all deliverable requirements which are not limited to the types of requests completed, issues encountered (with proposed remedy), approximate value of amount of time spent processing each request, number of requests processed as well as brief descriptions of complex requests with anticipated completion date. Our Program Manager will provide quality assurance and control, providing standardized reporting requirements and reviews to capture and mitigate any potential concerns with data management and reporting. Using current tools and software available, like MS Project, the Program Manager will maintain a Program Plan with goals, milestones and deliverables, coupled with a strong Risk Mitigation Plan to ensure all requirements are met and products delivered on-time. Our Project Management planning and execution are time-tested processes that have provided the highest caliber of performance by all of our personnel. Our Project Manager will be the single focal point between our resident FOIAXpress SME, our VA FOIA SME and our on-site FOIA Analysts, enabling the Project Manager to capture concerns and provide guidance seamlessly, resulting in streamlined operations which mitigate any obstacles in the processes. With our direct reach-back capability to FOIAXpress and FOIA experts, our approach is to provide immediate assessment of a situation, concurrent training if required and the expertise to expedite through the issue. In the event one of our candidates would require an extended leave of absence or sudden departure from the contract for whatever reason, our Project Manager has instant access to equally qualified candidates to prevent any work stoppage or production loss.

### Project Management Plan

The Project Manager will deliver the Project Management Plan as required in the PWS. This plan will be developed using CPMP standards, capturing our approach, the timelines, and necessary tools to execute all requirements. The CPMP will clearly define the schedule, milestones, risks and resource support required, and will be updated monthly and maintained throughout the period of performance. We will coordinate and execute the planned data collection as well as the routine and ad hoc reporting requests as defined in the PWS and as required by the VA staff.

### Technical Kickoff Meeting (PWS 5.1.2)

The Deceris Team will schedule the Technical Kickoff Meeting within 10 days of contract award as defined in the PWS, meeting all requirements as outlined. Team Deceris recognizes the minimum deliverables will be the Kickoff Meeting Presentation (to include intended approach, work plan and project schedule) and the meeting agenda. The agenda and Kickoff Meeting Presentation will be delivered to all attendees at least 5 days prior to the meeting. We will provide, at the Kickoff meeting, all information necessary to facilitate our staff’s site access, to include: List of Contractor Personnel; Signed Non-disclosure Agreements; Identity Verification Documents; and PIV packets for proposed personnel. Our team will work closely with the VA to capture any unforeseen requirements for the Kickoff Meeting and will provide meeting minutes to all attendees within 3 days of completion of the meeting.

### Reporting Requirements

The Deceris Team is intimately familiar with all reporting requirements in the PWS. Our team will construct the Bi-Weekly Activity Reports (BWAR) to capture all reporting requirements in a format acceptable to the VA and as defined in the PWS. Our team understands the requirement to capture reporting requirements in two week periods, delivering each report on time, with all data from the previous bi-weekly period.

The BWAR will be a measurement tool incorporated by the Program Manager to monitor performance as it is related to the CPMP. The report, coupled with the CPMP will provide the Program Manager the necessary visibility to mitigate risks, make adjustments and keep the project on scheduleBased on each client’s business or service goals and objectives, The Seirra 7 Team works collaboratively with our customer to determine what SHOULD be measured and what CAN be measured. If possible, we seek to identify metrics directly tied to the customer’s success factors.

Once quantifiable metrics are determined they are collected on a relevant periodic basis (usually monthly). After a few months of data collection, reports begin to identify performance volume, averages and trends. Some examples of core metrics include response time, resolution time, and customer satisfaction.

Working closely with VA leadership at the appropriate level, our team will implement defined metrics (as defined in section 5.1.3 of the PWS based upon the critical performance objectives provided by the VA to track project progress, status, and quality. We will continually monitor these metrics to ensure adequate resources and funds are allocated as necessary to perform the required tasks. The metrics will be leveraged to ensure project team members and the VA accurately monitor progress and critical attention areas while identifying opportunities for improvement. Our team will provide bi-weekly and monthly reporting, as defined and required by the PWS to present a complete understanding of the project’s progress so that appropriate corrective actions can be taken if the project’s performance deviates significantly from the plan. We will utilize FOIAXpress and Microsoft Project to generate status reports, bi-weekly and monthly project status dashboards, and ad-hoc reports at the request of VA senior management.

**Financial Reporting**

Team Deceris will closely manage all financial aspects of this program and report to the Government on a bi-monthly basis the hours worked, the current month spend rates, performance against the established project budget and any variances to hours, budget or project deliverables. All project information as required with PWS Section 5.1.3 will be included in our bi-weekly reports. The budget will be monitored through the use of the monthly Project Cost Report (PCR). The PCR outlines the measures that will be used to analyze the budget.

The project schedule is the primary tool for identifying, scheduling, and monitoring the progress of project tasks, sub-tasks and contract spending. A project schedule is developed with the support of Key Stakeholder representatives both from the client and Contractor project team. Once established, the approved schedule will be reviewed with the Client Project Sponsor, Team Deceris and other key project stakeholders on a bi-monthly basis through various venues (i.e., Joint Team Meetings, Schedule Review Meetings, and Team Lead Meetings).

Team Deceris is open to specific requirements that may be determined by VA Program staff to insure effective financial management of the FOIA Reduction project in an effort to create transparency and prevent escalation of outstanding issues.

**Performance Reporting**

In addition to the reporting requirements defined in the PWS, there are a wide range of performance measurements that can be developed and monitored with the FOIAXpress tool. We will work closely with VA staff to explore these additional reporting capabilities and determine which of them may be most beneficial to insure the highest quality of project support. Among a long list of potential metrics are:

* # of outstanding FOIA requests in backlog
* # of FOIA requests completed
* # of new cases received
* Average FOIA processing time by individual analyst
* Client satisfaction measures

Once we have explored the current use of FOIAXpress within VA’s current SOP’s, we will make recommendations on how additional performance metrics can be automatically generated by FOIAXpress with no consequence to the FOIA processing effort by the FOIA Analysts.

## Staffing Approach

The Deceris Team understands the importance of providing experienced and trained staff for this engagement. We participate in the Association for Image and Information Management (AIIM), and the American Society of Access Professionals (ASAP) both as a product vendor and a sponsor. FOIA experts and professionals are regularly sent to regional meetings and training events organized by these groups for certification and learning. We leverage our large presence at these conferences and shows as a FOIAXpress vendor to cultivate relationships with qualified FOIA and records management professionals to call upon if any staffing changes are required.

We also leverage our extensive network of FOIA professionals built upon previous FOIA support engagements and the implementation of FOIAXpress at over 200 federal FOIA offices. Our team will:

* closely monitoring contract work requirements and trends.
* Maintain continuous proactive search for, and dialogue with, qualified candidates in case new resources are required.
* Monitor conditions and trends in the labor marketplace to project availability of future FOIA support staff.

We will ensure our key personnel are updated with the latest FOIA law changes and processing best practices via our FOIA/PA Law trainings with Dick Huff, the former co-director of the Office of Information Policy (OIP), as needed. Further, we will ensure our key personnel are taking full advantage of the VA’s electronic FOIA management solution, FOIAXpress, to efficiently and correctly process requests by providing FOIAXpress refresher trainings as needed. Our staff will further be supported by Mr. Ben McEachin, a FOIA process expert who has 10 year of direct experience working within the VA FOIA environment. Mr. McEachin will insure our staff fully understand the current VA SOP for FOIA, offer suggestions for efficiency improvements to the process, and insure our staff can efficiently navigate through the wealth of VA resources.