

“How to Evaluate and Implement Day-Forward and Backfile Redaction ?”

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Itinerary

- Introduction to 1168
- What is Redaction?
- Why do you need Redaction?
- Where is Redaction happening?
- What is required of you in California?
- Define Day-Forward Redaction
- Define Back-File Redaction
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Assembly Bill 1168

RE: AB 1168 summarized

- Applies to all recorded documents referred to as public “Official Records” only
- Applies to Social Security Numbers only
- Specifies to truncate only – truncation refers to redacting only a portion of the whole number
- Specifies to redact “the first five digits only”
- Requires the truncated record version to be a copy of the original. This truncated copy is to be the Public Version for office and internet (online) access
- All requests for disclosure, to copy, inspect or review any “Official Record” between 1980 and current is to be the “Public Version”

Assembly Bill 1168

RE: AB 1168 summarized

- Applies to any public version of an "Official Record" recorded since January 1, 1980
- All County Recorders must have a Truncation Program in place no later than January 1, 2009
- Counties can assess a \$1.00 fee for recording the first page of each instrument to support the Truncation Program
- Counties can assess this fee until December 31, 2017
- Counties must petition board of supervisors by June 1, 2008 to levy additional fees
- CRAC is to report the truncation status of each county no later than January 1, 2009 and annually thereafter

What is redaction?

Redaction – What is it?

Redaction is the **masking** or “**blacking out**” of sensitive information from a digital (born digital or converted from another media) document

- Redaction protects personal identifying information and helps to prevent identity theft
- Typical fields to be redacted:
 - Social Security Number
 - Bank account number
 - Credit card number
 - Driver license number

Redaction – What is it?

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Marriage License
Valid **ONLY** in the
Commonwealth of Kentucky

To Any Person or Religious Society Qualified to Perform Marriages per KRS 402.050: You are hereby authorized to join together in the state of matrimony, according to the laws of the Commonwealth of Kentucky

Bride's Full Name	Nicole Hope Paradise	[REDACTED]
Current Residence	[REDACTED]	[REDACTED]
Groom's Full Name	Larry Russell Oldham	[REDACTED]
Current Residence	[REDACTED]	[REDACTED]

	<u>Bride</u>	<u>Groom</u>
Date of Birth (Age)	9/8/1983 (22)	4/29/1982 (23)
Place of Birth	Troy, AL	Elizabethtown, KY
Mother's Full Name		

Why do you need redaction?

What problem does redaction solve?

- **Identity theft:** concern over allowing public access, via public documents, to personal identifying information
- Current efforts are focused primarily on Social Security numbers
- Florida law also requires redaction of bank account, credit card and debit card numbers
- Likely next candidates: driver's license numbers, juveniles' names, maiden names
- Solutions should be flexible and adaptable – straightforward to add new items to be redacted

Current Debate: How “Public” is the Public Record?

- The keepers of the public record are not necessarily responsible for the contents of those records
- Clerks / Registers worked hard to make information more accessible without the necessity of coming into Clerks / Registers office
- Some states may take Florida’s lead in drafting legislation
- Others may recognize that a redaction-based solution is simply good public policy

Where is redaction happening?

Where is this happening?

- Florida is a pioneer in county-level redaction
- Additional states have passed legislation including:
 - California
 - Colorado
 - Florida
 - Indiana
 - Louisiana
 - Virginia
 - Michigan
 - Nevada
 - Ohio
 - Oklahoma
 - Pennsylvania
 - Texas

Orange County FL Experience

- 25 million images back to 1970; has now grown to nearly 30 million images
- No time for staff to review images (refinancing boom, hot housing market, etc.)
- Decided to go to outside contract instead
- Chose software AND human eye
- Cost estimated at just over \$700,000 for 30 million images

What is required of you in California?

Implement a Truncation Program

Program should address Backfile & Day- Forward

The plan must address the redaction of private/sensitive information from both historical records (*born digital or converted from another media*) and records to be created into the future or “Day-Forward”

- A Truncation Program can be any one or combination of the following approaches:
 - Manual redaction capability native to recording products
 - An Automated Redaction product integrated into your recording product’s workflow
 - Turnkey services approach for outsourced model
 - “Day-Forward” Automated and/or Manual Redaction Product
 - Outsourced Backfile Redaction featuring “state-of-the-art” software and well-trained service bureau for redaction services (secure, on-shore)

Day-Forward Redaction

What is definition of Day-Forward Redaction?

- All images/records created each day (born digital) will have all required redactions applied by the end of that business day
- Solution can be either outsourced service, in-house software solution or a combination of each
- Software solution will probably be purchase or leased
- Service-only solution will be billed on a “per-image” basis

What are considerations of an “Automated Redaction Software” tool?

- Will it operate within the current workflow of your existing recording system?
- Will it recognize a wide range of your instruments to be recorded on a daily basis?
- Is the product versatile enough to comply with new regulations for additional redactions?
- Does it provide the ability to “manually” redact incorrect results (i.e. false positives, in-accurate coverage of positive results)

What are considerations of an “Automated Redaction Software” tool?

- Is the review process a software driven “workflow” function?
- Is the application .Net allowing for remote access if required? (work from home application)
- What is the implementation process & timeframe?
- What additional development efforts will be necessary to implement and integrate the software solution with your recording system?

Back-file Redaction

What do I need to know before getting started?

- Assessment/Scope
 - Document Types?
 - Public/Non-Public?
 - Total Number of Records?
 - Total Number of Images?
 - What is to be redacted?

What a Backfile Redaction Project look like?

Step 1.

County A

Export images to be processed.

Step 2.

Redaction

(Using Software)

Examine 100% of images
Process Redaction Rules:
Found Regions (Review)
Didn't find, expected to find (Review)
Didn't find, didn't expect to find (Spot Check)

Step 3.

Validation

(Provider Data Verification Specialists)
Verify document images.
Assist with fine-tuning software.
Escalate to Supervisor for conflict review.
Return redacted images.

Step 4.

County A

Review redacted images.
Accept or Deny redacted images (within pre-defined acceptance period).

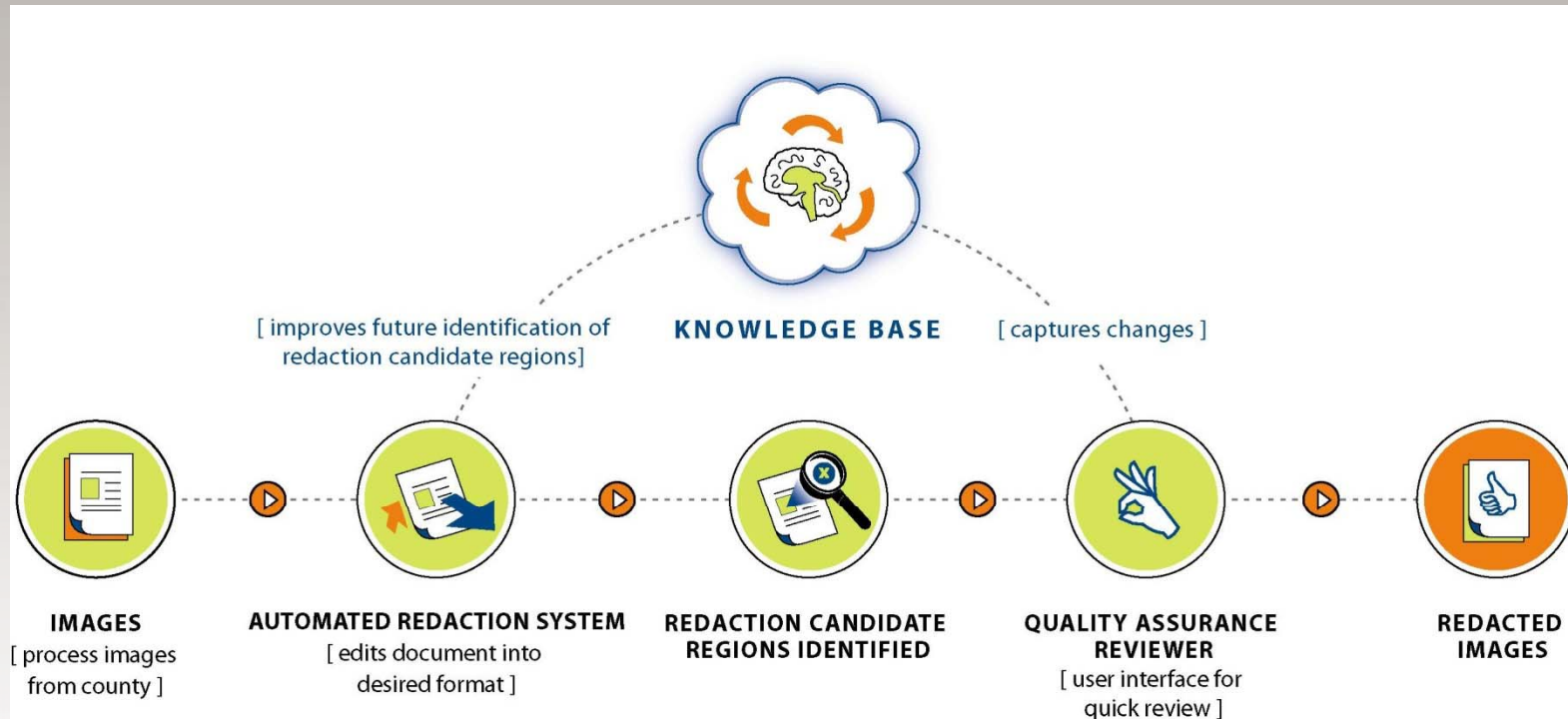
Provider must have sufficient technical knowledge for the extraction of the proper legacy data from your recording system. Only "Public" records need to be harvested for redaction.

SSNs will be located via multiple rules: product should use both context (business rules) and content (OCR) to locate potential redaction fields. (SSNs)

Verification should be a software driven workflow process with blind comparison and auto cued for Supervisory review. County should require a accuracy rate for the project.

County should be given sufficient time to review the project and submit found errors for remediation.

Sample Backfile Redaction Project



How do you assess a backfile redaction provider?

- Accuracy Rate
 - A written “GUARANTEED” accuracy rate is provided.
 - The contractual language commits the vendor to remediate all redaction errors until the “GUARANTEED” accuracy rate is achieved.
- Reports/Statistics
 - A detailed list of instruments redacted
 - Total images reviewed for redaction
 - Total images containing redactions
 - Total number of redactions
- Who does the work?
 - Must be in the United States - in-house, “on-shore”
 - Services work building must be secured and key-card security access only
 - All redaction staff must go through standard background checks

Ask yourself:

Am I, the clerk/recorder of my county, comfortable with trusting my reputation and that of the county on the word of Bob the redaction guy who says, "My software is so good that I will redact probably 90% + of the required redaction fields, regardless of the age of the records, document type or any other factor – no manual review required" – trust me. (but no guarantees implied or suggested)

Wrap Up

Important Dates and Key Items

- June 1, 2008 – last day to petition board of supervisors to assess additional \$1.00 per instrument “redaction” fee
- January 1, 2009 – date the Truncation Program plan must be in development and submitted to CRAC for review
- December 31, 2017 – final day for collecting redaction fees
- January 1, 1980 from this date forward all public records must have every Social Security Number truncated. (only last 4 digits visible)
- Backfile Redaction Providers must provide GUARANTEED accuracy and Redaction Reports

Q & A

Converted Images

What do I need to know before getting started?

Backfile Conversion projects are made up of 2 significant elements:

1. Scope – (look for cost drivers)

- Current and Intended research environment
- Current and Intended archival environment

Example Project –

- Current recording system went live in 2000
- Microfilmed records from county sovereignty of 1873 until 1930
- Photostats Books from 1931 until 1957
- Microfilmed records from 1958 to 2000
- Electronic index database from 1977 – 2000

Suggested Solution:

1. Nothing
2. Scan, index and load
3. Scan, index, load and create microfilm
4. Scan, index and load
5. Use “key index fields” for Match and Merge” for records 1977-2000

2. Source Document Profile – (look for cost drivers)

1. What types?
2. How many?

Providing Conversion for Images for Redaction

- History
 - Minimum of 5 years of reference-able projects
- Operations
 - Hardware
 - Current Scanner technology
 - Current capture software
 - Certifications/Associations
 - AIIM
 - Kodak
 - CDIA
 - Programming/Development
 - Prove Automation
 - OCR
 - Indexing
 - Blind Double-Key Verification
 - Staff qualifications
 - Internal Support
 - Bandwidth
 - Ability to remediate
- Company Profile
 - ***Should be a Technology Company!***
 - ***Ability to deliver not just the anticipated, but the un-expected***

Q & A

If interested in further information on back-file conversion projects, contact Kevin Williams @ kevin.williams@manatron.com or 866.917.4354 ext. 7266