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# electronic records day 10101010 10.10.18 2018

## eRecsDay 2018: Redaction Tools

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VERMONT STATE ARCHIVES AND RECORDS ADMINISTRATION  
ELECTRONIC RECORDS DAY, OCTOBER 10TH, 2018

# Learning Objectives

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- ❑ What is redaction?
- ❑ What are some records management best practices and tools available to State employees to assist with redaction?
- ❑ How can these tools be used successfully?
- ❑ How can I better manage records that are redacted, or require redaction?

# Definitions



## Public Record

Any written or recorded information, **regardless of physical form or characteristics**, which is produced or acquired in the course of public agency business.

Citation: 1 V.S.A. § 317 (Definitions; public agency; public records and documents)

## Electronic Record

"Electronic record" means a record created, generated, sent, communicated, received, or stored by electronic means.

Citation: 9 V.S.A. § 272 (Uniform Electronic Transactions Act; definitions)

## Redaction

“permanent removal of information within a document”

Citation: ISO/IEC 27038:2014

# Redaction

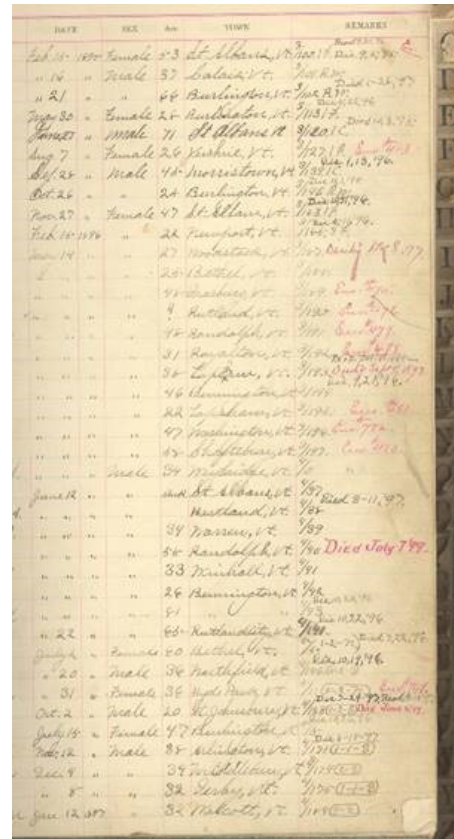
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(e) A public agency shall not withhold any record in its entirety on the basis that it contains some exempt content if the record is otherwise subject to disclosure; instead, the public agency shall redact the information it considers to be exempt and produce the record accompanied by an explanation of the basis for denial of the redacted information.

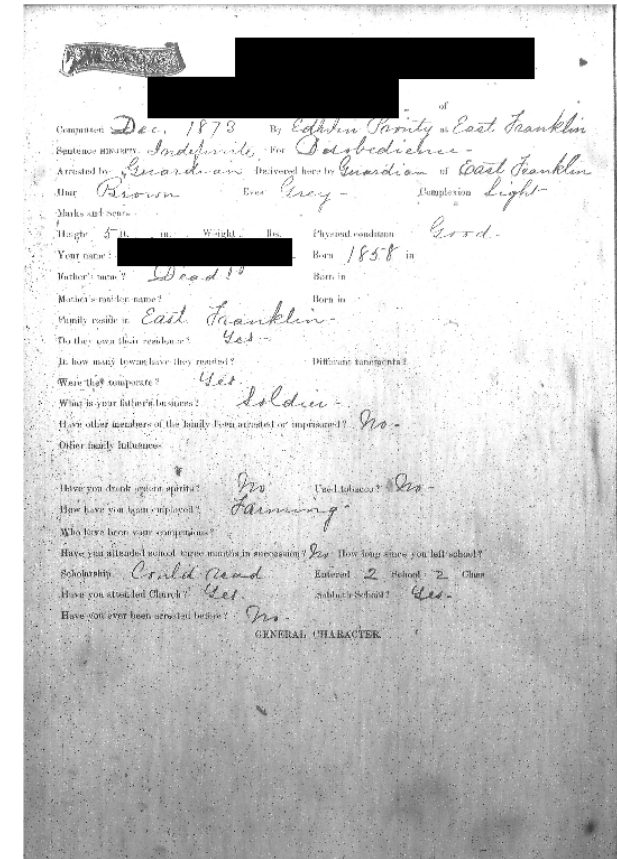
Citation: 1 V.S.A. § 318 (Procedure) [related to Access to Public Records]

# When is it appropriate to redact?

In compliance with 1 V.S.A. § 318 agencies should redact information they consider to be exempt if the record (or information) is otherwise subject to disclosure.



Redacted Vermont State Hospital Register, Courtesy VSARA, VSH-002



Redacted Weeks School Register, Courtesy VSARA, WEEK-001

# Resources: Schedules

## Record Schedules

- Each record type has a public access code
  - General: no access restrictions
  - Review: appears on GRS, indicates that too many factors are present to provide guidance – see appendix E for specific citations
  - Redact: information within the record has a statutory or federal exemption, but the entire record is not exempt
  - Exempt: statute or federal requirements to exempt public access or inspection
- Appendix E
  - Provides all legal requirements cited in the record schedule, provides a quick pointer to citations with access exemptions

STATE OF VERMONT SPECIFIC RECORD SCHEDULE

**SRS-1747.1022: Newborn Screening Records**

*SRS-1747.1022: This schedule is reserved for recorded evidence of activities and transactions that relate to or affect, in a specific manner, the coordination of screening for certain rare and serious diseases and conditions which may not be apparent at birth.*

Classification: Newborn screening (Coordinating)

Retention: With the exception of legal notices and registers, retain records related to newborn screening for three (3) years after the case is completed/closed, then destroy. Cases are considered completed/closed once the newborn reaches the age of majority.

Registers or similar systems that provide for the systematic and regular recording of newborn screening shall be retained until the register is superseded and then appraised by the Vermont State Archives and Records Administration for continuing value.

Other records shall be retained as specified in this schedule with the exception of transitory records. Transitory records created or received as part of the newborn screening coordinating process may be weeded as appropriate in accordance with GRS-1000.1000 (Transitory Records).

Other bloodspot specimens shall be managed in accordance with nationally recognized laboratory standards and applicable federal requirements relating to the disposal of human blood and body fluids.

Public Access: Exempt

**DISPOSITION AND KEEPING REQUIREMENTS for SRS-1747.1022 (see APPENDIX E for related legal references)**

Record Category/Type:	Applicability/Use:	Appraised Value:	Retention/Disposition:
SRS-1747.1022.141 Authorizations Public Access: Redact	Use for written approvals or disapprovals, and similar authorizations related to the screening of a newborn. Includes screening refusals, consent for additional testing purposes, and authorizations to destroy bloodspot specimens earlier than one year.	Temporary (Legal)	RETAIN UNTIL: Completed/Closed PLUS: 3 Year(s) THEN: Destroy (Shred)
SRS-1747.1022.50 Notices, Legal Public Access: General	Use for official, written statements, notices, or announcements that are required by law. Includes notices that storage of bloodspot specimens has deviated from required conditions.	Temporary (Legal)	RETAIN UNTIL: Calendar Year Ends PLUS: 1 Year(s) THEN: Destroy (General)
SRS-1747.1022.153 Referrals Public Access: Redact	Use for formal referrals of individuals to other agencies or programs. Includes referrals and requests for further testing which assist in the interpretation of screening results or clinical findings for the newborn and significant supporting materials.	Temporary (Legal)	RETAIN UNTIL: Completed/Closed PLUS: 3 Year(s) THEN: Destroy (Shred)

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STATE OF VERMONT SPECIFIC RECORD SCHEDULE

**Appendix E: Legal References**

SRS-1747.1022: Newborn Screening Records		Review for Exemption?
1 V.S.A. § 173	Minors [related to construction of statutes]	No
1 V.S.A. § 317	Definitions, public agency, public records and documents	Yes
12 V.S.A. § 521	Medical malpractice	No
12 V.S.A. § 561	Minority, insanity or imprisonment [related to limitations on time for commencing actions]	No
18 V.S.A. § 991	Establishment of Birth Information Network	No
18 V.S.A. § 992	Birth Information Network; confidentiality	No
42 U.S.C. § 300b-11	Clearinghouse of newborn screening information	No
42 U.S.C. § 300b-13	Interagency coordinating committee on newborn and child screening	No
42 U.S.C. § 300b-14	National contingency plan for newborn screening	No
42 U.S.C. § 300b-17	Report by secretary [related to genetic diseases]	No
42 U.S.C. § 300b-8	Improved newborn and child screening for heritable disorders	No
42 U.S.C. § 300b-9	Evaluating the effectiveness of newborn and child screening and follow-up programs	No
45 CFR 160.103	Definitions [related to general administrative requirements]	No
45 CFR 164.306	Security standards: general rules [related to security and privacy]	Yes
45 CFR 164.502	Uses and disclosures of protected health information: General rules	Yes
CVR 13-140-057	Newborn screening program regulations	No

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# Risks!

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Information risks associated with digital redaction include:

1. Failure to identify all exempt information contained within the electronic record
2. Failure to redact completely or correctly, allowing redacted information to be recovered
3. Failure to identify and communicate when information has been redacted, what has been removed, and under what authority

All of which can lead to reduced compliance and expose exempt information to inadvertent disclosure, or prevent lawful inspection of public records and information!

# Risks! continued...

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Management risks associated with digital redaction include:

1. Failure to internally identify which records and information contain exempt, or redacted, information
2. Accidental destruction of records through over-aggressive redaction techniques or workflows
3. Loss of value or meaning of records and information due to excessive redaction
4. Waste of resources continually reviewing and re-reviewing, redacting and re-redacting records due to poor management processes



# High-Level Redaction Procedures

## In order to successfully protect exempt information from disclosure, what steps need to be taken?

1. Know what exemptions apply
2. Know where information is contained in records/data
3. Remove exempt information
4. Indicate that it has been removed (citing exemptions)
5. (Subsequently) Manage master and redacted versions of records appropriately

# Information in Electronic Records

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**Bits on the disk:** users can't always see all information contained in an electronic record

**Information is stored everywhere:** filesystem, databases, document properties and metadata, document content, and more

**Redaction = deletion:** the only way to truly “hide” data is to remove it entirely.

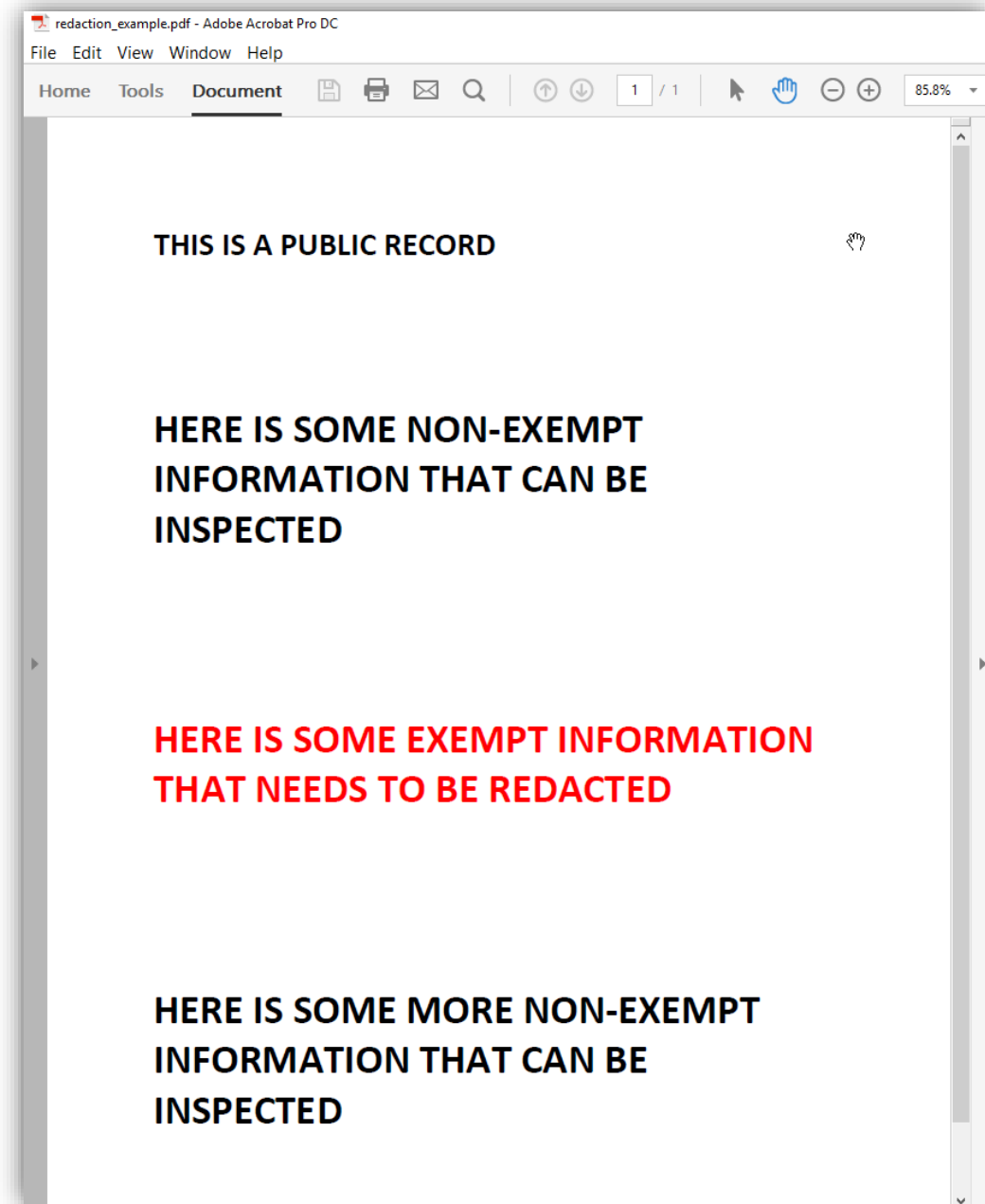
# Information in Electronic Records

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**Redaction = deletion**

Where is  
information  
stored?

Content



Where is  
information  
stored?

Metadata

Document Properties

Description Security Fonts Initial View Custom Advanced

Description

File: redaction\_example.pdf

Title: exempt\_information

Author: "Connizzo, Nicholas"

Subject: did you know that exempt information might be here too?

Keywords: what about down there in "additional metadata"?

Created: 10/4/2018 11:58:43 AM Additional Metadata...

Modified: 10/4/2018 11:58:45 AM

Application: Acrobat PDFMaker 15 for Word

Advanced

PDF Producer: Adobe PDF Library 15.0

PDF Version: 1.5 (Acrobat 6.x)

Location: [https://vermontgov-my.sharepoint.com/personal/nicholas\\_connizzo\\_vermont\\_gov/documents/redaction/](https://vermontgov-my.sharepoint.com/personal/nicholas_connizzo_vermont_gov/documents/redaction/)

File Size: 35.27 KB (36,113 Bytes)

Page Size: 8.50 x 11.00 in Number of Pages: 1

Tagged PDF: Yes Fast Web View: Yes

Help OK Cancel

Where is  
information  
stored?

Metadata

redaction\_example.pdf

Description  
Advanced

Description

Document Title: exempt\_information

Author: Connizzo, Nicholas

Author Title:

Description: did you know that exempt information might be here too?

Description Writer:

Keywords: what about down there in "additional metadata"?

Commas can be used to separate keywords

Copyright Status: Unknown

Copyright Notice:

Copyright Info URL:

Go To URL...

Created: 10/4/2018 11:58:43 AM  
Modified: 10/4/2018 11:58:45 AM  
Application: Acrobat PDFMaker 15 for Word  
Format: application/pdf

OK Cancel

Powered By xmp

Where is  
information  
stored?

Metadata

redaction\_example.pdf

Description  
Advanced

Advanced

- XMP Core Properties (xmp, http://ns.adobe.com/xap/1.0/)
  - xmp:ModifyDate: 2018-10-04T11:58:45-04:00
  - xmp:CreateDate: 2018-10-04T11:58:43-04:00
  - xmp:MetadataDate: 2018-10-04T11:58:45-04:00
  - xmp:CreatorTool: Acrobat PDFMaker 15 for Word
- XMP Media Management Properties (xmpMM, http://ns.adobe.com/xap/1.0/mm/)
  - xmpMM:DocumentID: uuid:3795a652-6a74-484c-ab70-d606c55ea618
  - xmpMM:InstanceID: uuid:bc641c9c-5430-46dd-9789-fb9789895ac8
  - xmpMM:subject (seq container)
- Dublin Core Properties (dc, http://purl.org/dc/elements/1.1/)
  - dc:format: application/pdf
  - dc:title (alt container)
  - dc:description (alt container)
  - dc:creator (seq container)
  - dc:subject (bag container)
- PDF Properties (pdf, http://ns.adobe.com/pdf/1.3/)
  - pdf:Producer: Adobe PDF Library 15.0
  - pdf:Keywords: what about down there in "additional metadata"?
- http://ns.adobe.com/pdfx/1.3/
  - pdfx:SourceModified
  - pdfx:Company
  - pdfx:Comments
- Adobe Photoshop Properties (photoshop, http://ns.adobe.com/photoshop/1.0/)
  - photoshop:AuthorsPosition: Digital Archivist / Digital Records Analyst

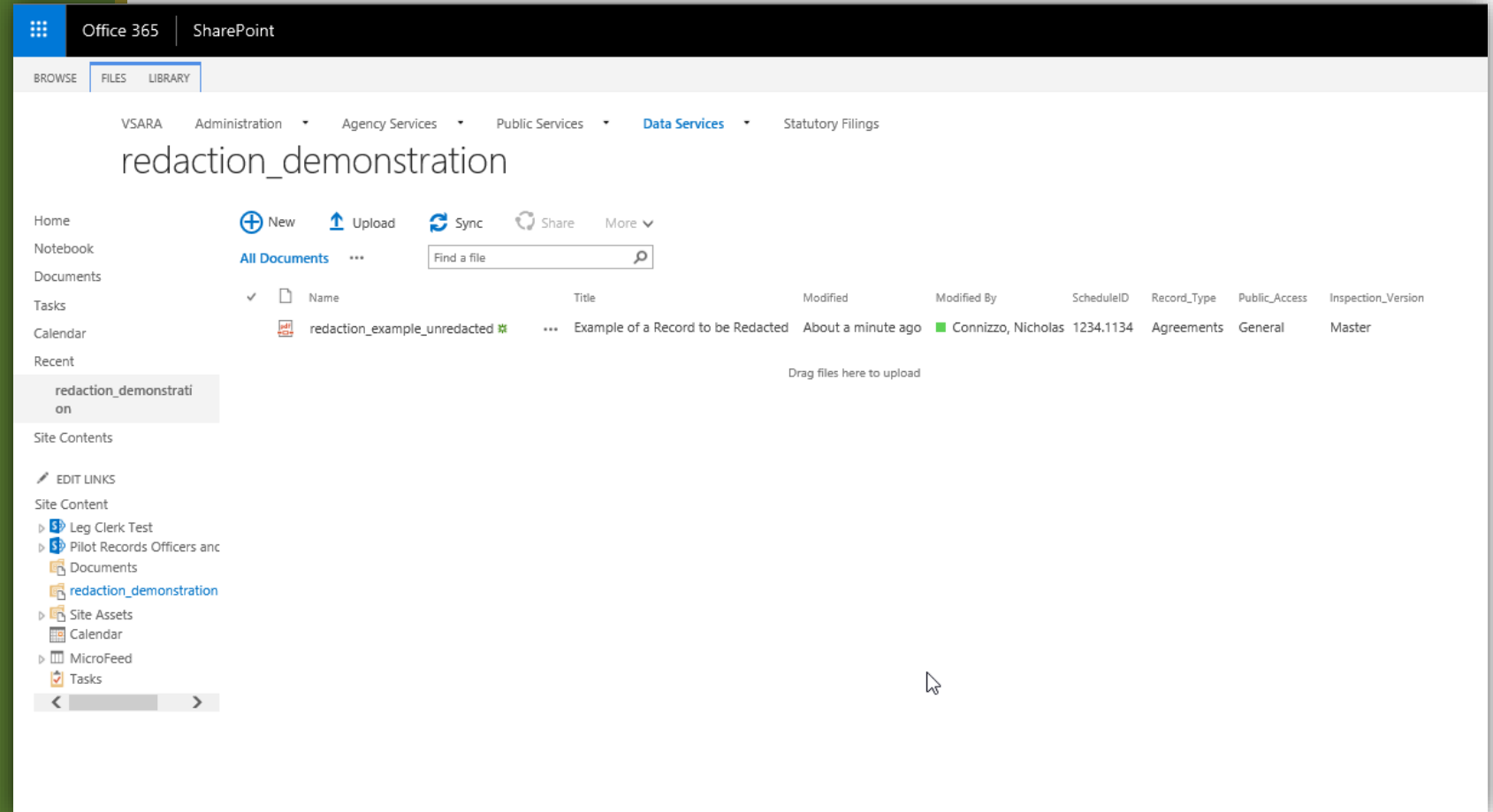
Powered By xmp

Replace... Append... Save... Delete

OK Cancel

Where is  
information  
stored?

Storage  
Systems





# Sample Redaction Workflow

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Find and identify records

Identify exempt information (and relevant citations)

- Ensure that ALL sources of information are searched

Create duplicate record(s)

- Migrate format (if necessary)
- Rename file using agency standard (e.g. document1\_redacted.pdf)

Perform redaction on exempt information

- Remove exempt information

Confirm

Deliver

Manage (manage originals and derivatives)

# Generally Accepted Recordkeeping Principles and Redaction

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- Accountability:** Who is responsible for each aspect of redaction workflows?
- Transparency:** Are redaction procedures well-documented? Do redaction methods communicate clearly when information has been removed, and under what authority?
- Integrity:** Are all sources of information known? Are redacted records still usable?
- Protection:** Is exempt information, and only exempt information, removed?
- Compliance:** Are all legal (and other) requirements met?
- Availability:** Can redacted records be produced in a timely and efficient manner?
- Retention:** Are retention (and public access) requirements known?
- Disposition:** How does the agency ensure that ALL versions of records are destroyed when their retention has been met?

# Tools and Resources

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## Adobe Acrobat Pro

- Advantages
  - PDF or PDF/A are solid formats for information dissemination and storage
  - Many file formats can be converted to PDF
  - Available to most or all state employees through statewide licenses
  - Add-ons and interfaces with Microsoft products, including Word and Outlook
  - Strong tools for redaction, locating exempt information, document manipulation, etc.



# Tools and Resources

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## Records Management Systems and other repositories

- Advantages
  - If configured correctly, master and redacted versions can be managed together without loss of context
  - Recordkeeping classification and metadata can be stored with documents (including public access codes)
  - Multiple systems throughout in SOV:
    - Office365
    - OnBase
    - Case Management Systems



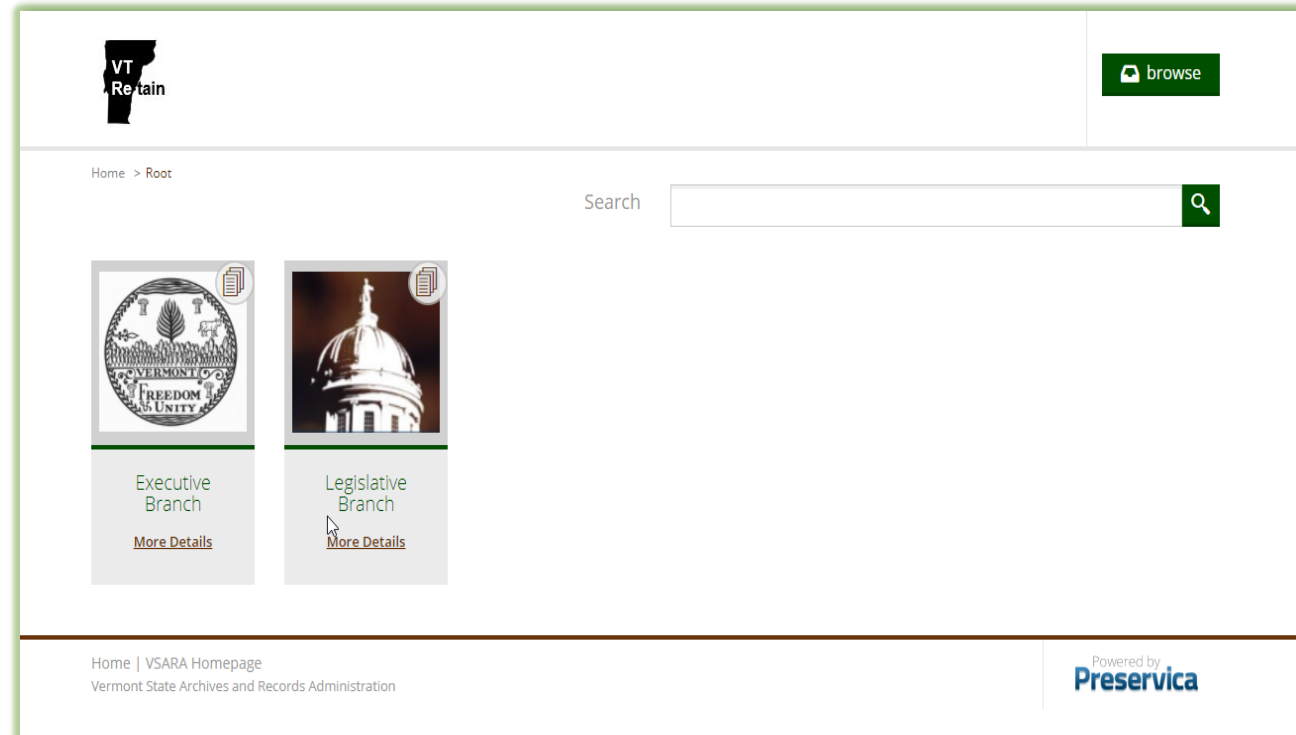
# Tools and Resources

## VT Re·tain

- Vermont's digital repository
- Permanent storage of and access to electronic public records with permanent value
- Digital preservation capabilities

<https://vermont.access.preservica.com/>

Configured to preserve master and redacted versions of records



# Live Demo

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- Converting records to PDF
- Redacting exempt information from born-digital or scanned PDF records
- Managing exempt records

# Redacting Email

The screenshot shows the Outlook interface for a user named 'Redact - nicholas.connizzo@vermont.gov'. The left sidebar shows the folder structure, with 'Redact' selected under 'Projects'. The main pane displays an email with the following details:

- Subject: PLEASE REDACT THIS EMAIL
- Date: Last Week
- From: Connizzo, Ni...
- Received: Fri 10/5/2018 1... 38 KB

The email body contains the following text, which is redacted:

IT CONTAINS SOME EXEMPT INFORMATION HERE IS THE EXEMPT INFORMATION BUT DON'T DELETE THIS BECAUSE THIS IS OPEN FOR PUBLIC INSPECTION

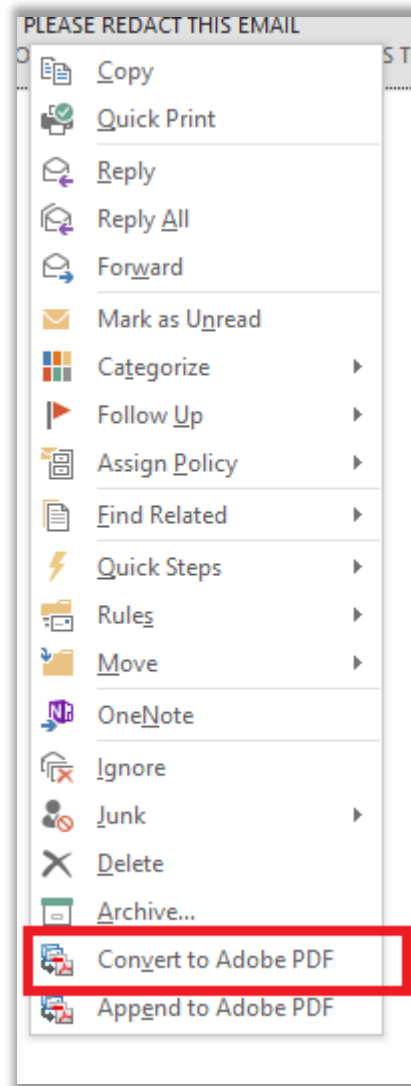
The right pane shows the email header and body content:

Reply Reply All Forward IM  
Fri 10/5/2018 10:25 AM  
CN Connizzo, Nicholas  
PLEASE REDACT THIS EMAIL  
To: Connizzo, Nicholas  
Cc: Wheaton-Book, Megan

IT CONTAINS SOME EXEMPT INFORMATION  
HERE IS THE EXEMPT INFORMATION  
BUT DON'T DELETE THIS BECAUSE THIS IS OPEN FOR PUBLIC INSPECTION

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Vermont State Archives and Records Administration  
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[nicholas.connizzo@vermont.gov](mailto:nicholas.connizzo@vermont.gov)

# Redacting Email



## Adobe Add-In

- Converts individual (or groups of) messages into PDFs
- Can be done directly from Outlook application
- Helpful if downloading multiple records through e-Discovery



# Redacting Email

The screenshot shows the Outlook 'Account Information' page. The left sidebar contains a navigation menu with the following items: Info, Open & Export, Save As, **Save as Adobe PDF** (highlighted with a red box), Save Attachments, Print, Office Account, Feedback, Support, Options, and Exit. The main content area is titled 'Account Information' and displays the account 'nicholas.connizzo@vermont.gov' on Microsoft Exchange. Below this are sections for 'Account Settings', 'Automatic Replies (Out of Office)', 'Mailbox Settings', and 'Rules and Alerts'. The 'Mailbox Settings' section shows a progress bar indicating 97.3 GB free of 99 GB. The top right corner of the window shows the text 'Redact - nicholas.connizzo@vermont.gov'.

# RIM Best Practices

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- Control records creation processes: segregate exempt information when feasible
- Don't collect information you don't need (or are not required to collect)
- Destroy records that have met retention requirements

# Next Steps

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Step-by-step guide and workflow examples: would it be valuable to have a “redaction guide” available?

Who else in your agency, or in the State would benefit from a session like this?

How can VSARA help you incorporate the efficient and systematic redaction of records into your existing RIM programs?

# References & Resources

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<https://www.sec.state.vt.us/media/560403/a-matter-of-public-record-2014.pdf>

<https://www.acsc.gov.au/publications/protect/Adobe-Acrobat-Redaction-Capability.pdf>

ISO/IEC 27038:2014 — Information technology — Security techniques (digital redaction)

VSARA Statewide RIM Program

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Vermont State Archives & Records Administration

<https://www.sec.state.vt.us/archives-records.aspx>