

JURISDICTIONS CURRENTLY REDACTING INFORMATION FROM THEIR RECORDS

Jurisdiction	1. Do you have a current system for redaction?	2. Is it a software application that automatically redacts information or is it a manual review process?	3. Are you redacting the information on: a) a case-by-case basis, b) from a certain date forward, c) have you redacted all documents previously filed or d) any combination of these solutions?
Arizona	No	No	We have been redacting on a case-by-case basis. As our examiners spot personal information, such as an SSN, they redact it at that time. Periodically, a customer will contact us requesting that an item of personal info be redacted and we will accommodate them as long as the info was not required by statute.
California	Yes	It is a manual review process. To redact specific information, a copy of the document is made, either black felt pen or correction tape is used to cover the confidential information, and a copy is then made of the redacted copy.	The general public is not authorized to receive specific "confidential" information, however, depending on the document, law enforcement, government officials acting in their authorized capacities, and select others are authorized to obtain this information. Requests are reviewed to make a determination whether or not to redact the information based on the requestor.
Canada Federal	Yes	We do not provide residential addresses of directors on our web site. (Directors are required to provide residential addresses because of residency requirements in our business corporation and not-for-profit corporation statutes.) We also manually black out credit-card information contained on documents received by traditional methods (by mail, fax, email) before scanning these documents into our system. Our software application ensures that directors residential addresses do not appear on our web site. Credit-card information is removed via a manual review process.	We have redacted credit-card information from all documents previously filed. On the other hand, we provide residential addresses on a case-by-case basis to members of the public who ask for this information in writing on condition that their request is in accordance with the purposes required by the statute.

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Colorado	Yes	The software application was a manual review process. In Colorado, a statute change first removed the requirement to include SSNs on the UCC documents effective July 1, 2001. Another statute change in 2002 instructed our office to redact this information on filings made under the previous requirements that encompassed a time frame of around April 6, 1989 up to June 30, 2001. Our office contracted with another state agency that wrote a computer program and hired temps to redact the images that are viewed by the public and internally. This project was completed before July 1, 2003. If a customer requests, the original images in their unredacted form can be obtained from IT who has these images stored with limited access. I'm not aware that we have ever had a request for the unredacted image. Since this information is not required to be included in current filings (except for EFS and maybe other minor miscellaneous filings) we do not have a current application set up to redact.	Colorado currently uses a for any current requests where someone included this information and should not have. The request is usually a court order to have it removed. Our method to comply with the court order is very much manual. Obviously the first redaction process was c. So I guess that would mean the correct answer is d. Colorado is in the process of writing a requirements document to have our IT department rewrite our secured transactions applications program. I anticipate that we will include an ongoing process of redaction. That process will probably remain a manual review since including any personal identifying information in not statutory, in most cases. It would be hard to program to have an automatic redaction since this information could appear anywhere within an attachment.
Georgia	Yes, in house.	manual review of each UCC document specifically analyzing the SSN/FEIN box	GA began redaction off SSN/FEINs contained on UCCs as of 11/01/2006
Illinois	Yes	Manually by humans	a) Illinois began manually redacting in 2001 with RA9, filing by filing. b) RA9 c) no d) Illinois has been solicited by Extract Systems, LLC but have not made a purchase of any software. Illinois would like to have a competitive comparison list of companies offering this product and prices to make an informed decision.

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Indiana	The Indiana Secretary of State Business Services Division does not currently have a system for redaction within its UCC financing statement database.	We are engaging in a manual review of certain documents for which we have received written or in-person requests. We are engaging in a manual review of certain documents for which we have received written or in-person requests, or entities which are not exempt from Indiana's Social Security Number privacy statute, which are found to contain Social Security Numbers, have the first five digits of the Social Security Number obscured.	This "manual" redaction only relates to the copy of the document being sent out. At this time previously filed UCC financing statements and new statements being filed are not being "redacted" We are in the process of reviewing software based redaction technologies.
Massachusetts	Yes	Manual review process: currently we make a duplicate copy of the original submitted for filing and block out SSN and FEINs at the time of filing. The duplicate copy is scanned and made available on the public record without SSN or FEIN visible.	Currently we redact information at the time of filing and on a case-by-case basis for previously filed documents. The "time of filing" procedure was instituted in November 2006; all document filed prior to that time are redacted on a case-by-case basis. To avoid having to maintain the "case-by-case basis in the future, we plan to redact all images dating back six (6) years with a software application.
Michigan	Yes	manually redacts social security numbers from limited liability partnership registration applications and from corporation annual reports, if they were included on reports filed prior to 1996 when financial information was required. No other information is redacted.	
Missouri	Missouri does manual redaction in the KB system.	It is a manual review process. We are in the process of procuring a software application that would automatically redact.	Currently all UCC records are being manually reviewed; we also redact upon request on a case by case basis. We redact SSN's and EIN's as a matter of course, and we do home addresses and signatures by request.
Nevada	No		
North Carolina	Yes	It is a software application that allows us to manually redact through visual identification and verification.	Began redacting all new UCC's in July of 2006. Not currently in the process of redacting all UCC documents previously filed.

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North Dakota	Yes	It is a manual system.	social security and FEIN number from documents on a case-by-case basis when copies of documents are requested.
Ohio	Yes	It is a combination of automated redaction and manual verification.	We began redacting forward in April 2006. Currently, we are currently working on previously filed documents.
Oregon	We are in the process of implementing a redaction system.	For the most part our system is going to be automatic redaction with manual intervention as needed. We are implementing software that allows the business to set the rules for redaction. For example if the SSN is in the correct format we will have it automatically redact. If there is a number the system thinks might be an SSN it will be placed into a queue for a filing officer to review.	We will be redacting all of the images in the system. We will redact in batches, but eventually will encompass the entire image database.
Pennsylvania	Yes, for SSN and personal account information. It was a policy decision brought directed by the Governor's office.	Manual review	We began redacting SSN's and personal account information on August 7, 2002. We try to redact manually when the mail is opened. If not, we are able to redact through the computer application. We have not gone back to redact information from prior documents. We do not retain an unredacted version. If SSN or personal account information is provided on corporate documents, we redact there also.
Rhode Island	RI blocked out the section for tax id and ss# on new forms. However on the national forms we accept, we use correction tape to redact info.	It is a manual review process	Prior to us providing information on line, we chose to backfile all records that were current at the time. In order to do this, we had to tape the old 5x8 forms to 8.5x11 paper. During this process, we decided to redact with the correction tape as we taped to the larger paper. I am sure there were a few that were missed, but overall, we got the majority of them. Now it is just a matter of reviewing any national forms that come in for filing.

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Texas	YES for SSN only	Manual review of documents.	We started redacting SSN from documents filed as of June 17, 2005 or there about. We have not gone backwards to redact SSN from older documents unless the customer calls and asks to have that information removed. UCC documents filed electronically are not reviewed, so if the filer were to include the SSN somewhere in the collateral field it would not be removed since we do not review electronic filings. Corporate documents filed electronically do go through a review process before they are filed. It is rare that the SSN number is ever included on these documents, but if it were there is a way of redacting the SSN.
Virginia	Will have a redaction process in place once the new UCC System is up and running.	A manual review process.	We will be redacting 5 years worth of documents.
Washington	Yes for STS, No for BOS	STS: manually redacts SSN and FEIN numbers from copies before mailing them with a search. BOS: does not have an automated system in place for reduction. If we receive a filing (non profit annual report) that has SSN's etc. we catch it manually and redact, either before scanning or upon request for a copy.	STS: Data from that field is captured but not displayed on any output we generate (search reports, acknowledgements, bulk data). These practices apply to all records in our database -- 1967 forward.