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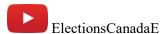
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ISSN 2371-3658

Cat. No.: SE2-9E-PDF

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Printed in Canada

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Introduction 1_

The Privacy Act (the Act) extends to Canadians and individuals present in Canada the right to access their personal information from federal government institutions. The Act also protects individuals' privacy by preventing others from having access to their personal information. Furthermore, it limits federal institutions' use of the personal information that they collect and retain.

Section 72 of the Act requires that the head of every institution subject to the Act prepare an annual report for tabling in Parliament. This report describes how the Office of the Chief Electoral Officer administered its responsibilities under the Act during the reporting period of April 1, 2020, to March 31, 2021.

1.1. Mandate of the Office of the Chief Electoral Officer

The Office of the Chief Electoral Officer is an independent, non-partisan agency that reports directly to Parliament which currently includes both Elections Canada and the Officer of the Commissioner of Canada Elections. Elections Canada's mandate is to:

- be prepared to conduct a federal general election, by-election or referendum;
- administer the political financing provisions of the Canada Elections Act;
- monitor compliance with electoral legislation;
- conduct public information campaigns on voter registration, voting and becoming a candidate:
- conduct education programs for students on the electoral process;
- provide support to the independent commissions in charge of adjusting the boundaries of federal electoral districts following each decennial census;
- carry out studies on alternative voting methods and, with the approval of parliamentarians, test alternative voting processes for future use during electoral events; and,
- provide assistance and cooperation in electoral matters to electoral agencies in other countries or to international organizations.

In fulfilling its mandate, Elections Canada also has the responsibility to:

- appoint, train and support returning officers and retain the services of field liaison officers across Canada;
- maintain the National Register of Electors, which is used to prepare preliminary lists of electors at the start of electoral events;
- publish reports on the conduct of elections and official voting results;
- maintain electoral geography information, which provides the basis for maps and other geographic products:
- register political entities, including political parties, electoral district associations, candidates, nomination contestants, leadership contestants, third parties that engage in election advertising and referendum committees;
- administer the reimbursements and subsidies paid to eligible candidates, registered political parties and auditors;
- disclose information on registered parties and electoral district associations, registered parties' nomination and leadership contestants, candidates, third parties and referendum committees, including their financial returns;

- refer to the Commissioner of Canada Elections information concerning possible offences under the *Canada Elections Act* (or other relevant acts);
- consult the Advisory Committee of Political Parties for advice and recommendations;
- issue written opinions, guidelines and interpretation notes on the application of the *Canada Elections Act* to political entities;
- recommend to Parliament amendments for the better administration of the *Canada Elections Act* by submitting a recommendations report after a general election, as well as by providing expert advice and other special reports; and,
- appoint the Broadcasting Arbitrator, who is responsible for allocating free and paid broadcasting time among political parties and for arbitrating disputes that may arise between parties and broadcasters.

The Office of the Commissioner of Canada Elections is responsible for ensuring compliance with, and enforcement of, the *Canada Elections Act* and the *Referendum Act*.

1.2. Structure of the Access to Information and Privacy Office

The Access to Information and Privacy (ATIP) Office is part of the Office of the Chief of Staff and is headed by an Assistant Director who is supported by a senior analyst and a junior officer as well as expert consultant(s) as required.

The ATIP Office is responsible for the following activities for both Election Canada and the Office of the Commissioner of Canada Elections:

- processing requests under the Access to Information Act and the Privacy Act;
- responding to consultation requests from other government institutions;
- providing advice and guidance to senior management and staff on privacy issues and privacy impact assessments;
- developing and delivering awareness training to managers and employees on how to fulfill their obligations under the Acts;
- developing policies, procedures and guidelines in support of ATIP legislation and central agency requirements;
- monitoring institutional compliance with the Acts, procedures and policies;
- acting on behalf of the Office of the Chief Electoral Officer in dealings with the Treasury Board Secretariat, the offices of the Information Commissioner and Privacy Commissioner of Canada and other government institutions regarding ATIP affairs;
- preparing annual reports to Parliament, in addition to other statutory reports and materials that may be required by central agencies;
- preparing and publishing the annual update of the Office of the Chief Electoral Officer's chapter of *Info Source*, describing the agency's record holdings and personal information banks; and,
- representing the Office of the Chief Electoral Officer by participating in ATIP community forums, such as the Treasury Board Secretariat's ATIP Community meetings.

2. Administration of the *Privacy Act*

2.1. Education and training

Privacy training at the Office of the Chief Electoral Officer typically involves educating staff on the principles of the Act; how to securely manage privacy requests and protect personal information. In the 2020-2021 fiscal year, the Office of the Chief Electoral Officer delivered 3 formal training and awareness sessions for 30 employees of various levels. One session provided an overview of privacy impact assessments and how they are conducted. Two sessions were introductions to privacy which provided an overview of the privacy concept, requirements of the *Privacy Act*, roles and responsibilities.

Three training sessions were also provided to six offices of primary interest liaison officers, who are responsible for coordinating the retrieval of responsive records within their respective sectors. The sessions provided an overview of the ATIP process, legislation, roles and responsibilities.

The ATIP Office also raised awareness of privacy issues throughout the agency when providing advice on the collection, retention, use and disclosure of personal information.

2.2. Institutional privacy policies and procedures

No new institutional-specific policies or procedures related to privacy were implemented during the fiscal year. The Office of the Chief Electoral Officer is continuing to review its privacy tools and procedures, and update them as required.

2.3. Institutional monitoring of privacy requests

The ATIP Office uses its case management software to monitor the status of each request being processed, including the number of days remaining before the statutory deadline. A weekly status reports of all open and recently closed files is regularly provided to senior officials, including the Chief Electoral Officer and the Executive Committee.

2.4. Material privacy breaches

A material privacy breach is any unauthorized collection, use, disclosure, retention or disposal of sensitive personal information that could reasonably be expected to cause injury or harm to the individual.

No material privacy breaches were reported to the Office of the Privacy Commissioner or to the Treasury Board of Canada Secretariat by Elections Canada during the reporting period.

2.5. Privacy impact assessments

The Office of the Chief Electoral Officer regularly conducts privacy impact assessments (PIA) to address privacy risks in new or existing departmental programs, initiatives or projects that manage personal information.

One PIA was completed by the Office of the Chief Electoral Officer during the 2020-2021 fiscal year. The PIA looked at the risks to privacy associated with Elections Canada's Managed Contact Centre Services (MCCS). The MCCS provides Tier 2 call centre services to Elections Canada as part of the agency's contact centre framework and responds to general or frequently asked questions. The Tier 2 services are provided by an external supplier who provides contact centre services during the federal general election.

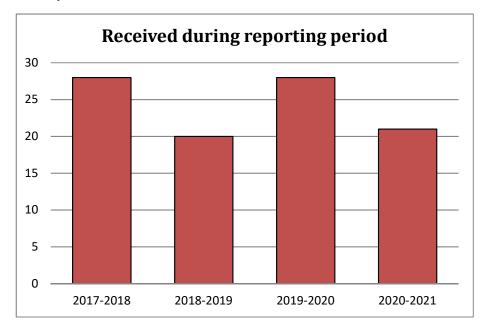
The PIA summaries can be found on the EC website at elections.ca > Resource Centre > Reports > Proactive Disclosure > Privacy Impact Assessments, where available.

3. Statistical Report on Requests under the *Privacy Act*

This section provides an interpretation of several statistics on the processing of requests made to the Office of the Chief Electoral Officer under the Act. All figures and data for the 2020-2021 fiscal year are provided in the attached statistical report (see Appendix II).

3.1. Number of requests

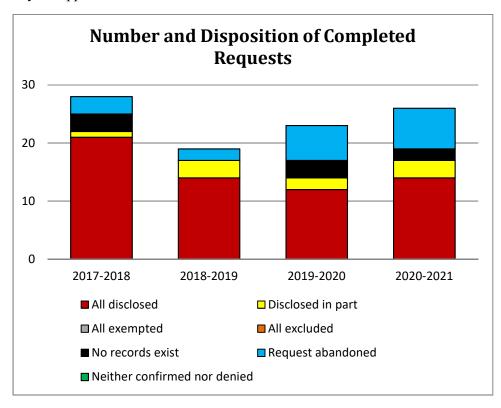
The Office of the Chief Electoral Officer received 21 formal requests for personal information during 2020-2021, a 25 percent decrease from the previous year when 28 formal requests were received. Twenty-six requests were processed during the reporting period and three requests were carried over into the new fiscal year.



The Office of the Chief Electoral Officer did not receive any consultations from other institutions during the reporting period.

3.2. Disposition of completed requests

Of the 26 requests completed during the reporting period, 14 resulted in full disclosure of the information requested. This represents 54 percent of all completed requests, a slight increase from the previous fiscal year during which 52 percent resulted in full disclosure. Three requests resulted in partial disclosure, where personal information of individuals unassociated with the request was exempted further to section 26 of the Act. Records did not exist for 2 requests and 7 requests were abandoned by the applicants.



3.3. Completion time of requests

In 2020-2021, a total of 17 requests (65 percent) were completed within 30 days, compared to 87 percent in 2019-2020 when 20 requests were completed. Eighty-one percent (21) of the requests were completed within legislated timelines. The Office of the Chief Electoral Officer has historically received simple privacy requests that are uncomplicated to process, primarily requests for information from the National Register of Electors. However, 9 requests closed in 2020-2021 (35 percent), were more complicated and took longer to process. Six requests were closed within 31 to 60 days, one was closed within 61 to 120 days and two were closed within 121 to 180 days. The requests took longer to process largely because of workload issues or difficulties with retrieving information. Unforeseen adjustments to work processes related to COVID-19 implemented towards the end of 2019-2020, continued temporarily affect the processing of some requests under the Act. Most employees, including ATIP staff, were required to work remotely with limited access, at times, to Elections Canada's network and paper files.

3.4. Disclosures of personal information under paragraph 8(2)(m)

Subsection 8(2) of the Act stipulates that a government institution may disclose personal information under its control without the consent of those whom the information relates. Such disclosures are discretionary and are subject to any other act of Parliament.

Paragraph 8(2)(m) allows an institution to disclose personal information for any purpose where, in the opinion of the head of the institution, the public interest in the disclosure clearly outweighs any invasion of privacy that could result from it or where the disclosure would clearly benefit the individual to whom the information relates.

The Office of the Chief Electoral made one disclosure pursuant to paragraph 8(2)(m) in the 2020-2021 fiscal year. The name, address and unique client identifier of 24,594 individuals were disclosed to Immigration, Refugees and Citizenship Canada, so they could send required notifications to the individuals. The Office of the Privacy Commissioner of Canada was notified further to subsection 8(5) of the Act, prior to the disclosure of the information.

3.5. **Fees and Costs**

There is no charge to individuals for processing requests under the Act.

During this reporting period, the ATIP Office expended \$134,919 to administer the Act. Salaries accounted for \$84,626 of this total, whereas spending on goods and services amounted to \$50,293.

Complaints

Individuals who disagree with the handling of their personal information or the processing of a request under the Act can file a complaint with the Office of the Privacy Commissioner of Canada (OPC).

There was one official complaint against the Office of the Chief Electoral Officer filed with the OPC in 2020-2021 concerning an alleged unauthorized disclosure of personal information. The complaint is still under investigation.

Appendix I: Delegation of Authority



DÉLÉGATION EN VERTU DE L'ARTICLE 73 DE LA LOI SUR LA PROTECTION DES RENSEIGNEMENTS PERSONNELS

DELEGATION ORDER PURSUANT TO SECTION 73 OF THE PRIVACY ACT

En vertu de l'article 73 de la Loi sur la protection des renseignements personnels, par la présente je délègue au titulaire du poste de Directeur adjoint. Accès à l'information et protection des renseignements personnels, ou en l'absence de cette personne, au titulaire du poste de Chef de cabinet, y compris toutes personnes nommées à ces deux postes de manière intérimaire, les attributions en lien avec les documents qui relèvent du directeur général des élections, dont je suis, en qualité de responsable d'une institution fédérale, investi conformément à la Loi sur la protection des renseignements personnels, à l'exception des documents qui relèvent exclusivement du Commissaire aux élections fédérales.

En vertu de l'article 73 de la Loi sur la protection des renseignements personnels. par la présente je délèque au titulaire du poste de Commissaire aux élections fédérales, ainsi qu'au titulaire du poste de Directeur adjoint, Accès à l'information et protection des renseignements personnels, ou en l'absence de cette personne, au titulaire du poste de Chef de cabinet, y compris toutes personnes nommées à ces trois postes de manière intérimaire, les attributions en lien avec les documents qui relèvent exclusivement du Commissaire aux élections fédérales dont je suis, en qualité de responsable d'une institution fédérale, investi conformément à la Loi sur protection des renseignements personnels.

Pursuant to section 73 of the Privacy Act, I hereby designate the person appointed to the position of Assistant Director, Access to Information and Privacy, or in that person's absence, the person appointed to the position of Chief of Staff, including any persons appointed to these two positions on an acting basis, to exercise or perform any of the powers, duties and functions related to the records that are under the control of the Chief Electoral Officer, conferred upon me as the head of the government institution by the Privacy Act, except as it relates to the records that are exclusively under the control of the Commissioner of Canada Elections.

Pursuant to section 73 of the Privacy Act, I hereby designate the person appointed to the position of Commissioner of Canada Elections, as well as the person appointed to the position of Assistant Director, Access to Information and Privacy, or in that person's absence, the person appointed to the position of Chief of Staff, including any persons appointed to these three positions on an acting basis, to exercise or perform any of the powers, duties and functions conferred upon me as the head of the government institution by the Privacy Act and that are related to the records that are exclusively under the control of the Commissioner of Canada Elections.

Il est entendu que cette délégation remplace toutes délégations antérieures de ma part ou de la part de mes prédécesseurs émises en vertu de l'article 73 de la Loi sur la protection des renseignements personnels.

For greater certainty, this delegation supersedes all previous delegations by me or my predecessors made pursuant to section 73 of the *Privacy Act*.

Signée à Gatineau le / Signed in Gatineau on _July 30, 2020_____

Stéphane Perrault

Directeur général des élections / Chief Electoral Officer

Appendix II: Statistical Report on the Privacy Act, 2020-2021

Government of Canada Gouvernement du Canada

Statistical Report on the Privacy Act

Name of institution: Office of the Chief Electoral Officer

Reporting period: 2020-04-01 2021-03-31 to

Section 1: Requests Under the Privacy Act

1.1 Number of requests

	Number of Requests
Received during reporting period	21
Outstanding from previous reporting period	8
Total	29
Closed during reporting period	26
Carried over to next reporting period	3

Section 2: Requests Closed During the Reporting Period

2.1 Disposition and completion time

	Completion Time							
Disposition of Requests	1 to 15 Days	16 to 30 Days	31 to 60 Days	61 to 120 Days	121 to 180 Days	181 to 365 Days	More Than 365 Days	Total
All disclosed	2	8	2	0	2	0	0	14
Disclosed in part	0	0	2	1	0	0	0	3
All exempted	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0
No records exist	0	1	1	0	0	0	0	2
Request abandoned	6	0	1	0	0	0	0	7
Neither confirmed nor denied	0	0	0	0	0	0	0	0
Total	8	9	6	1	2	0	0	26

2.2 Exemptions

Section	Number of Requests	Section	Number of Requests	Section	Number of Requests
18(2)	0	22(1)(<i>a</i>)(i)	0	23(a)	0
19(1)(<i>a</i>)	0	22(1)(<i>a</i>)(ii)	0	23(b)	0
19(1)(<i>b</i>)	0	22(1)(<i>a</i>)(iii)	0	24(a)	0
19(1)(<i>c</i>)	0	22(1)(<i>b</i>)	0	24(b)	0
19(1)(<i>d</i>)	0	22(1)(<i>c</i>)	0	25	0
19(1)(<i>e</i>)	0	22(2)	0	26	3
19(1)(<i>f</i>)	0	22.1	0	27	0
20	0	22.2	0	27.1	0
21	0	22.3	0	28	0
		22.4	0		

2.3 Exclusions

Section	Number of Requests	Section	Number of Requests	Section	Number of Requests
69(1)(<i>a</i>)	0	70(1)	0	70(1)(<i>d</i>)	0
69(1)(<i>b</i>)	0	70(1)(<i>a</i>)	0	70(1)(<i>e</i>)	0
69.1	0	70(1)(<i>b</i>)	0	70(1)(<i>f</i>)	0
		70(1)(c)	0	70.1	0

2.4 Format of information released

Paper	Electronic	Other	
7	10	0	

2.5 Complexity

2.5.1 Relevant pages processed and disclosed

Number of Pages Processed	Number of Pages Disclosed	Number of Requests		
189	186	24		

2.5.2 Relevant pages processed and disclosed by size of requests

	Less Than 100 Pages Processed		101-500 Pages Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More Than 5000 Pages Processed	
Disposition	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed
All disclosed	14	21	0	0	0	0	0	0	0	0
Disclosed in part	3	165	0	0	0	0	0	0	0	0
All exempted	0	0	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0	0	0
Request abandoned	7	0	0	0	0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0	0	0	0	0
Total	24	186	0	0	0	0	0	0	0	0

2.5.3 Other complexities

Disposition	Consultation Required	Legal Advice Sought	Interwoven Information	Other	Total
All disclosed	0	0	0	0	0
Disclosed in part	0	0	0	0	0
All exempted	0	0	0	0	0
All excluded	0	0	0	0	0
Request abandoned	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0
Total	0	0	0	0	0

2.6 Closed requests

2.6.1 Number of requests closed within legislated timelines

	Requests closed within legislated timelines
Number of requests closed within legislated timelines	21
Percentage of requests closed within legislated timelines	80.8

2.7 Deemed refusals

2.7.1 Reasons for not meeting legislated timelines

		Principal Reason		
Number of Requests Closed Past the Legislated Timelines	Interference with Operations / Workload	External Consultation	Internal Consultation	Other
5	0	0	0	5

2.7.2 Requests closed beyond legislated timelines (including any extension taken)

Number of Days Past Legislated Timelines	Number of Requests Past Legislated Timeline Where No Extension Was Taken	Number of Requests Past Legislated Timelines Where an Extension Was Taken	Total
1 to 15 days	1	0	1
16 to 30 days	1	0	1
31 to 60 days	0	1	1
61 to 120 days	2	0	2
121 to 180 days	0	0	0
181 to 365 days	0	0	0
More than 365 days	0	0	0
Total	4	1	5

2.8 Requests for translation

Translation Requests	Accepted	Refused	Total
English to French	0	0	0
French to English	0	0	0
Total	0	0	0

Section 3: Disclosures Under Subsections 8(2) and 8(5)

Paragraph 8(2)(e)	Paragraph 8(2)(m)	Subsection 8(5)	Total
0	1	1	2

Section 4: Requests for Correction of Personal Information and Notations

Disposition for Correction Requests Received	Number
Notations attached	0
Requests for correction accepted	0
Total	0

Section 5: Extensions

5.1 Reasons for extensions and disposition of requests

	15(a)(i) l	Interference	with oper	ations	15 (a)(ii)			
Number of requests where an extension was taken	Further review required to determine exemptions	Large volume of pages	Large volume of requests	Documents are difficult to obtain	Cabinet Confidence Section (Section 70)	External	Internal	15(b) Translation purposes or conversion
7	0	0	0	7	0	0	0	0

5.2 Length of extensions

	15(a)(i) Interference	with operation	ons	15 (a)(ii			
Length of Extensions	Further review required to determine exemptions	Large volume of pages	Large volume of requests	Documents are difficult to obtain	Cabinet Confidence Section (Section 70)	External	Internal	15(b) Translation purposes or conversion
1 to 15 days	0	0	0	0	0	0	0	0
16 to 30 days	0	0	0	7	0	0	0	0
31 days or greater								0
Total	0	0	0	7	0	0	0	0

Section 6: Consultations Received from Other Institutions and Organizations

6.1 Consultations received from other Government of Canada institutions and other organizations

Consultations	Other Government of Canada Institutions	Number of Pages to Review	Other Organizations	Number of Pages to Review	
Received during the reporting period	0	0	0	0	
Outstanding from the previous reporting period	0	0	0	0	
Total	0	0	0	0	
Closed during the reporting period	0	0	0	0	
Carried over to the next reporting period	0	0	0	0	

6.2 Recommendations and completion time for consultations received from other Government of Canada institutions

Recommendation		Number of Days Required to Complete Consultation Requests										
	1 to 15 Days	16 to 30 Days	31 to 60 Days	61 to 120 Days	121 to 180 Days	181 to 365 Days	More Than 365 Days	Total				
All disclosed	0	0	0	0	0	0	0	0				
Disclosed in part	0	0	0	0	0	0	0	0				
All exempted	0	0	0	0	0	0	0	0				
All excluded	0	0	0	0	0	0	0	0				
Consult other institution	0	0	0	0	0	0	0	0				
Other	0	0	0	0	0	0	0	0				
Total	0	0	0	0	0	0	0	0				

6.3 Recommendations and completion time for consultations received from other organizations

		Number of days required to complete consultation requests										
Recommendation	1 to 15 Days	16 to 30 Days	31 to 60 Days	61 to 120 Days	121 to 180 Days	181 to 365 Days	More Than 365 Days	Total				
All disclosed	0	0	0	0	0	0	0	0				
Disclosed in part	0	0	0	0	0	0	0	0				
All exempted	0	0	0	0	0	0	0	0				
All excluded	0	0	0	0	0	0	0	0				
Consult other institution	0	0	0	0	0	0	0	0				
Other	0	0	0	0	0	0	0	0				
Total	0	0	0	0	0	0	0	0				

Section 7: Completion Time of Consultations on Cabinet Confidences

7.1 Requests with Legal Services

Fewer Than 100 Pages Processed		101-500 Pa	101-500 Pages Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More than 5000 Pages Processed	
Number of Days	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed
1 to 15	0	0	0	0	0	0	0	0	0	0
16 to 30	0	0	0	0	0	0	0	0	0	0
31 to 60	0	0	0	0	0	0	0	0	0	0
61 to 120	0	0	0	0	0	0	0	0	0	0
121 to 180	0	0	0	0	0	0	0	0	0	0
181 to 365	0	0	0	0	0	0	0	0	0	0
More than 365	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0	0	0

7.2 Requests with Privy Council Office

	Fewer Than 100 Pages Processed		101–500 Pages Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More than 5000 Pages Processed	
Number of Days	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed
1 to 15	0	0	0	0	0	0	0	0	0	0
16 to 30	0	0	0	0	0	0	0	0	0	0
31 to 60	0	0	0	0	0	0	0	0	0	0
61 to 120	0	0	0	0	0	0	0	0	0	0
121 to 180	0	0	0	0	0	0	0	0	0	0
181 to 365	0	0	0	0	0	0	0	0	0	0
More than 365	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0	0	0

Section 8: Complaints and Investigations Notices Received

Section 31	Section 33	Section 35	Court action	Total
1	0	0	0	1

Section 9: Privacy Impact Assessments (PIA) and Personal Information Banks (PIB)

9.1 Privacy Impact Assessments

Number of PIA(s) completed	1

9.2 Personal Information Banks

Personal Information Banks	Active	Created	Terminated	Modified
	10	0	0	0

Section 10: Material Privacy Breaches

Number of material privacy breaches reported to TBS	0
Number of material privacy breaches reported to OPC	0

Section 11: Resources Related to the *Privacy Act*

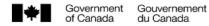
11.1 Costs

Expenditures	Amount	
Salaries		\$84,626
Overtime		\$0
Goods and Services		\$50,293
Professional services contracts	\$48,309	
• Other		
Total	\$134,919	

11.2 Human Resources

Resources	Person Years Dedicated to Privacy Activities
Full-time employees	0.90
Part-time and casual employees	0.00
Regional staff	0.00
Consultants and agency personnel	0.20
Students	0.00
Total	1.10

Note: Enter values to two decimal places.



Supplemental Statistical Report on the Access to Information Act and Privacy Act

Name of institution: Office of the Chief Electoral Officer

Reporting period: 2020-04-01 to 2021-03-31

Section 1: Capacity to Receive Requests

Enter the number of weeks your institution was able to receive ATIP requests through the different channels.

	Number of Weeks
Able to receive requests by mail	52
Able to receive requests by email	52
Able to receive requests through the digital request service	52

Section 2: Capacity to Process Records

2.1 Enter the number of weeks your institution was able to process paper records in different classification levels.

	No Capacity	Partial Capacity	Full Capacity	Total
Unclassified Paper Records	0	0	52	52
Protected B Paper Records	0	0	52	52
Secret and Top Secret Paper Records	0	52	0	52

2.2 Enter the number of weeks your institution was able to process electronic records in different classification levels.

	No Capacity	Partial Capacity	Full Capacity	Total
Unclassified Electronic Records	0	0	52	52
Protected B Electronic Records	0	0	52	52
Secret and Top Secret Electronic Records	0	52	0	52

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