

Auxiliary Organizations Association

REDACTION TECHNIQUES:

**A GUIDE FOR EDITING PROTECTED RECORDS
PRIOR TO RELEASE FOR INFORMATION REQUESTS**

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I. Purpose and Background

This guide summarizes techniques and methods for editing of organization records containing both disclosable and protected material in response to a records access request under policy and practices of the organization. Its purpose is to promote and facilitate sound and consistent records access request reviews.

While several approaches are treated, the guide does not recommend any one over the other, as it falls to each organization to set the methods that best meets its needs.

To place this special editing process into a broader management perspective, Section II defines the term redaction for the purpose of this guide, and Section III summarizes important principles that frame the techniques and methods described in Section IV. Section V rounds out the guide with suggestions on how to manage redacted records.

II. Redaction Defined

Redaction is the separation of disclosable information from information that is protected by blocking out words, sentences, or paragraphs (including, sometimes sections or pages) before releasing a document in response to a records access request determined to be within the organization's policy.

III. Redaction Principles

- Redaction should be reversible – never result in the permanent removal of original text. Redaction is done on copy of the original record, irrespective of the form of the record.
- Redaction is carried out to edit details from a record. It should be used when one or two words, a sentence or paragraph, a name, address, signature or protected data needs to be removed prior to release of the record.
- If the redacted information renders the document meaningless or nonsensical, the entire document should be withheld. This principle applies to paper documents involving individual pages.
- Redaction reviewers should consider any other factors of importance for an understanding of the material requested. For example, color – in a

photograph or on the paper document – may make meaning more clear, so the released redacted material should reflect such factors.

- Redaction should be performed or overseen by staff knowledgeable about the record, and possessing sound judgment about what is protected and disclosable. If oversight staff do not directly undertake the redaction, then clear and specific instructions should be issued to those conducting the editing. For example: “Report titled....dated....paragraph number...line beginning and ending....” Prior to release, overseeing staff should review the redacted record.
- Records access policy on redaction should be reasonable and not create an undue burden on the organization. On grounds of practicability, the requested document may require that a summary be transcribed, particularly when an extensive amount of redaction is necessary.

IV. Identifying Information for Redaction

The organization should have staff with a firm knowledge of the records requested, and able to identify private or otherwise protected information contain in those records under established records access policy. In this regard, the organization should hold in-service training programs to familiarize key staff with its records access policy and practices and redaction techniques.

To be responsive to information requests, it is critical that only private and otherwise protected material be redacted from documents containing requested information. Whole sentences or paragraphs should not be edited out when only one or two words are protected – unless release would place the missing words into context and make their content or meaning clear despite being redacted.

Reviewers must evaluate the circumstance of earlier information in the material suggesting the removed content. For example, if a paragraph refers to reports from overt sources, and a subsequent paragraph refers to reports from covert sources as well, removing only the ‘covert sources’ reference should also require removal of the ‘overt sources’ reference, or the meaning of edited words from the second paragraph could readily be inferred.

Organization records should be checked for other copies of the same document to insure that redaction is carried out consistently, and any file indexes should be checked to ensure that they do not contain details of the redacted material. See record keeping section.

V. Redaction Techniques

Hardcopy Documents. Redaction must always be carried out on a copy of the original document, leaving all information contained in the original document intact.

There is a range of sound redaction techniques and each can be effective if used properly and according to what best meets the organization's policy and practices, depending on such factors as:

- The structure and content of the document containing the requested information;
- The degree of confidentiality associated with the protected material in the document; and
- Cost and time available.

Regardless of the method used, the result of the editing must ensure that the redacted material cannot be seen or inferred due to incomplete redaction – that is, a certainty that the redacted information cannot be made out when the released document is held up to light, the ends, top or bottom of text are not visible, or that chemical processes can recover the edited material.

Appendix A contains alternative methods of hard-copy document redaction.

Electronic Records. While there are unique technical issues and risks associated with redacting records in electronic media, the general principles outlined above still apply.

The most straightforward type of electronic record is the text file (one-to-one relationship between bytes and displayed characters), and editing these formats is simply a matter of making a copy of the file, deleting the protected information from the copy, saving the edited version, then using that version for release. Do not confuse the two versions!

The majority of electronic records created using office systems are stored in proprietary, binary-encoded formats. Binary formats do not have a simple and direct correlation, and may contain significant information which is not displayed to the user, and the presences of which may therefore not be apparent. The stored data record (file) may incorporate change histories, audit trails, or embedded metadata, by means of which deleted information can be recovered, or more basic redaction processes circumvented. These formats are also typically the property of the software owner/developer with strict license provision over release of documentation in these formats. Therefore, the means by which information is stored within these formats are not well understood. Also, cryptographic and semantic analysis and techniques can potentially be applied to recover redacted data from the file.

It is critical that any redaction technique is secured to eliminate the possibility of redacted information being recovered upon release of an electronic file.

Appendix B contains techniques to the redaction of electronic records.

VI. Record-keeping of Released Redacted Documents

Once specific redactions in a document containing information requested have been identified and a determination made to make the necessary editing, the determination needs to be confirmed. For most organizations this process merely involves retaining and filing a copy of the released redacted document(s), with a notation explaining the reasons for the redactions. This file typically includes the response letter transmitting the redacted information to the requesting party.

VII. Records (information) Request Review Process

Each organization's information request review process must be tied closely to applicable standards, including its records access policy.

Appendix C is a template Records Review Checklist that can be used as a guide in developing a structured process that best fits each organization.

APPENDIX A

TECHNIQUES OF REDACTION

Cover-up Tape. The simplest form of redaction is to use a high quality cover-up tape that can be placed on a faithful copy original document over the areas to be redacted, taking care that no parts of words are showing. By making a photocopy of the redacted text/document, a version is produced ready for release. The tape is white, and acts in much the same way as if using correction fluid, but can be reused several times. It is available in 1/6" for a 10-12 font typewritten line, 1/3" for two typewritten lines and 1" for general corrections. The taped-version of the document should be retained for redaction records and to provide for any future requests of the same information on the document.

Blacking/Whiting Out. Another simple solution is to photocopy the original document and use a black marker pen to block out the sensitive material. The redacted version should then be photocopied again to produce the version for release. The further photocopy is necessary as information redacted using marker pen can be read when held up to light. The same process can be employed substituting a good quality correction fluid for marker pen. Ensure that no redacted text is visible before making the second photocopy, which again is necessary as correction fluid can be easily removed.

Scalpel. This is perhaps the most precise and secure method of redaction as the exempt material is physically removed, leaving no risk of text being visible in the released version. A photocopy of the original is made. The material to be redacted is then cut from this photocopy using an artist's scalpel or similar tool, leaving a 'doily', which is then photocopied again to provide the redacted document.

Redaction-Feature Photocopier. Photocopiers are available which, in addition to normal copying functions, also have facilities to automatically remove marked out areas on a document. They provide a secure method of redaction, as there is no possibility of the removed text being visible after copying. However, they are limited in their effectiveness as the programs can, at present, only remove paragraphs and stand-alone areas of text such as addresses or signatures. They cannot reliably detect small areas of data such as sentences or individual words. A photocopier of this nature would probably be cost-effective only for organizations carrying out a large volume of redaction, where savings on more conventional materials would outweigh the cost of investing in such a copier.

APPENDIX B

REDACTION TECHNIQUES FOR ELECTRONIC RECORDS

Unique Principles

The redaction of electronic records should be carried out under the following principles:

- The original or master version of an electronic record must never be redacted – redaction must always be carried out on a new copy of the record, either in paper or electronic format.
- Redaction must irreversibly remove the required information from the redacted copy of the record. The information must be completely removed from the bit stream, not simply from the displayable record.
- Redaction should always be carried out using methods which have been fully security tested.
- Electronic redaction should be carried out in a controlled and secure environment that provides access only to those trained and authorized to carry out redaction.
- All intermediary stages of the redaction process should be deleted. Only the original record and the appropriately redacted copy should be retained.

Traditional Techniques

For electronic records which can be printed as hard copy, traditional redaction techniques like those described in Appendix A can be successfully applied. The record can either be printed out and the redaction undertaken on the printed copy, or the information can be redacted from the electronic copy, which is then printed out in hard copy. If the redacted information is required in electronic form, the redacted hard copy can be scanned into an appropriate format, such as Adobe PDF.

Format redaction

Records may be redacted electronically in their original format. This may be carried out either using deletion tools within the creating software, or by using specialized redaction software. This approach must be treated with extreme caution, due to the possibility that deleted information may still be recoverable, and the potential for information to remain hidden within non-displayable portions of the bit stream.

Conversion

An electronic record may be redacted through a combination of information deletion and conversion to a different format. Certain formats, such as plain ASCII text files, contain displayable information only. Conversion to this format will therefore eliminate any information that may be hidden in non-displayable portions of a bit stream.

Round-tripping

The redacted record may need to be released in its original format. In this case an extension of the conversion approach may be used, involving conversion of the record to another format, then converting it back to the original format, thus removing all evidence of the redacted information. Information deletion may be carried out either before conversion, or in the interim format. See steps below.

Electronically Redacting Documents – Best Practices

When redacting electronically, great care must be taken over the choice of target format. It is crucial that no evidence of redacted information is retained in a redacted copy. Some binary formats may allow changes to be rolled back; consequently these formats should not be used for creating redacted copies. PDF is recommended as a format for redacted copies, but PDF files should be “round-tripped” via a simple image format to ensure that all evidence of previously redacted information is removed.

Redacting Office Documents

This guidance applies to word-processed documents, including documents created using all versions of Microsoft Word, WordPerfect and OpenOffice Writer, and to spreadsheets, including those created using versions of Microsoft Excel, Lotus 1-2-3, and OpenOffice Calc.

Office documents should be electronically redacted using the following steps:

- An electronic copy is made and information is redacted by deleting all restricted information and replacing it with the text string “[redacted]” – so the redaction is apparent but the space cannot be used to identify the missing information.
- The redacted document is then ‘printed to PDF’ using PDF creation software such as Adobe Acrobat.
- The resulting PDF file is round-tripped via the BMP image format as described below. If the redacted document is no more than a single page, users may prefer to leave the document as a bitmap image.

Redacting PDF Documents

Documents already in PDF format should be redacted using the following steps:

- An electronic copy is made and this copy is opened in Adobe Acrobat (the full version, not Adobe Acrobat Reader). For PDF documents where the text is stored as text, the Text Touch-UP tool can be used in Adobe Acrobat to replace the redacted text with a redaction marker (e.g. ‘[redacted]’). However, for PDF documents where the text is stored as an image, the Text Touch-Up tool can’t be used. In these cases, and for graphics and images, use The Square Tool to redact this PDF by drawing black rectangles over text and images.
- The resulting PDF file should be round-tripped via the BMP image format as described below. If the redacted document is no more than a single page, users

may prefer to leave the document as a bitmap image. BMP is not recommended as a long-term preservation format.

Round-tripping as Redaction Process

In round-trip redactions, the following steps should be taken:

- Convert the PDF file into a set of bitmap images (BMP files), one for each page of the document. Widely available graphics software (e.g. Adobe Photoshop Elements) can be used to perform this step.
- Convert each of these image files back into a PDF file. Widely available graphics software (e.g. Adobe Photoshop Elements) can be used to perform this step.
- Recombine the individual page PDF files to form a PDF containing all of the pages of the original document. Specialized software may be required to combine the individual PDF files.

Conventional Redaction for Office Documents

In some circumstances, it may be preferable to redact an office document by traditional methods, rather than electronically.

Word-processed documents. This guidance applies to word-processed documents in general, including documents created using all versions of Microsoft Word, WordPerfect and OpenOffice Writer.

Such documents should be redacted using the following steps:

Either:

- The document should be printed to paper.
- The paper copy should be redacted using conventional methods for redacting paper records.
- If an electronic version of the redacted document is required, this should be created by scanning the redacted paper copy into an appropriate format, such as Adobe PDF.

Or:

- An electronic copy is made, this copy is redacted by deleting all restricted information and replacing it with the text string “[redacted]”, so that redaction is apparent but the space cannot be used to identify the missing information.
- The redacted document is then printed to paper.
- If an electronic version of the redacted document is required, this should be created by scanning the redacted paper copy into an appropriate format, such as Adobe PDF.

Spreadsheets. This guidance applies to spreadsheets in general, including those created using versions of Microsoft Excel, Lotus 1-2-3, and OpenOffice Calc.

Spreadsheets should be redacted using the following steps:

Either:

- The required portion of the spreadsheet should be printed to paper.
- The paper copy should be redacted using conventional methods for redacting paper records.
- If an electronic version of the redacted spreadsheet is required, this should be created by scanning the redacted paper copy into an appropriate format, such as Adobe PDF.

Or:

- An electronic copy is made and this copy is redacted by deleting all restricted information and replacing it with the text string “[redacted]”, so that redaction is apparent but the space cannot be used to identify the missing information.
- The redacted document is then printed to paper.
- If an electronic version of the redacted document is required, this should be created by scanning the redacted paper copy into an appropriate format, such as Adobe PDF.

Note: When redacting electronic formats, a record of decisions should be kept in the same manner as paper formats.

APPENDIX C

RECORDS (INFORMATION) REQUEST REVIEW PROCESS

CHECKLIST

PROCESS STEPS	EVALUATIONS	COMMENT
<p>1. Is the information request a proper one?</p>	<p>If NO, why?</p> <ul style="list-style-type: none"> • Too General • Too burdensome • Harassment <p>Respond in writing to requestor giving reasons why the organization feels the request is not proper.</p> <p>If YES: determination is that the request is sufficiently specific and made in good faith. Respond in writing to requestor indicating that the request has been received and is being processed within time-certain. Go to Step 2.</p>	<p>"Intent" of requestor NOT a factor in evaluating information requests.</p> <p>See IRS criteria as possible guide.</p> <p>Written requests should be encouraged, but not required. Initial letter should include reference to information request (if in writing) or summary of the oral request.</p>
<p>2. Is the requested information held by the organization?</p>	<p>If NO: Send letter to requestor indicating that the information requested is <u>not</u> held by the organization.</p> <p>If YES: Go to Step 3.</p>	<p>Retain copy of letter in file with initial response letter and information request.</p>
<p>3. Is the requested information contained in a single document or record?</p>	<p>If NO: Research & compile all relevant documents/records. Make copy of documents or records, place in file with initial response letter. Go to Step 4.</p> <p>If YES: Make copy of document/record, place copy in file with initial response letter. Go to Step 4.</p>	<p>Inter-department cooperation may require supervisor role in compiling documents or records.</p>
<p>4. Is the requested information <u>all</u> subject to public access under the law?</p>	<p>If NO: Go to Step 5.</p> <p>If YES: Send response letter to requestor enclosing requested information (or pointing requestor to website posing the requested information). Include reference to public access requirement.</p>	<p>Keep response letter copy in file.</p>

APPENDIX C

RECORDS (INFORMATION) REQUEST REVIEW PROCESS

CHECKLIST

PROCESS STEPS	EVALUATIONS	COMMENT
<p>5. Is information requested subject to any individual privacy rights?</p>	<p>If NO: Go to Step 6.</p> <p>If YES: Send letter to requestor citing privacy rights over information requested.</p>	<p>Review privacy rights requirements & consult with supervisor/legal counsel if in doubt.</p> <p>.Keep response letter in file.</p>
<p>6. Is information requested subject to business information protection under laws or organization policy?</p>	<p>If NO: Go to Step 7.</p> <p>If YES: Send letter to requestor citing basis for not releasing the information requested.</p>	<p>Draft letter may need to be reviewed by supervisor/legal counsel if request is complex. Keep response letter in file.</p>
<p>7. Is information requested contained in document or records also containing protected information?</p>	<p>If NO: Send letter to requestor citing basis for releasing the information requested, and enclosing the documents or records (or pointing to website where information is posted).</p> <p>If YES: Go to Step 8.</p>	
<p>8. Can requested information contained in document(s) or record(s) be released to requestor using redaction techniques?</p>	<p>If NO: Prepare summary from document(s) or record(s). Send letter to requestor indicating why summary is provided, not the document(s) or record(s), and cite policy.</p> <p>If YES: Utilize accepted redaction techniques to edit out protected information, leaving information requested in <u>copy</u> of document(s) or records(s). Make copy of redacted document and enclose with response letter to requestor citing policy and redaction circumstances.</p>	<p>Supervisor/legal counsel may be involved in previewing summary and response letter in these information request cases.</p> <p><i>See Redaction Guide</i></p> <p>Supervisor/legal counsel should preview redacted document(s) or record(s) and response letter prior to its release to requestor.</p> <p>Retain redacted document(s) or record(s) in file with response letter.</p>