

Open Public Records:

The Fountain of Truth

Richard J. H. Varn



COALITION FOR SENSIBLE PUBLIC RECORDS ACCESS

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Open Public Records: The Fountain of Truth

A popular Government, without popular information, or the means of acquiring it, is but a Prologue to a Farce or a Tragedy; or perhaps both. Knowledge will forever govern ignorance: and a people who mean to be their own Governors, must arm themselves with the power which knowledge gives.

James Madison

Most truths are so naked that people feel sorry for them and cover them up, at least a little bit.

Edward R. Murrow

We are not afraid to entrust the American people with unpleasant facts, foreign ideas, alien philosophies, and competitive values. For a nation that is afraid to let its people judge the truth and falsehood in an open market is a nation that is afraid of its people.

John F. Kennedy

And ye shall know the truth, and the truth shall make you free.

John 8:32

Introduction

The Coalition for Sensible Public Records Access (CSPRA) is a non-profit organization dedicated to promoting the principle of open public record access to ensure individuals, the press, advocates, and businesses the continued freedom to collect and use the information made available in the public record for personal, commercial, and societal benefit. It is CSPRA's belief that the records of how our society governs itself at all levels and manner of government ought to be open and accessible to all. The primary exception to this principle is the handful of specific situations where the privacy interest of the subject of such records substantially outweighs the public right to know. To allow access to be thwarted by mere concerns over individual embarrassment or need to control one's image is to reduce the truth to individual possession instead of being a good held in common by the whole. As James Madison wisely noted, those who mean to govern themselves must be armed with knowledge. This paper addresses truth and its promise as found in public records. It also challenges the growing numbers of those who would attack the truth and favor a society veiled in secrecy. It is CSPRA's belief that a society organized toward freedom and prosperity has an interest in seeing truth protected.

The Promise of Truth

A functioning, market-based democracy is fueled by truth, depends on truth, and is best regulated by truth. Our democracy was founded on this principle. It was subsequently

enshrined in the First Amendment to our Constitution and it is woven throughout our laws, culture, and economy. Truth has been one of the defining and historical differences that set the American experience apart, fueling our successes. When it has been ignored, we have experienced some of our most damaging and ignominious failures.

Public records are a critical source of the truth. When open and accessible, they are heavily relied upon for advocacy, accountability, commerce, marketing, public safety, and newsgathering. They provide a source for the truth about the behavior of our residents and licensed professionals, the ownership of property and corporations, the activities that influence the political processes, and the whereabouts of people. In short, they mimic what people living in smaller towns and communities in free societies have known and relied upon for centuries to thrive. Public records reflect what we have always known as a community, but only recently have we taken to electronically recording and filing such records so one could find and read them easily. The public truth became the public record and when we outgrew towns where everyone knew this oral truth, we fell back upon the public record to meet our need for reliable and true information.

Open public records are also a powerful equalizing force. When there is no public source, information and truth can still be obtained for a price that is not affordable to all. Many of our entrepreneurs, small businesses, ordinary people, political candidates, and community activists are direct and indirect beneficiaries of open records. With direct access to open records and indirect access through the products and services that non-profit and for-profit entities provide, they can compete with those of greater means. From James Madison to Thomas Friedman, the leveling effect of open and equal access to truthful information has been recognized as a bulwark of societal and economic equality. The truth cannot only make one free; truth grants equal opportunities to all.

Markets throughout history and especially of late have had their share of ignominious failures. These are due in large part to the absence of transparency and the greed that grows in shadows where truth's sunshine is shielded. Trading, capital, and other macro-markets depend heavily on true and complete information. Moreover, the consumer and service economy depend on population-wide demographic and individual information that will help target messages, goods, and services from willing legitimate sellers to willing buyers. These two forces—macro-markets and the consumer economy—run on truthful information. It is a critical resource in our modern economy equal to oil, lumber, computer chips, plastic, and steel. It is necessary for policy makers to finally achieve a common understanding of the importance of this fact and be mindful of it when addressing public records issues.

The Threats to Turn off the Truth

Identity Theft and Crime

There are growing and pervasive efforts to restrict the flow of public information. A majority of it stems from the fear that public records are a cause of identity theft and that closing public records will slow down or stop this crime. This has become the trump card of

secrecy. Merely whisper the words identity theft and public records slam shut regardless of the validity of the claim or the impact of hiding and redacting the truth.

One would think that any claim that leads us to stifle the truth would be supported by overwhelming evidence. If we believe in a rational democracy and the truth itself, then the least we can do is ask for the evidence before we react. We have asked, we have searched, and the best we can find are anecdotes and assumptions, but no actual evidence to support the claim that public records cause identity theft to any substantial degree or that their redaction will prevent it. What we have found instead is evidence to the contrary. We have found evidence that the majority of crimes identified as identity theft are actually credit card fraud. This has nothing to do with the public record since credit card numbers are not and should not be public. Except where credit card numbers are stolen from the government, credit card fraud has nothing to do with government records.

2008 Rank	2007 Rank	Item	2008 Percentage	2007 Percentage	Range of Prices
1	1	Credit card information	32%	21%	\$0.06-\$30
2	2	Bank account credentials	19%	17%	\$10-\$1000
3	9	Email accounts	5%	4%	\$0.10-\$100
4	3	Email addresses	5%	6%	\$0.33/MB-\$100/MB
5	12	Proxies	4%	3%	\$0.16-\$20
6	4	Full identities	4%	6%	\$0.70-\$60
7	6	Mailers	3%	5%	\$2-\$40
8	5	Cash out services	3%	5%	8%-50% or flat rate of \$200-\$2000 per item
9	17	Shell scripts	3%	2%	\$2-\$20
10	8	Scams	3%	5%	\$3-\$40/week for hosting, \$2-\$20 design

Table 1. Goods and services available for sale on underground economy servers
 Source: Symantec

We have also found evidence that the criminals have changed their methods. Studies have shown that the theft of money and goods has moved from the small-scale theft and use of identity data, to wholesale theft of security keys and sophisticated cyber and phishing attacks (see Table 1 above from Symantec showing what is being purchased on the black market to enable theft and fraud). We have found evidence that the data in the public record that is targeted for closure and redaction is routinely available from other legal and black market sources. Finally, we have found evidence that open public records are often used to prevent and prosecute identity crimes, help prove the innocence of the victims of identity crimes, and help repair the damage caused by identity crimes. We have summarized some recent studies supporting this analysis in Figure 1 below.

We would also expect that anyone who wants to remove or block the truth from the public record would meet the burden of showing that the benefits outweigh the costs. Not only has

this basic burden not been carried, it has not even been hefted. The many redactions and record closings cost government an enormous amount in money, time, personnel, software, and lost opportunities. The cost to society and those individual and business users is a multiple

Figure 1: Summary of Recent Studies (see Endnotes for Citations)

1. Of the \$54 billion in identity theft and fraud, \$22 billion is credit card fraud, \$11 billion is existing account fraud, and \$21 billion is new account fraud (Javelin, p. 10)
2. Public records are not a significant or easily used source of data leading to identity theft and fraud (Combs, pp. 2-5, Symantec, p. 20)
3. Un-validated, weak single factor authentication (usually something we know like a number or fact that is widely available or easily acquired) and a highly-evolved and unchecked cybercrime industry are the primary causes of identity theft, fraud, and crime, not personal data availability and access in public records (Combs, pp. 4-7)
4. Monitoring, Red Flags rules, and better cyber security work to reduce risk and loss from fraud (Javelin, pp. 9, 14), while closing public records does not (Combs, pp. 7-10)
5. 70 to 150 million or more personal computers can be controlled by a stranger (Trend Micro and Symantec)
6. Thieves do not need to do all the work to steal an identity when they can steal credit card numbers, passwords, and direct access to existing accounts and hence, these are the most popular tools of theft (Symantec p. 11)
7. Most of the personal data that government is trying to redact from the public record is in such wide use, has long been publicly available, is stored in countless and better organized non-governmental systems, and must be used so often, that it cannot be made secret no matter how much government tries to do so (Combs, pp 7-11)

of the government costs. Often the costs of solutions are passed on in the form of higher fees and taxes. Moreover the impact on commerce, newsgathering, democracy, entrepreneurs, financial markets, and consumers remains uncounted and unappreciated. Weighed against this staggering cost, there are no documented, quantifiable, provable benefits from closing and redacting public records. While we think it unrelated, it is worth noting that since redactions to prevent identity theft have begun, identity theft has *grown* to a record level. It is the duty of policy makers and jurists to fairly weigh the policy and legal options. In that weighing, there is but one possible conclusion: The scales remain precipitously tipped toward openness and truth as nothing has been placed on other side of the scale of any substantial weight.

We have consistently advocated improved identity and information security and monitoring, more crime fighting personnel and resources, and increased international cooperation in tracking down and punishing cyber and identity criminals. When used, these measures have yielded results. However, they are not the weapons of choice our lawmakers, judges, and administrators are choosing first or in sufficient measure. If we are serious about stopping

these crimes and protecting privacy, this must change and we must stop pretending that redacting the truth in public records is an effective or adequate countermeasure. Our suggested countermeasures are summarized in Figure 2 below. If doubts remain, please consider this question: If no personally identifiable information were left in any public record, would identity theft stop or even shrink? There is only one rational answer and that is “no.”

Putting the Price of Truth Out of Reach

Even when economic times have been good, the price of public records has been generally and selectively raised. In bad times, this trend takes a steep turn up and becomes a source of revenue to help balance budgets. It is even worse when uncomprehending lawmakers attempt to charge the same amount per record for bulk access as for individual access and the resulting unaffordable charges can amount to hundreds of millions of dollars. In effect, no money can be raised thusly as no one can afford the truth at that price. Sometimes there is the added argument that others should not prosper when government suffers. This is asserted even though such prosperous business activity using public records is already taxed and acts as a catalyst for a majority of all economic activity.

Figure 2—More Effective Countermeasures Against Identity Theft and Fraud

Encourage and help everyone to:

1. Strengthen—use combinations of hard to fake authentication factors that represent something you know, own, and are
2. Monitor—use do-it-yourself or pay services to monitor credit reports and the use of personal information
3. Prevent—use free and fee-based credit alert and freeze services as well as transaction type and size limits on accounts
4. Secure—increase cyber security awareness and ability with training and up-to-date security tools and patches
5. Encrypt—make lost and stolen sensitive data unreadable with strong encryption
6. Reform—use and expand the Federal Trade Commission’s Red Flags rule on opening, using, and altering financial accounts to cover all important accounts, transactions, and benefits
7. Enforce—hire and train more cyber cops

So, whatever the reason for the public records price increases, the result is the same—the price of truth goes up. This imperils a valuable resource. The public record is impartial. It is supposed to be factual and beyond manipulation or distortion to fit an agenda or to cover up things that are the public’s business. It is this lack of personal control over public records and our right to access them that give public records and the truth they contain their power and value for so many beneficial uses. They are paid for by the taxpayers and are the property of the people. Charging more than the marginal cost of reproduction is double taxation. When those charges become

excessive, those charges stop being merely unfair and become an undemocratic tax on truth and its political and economic uses. Consider this another way: Who would campaign on a truth tax platform? And when overpriced truth starts to clog the engine of the economy, who

will stand up and take credit for the jobs lost? Putting the price of truth too high risks making parable into reality: We will kill the goose that lays the golden eggs for our economy by pricing it to death.

Will the True Me Please Stand Up

Many proposals seek to eliminate unique identifiers such as social security number and personally identifiable data such as name and address from public records entirely or just from public records made available to the public. These proposals often, intentionally or not, apply even when there are legitimate and important public or private needs to uniquely identify a person. Since there is no common government system to do this, the public and private sectors have improvised one. Unique or distinct data such as date of birth, SSN, driver's license number, address, and so on is used in conjunction with name to positively identify a person. This is necessary because name alone cannot positively identify a person and properly connect events and behavior to the right person and their property. Doing so is the heart of responsibility in America today. Such affirmative identification was a formality when most of us lived in rural areas and everyone knew everybody else who resided there. Now, our reputations, credit, benefits, safety, and much more depend on the accurate identification of millions of Americans who are not our friends and neighbors.

The truth of massive populations who share many common names is that there is no way to preserve the integrity of the facts and the truth about a person without the other data elements. Because positive identification is so essential, we have allowed the use of these data elements to grow and become ingrained in numerous systems. It is these systems on which we rely for most public and private processes. Even if there was consensus to change the broad use of these other data elements as unique identifiers, the needs we have, as civil and commercial society, to uniquely identify a person will not change. Some kind of system is needed and any new system would need to relate these existing data elements to names to maintain continuity of information for several generations. The question is not whether we should have unique identifiers, but how we manage them and use them. They cannot be eliminated from held or disseminated public records without harming the many legitimate uses of the data to determine with some certainty, who a person is and what records apply to them.

A final irony is that often legislation and rules seek to prevent transfer of unique identifiers to commercial entities to which we already entrust our unique identifiers. Financial institutions, credit bureaus, information brokers, insurance companies, lawyers, and so on already have our personal information such as social security number by necessity and, at times, by law. Not giving these commercial entities the personal identifiers in the public record to legitimately and accurately link events and behavior to the right person and their property protects no one but the imposters, harms the innocent, and hides the truth about the one true person that is the subject of that record.

Expunging History

Another threat to the truth is the effort to make a person's criminal past a secret. While we understand and support criminal record expungement in limited circumstances such as certain

juvenile crimes or minor offenses, many proposals go far beyond that. The concern is that America has criminalized too much behavior and over-incarcerated its population, especially minority males. The desire is to give a convicted criminal a better chance at reintegration into society and a second chance at life. We applaud the goal, but not the method.

There are numerous legitimate uses of the truth of someone's past criminal behavior. Many laws require a criminal background check for purposes such as employment, licensing, access to secure facilities, and work with vulnerable populations. Reviewing a person's criminal history is also a legitimate part of an assessment of the risks a person presents and the likelihood of their success in an endeavor. These include such things as:

- Will the past behavior be repeated?
- Was the person's failure in judgment transient or persistent?
- Did the person's behavior lead to ill-spent time and major gaps in their work and life experiences?
- Do they have less valuable work and life experiences because they did not get such experiences from the corrections system?
- Have they learned from their mistakes and become stronger as a result?
- How will they impact customers they serve, co-workers, and those that depend on them?

Given that there are mandatory and legally permissible uses of this truth and the public records that document it, it is concerning that some wish to make the truth of a person's criminal past disappear as if it never happened. Hiding it from the public record does not mean it did not happen or that is not recorded, remembered, or an essential part of who a person is—for good or for ill. Many employers know this and strike a balance between embracing ex-offenders as valued human resources and rejecting them for their risks or lack of qualifications. There are many more jobs that they could hold, but they need better education, substance abuse treatment, job training, and reintegration services from the corrections system to get them. Criminal justice reform, sentencing reform, and a better balance between punishment and rehabilitation are needed. Such efforts will be more achievable and effective in addressing this problem than trying to expunge history or have government make risk management and qualification decisions for all employers.

Finally, allowing access to the complete public record of a person's criminal behavior and then preventing its use undermines the purpose of a public record and asks us not to seek the truth. The essence of a legitimate criminal justice system is that there can be no secret trials or convictions nor limits on our speech about such events and facts. When we launch down the slippery slope and say when and how we can know and use the truth of a criminal conviction, how will we know when to stop? If we cannot as individuals and as a society speak and think freely about the truth as our judges and juries find it, what is left of the public part of the public record?

The First Casualty of War

In 1918 US Senator Hiram Warren Johnson is purported to have said: “The first casualty when war comes is truth.” If that war has no likely end as with the war on terrorism, what becomes of truth then? Will it be a permanent casualty? Compounding this is the ever-changing enemy and what that enemy may use to spread terror. What will become of the truth when everything we know can be a theoretical threat and we hide more and more of the truth just in case that theoretical threat could become real? The over-classification of public records as confidential for security purposes has affected public records access at all levels of government. While threat assessment and management is a critical public function, there needs to be a more thoughtful balancing process for closing and reopening public records. If we overreact and negatively and unnecessarily affect our values and way of life, we lose the war on terrorism by our own acts. The truth is a better weapon for us than it is against us. We urge caution in hiding it and plead for speed and vigilance in opening it back up as soon as possible.

Let It Flow: The Abundant Benefits Flowing from Public Records

The use of public records by the press and public for selecting and electing public officials and the oversight of government is well understood. Government that lives in the sunshine is closest to its people and to its purpose. But what is less appreciated and understood are the myriad of other uses of public records. Like any good system, this is mostly invisible and unnoticed by those whom it serves. Unfortunately, this means these uses of the truth can be taken for granted or stepped on without knowing the harm being done. We would all do well to better know that on which we so greatly depend, especially if the “we” are those who make the laws and rules that affect public records and their use. Consider the following top activities that nourish our lives and our prosperity and that depend on accessible, complete, accurate, and truthful public records:

1. Life Events

Many critical and routinely valuable events in our lives depend on the truth of public records. A reliable system of recording property owners and for assessing the credit worthiness of buyers and sellers means we can securely and economically buy and own a home, a vehicle, investments, and consumer goods of all kinds. The truth about those places and people who care for our youngest, oldest, infirm, and most needy helps us make the right choices and better protect those we love. Love itself is enabled by the truth in public records in that it helps us find a partner who truthfully represents themselves and their marital status. When our good behavior is reflected in an accessible and true public record, we are rewarded with work and life opportunities fitting out skills and character. Even the everyday life events depend on the truth—for instance, when we check to see how well a restaurant complies with the health code

2. Person and business locator services

Whether we are seeking to recover a debt, to fairly administer justice and law enforcement, enforce a law, collect child support, find witnesses and bail jumpers, or just find an old friend, a long lost ancestor, or a new business, we often use public records to find who and what we need.

3. Background screening for personal and workplace safety, security, and to protect vulnerable populations

William Shakespeare said, “Love all, trust a few.” In a world fast approaching seven billion souls and millions of businesses, how can we know whom to trust? Who has been convicted of serious crimes? Who is a sex offender? Who is a good credit risk or a safe driver or successfully employed? Given even the most obsessively long-lived extroverted individual could only briefly meet a few hundred thousand people in a lifetime, what happens when we need to trust a person we do not know? This is the essence of why background screening has been a growing, well-used, and well-liked process and business. We live in a global village without any of the communal and shorthand knowledge of the traditional village that helped us make rational risk-benefit decisions. The public, “unspinnable” record of a person’s and a company’s history is a rare and precious commodity that stands in for the knowledge of the village. The background check, substituting in the Internet era for what talking to one’s neighbors used to accomplish, allows citizens of our connected world to make these risk-benefit decisions.

4. Public safety and criminal activity detection, response, mitigation, and intervention

Public records and the value-added services on which they are based are key investigative tools for government agencies, law enforcements, and security firms. The intelligent use of such records can prevent and detect fraud related to credit cards, health benefits, insurance, and mortgages. Public records are often used to do identity verification of both individuals and businesses to prevent ID theft and fraud and help a victim recover their reputation after the crime. In addition to crime fighting, public records are key in product and vehicle notifications and recalls. They are also used to provide car history keeping sellers honest and letting buyers know of potential safety hazards from damaged cars.

5. Economic growth, fairness and job creation

It is often said that we live in an information economy. The natural resource on which that economy depends is information and public records are a critical source. Public and private data is used in combination to equalize access to business opportunities, provide convenient and personalized customer service, increase markets and market efficiency, and contribute substantially to economic growth. It is so ubiquitous, it is easy to forget that good information leads to target marketing and communications that help businesses get started or grow. We have achieved a degree of democratization of opportunity through equal and reasonably priced access to public information that strengthens the vitality of our entrepreneurial and small business sectors. It should not take difficult economic times to appreciate that the free flow of information is a job creation engine for our economy.

6. Helping residents exercise their right to know by indexing and adding value and services to public records

Many public records systems are by themselves sufficient to meet a particular need. Yet, these systems were never intended to meet all needs. Government sometimes struggles to keep up with new technology. Non-profits, citizens, commercial enterprises, academic institutions, and press entities among others fill in the gaps and expand the utility and

accessibility of public records. Aside from being a valuable activity in its own right, these creative value added public records systems are great enablers of many other productive and useful endeavors. For example, public mapping and satellite systems contributed to what is now a well-known and appreciated success story known as GPS and personal navigation systems. There are countless others that enrich our lives and improve our productivity.

Conclusion

On the classic TV show *Dragnet*, the starring character Joe Friday was famous for saying, “All we want are the facts, ma’am.” That, in a nutshell, is what we want from our government. This paper has implored that we all work to preserve our system of open government to give to us all the true facts that are in the public record. We have had to implore because the threats to the truth are many and are often without a solid foundation in facts or democratic principles. We have shown that there are better countermeasures to information misuse and fraud than hiding the truth. We have shown that the benefits of the truth are great and the risks from hiding it are too high to justify.

It is inescapably ironic that we need to implore Americans and our policy makers to protect the truth. One would expect the truth to be safe in a nation whose history is rife with generations upon end who freely sacrificed blood and treasure in its defense. If we cannot stand for something as basic to our Constitutional form of government and free market society as the truth, we are in grave danger of losing our way and forgetting the costs dearly paid on our behalf. If the truth is not safe in America, where can it be safe?

The public record is the portion of the truth of our society that is held by our government in trust for the common good. This trust and truth have not been given their due, nor true weight as the glue that holds our government, society, and free market system together. Hiding the truth, taxing the truth, and changing the truth in public records must be seen for what it is—an assault on truth itself, our form of government, our economy, and our way of life. Those who would represent us should stop this assault and instead, pick up the standard of truth, bear it with fidelity, and pass it on to the next generation.

Endnotes

1. [Social Security Numbers, Public Records, and Identity Theft](http://www.cspra.org), Combs, Daniel, 2008, available at <http://www.cspra.org>, under Recommended Reading
2. 2010 Identity Fraud Survey Report, Javelin Strategy and Research, February 2010, at <http://www.javelinstrategy.com>
3. Symantec Global Internet Security Threat Report, Symantec Corporation, Marc Fossi Executive Editor, Volume XIV, Published April 2009 <http://www.symantec.com/business/theme.jsp?themeid=threatreport>
4. Federal Trade Commission Red Flags Rule, see generally <http://www.ftc.gov/bcp/edu/pubs/business/idtheft/bus23.shtm>. The Red Flags Rule was promulgated in 2007 pursuant to Section 114 of the Fair and Accurate Credit Transaction Act of 2003 (FACT Act), Pub. L. 108-159, amending the Fair Credit Reporting Act (FCRA), 15 U.S.C. § 1681m(e). The Red Flags Rule is published at 16 C.F.R. § 681.2.

About the Author

Richard J. H. Varn has served as the Chief Information Officer (CIO) for the City of San Antonio since May of 2007 and previously served as the city's first CIO in 2005 on an interim basis. For over 20 years he has also been a small business entrepreneur and managed his own consulting company. Founded in 1988, RJV Consulting serves public and private sector clients in the areas of information technology, business strategy, innovation, education, and public policy. He is the Technology Policy Advisor to the National Retail Federation, Executive Director of the Coalition for Sensible Public Records Access, and serves on the Board of Trustees for the Educational Testing Service. From 2003-2008 he was a Senior Fellow with the Center for Digital Government and Education.

Mr. Varn's first career was in public service, beginning in 1978 at the University of Iowa and continuing in 1981 as a state legislative aide. He went on to win elected office in 1982 at the age of 24 and served as a State Representative for four years and as a State Senator for eight years. During that time, he was twice elected Majority Whip and chaired numerous committees including the Education Appropriations, Communications and Information Policy, Human Services Appropriations, and Judiciary Committees. He was the first Iowa legislator to install and use a computer in the Iowa legislative chambers. He left the legislature in 1994 to teach and serve as Director of Telecommunications and IT Production Services at the University of Northern Iowa. There he led a successful reorganization of the technology departments and created numerous innovative e-learning programs. He returned to state government in 1999 to create the state's first Information Technology Department. He served as its first Director and as the state's first CIO. Iowa's IT Department quickly gained a reputation for innovative and efficient use of information technology to deliver solutions to government and its citizens. Mr. Varn returned to consulting in 2002.

His degrees and academic honors include membership in Phi Beta Kappa, a Bachelor of Arts with honors in Political Science, and a Juris Doctorate with distinction from the University of Iowa.

Mr. Varn has received numerous awards and recognitions for his public service on behalf of education, fiscal reform, libraries, student financial aid, distance learning, human services, process innovation, and government management. His technology honors include being named twice to the Federal 100 and winning the National Association of State Chief Information Officers Outstanding Achievement Award. He is an internationally recognized expert and leader in information technology, privacy, identity security, public policy, and digital government.

The Coalition for Sensible Public Records Access (CSPRA) is a not-for-profit organization dedicated to preserving responsible access to public record information. CSPRA sponsors research and publications, legislative briefings, and other activities designed to foster a more thoughtful debate about how such access should be balanced with privacy concerns.

Additional information about CSPRA is available at www.cspra.org