Understanding the need for information protection and the use of redaction technology types and best practices.

Neal Fischer
Principal and Founder Hershey Technologies
About Neal Fischer

- Founded Hershey Technologies in 1991
- Business Process Automation Products and services for...
  - *Reduce Expenses*
  - *Improve Productivity*
  - *Automate Inefficient Processes*
- Over 15 years of industry experience
- Developed Highly trained & certified technical staff
Redaction ...Defined

- **redaction** (rĕ-dāk′shən)  
  **n.**
  
  The act or process of editing or revising a piece of writing; preparation for publication.

- An edited work; a new **acceptable** edition or revision

**Example:** Redacted testimony suitable for public release.
Use of Redaction Technology ..the collision course
The Right to Know vs. Right to Privacy

- eGovt = Delivery of electronic information 7x24 … often including public records that contain sensitive information
- The Public Call for Government Transparency and or Commercial Fair Practices vs. Responsibly to Protecting Sensitive Information through redacting or simply limiting access.
Balancing Act…Need to Know vs. Right to Know….

- Keeping Confidential Information
- Public Access vs. Privacy Rights
- Key Business Drivers & Government Mandates
  - Compliance, Transparency
  - Industry Guidance Mandates via HIPPA, FOIA, Education, Government….
  - PCI ACT (Payment Card Information $$$)

CALIFORNIA OFFICE OF PRIVACY PROTECTION
What Information is Protected?

Exemptions to FOIA

- National Defense
- Compromises Personnel & Operating Procedures
- Attorney Client Privilege
- Personal Identifiable Information

REDACTION CITATIONS

The red letters and numbers refer to specific exemptions of the Freedom of Information Act (Title 5 U.S.C § 552) that protect the redacted (blacked out) information.

(b) (1) denotes a redaction to protect information that is properly and currently classified in the interest of national defense, as specifically authorized under the criteria established by Executive Order and implemented by regulations, such as DOD 5200.1-R (Reference (G)). Information is withheld because it contains information concerning military operations and vulnerabilities or capabilities of plans and release of this information would impede the defense of national security.

(b) (2)(High) denotes a redaction to protect personnel, operating procedures, and national security. Information is withheld because release of this information would clearly or could be expected to impede the conduct of the mission, allow circumvention of previously unknown tactics, and place personnel at increased risk for injury or death.

(b) (3) specifically 10 USC §130b denotes a redaction to protect personnel. Information is withheld because release of this information would clearly constitute or could be expected to constitute placing personnel in overseas, sensitive, or routinely deployable units and their family members at increased risk for injury, ham, or death.

(b) (5) denotes a redaction to protect attorney work product or attorney client privilege. Information is withheld because release of this information would constitute or could be expected to be a violation of attorney client privilege and a failure to protect attorney work product.

(b) (6) denotes a redaction to protect personal privacy. Names and identities of personnel as well as other personal identifying information are withheld because release of this information would clearly constitute or could be expected to constitute an unwarranted invasion of the personal privacy of the individuals.
Examples of Redaction ..National Defense Policy
Examples of Redaction .... Privacy Protection (PII)

What gets redacted (as examples):

Name: Dr. John Luke Williams, Jr., D.O.B. 7/1/64
SSN: 111-11-1111 or Social Security #: 111-11-1111
Phone: 602-971-6061, Fax: 602-942-2111
Email: johnluke@noplace1.com or jluke@noplace2.com

This report is about Dr. John L. Williams. It appears the Dr. Williams, phone no: 602-971-6061, has an email address of: johnluke@noplace1.com as well.

Williams, Jr. was the first to notice that the old phone number listing of: 602-971-6061, no longer worked. So he emailed mfixit@noplace1.com with a request.

To his surprise, Williams time John call 602-971-6061 initial. Williams, Jr. we not on the 602-971-6061 anymore immedi.

Name: Dr. Williams, Jr.
Date of birth: 7/1/64
Cell phone: 1-602-971-6061

To also redact address number, credit card number in addition to the privacy information, find and redact below:

Other types of redactions are possible:

[Hershey Technologies]
Examples of Redaction ...Public Testimony

**REDACTED**

**PREPARED SUPPLEMENTAL TESTIMONY OF**

**BEFORE THE PUBLIC UTILITIES COMMISSION**

**OF THE STATE OF CALIFORNIA**

Table 1  Projected in-service schedule for New PPAs

<table>
<thead>
<tr>
<th>(MW-nameplate capacity)</th>
<th>2007</th>
<th>2008</th>
<th>2009</th>
<th>2010</th>
<th>2011</th>
<th>2012</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Renewable Resources PPAs</td>
<td>2</td>
<td>5</td>
<td>7</td>
<td>275</td>
<td></td>
<td></td>
<td>288</td>
</tr>
<tr>
<td>Peaker PPAs for CDWR Replacement/Resource Requirements</td>
<td>REDACTED</td>
<td>REDACTED</td>
<td>REDACTED</td>
<td>REDACTED</td>
<td>REDACTED</td>
<td>REDACTED</td>
<td>930</td>
</tr>
</tbody>
</table>
Fastest growing crime ..Identity Theft

Legislation protecting personal data and consumer rights to privacy, emphasizing the importance of achieving a balance between business information benefits and consumer rights.

data protection • credit information • developing countries • emerging economies • legislation • personal data • privacy • cyber threats • regulation • security • standards • credit reporting service
Why best practices and selection of the proper redaction methods matter

*Balancing process with efficiency*

- Develop best practice to ensure content protection regardless of format (Paper, Electronic)
- Properly identify content at risk and completely remove affected content
  - Protect integrity of original document
  - Streamlined & cost-effective redaction process
  - Reduces mistakes
  - Easy to comply with electronic filing rules
WASHINGTON, Dec. 8, 2009

Unredacted TSA Manual Leaked Online
An embarrassing security breach concerning the TSA's manual for screening air travelers

• 129 Comments
By Bob Orr

(CBS News) It was a security breach and a big embarrassment for the Transportation Security Administration. A secret manual that tells airport screeners around the country how to do their jobs somehow wound up on line for all the world to see.

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Types of Redaction Technology Offerings & Use Cases

Review Business Requirements

- Information Type,
- Volume
- Risk Tolerance
- Resources
- Budget

- eDiscovery/Case Mgmt
- Public Records
- Identity Protection
- FOIA
- HIPPA
- PCI
Redaction Use Cases:
#1 Protecting privacy with paper documents & forms

- TIFF Images
- Apply redaction as part of an imaging workflow
- OCR’ed Image (unredacted)
- Redacted Image

• Scan & Process for OCR content
• Redact text patterns from OCR locations or **structured zones**
• Support for remote “ad-hoc” visual review
• Uploads redacted and non-redacted original records files to content, case or records management system

HERSHEY TECHNOLOGIES
Use Cases # 2
Support for Ad-Hoc Redaction – Key words & text strings

Redaction Performed by SME

- Redacts information selected by user
- Find text and redact
- Redact based on a script of text strings / patterns / macros
- Marked with exemption reason
- Finalize redactions review and publish to PDF, TIFF or secure CSF
Use Case # 3
High Volume - Rules Based Redaction

Automated Redaction System

- Redact event handling preset information selected by user
- Find text and redact
- Redact to a script of text strings / patterns / macros
- Marked with exemption reason
- Redaction authoring saved as XML “RedactUps” – recall later and change required
- Add Bates numbers, Identify SS #, Credit Cards #, ID #
- Finalize redactions and publish to PDF, TIFF or secure CSF
Technology Demonstration

Automated Redaction & Image Annotation Services

In Action
Best Practices

- Keep in the mind the following when taking on projects that require redaction:
  - Understand the use cases, volumes, schedules, resources and specific features of the tools you will need.
  - Consequences and Risks of accidental information disclosure.
  - Is all the information removed?
    - Is there additional hidden text, abbreviations metadata, etc.
Best Practice and Common Sense Matter

- CALIFORNIA CRIMINAL EVIDENCE: AND REDACTION

- A common privacy protection solution is often to redact the statement to delete your client's name and insert a pronoun. Often, this isn't enough.

- The California Supreme Court, noting that where, as here, the reference to "the other" led to the obvious inference that it was the defendant, the redaction doesn't cure the error.
Best Practics – continued

- Understand the software tool sets and labor dependencies.
  - Redaction typically creates two (2) files..
    - Example: Acrobat does not rename the document for you, so exercise care.
    - Redactions must be applied individually, to each document.

- Examine the feature set…
  - Search and Redact features will only find text in searchable documents
  - What about pattern matching. e.g. number strings, fault tolerance etc. (Fischer, Fisher )?
Best Practices (cont)

- Carefully review all documents prior to submission in discovery. Setup a redaction workflow team, a two-person review team will catch many more errors than a single person.
- Know your local court rules and judges orders regarding redaction.
- Commercial clients …ask the company assigned legal council or clerk of the court for clarification if you need more information.
- Questions & Answers