

City of Spokane

Body Camera Video Redaction Cost Study

October 2023

Background

The Spokane Police Department (SPD) has implemented a Body Camera program. Officers wear body cameras and capture recordings that are public records subject to the Washington Public Records Act, Chapt. 42.56 RCW (PRA). The PRA, under RCW 42.56.240(14)(f)(i), allows a law enforcement agency responding to requests for body camera recordings to charge certain requestors the reasonable costs of redacting videos prior to disclosure. The purpose of this cost study is to determine those reasonable costs. Allowable redaction costs are in addition to copying costs that agencies are legally allowed to charge requestors.

Introduction

With the exception of the following requestors, 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 camera recording prior to disclosure:

- A person directly involved in an incident recorded by the requested body camera recording;
- An attorney representing a person directly involved in an incident recorded by the requested body camera recording;
- A person or his or her attorney who requests a body 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 agreement.

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

The purpose of this cost study is to determine the reasonable cost of redacting body camera recordings in order to provide a requestor the estimated cost of redacting particular body camera recordings and, to provide requestors a choice of redaction types in order to reduce costs to those requestors.

Principles

- We charge for redactions based on the parameters provided in the PRA.
- We charge staff time (salary + benefits) directly applicable to redacting videos.

- We charge staff time for no more than the lowest-paid employee assigned responsibility for redacting video.
- We have a highly skilled Public Records Specialist who applies their expertise to redact video in an efficient and skillful manner.
- We use redaction technology that most effectively and efficiently meets the administrative and operational needs of the Department.
- We do not charge requestors any costs related to the redaction technology.
- The City incurs substantial costs for video management, processing, storage, and redaction technology.
- In addition to allowed redaction costs, we charge requestors the actual cost of copies of Body Cam Video recordings as provided in the PRA.

Types of Redactions

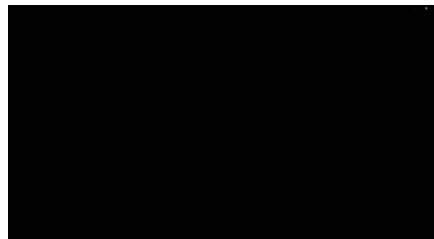
- Targeted Video Redaction of Person or Object with or without Targeted Audio Redaction: This blurs or blacks out the face or identifying features of an individual or object and removes exempt audio content.
- Targeted Audio Redaction Alone: This removes exempt portions of the audio.
- Blackout of Screen with or without Audio Removal: This completely blacks out targeted segment(s) of video and may include redaction of associated audio from the segments.

Video Redaction Type Illustrations

Targeted Video Redaction



Blackout of Screen



Redaction Process

The cost of redacting video using current technology reflects actual staff time derived from the workflow necessary to apply redactions as detailed in the SPD Redaction Process Workflow, attached to this Cost Study.

Time Studies

Stopwatch style time studies were conducted to determine the amount of time it takes to redact body camera recordings including how long it takes to remove audio from an entire video, eliminate one minute of video, redact one minute of audio, and redact one minute of video.

Time Study Results:

| Redaction Type | Video Time | Average Redaction Time |
|---|--|--|
| Targeted Video Redaction with Targeted Audio Redaction | 1 Minute per individual or object redacted | 11 Minutes per individual or object redacted |
| Targeted Video Redaction without Targeted Audio Redaction | 1 Minute per individual or object redacted | 10 Minutes per individual or object redacted |
| Targeted Audio Redaction Alone | 1 Minute | 1 Minute |
| Blackout of Screen, with Audio Removal | 1 Minute | 1 Minute |
| Blackout of Screen, without Audio Removal | 1 Minute | 2 Minutes |

Public Records Video Redaction Costs

The PRA allows agencies to charge the actual cost of redacting body camera recordings including the cost of redaction technology provided it is the least costly commercially available method. The Public Records Specialist salary amount does not include the cost of redaction technology and the City does not intend to charge requestors technology costs at this time. The City intends to charge requestors at the rate of \$0.76 per minute of Public Records Specialist time to redact body camera videos. This rate is below the actual cost incurred by the City for redacting video. The following table depicts the calculations of the salary and benefits of the Public Records Specialist assigned to video redaction:

| | Hours/Yr | Rate/Hr | 2023 |
|------------------------------|----------|---------|----------------|
| Salary | 2080 | 33.3868 | \$ 69,445 |
| Benefits | | | \$ 25,667 |
| Total Salary+Benefits | | | \$ 95,112 |
| | | | |
| Total Minutes in 2080 hours | | | 124,800 |
| | | | |
| Total Cost Per Minute | | | \$ 0.76 |

Estimating Redaction Costs

Based on the results of the cost study, SPD Public Records Specialists Workgroup staff will calculate estimated redaction costs at the following rates:

| 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 Targeted Audio Redaction | \$0.76 per individual or object redacted | 11 per individual or object redacted | \$8.36 per individual or object redacted |
| Targeted Video Redaction without Targeted Audio Redaction | \$0.76 | 10 per individual or object redacted | \$7.60 |
| Targeted Audio Redaction Alone | \$0.76 | 1 | \$0.76 |
| Blackout of Screen, with Audio Removal | \$0.76 | 1 | \$0.76 |
| Blackout of Screen, without Audio Removal | \$0.76 | 2 | \$1.52 |

SPD Will Charge Redaction Costs 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 \$0.76 per minute.

ATTACHMENT

SPD Redaction Process Workflow for Body Camera Video Redaction

1. Receive Initial Video Request
 - a. Locate video in Evidence.com using one or more of the following fields: case number, officer ID, and date/time (Evidence.com is a cloud-based system).
 - b. Conduct research to locate incident if video not initially found in Evidence.com. Verify officer on the call, then check Evidence.com for video submitted by that officer for incident date/time.
 - c. Once videos are located, request case link from Evidence.com.
2. Public Records Specialist Redaction Process
 - a. Receive Evidence.com download link via email.
 - b. Upload videos to Caseguard Studio for Public Records Specialist to identify redactable content.
 - c. Public Records Specialist reviews video to identify content that requires redaction, detailing relevant time codes.
 - d. Where redaction is required, the Public Records Specialist will apply redaction and remove audio at appropriate points in video.
 - e. Public Records Specialist must selectively redact video FRAME BY FRAME to ensure the exempt content is redacted.
 - i. Camera movement, lighting conditions, environment, proximity of individuals/objects to camera, number of individuals/objects to be redacted, and other qualitative factors will contribute to the complexity of the redaction. In addition, the file size of the responsive records will also contribute to the time it takes to redact.
 - f. Multiple passes of the video will be required to track individuals and/or ensure that all exempt video and audio content has been redacted throughout video.
 - g. Public Records Specialist conducts quality assurance by replaying video in real time or slower to refine redaction and ensure redaction accuracy.
 - h. Public Records Specialist will export redacted videos from Caseguard.
3. Redaction Distribution
 - a. If the requestor has provided BOTH an email address and a cell phone number, a link will be created in which the requestor may receive the requested body cam video.

- b. For all other requests, the body cam video will be downloaded to a thumb drive and be made available either by mail or for pick-up at Spokane Police Records. Requestor will be charged for the actual cost of the thumb drive and mail (if applicable).