



# City of Selah Public Records Policy

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## Body Worn Camera Redaction Cost Study

June 2023

### 1. Background

In 2022, the Selah Police Department (SEPD) implemented a Body Worn Camera (BWC) program. Currently, 19 Selah police officers are equipped with body cameras which capture recordings that become public records, and are subject to the Washington Public Records Act (PRA). According to RCW 42.56.240(14), the PRA allows a law enforcement agency to charge certain requestors the reasonable costs of redacting BWC recordings prior to disclosure, in addition to copying costs that agencies are legally allowed to charge requestors. The following describes the cost study conducted by the Selah Police Department to ensure proper application of fees associated with the body worn camera records.

### 2. Introduction

The PRA allows an agency to charge a requestor the reasonable costs of redacting, altering, distorting, pixelating, suppressing, or otherwise obscuring any portion of the body worn camera recording prior to disclosure. However, the following types of requestors have a right to BWC records free of charge:

- A person directly involved in an incident recorded by the requested body worn camera recording;
- An attorney representing a person directly involved in an incident recorded by the requested body worn camera recording;
- A person or his or her attorney who requests a body worn camera recording relevant to a criminal case involving that person;
- The executive director from either the Washington state commission on African-American affairs, Asian Pacific American affairs, or Hispanic affairs; or
- If relevant to a cause of action, an attorney who represents a person regarding a potential or existing civil cause of action involving the denial of civil rights under the federal or state Constitution, or a violation of a United States department of justice settlement.

An agency that charges redaction costs must use redaction technology that provides the least costly commercially available method of redacting body worn camera recordings, to the extent possible and reasonable.

### 3. Principles

#### 3.1. The Selah Police Department will Charge for:

- Redactions based on the parameters provided in the PRA.
- Staff time directly applicable to redacting video recordings, at a rate no more than the lowest-paid employee assigned responsibility for redacting video recordings.
- The actual cost of copies of BWC recordings as provided in the PRA, in addition to allowed

- redaction costs.
- The actual time it takes to redact a particular video recording, calculated at the rate of \$0.43 per minute.
- The actual cost of copies of BWC recordings as provided in the PRA, in addition to allowed redaction costs.

### 3.2. The Selah Police Department:

- Uses redaction technology that most effectively and efficiently meets the administrative and operational needs of the Department.
- Does not charge requestors any costs related to the redaction technology.
- Incurs substantial costs for video recordings management, processing, storage, and redaction technology.

## 4. Redaction Process

The cost of using current technology to redact video recordings is based on actual staff time derived from the workflow necessary to apply redactions as detailed in the SEPD Redaction Process Workflow, below.


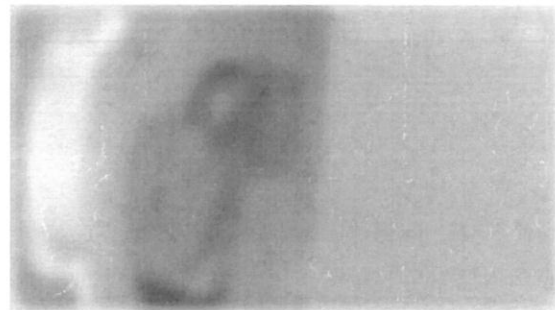
The salary for the SEPD Public Records Video Specialist is approximately \$.43 per minute, which does not include employee benefits or other overhead costs. RCW 42.56.240(14) outlines the allowable charges for the actual cost of redacting BWC recordings including the cost of redaction technology. However, the Video Specialist's salary does not include the cost of redaction technology, nor does the City intend to charge requestors for the technology costs. Therefore, the City intends to charge requestors at the rate of \$.43 per minute to redact BWC recordings. This rate is lower than the actual cost incurred by the City for redacting BWC recordings, which was determined by the results of the following Redaction Process Workflow.

REDUCTION PROCESS WORKFLOW			
Redaction Method	Estimated Cost Per Minute to Redact	Minutes to Redact Per Minute of Raw Footage	Estimated Cost of Redaction Per Minute of Raw Footage
Targeted Video Redaction with or without Targeted Audio Redaction	\$0.43 per individual or object redacted	6 per individual or object redacted	\$2.58 per individual or object redacted
Targeted Audio Redaction Alone	\$0.43	5	\$2.15
Screen Blur or Screen Blackout	\$0.43	1 Minute per segment	\$0.43/segment

## 5. Time Studies

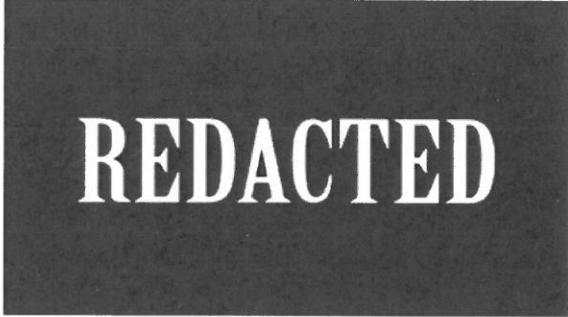
Stopwatch style time studies were conducted to determine the amount of time it takes to redact BWC recordings including how long it takes to fully blur and remove audio from an entire video recording, eliminate one minute of video recording, redact one minute of simple audio, redact one minute of complex audio, redact one minute of simple video recording, and redact one minute of complex video recording. The results of the Time Studies is outlined in the table below.

Redaction Type	Actual Time	Redaction Time
Targeted Video Redaction with or without Targeted Audio Redaction	1 Minute per individual or object redacted	6 Minutes per individual or object redacted
Targeted Audio Redaction Alone	1 Minute	5 Minutes
Screen Blur or Screen Blackout	1 Minute per segment	1 Minute per segment

TYPES OF VIDEO REDACTIONS	
Targeted Video Redaction <sup>1</sup>	Description
	<b>Targeted Video Redaction of Person or Object with or without Targeted Audio Redaction:</b> This blurs or blacks out the face or identifying features of an individual or object.
Screen Blur <sup>2</sup>	Description
	<b>Screen Blur:</b> This blurs the entire screen for a segment of video recording containing an exempt image, such as a Mobile Data Terminal (MDT) with exempt screen content, the interior of a place of residence where a person has a reasonable expectation of privacy, the interior of a medical or mental health facility, etc.

<sup>1</sup> The size of the dot or shape obscuring an individual or object may vary to ensure that exempt identifying details are sufficiently obscured.

<sup>2</sup> The screen blur above is illustrated at 60% blur. The level of blurring may vary to ensure that exempt identifying details are sufficiently obscured

Screen Blackout	Description
	<p><b>Screen Blackout:</b> This blacks-out the entire screen for a segment of video recording containing an exempt image, such as a Mobile Data Terminal (MDT) with exempt screen content, the interior of a place of residence where a person has a reasonable expectation of privacy, the interior of a medical or mental health facility, etc.</p>

In some instances, **Targeted Audio Redaction** may be used. This technique removes exempt portions of the audio without redacting any related video recordings.

## 6. Time Studies

Stopwatch style time studies were conducted to determine the amount of time it takes to redact BWC recordings including how long it takes to fully blur and remove audio from an entire video recording, eliminate one minute of video recording, redact one minute of simple audio, redact one minute of complex audio, redact one minute of simple video recording, and redact one minute of complex video recording.

## 7. Conclusion

### ***SEPD Will Charge a Fee for Redaction Based on Actual Redaction Time***

The City will charge requestors redaction costs reflecting the actual time it takes to redact a particular video calculated at the rate of \$0.43 per minute.