

United States Department of the Interior OFFICE OF THE SECRETARY

Office of Law Enforcement and Security 1849 C Street NW Washington DC 20240

July 13, 2023

LAW ENFORCEMENT AND SECURITY POLICY BULLETIN NO. 23-01

SUBJECT: Department Policy for the Expedited Public Release of Body Worn Camera and Vehicle Mounted Camera Video Footage Pursuant to 446 DM 41

1. Purpose

Chapter 41 of Departmental Manual Part 446 (446 DM 41) establishes policy governing the use of body worn cameras (BWCs) and vehicle mounted cameras (VMCs) by Department of the Interior (Department) law enforcement officers (LEOs). The Chapter reads, in part, "The Department will strive to expedite the public release of BWC and VMC video footage following incidents involving serious bodily injury or death in order to promote transparency and accountability. The public release of such video footage also must be consistent with applicable law, including the Privacy Act of 1974, and shall take into account the duty to protect the privacy rights of the persons depicted in the footage and any need to protect ongoing law enforcement operations." 446 DM 41 further states, "Bureaus must establish policy governing the release of BWC and VMC video footage that is consistent with this Chapter."¹

This Bulletin supplements 446 DM 41. Bureaus/Offices must establish policy and procedures governing the public release of BWC and VMC video footage for incidents outlined in the Scope section of this Bulletin. Unless otherwise mandated in this Bulletin, Bureaus/Offices are afforded discretion in the manner in which such footage is publicly released, subject to restrictions under the Privacy Act of 1974, Freedom of Information Act (FOIA), and other applicable laws. Indeed, as noted below, decisions regarding the timing, redactions, and presentation of such releases will often be fact-specific and require the exercise of sound judgment by various stakeholders. Nonetheless, in an effort to promote uniformity and consistency of approach among the Department's law enforcement programs in matters that may garner significant public scrutiny and media attention, this Bulletin provides guidance for the Bureaus/Offices when establishing their policies and

¹ 446 DM 41 uses the word "footage" to mirror the language in EO 14074. This Bulletin often uses the word "recording" to underscore the digital nature of the release and recognize that additional information, such as metadata, may be released in certain instances. It is intended that "footage" and "recording" be read interchangeably in this Bulletin and to allow for broad production under applicable laws and Department policy.

procedures. The Bulletin represents a consensus-built approach by the Department's law enforcement programs and reaffirms the Department's commitment to transparency and accountability to the citizenry we intend to serve.

2. Effective Date

This policy is effective immediately.

3. Authorities

- Executive Order (EO) 14074, Advancing Effective, Accountable Policing and Criminal Justice Practices to Enhance Public Trust and Public Safety, May 25, 2022;
- 5 U.S.C. § 301; 43 U.S.C. § 1454; Reorganization Plan No. 3 of 1950, (64 Stat. 1262), as amended; 54 U.S.C. § 102701 et seq., for the National Park Service; D.C. Code § 5-201 et seq. and related authorities for the U.S. Park Police; 43 U.S.C. §§ 1733(c)(1)-(2), for the Bureau of Land Management; law enforcement authorities specific to the Fish and Wildlife Service, including but not limited to 16 U.S.C. § 3375(b) and 16 U.S.C. § 460k-3; 25 U.S.C. § 2803, for the Bureau of Indian Affairs; and 43 U.S.C. § 373b, for the Bureau of Reclamation;
- 446 Department Manual (DM) 41, Body Worn Cameras and Vehicle Mounted Cameras
- The Privacy Act of 1974 (5 U.S.C § 552a);
- Nothing in this policy affects the rights, procedures, or Department regulations governing requests for, and release of, records under the Freedom of Information Act (FOIA, 5 U.S.C. § 552), the Privacy Act of 1974 (5 U.S.C. § 552a), or the Government in the Sunshine Act (5 U.S.C. § 552(b)).

4. Coverage

This policy applies to all Bureaus/Offices that have law enforcement programs and/or employ law enforcement personnel.

5. Scope

Bureaus/Offices must identify the types of incidents that will require the public release of BWC and VMC recordings. The purpose of listing such incidents is to promote transparency and accountability and establish a reasonable expectation from the public and prevent any perception that the Bureau/Office selectively chooses footage to share with the public or discloses only favorable recordings. The list also alerts Bureau/Office personnel to initiate the process for expediting the public disclosure. Nothing in the Bulletin prevents the Bureau/Office from choosing to produce additional recordings that demonstrate its

commitment to serving the public and achieving its mission.² However, the list of incidents will reflect the Department's commitment to transparency and accountability in the event of certain significant incidents.

At a minimum, Bureau/Office policy must ensure the following categories are included for mandatory public releases:

- Use-of-force incidents resulting in serious bodily injury³ or death;
- Deaths in custody⁴;
- Incidents involving the use of deadly force,⁵ regardless of whether the incident results in serious bodily injury or death.

Additionally, Bureaus/Offices are encouraged to include other types of recordings that demonstrate their commitment to transparency and serving the public interest.

6. Timing

Bureaus/Offices must expedite the public release of BWC and VMC recordings following incidents listed in this LEB no later than 30 days after an incident. Bureaus may establish a stricter timetable and are encouraged to release their recordings as soon as practical after the incident. The Department recognizes that certain incidents present unique challenges and obstacles to public releases. In exceptional cases, upon request from the Bureau/Office, the Director OLES may grant an extension to the 30-day requirement.

³ "Serious bodily injury" means bodily injury which involves - (A) a substantial risk of death; (B) protracted and obvious disfigurement; or (C) protracted loss or impairment of the function of a bodily member, organ, or mental faculty. *See* 21 U.S.C. § 802(25).

⁴ "Death in custody" means "the death of any person who is detained, under arrest, or is in the process of being arrested, is en route to be incarcerated, or is incarcerated" at a DOI or Bureau law enforcement or security facility. *See* 34 U.S.C. § 60105(a).

² As explained further in Section 8 of this Bulletin, all public releases, and production of information contained therein, must comport with the Privacy Act of 1974 and any applicable System of Records Notice (SORN). It is incumbent on the Bureau/Office to consult with Office of the Solicitor (SOL) to ensure all public releases comply with applicable laws and Department regulations and policies.

⁵ "Deadly force" means any use of force that carries a substantial risk of causing death or serious bodily injury. Deadly force does not include force that is not likely to cause death or serious bodily injury but unexpectedly results in such death or injury. *See* 446 DM 20.

7. Community Briefing Videos

Consistent with national standards and best practices, the Department expects Bureaus/Offices to use the production format typically referred to as "community briefing videos" or "critical incident briefings." Releasing footage often has the potential to be interpreted out of context by the public.⁶ BWC and VMC footage may not capture preceding conduct or the underlying basis for the encounter. Footage depicting only a singular vantage point may lead to even greater misunderstandings regarding the incident, which, in turn, leads to greater public distrust. Consequently, many state and local law enforcement agencies produce community briefing videos, which detail the event and provide contextual background for the footage. For incidents involving multiple officers, for example, the presentation explains the various camera angles and the officers' perspectives.

It is imperative that Bureau/Office policy outline certain qualities and prohibitions regarding these videos. For example, all community briefing videos must provide disclaimers regarding the ongoing nature of the investigation (if applicable); viewer discretion is advised; and the general basis for any redactions (*e.g.*, to protect the identities of bystanders and/or juveniles). Additionally, any narration or scripted recording must be limited to the facts of the incidents as known at the time of the recording. Bureaus/Offices should only use language that factually chronicles the actions seen in the video and refrain from editorializing actions that may lead the public to a conclusion or using any legal terminology that suggests criminality, liability, or misconduct (e.g., "violated policy," "used excessive force," or "fleeing suspect"). Community briefing videos also must comply with requirements under Section 508 of the Rehabilitation Act of 1973.

Bureaus/Offices may digitally enhance or augment the recordings in their community briefing videos to highlight aspects of the incident (e.g., maximize visibility of an obscure firearm), provided the augmentation is either readily perceptible to the public or explained in the briefing video.

Appendix A to this Bulletin provides a style guide to inform the production of community briefing videos. Bureaus/Offices are strongly encouraged to develop their own community briefing style guides and templates in advance of an incident.

8. Withholdings/Redactions

As noted in 446 DM 41, the public release of BWC and VMC footage must be done in a manner consistent with applicable law, including the Privacy Act of 1974, and to protect the privacy rights of persons depicted in the footage and any need to protect ongoing law

⁶ Depending on the legal grounds for public release, a complete version of the footage from the incident may need to be made available to the public, such as placed in a FOIA reading room, in addition to the creation of a community briefing video. Bureaus/Offices will need to consult with SOL to determine whether the underlying footage, in addition to the community briefing video, will need to be made publicly available.

enforcement operations. The release must also comply with all applicable Department and Bureau/Office regulations and policies.

Bureau/Office policy should detail its protocols for both its qualitative evaluation and technical execution of redactions. Bureau/Office policy should set forth a general deadline for completion to ensure it is prioritized and given the requisite resources. In the event Bureaus/Offices require technical support from the Department or a contractor (*e.g.*, another Bureau law enforcement program, SOL FOIA Compliance Team, BWC contractor, etc.), they should identify such needs at the earliest possible opportunity and engage with the component prior to any incident in order to coordinate efforts.

To ensure compliance with the Privacy Act and other applicable laws and regulations, each Bureau/Office policy must include protocols for assessing whether certain information should be withheld and, if necessary, making appropriate redactions. Appendix B to this Bulletin provides a Reference Guide for making redaction/withholding assessments. Appendix B is not intended to be a definitive, exhaustive list, as each video is unique and may present distinct considerations. However, public releases often occur in the wake of a stressful event for the Bureau, and the appendix should serve as a helpful resource during crisis communications.

9. Department Internal Coordination

Coordination and collaboration between various Department and Bureau/Office stakeholders prior to any public disclosure is critical for successful crisis communication. Bureau/Office policy should detail the level of internal coordination and ensure appropriate leadership is briefed at appropriate stages of preparation. Below are a few critical stakeholders that must be consulted during the process:

<u>Director, Office of Law Enforcement and Security (OLES)</u>: As noted in 446 DM 41, "the decision to expedite the public release of BWC and VMC video footage depicting serious bodily injury or death (or any event that is reasonably anticipated to garner substantial media attention) will be made in consultation with the Director, OLES. Bureaus must notify the Director, OLES of the existence of any such video footage at the earliest possible opportunity." Director, OLES, will assist in coordinating with other Department stakeholders and ensure consistency of practice by the Department's law enforcement programs.

Director, OLES, may also help facilitate coordination with DOI's Victim Assistance Program (VAP), when necessary. Certain incidents (e.g., domestic violence, criminal mass casualty, domestic terrorism incidents) can have a devastating impact on victims, families, survivors, first responders, bystanders, and members of the public. Fair and compassionate treatment of victims, their families, and survivors is of critical importance. Coordination with a VAP may be necessary to prevent the public release from re-traumatizing victims or violating their protected rights. VAP personnel may be best suited to reach out to victims and the decedent's family and notify them of the forthcoming public release, as well as participate in any meeting in which the decedent's family is allowed to view the footage in advance of the public release. While the Bureau VAP may be able to provide such assistance, OLES can facilitate assistance from DOI's VAP, if needed.

<u>Office of the Solicitor (SOL)</u>: SOL should be contacted at the earliest possible opportunity to allow for legal review of the BWC or VMC footage and any additional relevant information. SOL will help ensure the production comports with the Privacy Act of 1974 and all other applicable laws and Department and Bureau/Office regulation and policies. SOL should be consulted during the drafting of any community briefing video script, press release, or public statement regarding the incident. SOL will also participate in outreach to the appropriate Federal, State, Tribal or local criminal investigative agency or prosecutor's office with respect to the public release of the footage (see below). SOL will further assist in identifying any potential criminal and civil liability issues stemming from the incident and help coordinate efforts accordingly.

<u>Department Communications Office (OCO)</u>: Given the level of public attention and media scrutiny that arises from certain incidents, OCO may play a significant role to play in collaborating on and reviewing the Bureau's/Office's public releases of BWC and VMC footage. Bureau/Office policy must ensure that its leadership coordinates with OCO at the earliest possible time and provide situational awareness (including briefings, if requested) throughout the production and dissemination process. While the Bureau will lead on the development of the video and distribution, OCO will have situational awareness and review the communication plan.

<u>Other Bureau(s) Involved in the Underlying Event</u>: When two or more Bureau/Office law enforcement programs within the Department are involved in the underlying incident, they shall work together to ensure a coordinated effort for the public release of any information, including video footage. In the event the Bureaus are unable to resolve any issue(s) with respect to the public release of information, OLES will decide the appropriate course of action, in consultation with the Bureaus/Offices, SOL, and OCO.

<u>Bureau/Office Associate Privacy Officers</u>: As the officials responsible for protecting privacy interests and securing the information provided to organizations within the Department, Associate Privacy Officers should be contacted early in the process for guidance on releases and to ensure safeguards are implemented to protect individual privacy. Bureau/Office policy must identify the appropriate level of engagement and ensure privacy rights are respected and protected.

10. External Outreach

Bureau/Office policy must detail external outreach efforts. The policy should identify the proper person(s) within the Bureau/Office to initiate contact and provide all necessary briefings.

<u>Department of Justice (DOJ)/United States Attorney's Office (USAO)/Criminal</u> <u>Investigative Agency</u>: The effort to promote law enforcement transparency and accountability must not come at the cost of interfering with an active criminal investigation or compromising the integrity of any potential future prosecution. Therefore, the public release of BWC and VMC footage must be done in consultation with the appropriate Federal, State, Tribal or local criminal investigative agency and/or prosecutor's office.

There is a presumption that the public release of BWC or VMC footage will not impact or interfere with any ongoing law enforcement or prosecutorial efforts. This presumption is predicated on guidance from the DOJ regarding Section 13(b) of EO 14074. DOJ anticipates being able to publicly release its own footage "as soon as practical" following incidents resulting in serious bodily injury or death in custody. *See, e.g.*, ATF O 3020.4 ("There is a presumption ATF will publicly release all TFO BWC recording(s) that depict an incident resulting in the serious bodily injury or death of another, as soon as practical unless there exist specific and compelling grounds to justify withholding, which cannot be resolved by redaction, partial withholding, or other means."); DEA BWC Policy D45-411 (similar language). It is presumed that such public releases will occur prior to a declination letter or charges being filed in a criminal matter and prior to the conclusion of the administrative investigation.

Nonetheless, consultation with the criminal investigative agency and prosecutor's office is prudent. Bureaus/Offices must give due consideration to such entities when they are able to articulate a specific, tailored basis to delay the release. For example, a criminal investigator may seek to interview a particular witness without the individual having the benefit of seeing the footage beforehand. Additionally, there may be instances in which announcing criminal charges against an officer prior to the release of particularly traumatic footage may avert or mitigate civil unrest. Such tailored requests should be strongly considered. However, general notions of "close-holding" potential criminal evidence should not be encouraged, and any agreed-upon delay should be caveated with a timetable for future release. SOL should participate in any discussions with DOJ or the criminal investigative entity in the event there are any disagreements about the public release.

<u>Subject/Family/Legal Counsel Outreach</u>: Following certain incidents, it may be appropriate to notify certain individuals related to the incident of the upcoming public release and, if feasible, allow them to view the recording(s) in advance, provided that doing so does not delay the release of the recordings. These individuals may include:

- The Subject upon whom force was used;
- If the Subject is deceased, the next of kin;
- If the Subject is a juvenile, the Subject's parents or legal guardian;
- Legal counsel for any of the above.

Bureau/Office policy should outline such outreach efforts, including the Department or Bureau/Office employee responsible for the notification. Bureaus/Offices may benefit from consulting with other law enforcement agencies in the region that have experience with family outreach. Bureaus/Offices should be aware that subject and/or decedents' families may request to view the underlying footage from the incident rather than the community briefing video. Bureaus/Office policy should plan for such scenarios. <u>Other Department/Agency Involved in the Underlying Event</u>: Bureau/Office policy must include protocols for coordinating with other law enforcement agencies (LEAs) in the event an LEA outside of the Department was directly or indirectly involved in the underlying event. Bureau/Office policy should encourage coordination; however, in the event the other agency is conducting its own internal investigation, or disputes or discrepancies arise between the LEAs concerning the underlying event, Bureaus/Offices should take every reasonable precaution to ensure it does not interfere with, or even give the appearance of interfering with, the internal affairs process and deliberations of the external LEA.

11. Inquires

Inquires on directives contained in this Policy Bulletin can be directed to the Director, OLES.

12. Distribution

This policy will be distributed to all Bureau/Office Directors of Law Enforcement. The policy also will be posted on the OLES website and the Law Enforcement Portal.

13. Rights and Benefits

This Bulletin (including Appendices) is not intended to, and does not, create any right or benefit, substantive or procedural, enforceable by law or equity by a party against the United States, its departments, agencies, instrumentalities or entities, its employees or FOIA personnel, or any other person.

> Robert D. MacLean Director, Office of Law Enforcement and Security

APPENDIX A

Community Briefing Video Style Guide

Creation of a Style Guide and Template(s)

Video editing is a time-consuming process which requires specialized skills and equipment. Video editors' time is often in demand, and they will likely have several competing priority projects. The Department hopes to avoid unnecessary delays through the creation of the community briefing video by providing the following template and style guide.

While each Bureau/Office should use their discretion to determine their vision for what community briefing videos will look like, the Department expects the videos to be of the highest professional quality and consistent in appearance and content with other community briefing videos released by the Department.

The videos must be 508-compliant and use only official Department and Bureau/Office logos and symbols. The typeface of any written content should be plain and legible.

Recommended Content of the Community Briefing Video

It is up to the discretion of each Bureau/Office to determine whether Steps 2-5 are done through written/audio presentation versus on-camera video; however, the Department believes delivering Steps 2-4 on-camera would lend credibility and authenticity to the presentation.

• Step 1: Title Card

The title card should provide the basic information regarding the date and location of the incident and the Bureau/Office. See attached sample.

• Step 2: Introduction to the Bureau/Office Law Enforcement Program

At the beginning of the video, a 1-2 minute statement about why this is being shown, including why the Bureau's LEOs were involved in the incident and why the release of the footage is consistent with best practices. Many members of the community may not be aware that the Bureau/Office has a law enforcement program, and the mission and purpose of the program should be briefly explained. The presence and role of other first responders should also be explained.

• Step 3: Status of the Investigative Process and Relevant Policies

We recommend an additional 1-2 minutes to briefly relay to the viewer the status of the investigation, as well as an explanation of the investigative process and any relevant policies may be cited. The following disclaimers should be included:

- ✤ All parties are presumed innocent.
- The information presented is based on what is known at this point in the investigation, and a statement that understanding may change as the investigation

proceeds.

The briefing will not draw any conclusions about whether these officers acted consistent with law and policy until all the facts are known and the investigation is complete.

• Step 4: Narration and Summary of the Incident Details

Bureaus/Offices should create a brief narrative that states the context and facts as known at the time of the release. This narrative should be carefully written to represent only those facts known at the time of the release and should not make any implications or draw any conclusions. The purpose of this narrative is to answer the questions of who, what, when, and where (not why). Detail and highlight any first aid/rescue/lifesaving efforts performed on the decedent or suspect(s).

The narrative should be in plain, easy to understand language free of acronyms, abbreviations, and jargon. It is giving the viewer the opportunity to understand what they are about to see.

• Step 5: Introduction to the Recording

This card should explain the nature of the recording itself. If part of the recording contains a video-only buffer, this should be explained. If the video has been enhanced in any way or if portions of the recording have been redacted, withheld, slowed down, or sped up, then this should be explained to the viewer. If multiple officers were involved, the slide should inform the viewer of whose camera was used.

If applicable, state that "the video you are about to see may contain graphic or disturbing images and viewer discretion is advised."

• Step 6: The Body Worn Camera Recording

Subjects in BWC videos have privacy interests which may warrant redactions. See Appendix B.

Bureaus/Offices should use overlays on their videos, if consistent with agency policy. (Note: Overlays are the text on the top left of a BWC or VMC video. Similar to the watermark which is on the top right.) This helps to ensure identification of an official agency released video and ensures if the video is "screen captured" and used unofficially, the source of the video is known.

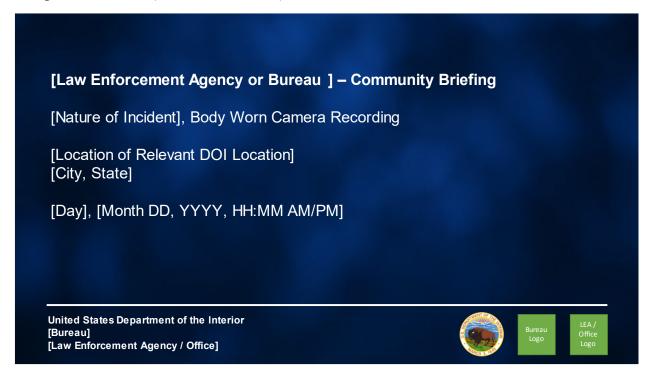
Other video and audio recordings (dash cameras, security cameras, radio runs, 9-1-1 calls, etc.), photos of evidence, and maps may be spliced in order to help the viewer understand context of the incident.

If there are audible, spoken words in the video recording, the video must have subtitles or closed captioning. An automatic caption generator may be used; however, the captioning should be reviewed for accuracy. If the spoken words cannot be clearly understood, then replace the subtitles with "[inaudible]."

• Step 7: Closing

After the recording has ended, additional slides or an on-camera presentation may be added to provide contact info for tip hotlines, further information about how to access policies, and/or any other relevant information.

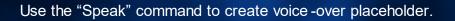
Sample Title Cards (PLACEHOLDER)



This briefing is intended to provide the public with information about [the critical incident.] You are about to see relevant video recordings to gain a better understanding of what occurred. This incident is still under investigation, and all statements in this briefing are based on the details we know at this point.

We are committed to being transparent with our community, and it's our priority to release this information and inform our community as soon as possible. For privacy purposes, we have concealed audio and images of the individuals captured in this video. A word of caution: this video of an officer-involved shooting contains graphic content and strong language. Viewer discretion is advised.

United States Department of the Interior [Bureau] [Law Enforcement Agency / Office]



Instructions can be found here: <u>Use the Speak textto-speech feature</u> to read text aloud <u>Microsoft Support</u>

United States Department of the Interior [Bureau] [Law Enforcement Agency / Office]



LEA / Office This incident is being investigated and all statements in this community briefing are based on the details known at this point in the investigation. As the investigation continues, more details may be learned that change the understanding of the incident.

United States Department of the Interior [Bureau] [Law Enforcement Agency / Office]



The investigation into this incident is being handled by the [Investigative Agency / Office] and reviewed by the [Reviewing Agency / Office, if applicable.

An administrative review of this incident [is being / will be] conducted by the Department of the Interior.

United States Department of the Interior [Bureau] [Law Enforcement Agency / Office]



APPENDIX B

Reference Guide for Redactions/Withholdings for Release of BWC and VMC Footage

As noted in EO 14074 and 446 DM 41, the public release of BWC and VMC video footage "must be consistent with applicable law, including the Privacy Act of 1974, and shall take into account the duty to protect the privacy rights of the persons depicted in the footage and any need to protect ongoing law enforcement operations."

<u>Protected Individuals</u>. To protect the rights of the persons depicted in the footage, information regarding the following individuals should be redacted/blurred/withheld:

- Third-Party Witnesses/ Bystanders: Individuals who had no direct involvement in the underlying incident.
- Victims: Information regarding victims of crimes, particularly domestic violence, human trafficking, and sexual assault or misconduct, should be safeguarded to the maximum extent possible. Unless the victim's interaction with law enforcement was the basis for the underlying incident, and the release of the victim's information serves a legitimate public purpose, information about a victim should not be released.
- Juveniles: Information regarding juveniles should be withheld, unless the juvenile has been charged with a crime, the name is already a matter of public record, the juvenile's likeness is already in the public domain (*e.g.*, citizen video), and the release of the juvenile's information serves a legitimate public purpose.
- Potentially Threatened Individuals: Information about individuals should be withheld when there is a legitimate concern the individual may be harassed, doxed, threatened, or retaliated against in the event their name is publicly released.
- Decedents who's next of kin has yet to be notified.

For the above individuals, blurring/redactions should include, but are not necessarily limited to:

- a. Faces
- b. Recognizable Aspects, such as tattoos and clothing
- c. Likeness
- d. Home address
- e. License Plates
- f. Personally Identifiable Information (PII) see list below in Additional Redactions

Law Enforcement Officers. The above safeguards should be afforded to law enforcement officers involved in the underlying incident when there is a legitimate concern that the public release of such information may subject the officer(s) to harassment, doxing, threats, or retaliation. However, officer information should be released in the event they have been arrested or indicted based on the incident and their name(s) is a matter of public record.

<u>Additional Redactions</u>. Pursuant to FOIA Bulletin Number: 22-02, FOIA personnel may withhold the below categories of information without obtaining further consultation with SOL. While expedited public releases under this Policy Bulletin will be proactive (without requiring a FOIA request prior to production), such withholdings are nonetheless warranted.

Any information including but not limited to a particular individual's:

- Social Security number;
- Tribal enrollment number;
- Passport number;
- Airline membership/frequent-flier account number;
- Credit card number;
- Bank account number;
- Age;
- Date of birth;
- Place of birth;
- Medical information (for example, medical conditions, medical history—including pregnancy status and history—and details of insurance benefits);
- Biometric information (for example, x-rays, fingerprints, retinal scan, voice signature, facial geometry, DNA, and genetic information);
- Marital status;
- Emergency contacts;
- Information about spouses, domestic partners, family members, and minors;
- Information pertaining to eligibility for retirement (including service computation dates and tenure);
- Information pertaining to eligibility for disability preferences;
- Financial information, such as credit ratings and personal credit card or financial account numbers;
- Appointment for drug testing documented in a Visitor Log;
- Personal cellular phone number documented in a Visitor Log;
- Name, if the individual is a minor, documented in a Visitor Log;
- Individual's activities or exercise of First Amendment rights; and
- PII or private information that may cause embarrassment, unfairness, financial loss, risk to personal safety, emotional harm, or other harms.