



CONNECTIONS Tip Sheet

Data Redaction

Revised September 2015

On occasion, confidential information is entered in error and saved in CONNECTIONS. When such information cannot be changed (e.g. a Progress note saved as Final, an approved FASP or Home Study, or other uncorrectable narrative section in CONNECTIONS), and the retention and subsequent re-disclosure of the information is contrary to OCFS policy and would violate Federal or State confidentiality laws, rules and regulations, a process exists for the redaction (removal) of such information. This tip sheet outlines the criteria for redacting information entered in error and the process by which this is done.

What Do I Do First?

When a worker discovers that incorrect confidential information has been retained in CONNECTIONS, this should be immediately brought to the attention of his or her supervisor. The supervisor will then determine if the scenario is appropriate for a redaction request to OCFS by referring to the OCFS guidelines contained in this tip sheet.

If the situation is discovered during a review of records by OCFS and meets the redaction criteria, the redaction request is to be processed by the OCFS staff who discovered it.

What Information Must be Redacted?

Information can only be removed if:

- it was entered into CONNECTIONS contrary to OCFS policy;
- AND**
- the retention of the information in CONNECTIONS and its potential subsequent re-disclosure would violate Federal or State confidentiality laws, rules or regulations.

Progress Notes Entered in New York City ADVPO Cases

Based on the Advocates for Children Federal litigation settlement in

New York City, Progress Note entries are **not required** in ADVPO cases, but the **entry of notes itself is not a violation** of statute or regulation. If notes are entered, it is acceptable to leave them in ADVPO cases. Data redactions in ADVPO cases are only necessary when they meet the criteria identified above.



Under no circumstances will this protocol be used to remove information from CONNECTIONS because of a factual error or where information was entered in an unprofessional manner. Incorrect information may instead be addressed by adding an addendum to the CONNECTIONS record that notes the error and corrects the misinformation.

What Data is Redacted?

When data is redacted, only the inappropriately entered words or phrases are removed. They are replaced with the following statement: ***"Information that was recorded contrary to federal or state confidentiality laws, rules or regulations was removed from this document [DATE OF DATA REDACTON INSERTED HERE] pursuant to the OCFS CONNECTIONS Case Record Amendment Protocol."*** The remainder of the narrative's text is maintained.

How Do I Submit a Redaction Request?

1. Redaction requests must be submitted by email to the CONNECTIONS Triage Unit at: ocfs.sm.conn_app@ocfs.state.ny.us

(Note: the address contains an underscore.)



*Maintaining confidentiality is of utmost importance in this process. **To preserve confidentiality, it is extremely important not to include a case name in email.** The case should be identified by the CONNECTIONS Case and Stage ID numbers only*

The request should include:

- the CONNECTIONS Case ID
- the CONNECTIONS Stage ID
- the location of data (e.g. Progress Note date, FASP section).

No further information is required at this time.

After the request has been reviewed, the Triage Unit will contact the requestor if further discussion is necessary.

2. OCFS Bureau of Policy Analysis will be notified of the request, and will review whether it meets the criteria for redaction.

If the Bureau of Policy Analysis approves the request, the Triage Unit specialist will complete the *Request for Amendment Form*, and proceed with the internal redaction process.

If the request does not meet the criteria for redaction, the Bureau of Policy Analysis will inform the Triage Unit specialist who will then contact the user with recommendations on how to handle the misinformation.

3. Under certain circumstances OCFS Counsel's Office may review the request and provide a decision on how to proceed.
4. If the existence of such information comes to the attention of OCFS through another means, OCFS may follow this protocol without a

Local Department of Social Services or Voluntary Agency initiating

Only OCFS has the ability and authority to approve a redaction of information. Prior to being redacted, a copy of the original entry is made, and securely stored outside of CONNECTIONS. The information is retrievable when required, including when requested by a court.

Examples of Information Subject to Redaction

The kinds of confidential information subject to redaction include, but are not limited to:

- Inappropriate identification of CPS Reporter/Source
- Certain adoption records information, such as post-finalization identification of birth parent information
- The street address for a residential program for victims of domestic violence
- Inappropriate disclosure of certain health issues, including but not limited to, HIV or AIDS status, or treatments/medications that would indicate such status

Resources

- CONNECTIONS Job Aids and Tip Sheets:
<http://ocfs.state.nyenet/connect/jobaid/jobaid.asp>
- CONNECTIONS Regional Implementation Staff:
<http://ocfs.state.nyenet/connect/contact.asp>
- CONNECTIONS Application Help Mailbox:
ocfs.sm.conn_app@ocfs.state.ny.us
(NOTE: address contains an underline)
- CONNECTIONS Communications Mailbox:
connections@ocfs.ny.gov

ITS Enterprise Service Desk
1-800-697-1323