

Ohio Corporate Redaction Project

Submitted by: Ohio Secretary of State, Business Services Division

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Introduction: The Ohio Secretary of State's (SOS) office was previously sued by a customer who noticed that his social security number was displayed on the SOS website as a result of a Uniform Commercial Code (UCC) filing. Extraordinary effort and costs were expended to attempt to rectify the situation. Corporate documents were not directly affected; however, we began training staff on how to recognize social security/employer identification numbers (SSN's & EIN's). Approximately 6 million images were involved in the UCC redaction project.

Description: After the law suit was settled, legislation was enacted to give our office guidance on how to protect the identity of residents of Ohio. Ohio HB 46 went into effect on September 1, 2008 and permits the Secretary of State's office to redact or reject any document that contains a social security number or federal tax identification number. An outside vendor completed the UCC redaction project, but since then our internal UCC staff members were trained to recognize SSN's & EIN's and in an effort to complete the work internally as a cost saving method, we trained the corporate filers on the redaction process. As of January of 2009, we have the capability to view images through our internal Image Maintenance Program. Our IT department has placed over 3,600,000 documents from filings in the database that totaled almost 15 million pages on this system, which provides an opportunity for our filers to work on this project when their corporate filing responsibilities are low.

Benefits of the Project: Since the number of corporate filings submitted has been low, this will be a project that employees can work on at any time. Since the law does not give our office a deadline by when the documents must be redacted, there is no need to assign individuals to exclusively work on this. Additionally, we believe it is a service and a proactive measure for our customers to protect their personal, sensitive information.

Lessons learned: The UCC redaction project was mostly outsourced at a cost of \$231,680.00. However, countless hours of employees' time was utilized because the vendor did not correctly complete the project. By keeping this project in-house, we are utilizing existing resources and the cost is minimal (approximately \$16,000.00.)