

Redaction Best Practices

NACRC Winter Conference

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Property Records Industry Association

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PRIA Adopted 12/10/2014

- Redaction Best Practices Work Group
 - Formed July 2010
 - Co-chaired by Nancy Becker, Montgomery Co PA Register of Deeds (government co-chair) and Ann Kirkbride-Hopfer, Mentis Technology (business co-chair)
 - Approximately 30 people participated
 - A labor of love (although editing was tough!)

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State Legislation

- [State by State Listing of Redaction Laws](#) available on PRIA web site
- List last updated 11/2009
- Not much legislative activity since then
- If you check listing & see corrections needed, TELL us please
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PII & Identity Theft

- PII = Personally identifiable information
 - Social security number
 - Date of birth
 - Driver's license number
 - Financial institution account number, credit card, debit or charge card number
- Identity Theft
 - Legislation to protect us from ourselves

SSNAPP Act

- Social Security Number and Privacy Protection Act (SSNAPP)
 - Created by PRIA in 2006
 - Available at [PRIA's SSNAPP Act](#)

Redaction Best Practices

- For land records (not court, vital, or voting records)
- 14 best practices
- Redaction = concealing/covering private data in the public record from public view
- Redaction is NOT permanently removing data from the recorded document

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Follow Your Statutes

- Follow your state-specific statutes regarding duty to redact personally identifiable information and to provide public access to the records
 - Recorders should not under or over redact data elements beyond statutory authorization

Legislators Should Consult

- Legislators should consult their Recorders, as well as PRIA and other like organizations
 - Chain of title matters for real property
 - Don't adversely impact constructive notice requirements

Identify the Problem and Scope

- Identity Security - threats real or perceived?
- Privacy - what's been lost?
- Personal Information - what causes the problem?
- Magnitude - how many and what types of records?
- Scope - how available already?



Humans Get Tired

- Use automated redaction software for covering up data on digital images
 - Finding PII is challenging
 - Reading/searching page after page is mind-numbing
 - Software outperforms humans many times over

Avoid Complications

- Allow full, open access to the redacted version of a document, while maintaining the un-redacted copy as the master/legal document
 - Rules for different users = security issues and potential pitfalls
 - What you are redacting doesn't impact constructive notice of the document

Avoid Stars & Check Marks

- Avoid marking on documents in such a way that will inhibit the effectiveness of OCR software on that document
 - Old style = ✓ by submitter name or ★ by “return to” information
 - Tendency to impair clarity of letters and thus potentially confuse OCR software

What DPI and File Format?

- Scan documents to produce images at 300 dpi
 - Can get by with 200 dpi, but why?
 - Cost for storage space decreased
 - OCR results increase significantly
- TIFF group 4 is the desired file format for best character recognition accuracy
- ****As of the publishing date of paper****

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What About Benchmark Testing?

- Conduct accuracy benchmarks prior to purchasing an automated redaction solution
- Apply same benchmarks throughout use of system

Go Forward Accuracy Testing

- For “go forward” redaction, perform separate onsite vendor accuracy benchmark

Leave Property Addresses

- Do NOT redact property addresses
 - The land records reflect who owns the property and who has an interest in it
 - Redacting property addresses can lead to chaos and imperfect constructive notice

Not Two Complete Sets

- Master/legal documents should NOT be redacted. Redact copies which will be publically accessible.
 - Does not mean having two sets of records.
 - Have master/legal and redacted only when necessary
 - Example = ssn# on page 1 of 10
 - Keep master and redacted of only that page or only that document

Don't Redact Signatures

- Do NOT redact signatures.
- Land records prove ownership and encumbrance
- While nothing is perfect, “copying” signature is tough, especially as we tend to sign on a line and/or over other letters/words

Redact Digital Images

- Use automated redaction tools for digital images
 - For paper, the old school cover up with black magic marker and then re-copy; not always easy or complete
 - You can't redact effectively on microfilm
- The black box imprint or the x & y on the page coordinates

Sample Sets for Existing Records

- Create statistically correct sample document sets for your existing repository
 - More documents in last 10 years = more sample docs from last 10 years
 - Appearance of PII in documents = practically speaking, 1970 to 2005

Use Same Accuracy Measure

- Select an accuracy measuring methodology you are comfortable using and apply it evenly across all benchmarks
 - On a document basis
 - On a page basis
 - On a field basis
- Pages 33-35

Ask the Right Questions

- Risks
- Measurable Outcomes
- Costs
- Education
- Storage Component Issues
- Considerations for Policymaking



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Thank You

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