



## Personnel Data Redaction Workshop

April 24, 2025

9 a.m. – 11 a.m.

- Mute/Unmute
- Cameras
- Chat, Participant, and Polling panels
- Breakout sessions

# Introductions and attendance

In the Chat Panel, please introduce yourself:

- Your name
- Your entity
- Your data practices role
- Any burning questions you would like to discuss this morning.



# Agenda

9:00am-11:00am

Time	Activity
9:00	Welcome and introductions
9:05	Redaction presentation
9:15	Introduction to scenario
9:20	Breakout 1
9:45	Break
10:00	Breakout 2
10:20	Breakout 3
10:40	Full group debrief and evaluations

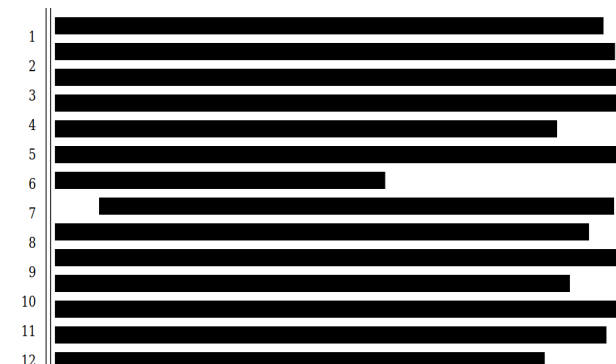
# Personnel data

Minn. Stat. sec. 13.43

- Public presumption is reversed – personnel data are **private** unless a law classifies it as public
- Must be data on individuals
  - Is the individual the subject of the data?
  - Is the identifying information incidental?
- Public complaint and disciplinary data
  - Existence and status of a complaint
  - Final disposition of disciplinary action
  - Data documenting the basis for the action
  - Specific reasons for the action

# Redaction

- Separate not public data from responsive data
  - Personnel context = Private data on others
- At the data element level, not document
- Identity can be more than a name
- Provide specific citation in support of redaction
  - Does not need to be by redaction/by line



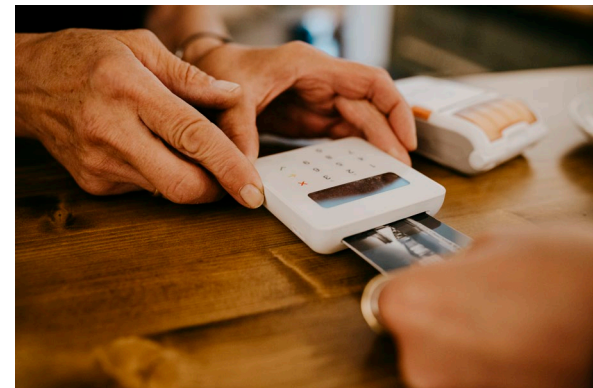
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# Practical tips

- Work as a team, if possible, to compare notes & redactions
- Identify data subjects
  - Names
  - Pronouns
  - Characteristics
    - Titles that could only be one person
    - Location of desk/workstation
- Document justifications on close calls in case of challenges later
- Be consistent

# Costs and timing

- What can you charge?
  - You can charge for copies
  - You cannot charge to redact
    - Redaction = separating public from not public data or not public data about others from data subject's data
- Data subjects get data in 10 business days
- Members of the public =  
a reasonable amount of time





# Introduction to the scenario

Personnel investigation of Abbott Elementary janitor, James Johnson. Scenario packet includes:

- Complaint and emails
- Investigator contract
- Investigator's notes
- Investigative report
- Discipline letter

# Breakout Room 1 – Zach

- Introduce yourselves and pick a spokesperson (or person farthest from St. Paul)
- Take 15 minutes to review, redact, and discuss with the group.
- Use “Ask for Help” button in the Participant Panel, if you need assistance.
- Click the red circle at the bottom of screen to exit.

# Breakout Room 1 - Zach

Zach calls your office and says, “I would like copies of all data about the complaint against Mr. Johnson and any discipline.” Zach identifies himself as Mr. Hill’s partner.

**What data must you provide?**

# Breakout Room 2 – Employee

- Introduce yourselves and pick a spokesperson (or person with the closest birthday)
- Take 15 minutes to review, redact, and discuss with the group.
- Use “Ask for Help” button in the Participant Panel, if you need assistance.
- Click the red circle at the bottom of screen to exit.

# Breakout Room 2 – Employee

Mr. Johnson contacts your office and asks for all data on complaints against him and this investigation.

**What must you provide?**

# Breakout Room 3 – Witness

- Introduce yourselves and pick a spokesperson (or person who lives closest to the state capitol)
- Take 15 minutes to review, redact, and discuss with the group.
- Use “Ask for Help” button in the Participant Panel, if you need assistance.
- Click the red circle at the bottom of screen to exit.

# Breakout Room 3 – Witness

Melissa Schemmenti contacts your office. She says: “I’m curious about the investigation about Mr. Johnson. Can I get information on any discipline, and a copy of my testimony?”

**What must you provide?**

# Scenario Considerations

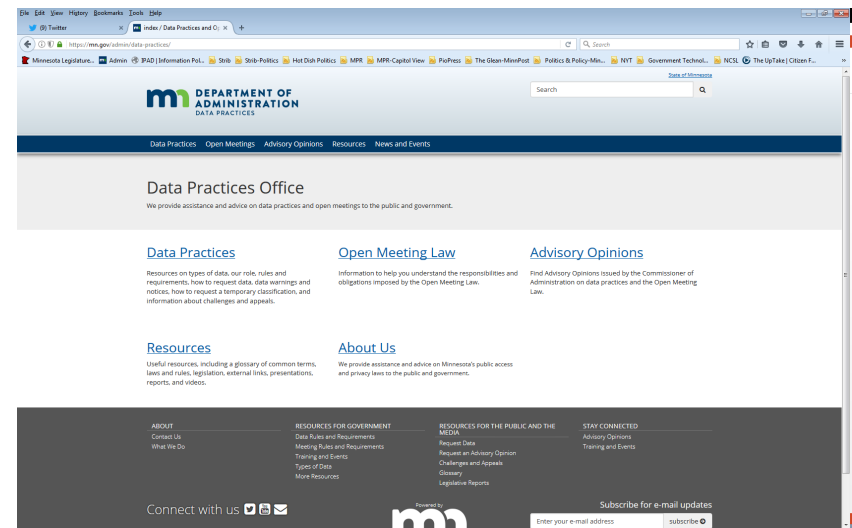
- What are identifying data on other employees?
  - Name
  - Work location
  - Position/titles
  - Other examples?
- Email signatures
- Identifying data in interviews



# Who we are and what we do

## Data Practices Office

- Informal advice/technical assistance
- Commissioner of Administration advisory opinions
- Website and informational materials:  
<https://mn.gov/admin/data-practices/>
- Listserv and newsletters
- Legislative assistance
- Training



# Questions?

**Phone:** 651-296-6733

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**Website:** [mn.gov/admin/data-practices](http://mn.gov/admin/data-practices)

**Twitter:** [@MNgovdata](https://twitter.com/MNgovdata)

**YouTube:** <https://www.youtube.com/user/INFOIPAD>