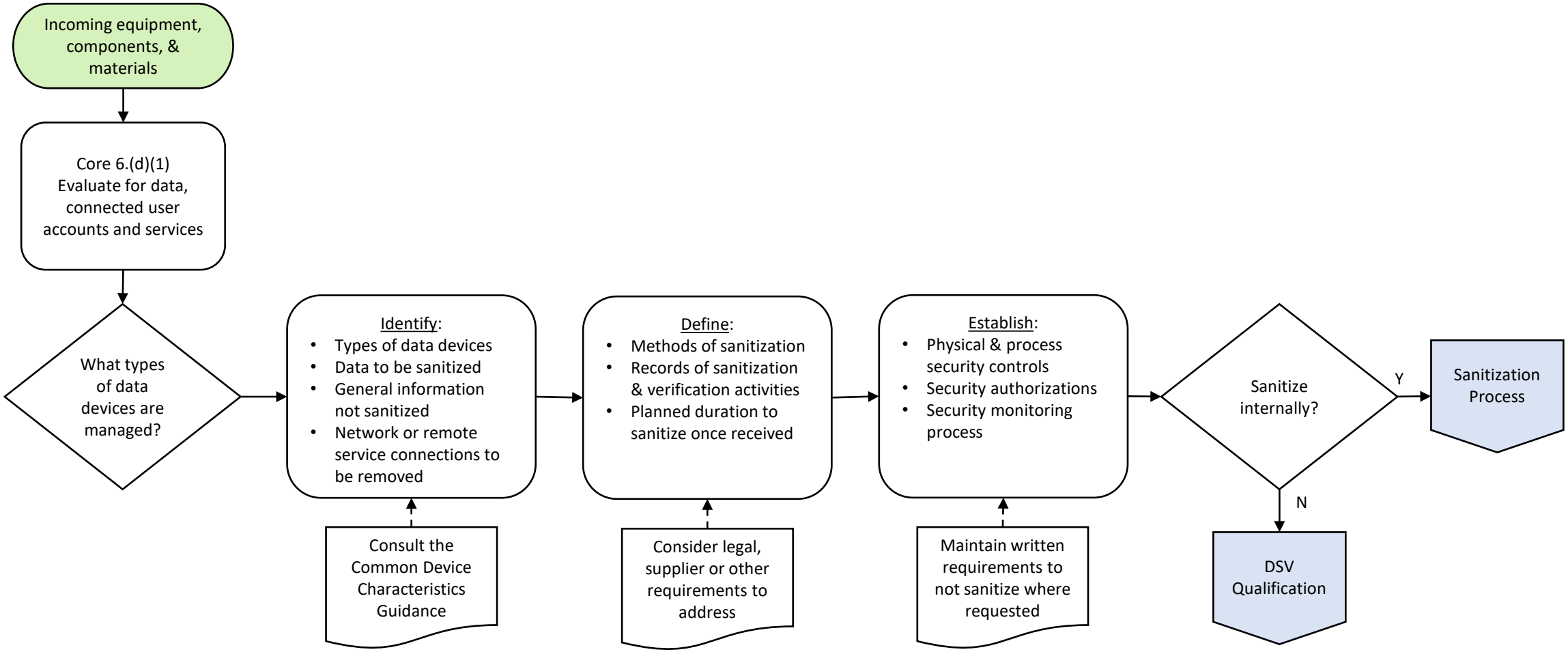STEPS FOR DEVELOPING A DATA SANITIZATION PLAN & PROCEDURES