

US Department of Health and Human Services

Privacy Impact Assessment

Date Signed:

02/25/2026

OPDIV:

ACF

Name:

Redactable, Inc. Document Redaction Platform

PIA Unique Identifier:

P-8863214-401218

The subject of this PIA is which of the following?

Minor Application (stand-alone)

Identify the Enterprise Performance Lifecycle Phase of the system.

Implementation

Is this a FISMA-Reportable system?

Yes

Does the system include a Website or online application available to and for the use of the general public?

No

Identify the operator.

Agency

Is this a new or existing system?

New

Does the system have Security Authorization (SA)?

No

Indicate the following reason(s) for updating this PIA.**Describe the purpose of the system.**

The purpose of the Redactable, Inc. Document Redaction system is to support the secure and efficient redaction of sensitive information from documents related to the Unaccompanied Alien Children (UAC) Bureau. This includes documents required for Freedom of Information Act (FOIA) responses, E-discovery and litigation related requests, program integrity audits and monitoring, regulatory compliance, and other authorized agency disclosure review processes. Redactable, Inc. does not determine legal sufficiency of redactions; program staff retain accountability for reviewing and certifying all redacted outputs.

Describe the type of information the system will collect, maintain (store), or share.

The system will process and temporarily store pre-existing documents containing Personally Identifiable Information (PII), including names, dates of birth, Alien Number, phone number, email address, Social Security Numbers, driver's license number, mother's maiden name, certificates, education records, military status, foreign activities, taxpayer identification (ID), photographic identifiers, biometric identifiers, vehicle identifiers, mailing address, financial account info, device

identifiers, employment status, passport number, medical and legal records, and other sensitive data. The system does not collect data directly from individuals but processes existing Office of Refugee Resettlement (ORR) documents.

Provide an overview of the system and describe the information it will collect, maintain (store), or share, either permanently or temporarily.

Redactable, Inc. is a cloud-based redaction platform that uses automated, machine learning-driven document analysis to identify and redact sensitive information, including PII. The system is used by ORR staff and contractors to process FOIA release reviews and controlled disclosures, E-discovery and litigation related requests, program integrity audits and monitoring, regulatory compliance, and other authorized agency disclosure review processes. Redactable, Inc. temporarily stores uploaded documents for processing and redaction. Once redacted, documents are downloaded and stored in ORR systems, and the originals are deleted from Redactable, Inc.'s platform, per vendor retention policies. The system handles PII such as names, dates of birth, Alien Number, phone number, email address, Social Security Numbers, driver's license number, mother's maiden name, certificates, education records, military status, foreign activities, taxpayer identification (ID), photographic identifiers, biometric identifiers, vehicle identifiers, mailing address, financial account info, device identifiers, employment status, passport number, medical and legal records from source files, but does not extract or store PII that it processes from the source files.

Does the system collect, maintain, use or share PII?

Yes

Indicate the type of PII that the system will collect or maintain.

Social Security Number
Date of Birth
Name
Photographic Identifiers
Driver's License Number
Biometric Identifiers
Mother's Maiden Name
Vehicle Identifiers
E-Mail Address
Mailing Address
Phone Numbers
Medical Records Number
Medical Notes
Financial Accounts Info
Certificates
Legal Documents
Education Records
Device Identifiers
Military Status
Employment Status
Foreign Activities
Passport Number
Taxpayer ID
Alien number

Indicate the categories of individuals about whom PII is collected, maintained or shared.

Employees
Public Citizens
Business Partner/Contacts (Federal/state/local agencies)

Vendor/Suppliers/Contractors

Unaccompanied Alien Children, Sponsors, Beneficiary or Applicant Information, Care Provider Names and Business Information

How many individuals' PII is in the system?

100,000-999,999

For what primary purpose is the PII used?

The PII is used to identify and redact sensitive information from documents related to FOIA release reviews and controlled disclosures, E-discovery and litigation related requests, program integrity audits and monitoring, regulatory compliance, and other authorized agency disclosure review processes under the UAC Bureau. Automation improves accuracy, reduces human error, and ensures compliance with federal privacy and confidentiality requirements.

Describe the secondary uses for which the PII will be used.

PII may be used for quality assurance reviews to ensure accuracy and compliance with privacy standards.

Identify legal authorities governing information use and disclosure specific to the system and program.

Statutes

The Privacy Act of 1974, 5 U.S.C. § 552

Freedom of Information Act (FOIA), 5 U.S.C. § 552

Federal Records Act (FRA), 44 U.S.C. § 3101 et seq.

Homeland Security Act (HSA) of 2002, 6 U.S.C. 279(b)(1)

Trafficking Victims Protection Reauthorization Act (TVPRA) of 2008, 8 U.S.C. § 1232

Regulations

UC Program Foundational Rule, 45 C.F.R. Part 410

Standards to Prevent, Detect, and Respond to Sexual Abuse and Sexual Harassment Involving Unaccompanied Children Interim Final Rule, 45 C.F.R. Part 411

Investigations of Child Abuse and Neglect Rule, 45 C.F.R. Part 412

Are records on the system retrieved by one or more PII data elements?

No

Identify the sources of PII in the system.

Government Sources

Within OpDiv

State/Local/Tribal

Identify the OMB information collection approval number and expiration date

Not Applicable. Redactable, Inc. does not collect information directly from individuals for reporting or survey purposes.

Is the PII shared with other organizations?

Yes

Identify with whom the PII is shared or disclosed and for what purpose.

Describe any agreements in place that authorizes the information sharing or disclosure.

ORR currently has a 2021 Memorandum of Understanding (MOU) with Department of Homeland Security and a 2016 MOU with the Department of Justice.

Describe the procedures for accounting for disclosures.

ORR uses procedures in its UAC Bureau Policy Guide to process requests for information.

Describe the process in place to notify individuals that their personal information will be collected. If no prior notice is given, explain the reason.

Documents processed by Redactable, Inc. originate from existing Agency systems, where the Privacy Act Statement or Notice (SORN No. 09-80-0321) has already been provided, with details about what information ORR collects and how the information is used.

Is the submission of PII by individuals voluntary or mandatory?

Mandatory

Describe the method for individuals to opt-out of the collection or use of their PII. If there is no option to object to the information collection, provide a reason.

There is no opt-out option. The system processes documents already in ORR's possession for legal and regulatory purposes.

Process to notify and obtain consent from individuals whose PII is in the system when major changes occur to the system.

Notice and consent are governed by program-specific authorities. The applicable SORN provides information about routine uses and disclosures. The SORN is updated when significant changes to the processing, storing, and/or use of the information occur. Additional direct notice is not required for processing done solely to protect privacy and security.

Describe the process in place to resolve an individual's concerns when they believe their PII has been inappropriately obtained, used, or disclosed, or that the PII is inaccurate.

Individuals may contact the ORR FOIA Office or the ACF Privacy Office to file a complaint or request correction. ORR follows HHS privacy and redress procedures to investigate and resolve such concerns.

However, this is not necessarily applicable. The records will not be shared. They will be redacted as part of this effort.

Describe the process in place for periodic reviews of PII contained in the system to ensure the data's integrity, availability, accuracy and relevancy.

ORR staff conduct periodic quality assurance reviews of redacted documents to ensure PII is properly identified and removed. The vendor also provides audit logs and system reports to support oversight.

Identify who will have access to the PII in the system and the reason why they require access.

Describe the procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.

Access is role-based and granted only to authorized personnel with a need-to-know. ORR Information Technology (IT) and program managers approve access requests based on official job duties and maintain access control lists.

Describe the methods in place to allow those with access to PII to only access the minimum amount of information necessary to perform their job.

The system enforces least-privilege access through user roles and permissions. Users can only view documents assigned to them for redaction. Audit logs track all access.

Identify training and awareness provided to personnel (system owners, managers, operators, contractors and/or program managers) using the system to make them aware of their responsibilities for protecting the information being collected and maintained.

All personnel receive annual HHS privacy and security awareness training, including handling of PII and data protection responsibilities.

Describe training system users receive (above and beyond general security and privacy awareness training).

Redaction-specific training is provided by ORR or the vendor, including how to identify and redact PII, using the Redactable, Inc. interface, and following ORR redaction protocols.

Do contracts include Federal Acquisition Regulation and other appropriate clauses ensuring adherence to privacy provisions and practices?

Yes

Describe the process and guidelines in place with regard to the retention and destruction of PII.

Redacted documents are retained in accordance with the HHS Records Schedule (e.g., FOIA-related records: N1-468-09-001). Documents uploaded to Redactable, Inc. are deleted after processing, per vendor policy.

Describe, briefly but with specificity, how the PII will be secured in the system using administrative, technical, and physical controls.

Technical control:

Technical controls implemented by the system include role-based access control, strong authentication, encryption of PII at rest and in transit, and audit logging to monitor and record system access and activity.

Administrative control:

Administrative controls enforced by ORR include mandatory privacy and security training, periodic access reviews, and incident response procedures.

Physical control:

Physical controls are provided through the use of secure, FedRAMP-authorized cloud infrastructure with restricted physical access.