# Redaction & Public Posting Process Frequently Asked Questions (FAQ)

For Grant Recipients *of the Broadband Infrastructure Program (BIP), the Connecting Minority Communities Pilot Program (CMC), and the Tribal Broadband Connectivity Program (TBCP)*

# C O N T E N T S

# NOTE:

*This document is intended solely to assist grant recipients of the Broadband Infrastructure Program (BIP), the Connecting Minority Communities Pilot Program (CMC), and the Tribal Broadband Connectivity Program (TBCP) and the requirements set forth in the Notices of Funding Opportunity (NOFOs) for these programs. This document does not and is not intended to supersede, modify, or otherwise alter applicable statutory or regulatory requirements, the terms and conditions of the award, or the specific application requirements set forth in the NOFOs. In all cases, statutory and regulatory mandates, the terms and conditions of the award, the requirements set forth in the NOFOs, and follow-on policies and guidance, shall prevail over any inconsistencies contained in this document.*

# INTRODUCTION TO THE REDACTION & PUBLIC POSTING PROCESS

To comply with the Federal Funding Accountability and Transparency Act of 2006 (FFATA) and the FFATA Subrecipient Reporting System (FSRS), the National Telecommunications and Information Administration (NTIA) Office of Internet Connectivity and Growth (OICG) must take all necessary steps to publicly disclose the information of the prime recipient, and qualifying subrecipients, receiving government funding. Additionally, NTIA anticipates receiving requests pursuant to the Freedom of Information Act (FOIA) for access to grant award documents and therefore NTIA is required to proactively disclose such records under FOIA law.

# FREQUENTLY ASKED QUESTIONS

In support of the redaction and public posting process, this document has a compilation of several common questions and considerations which may arise during the preparation of project documents. Please review the answers and resources shared to ensure familiarity with the required steps to successfully prepare your project documentation.

## REDACTION

### Q: Why might grant recipients receive a request to redact documents?

A: The U.S. Department of Commerce, National Telecommunications and Information Administration (NTIA) established the Connecting Minority Communities Pilot Program (CMC), Broadband Infrastructure Program (BIP), and Tribal Broadband Connectivity Program (TBCP) pursuant to the Consolidated Appropriations Act, 2021 (CAA). Due to the nature of these grants, CAA awards are of interest to media, local and state governments, individuals, and companies. Accordingly, NTIA anticipates receiving many requests pursuant to the Freedom of Information Act (FOIA) for access to CAA grant award documents and therefore is required by the FOIA to proactively disclose such documents. As such, NTIA intends to post CAA award documents on its website. However, grant recipients are given the opportunity to redact their documents to remove any business confidential or personal private or sensitive information. Grant recipients should review the exemptions listed under the Freedom of Information Act (FOIA) in Subpart C of 5 U.S.C. §552.

### Q: How do grant recipients redact documents?

A: All redacted documents should be in PDF format, and section(s) of the documents may be redacted using Adobe Redaction Tools. First, select "Tools" and "Redact." Next, use the crosshair to draw rectangles over the text or images you want to permanently remove from the PDF and click "Apply." Then, sanitize the PDF by leaving the toggle button on and select "Continue" on the pop-up that appears. Afterwards, be sure to review your document to ensure that the redactions are complete and correct. Lastly, rename the file to avoid overwriting the original PDF and click "Save." See Appendix A: How to Redact in Acrobat Pro for further information.

### Q: What should grant recipients do if they don't want to redact their documents?

A: If grant recipients do not intend to redact any of the award documents, they should indicate this by replying to the redaction notification email, confirming they have reviewed the information and determined that no redaction of the grant documentation is necessary.

### Q: What type of information should grant recipients redact?

A: Generally, NTIA personnel cannot advise grant recipients on what information to redact from the documents, what information may constitute business confidential to the grant recipient, or what may be personal private information (PII). There are nine exemptions to disclosures that protect sensitive information under the Freedom of Information Act (FOIA), 5 U.S.C. §552. The Code of Federal Regulations (CFR) outlines these exemptions in Subpart C – Exemptions to Disclosure § 5.31. Grant recipients should review these exemptions to determine the circumstances and information that may be redacted.

### Q: How often do grant recipients need to redact documents?

A: Grant recipients will have the opportunity to redact information from their project documents on a rolling basis throughout the duration of the period of performance for the grant award. Grant program offices control the frequency of redactions. For questions, grant recipients should consult their assigned Federal Program Officer (FPO).

## PUBLIC POSTING

### Q: When does public posting take place?

A: Redaction and public posting of grant documents takes place after awards are made, annually thereafter, and as decided by the FPO or the Program Office on an ad-hoc basis.

### Q: How long will grant recipient documents be posted publicly?

A: Grant recipient materials published during this process become available for the public for a period that is consistent with records retention requirements. DOC and NTIA reserve the right to maintain access to published information for a period longer than records retention requirements.

### Q: Which documents will be posted?

A: NTIA is committed to transparency regarding the use of federal funds from obligated grants. To this end, grant recipient applications, supporting documents, awards, award amendments, and reports will be posted. Please note that this may vary for each grant program. Grant recipients will have the opportunity to redact materials to ensure that confidential business information, personally identifiable information, or proprietary information is not disclosed to the public.

### Q: Where will redacted documents be posted?

A: The redacted documents will be posted on each grant program's "Funding Program" page on the BroadbandUSA website. Specifically, the Broadband Infrastructure Program Funding Page, the Connecting Minority Communities Pilot Program Funding Page, and the Tribal Broadband Connectivity Program Funding Page.

# APPENDIX A: HOW TO REDACT IN ACROBAT PRO

## How to Redact in Adobe Acrobat Pro
### *National Telecommunications & Information Administration (NTIA)*

### Redaction & Public Posting Process

To comply with the Federal Funding Accountability and Transparency Act of 2006 (FFATA) and the FFATA Subrecipient Reporting System (FSRS), the National Telecommunications and Information Administration (NTIA) Office of Internet Connectivity and Growth (OICG) must take all necessary steps to publicly disclose the information of the prime recipient, and qualifying subrecipients, receiving government funding. Additionally, NTIA anticipates receiving requests pursuant to the Freedom of Information Act (FOIA) for access to grant award documents. This document is intended to be a resource for NTIA grant recipients as they complete redactions of their project documents.

### *Using Adobe Acrobat Pro to Redact Documents: Step-by-Step*

All redacted documents should be in PDF format, wherein redacted section(s) of the enclosed documents are drawn using Adobe Redaction Tools, including final application of the redactions. Please see below for step-by-step instructions for redacting documents using Adobe Acrobat Pro.
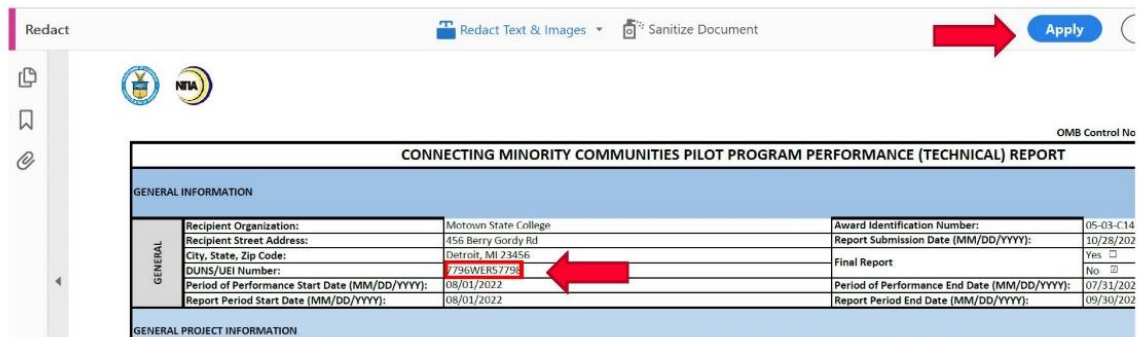
**1**    Select "**Tools**" ➔ "**Redact.**"
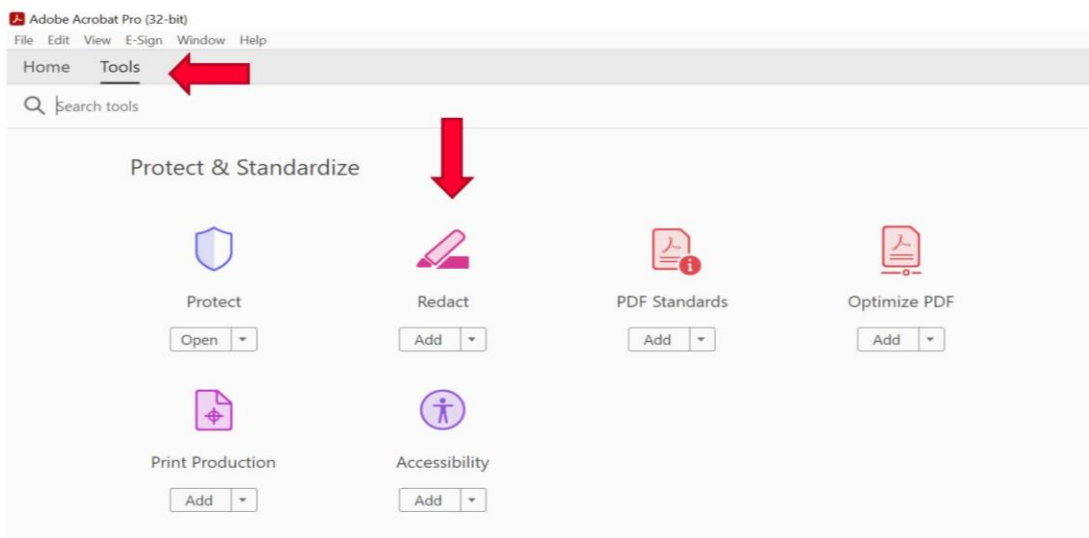
**2**

Use the crosshair to draw rectangles over the text or images you want to permanently remove from the PDF. (Type Command+Z on a Mac or Control+Z on a PC to undo any mistakes.)

Click "**Apply.**"



**3**

A pop-up will appear warning you that redacted information will be permanently deleted and you won't be able to retrieve it. In the same pop-up window, select whether you want to remove the hidden data and metadata. Sanitize the PDF by leaving the toggle button on.

Click "**Continue**" to apply the redactions.

**4** Review your document to ensure that the redactions are complete and correct.



**5** Rename the file to avoid overwriting the original PDF and click "**Save**."

**4** Review your document to ensure that the redactions are complete and correct.

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**GENERAL INFORMATION**
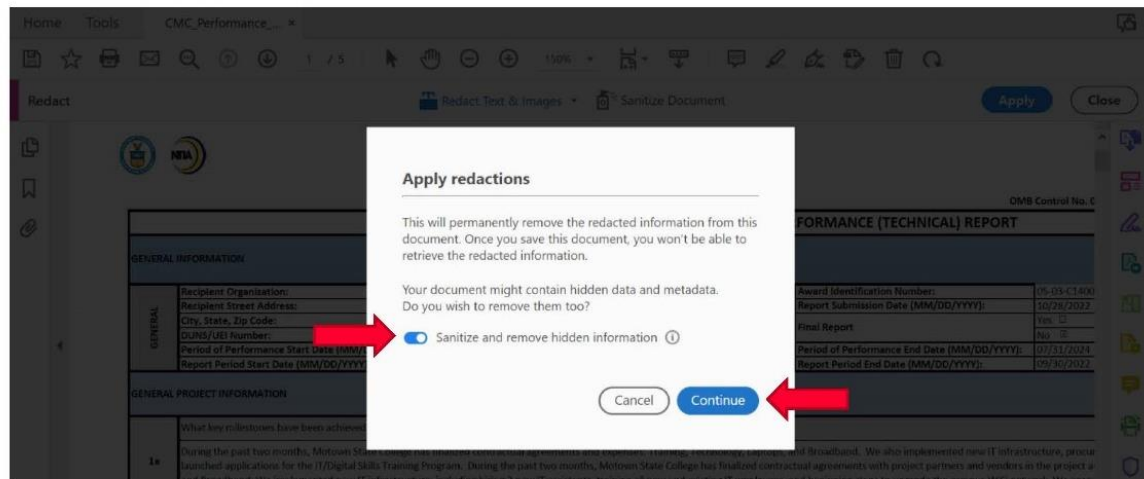
| | | |
|---|---|---|
| **GENERAL** | Recipient Organization: | Motown State College |
| | Recipient Street Address: | 456 Berry Gordy Rd |
| | City, State, Zip Code: | Detroit, MI 23456 |
| | DUNS/UEI Number: | ████████ |
| | Period of Performance Start Date (MM/DD/YYYY): | 08/01/2022 |
| | Report Period Start Date (MM/DD/YYYY): | 08/01/2022 |

**GENERAL PROJECT INFORMATION**

**5** Rename the file to avoid overwriting the original PDF and click "**Save.**"