



Tommy G. Thompson
Governor

Marlene A. Cummings
Secretary

1400 E. WASHINGTON AVENUE
P O BOX 8935
MADISON, WISCONSIN 53708-8935
E-Mail: dori@mail.state.wi.us
(608) 266-2112
FAX#: (608) 267-0644

**SENATE PRIVACY, ELECTRONIC COMMERCE
AND FINANCIAL INSTITUTIONS COMMITTEE**
DATA ENTRY, DATA COLLECTION, PRIVACY AND SALES POLICIES OF
THE DEPARTMENT OF REGULATION AND LICENSING

Statement of William Dusso

September 8, 1999

Room 201 SE, State Capitol

Mr. Chairman and members of the committee, I am William Dusso, legal counsel for the Department of Regulation and Licensing. Department Secretary Marlene Cummings requested that I appear today in response to your invitation.

The department is responsible for credentialing and regulating various professions and occupations and providing administrative services to boards attached to the department. Currently, the department and boards are responsible for regulating 72 professions and occupations and 27 types of business establishments. Licenses are renewed for about 280,000 individuals every two years. Examinations are administered to about 15,000 applicants annually. The department issues new or initial credentials to approximately 20,000 applicants per year. Complaints are filed by the public and processed by the department on the average of about 2,000 per year.

Data entry and data collection

The department maintains computer database information relating to credential holders, applicants, examination candidates, complaints and hearings.

Applicants and credential holders. Most of the data maintained by the department on computers relates to individuals who hold a credential. This information is obtained principally from application materials filed by the person who is seeking a professional credential. (A copy of an application form is attached.)

Data collected from applications for a profession is entered into the department's

Regulatory Boards

Accounting; Architects, Landscape Architects, Professional Engineers, Designers and Land Surveyors; Professional Geologists, Hydrologists and Soil Scientists; Auctioneer; Barbering and Cosmetology; Chiropractic; Controlled Substances; Dentistry; Dietitians; Funeral Directors; Hearing and Speech; Medical; Nursing; Nursing Home Administrator; Optometry; Pharmacy; Physical Therapists; Podiatry; Psychology; Real Estate; Real Estate Appraisers; Social Workers; Marriage and Family Therapists and Professional Counselors; and Veterinary.

database by agency staff who are assigned to the particular bureau that works with the profession or work in the department's central word processing area. Most renewal application information is processed electronically through a bank lockbox, with the exception that changes of address are keyed at the bank lockbox and verified by agency staff.

Examination candidates. Most professional credentials issued by the department require the applicant to complete an examination. The department maintains an examination database to track applicants through these various examinations. Department staff collect information for the examination database either from information provided to the department by the candidate, or from the contractors that provide and administer the examinations.

Complaints and Hearings. The complaint and hearing databases include:

- information received from the general public who write letters or file complaints against credential holders,
- information which is required by law to be filed with the department, such as loss of hospital staff privileges by a physician for quality of practice reasons, and
- information relating to the screening, investigation, prosecution and disposition of a formal or informal complaint.

Information is entered into the complaint and hearing database by staff in the department's Division of Enforcement and Office of Legal Services.

Legal obligations to collect, protect and disclose

The department has obligations to provide information to the public about credential holders and also to protect certain personal information that it receives.

Data collection restrictions. As a licensing agency, the department and the boards are constrained by s. 103.35, Stats.¹ from requiring licensing applicants to provide information which is "... not essential for the determination of eligibility for issuance or renewal ..." of a credential. This statute prohibits the department from requiring

information that is not essential to determine eligibility, but if the department requests such information, "... the applicant shall be notified in a prominent place on or accompanying the request that she or he is not required to provide such information." Section 103.35, Stats. is considered by the department when preparing a form for collecting data and has proved to be an effective restriction on the temptation to request unnecessary information.

Public records law disclosure. The public records law in ss. 19.31-19.36, Stats. and the many cases decided under these statutes express a strong public policy favoring disclosure of records kept by public agencies. The great majority of requests to inspect department records are granted. Historically, even though the public records law favors disclosure, the department had concluded that it could usually deny requests to disclose medical records, educational transcripts and scores on professional licensing examinations. In 1996 the Court of Appeals decided in *Munroe v. Braatz*² that the justification given for denying a request for test scores was insufficient and ruled that the public interest in maintaining the confidentiality of the test scores was outweighed by the public interest in their disclosure. Requests to inspect medical records and educational transcripts continue to be the types of requests that are usually denied.

Notice to applicants concerning personally identifiable information.

Department application forms include the following notice to applicants:

PERSONALLY IDENTIFIABLE INFORMATION

Information collected on an application form will be used to determine eligibility for a credential or examination. Information collected on a complaint form will be used to assist in determining compliance with professional standards. It is not likely that information collected by these forms will be used by the department for other purposes.

Credential holders may use a business address as a mailing address for department mail. A change of address must be reported to the department within 30 days.

Information collected by these forms may be made available to others under Wisconsin laws governing inspection of public records. Credentialing is a public process with a goal of identifying those competent to protect the public. Names and addresses provided on an examination scheduling application, application pass/fail status on the

examinations, and name and address on a credential record may be provided to other who request it.

Limiting data redisclosure by contract. The department specifies in contracts for examinations that the data collected is the property of the state and may not be used by the contractor without the state's permission.³ The department reviews examination application forms used by contractors. Although many examination providers routinely require that applicants disclose social security numbers as a condition of taking the examination, the department requires the contractor to identify to the applicant that the social security number is voluntary

Social security numbers. Until January 1996, on the basis of the Federal Privacy Act, the department did not obtain social security numbers from credential holders and did not keep records of social security numbers. Under 1995 Wisconsin Act 27, the department began to request social security numbers for persons who hold credentials pursuant to a program for collecting delinquent state taxes. Current Wisconsin law requires that the department request social security or federal employer identification numbers from applicants and to deny applications if the numbers are not provided.⁴

Under s. 440.03 (11m) (c), Stats., the department is prohibited from disclosing social security numbers except to the Department of Workforce Development and the Department of Revenue for purposes of administering programs to collect delinquent state taxes and delinquent support obligations.⁵ Department procedures and computer software restrict access to social security numbers in department records. Social security numbers are collected from applicants on a form that is separate from other application information. All forms with social security numbers are forwarded to the central services unit of the agency. Computer access to social security numbers is limited to certain staff in the central services unit.

Name and address lists.

The department is obligated by statute, sec. 440.035 (4), Stats.⁶ to compile and keep current a list of the names and addresses of all persons who are credentialed and make this register available for public inspection. In 1979, the department requested an

opinion from the Attorney General on whether the department could deny requests for mailing labels on the basis that the licensee's interest in privacy outweighed any benefit to the public from providing the labels. The opinion of the Attorney General then was that the department could not deny the request on the basis of the licensee's interest in privacy and that the computerized name and address lists were available for inspection by the public under the public records statute.⁷ Based on the public records statute, the 1979 opinion and sec. 440.035 (4), Stats. the department makes name and address lists available for public inspection and copying. Fees for lists are based on costs to produce as described in sec. 19.35, Stats. In providing these lists, the department is not selling names and addresses, a practice prohibited by sec. 19.71, Stats.,⁸ because sec. 440.035 (4), Stats. requires the lists be made available for inspection and because a public records fee is charged.

The department occasionally receives a complaint from a credential holder that her or his name, address or license number is available to the public. Recently, the department responded to this concern by changing its policy so that credential holders may submit a business rather than residential address for department records. A statement of this policy is currently sent with each renewal notice. (A copy of the statement, a chart showing the number of lists sold and categories of purchasers and the department's form for ordering a list are attached.) In setting policy in this area, valid complaints from credential holders critical of the availability of personal information have to be weighed against uses of these lists that are generally thought to be in the public interest. For example, employers and insurance companies use the lists to verify license status; employers – to recruit professional employees; schools – to advertise continuing education courses; public officials – to communicate with constituents and researchers and planners – to anticipate manpower needs.

Thank you for the opportunity to provide information.

¹ 103.35 Information required for licensure. No state office, department, board, examining board, affiliated credentialing board, commission, council or independent agency in the executive branch, the legislature or the courts may, as a condition for receiving an occupational or professional certificate, license, permit or registration, require the submission of information by the applicant which is not essential for the determination of eligibility for the issuance or renewal of the certificate, license, permit or registration. Information which is not essential to determine eligibility for issuance or renewal may be requested but the applicant shall be notified in a prominent place on or accompanying the request that she or he is not required to provide such information.

² *Munroe v. Braatz*, 201 Wis.2d 442 (Ct. App. 1996)

³ An example: "Scores and candidate information collected by PES remain the property of the DEPARTMENT and may not be used without written permission of the DEPARTMENT for any purpose other than to prepare examination or score information and reports to the DEPARTMENT, and to evaluate the examination, except that with candidate authorization PES may report a candidate's score to another state board; group scores (without individual identification) may be provided to colleges and universities and periodic reports of group data may be provided to national committees and authorized state agencies and individuals."

⁴ Under s. 440.03 (11m), Stats.,

(a) Each application form for a credential issued or renewed under chs. 440 to 480 shall provide a space for the department to require each of the following to provide his or her social security number:

1. An applicant for an initial credential or credential renewal. If the applicant is not an individual, the department shall require the applicant to provide its federal employer identification number.

2. An applicant for reinstatement of an inactive license under s. 452.12 (6) (e).

(b) The department shall deny an application for an initial credential or deny an application for credential renewal or for reinstatement of an inactive license under s. 452.12 (6) (e) if any information required under par. (a) is not included in the application form.

⁵ 440.03 (11m) (c), Stats. The department of regulation and licensing may not disclose a social security number obtained under par. (a) to any person except to the department of workforce development for purposes of administering s. 49.22 and, for a social security number obtained under par. (a) 1., the department of revenue for the sole purpose of requesting certifications under s. 73.0301.

⁶ 440.035 (4) Compile and keep current a register of the names and addresses of all persons who are credentialed to be retained by the department and which shall be available for public inspection during the times specified in s. 230.35 (4) (a). The department may also make the register available to the public by electronic transmission.

⁷ 68 Op. Atty Gen. 231 (1979)

⁸ 19.71 Sale of names or addresses. An authority may not sell or rent a record containing an individual's name or address of residence, unless specifically authorized by state law. The collection of fees under s. 19.35 (3) is not a sale or rental under this section.



State of Wisconsin
Department of Financial Institutions

Tommy G. Thompson, **Governor**

Richard L. Dean, **Secretary**

TESTIMONY OF
David G. Anderson, Executive Assistant
Wisconsin Department of Financial Institutions

Senate Committee on Privacy, Electronic Commerce and Financial Institutions
September 14, 1999

Mr. Chairman and members of the Senate Committee on Privacy, Electronic Commerce and Financial Institutions, it is a pleasure for me to be here this morning on behalf of the Wisconsin Department of Financial Institutions. My name is Dave Anderson and I serve as the Executive Assistant at DFI. My primary responsibilities at DFI lie in the area of policy and legislation, and I am pleased to have this opportunity to discuss with you what we view as a very significant policy issue affecting the industries we regulate as well as the consumers of the financial services that these industries provide.

My role this morning will be to put into some context the types of information we collect and the safeguards that are in place with regard to the release of this information. I will then introduce DFI's General Counsel, Chris Green, who is the Department's custodian of the records.

At the outset, let me say how important it is for the committee to put into perspective DFI's various roles.

First, DFI is a regulatory agency. In all, we have responsibility for the safety and soundness oversight of 670 depository institutions, including banks, savings banks, savings and loan associations and credit unions. In addition to examining these institutions, we also examine or audit other financial services to ensure that they are in full compliance with their governing statutes. In the course of these examinations, we acquire a whole host of very specific information relating to the operations of these institutions and services. While our annual report contains summary information relating to their general operations, we are statutorily prohibited from releasing any specific information garnered through the examination process. As you have found out yourself on at least two occasions, Mr. Chairman, we take very seriously the responsibility of protecting this information. I should add that Supreme Court decisions have also affirmed our ability to not release in any form examination-related information.

Secondly, DFI is involved in the licensing of certain financial service providers and, in many cases, of certain individuals who work in the delivery of these financial services. Needless to say, we need to acquire as part of the licensing process a variety of personally identifiable information necessary for us to do background checks. While much of the information contained on licensing applications is in fact open for public review, we are very careful in only releasing information that is responsive to the requests we receive while not releasing information such as social security numbers.

Office of the Secretary

Mail: PO Box 8861 Madison WI 53708-8861

Voice: (608) 264-7800

Fax: (608) 261-4DFI

Courier: 345 W. Washington Ave. 5th Floor Madison, WI 53703

TTY: (608) 266-8818

Internet: www.wdfi.org

Thirdly, DFI is a ministerial agency. Our Corporate and Consumer Services Division, for example, is responsible for maintaining two important record-keeping systems, the state's Uniform Commercial Code Lien Filing System and our Corporate Records Information System. Both of these systems were designed not only to maintain in an organized fashion the information they collect but also to provide this information to the public in the most convenient way possible. As a matter of fact, state statutes provide for DFI to recoup any costs associated with the release of this information and they establish the rates for which these costs can be recovered.

Do we collect personally identifiable information as part of these filings? Well, it was just recently brought to our attention by State Representative Marlin Schneider that national uniform commercial code lien filing forms that we have used for years ask for a social security number as an optional identifier to be used for search purposes. We promptly moved to eliminate the social security number from our computer-based index and proposed to the International Association of Corporate Administrators that the request for the social security number be removed from the forms in use across the nation. We were pleased that the association agreed and we're proud that we were helpful in effectuating a national change of this magnitude.

Finally, DFI is an administrative agency and we are responsible for maintaining data and records involving each of our employees. Basically, the state's overall safeguards with regard to personnel information apply and, along these lines, we are no different than any other state agency.

With that brief overview, let me now introduce General Counsel Chris Green who will address more specifically privacy as it relates to our various areas of responsibility.



State of Wisconsin
Department of Financial Institutions

Tommy G. Thompson, Governor

Richard L. Dean, Secretary

Testimony of Christopher Green
General Counsel, Department of Financial Institutions
Senate Privacy, Electronic Commerce and Financial Institutions Committee
September 14, 1999

Senator Erpenbach and committee members:

Thank you for inviting the Department of Financial Institutions to appear before you to address the issue of data collection and privacy. As Dave Anderson has already alluded to, DFI has a number of primary functions. I will discuss information we collect pursuant to our functions of regulation, licensing and record-filing.

Regulation

The Division of Banking regulates state-chartered banks and various other entities under its licensed financial services and mortgage banking sections. The Division of Savings Institutions regulates state chartered savings banks and savings and loans while the Office of Credit Unions regulates state chartered credit unions.

Almost all of the information collected by the divisions or office relates to business entities. The nature of the information relates to the safety and soundness or financial condition of financial institutions or licensed financial service providers. Personally identifiable information is not normally collected on individuals under this regulatory function.

Under this function, the primary source of information is through the examination process. The statutes pertaining to banking, savings institutions and credit unions require that information gained through the examination process be treated as confidential. Since as far back as 1919 this confidentiality has been protected by the courts.

As an exception to the statement that the information collected under this function relates only to business entities, the Division of Banking collects information regarding individuals in the licensing of loan originators. Information collected includes the applicant's name, address, phone and fax numbers. Also obtained is the name of the mortgage banker/broker company responsible for the loan originator. The application asks a series of questions to enable the division to determine if the applicant has committed a crime that relates to a breach of trust or has been subject to regulatory actions in other jurisdictions. This information is public under the open records law.

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Licensing

DFI licenses certain financial service providers and certain individuals who work in the delivery of those financial services. Our Division of Securities, for example, licenses several thousand broker-dealers and about 80,000 broker-dealer agents.

In every case, we would have personally identifiable information which we would make available to the National Association of Securities Dealers, all state regulators, the Securities and Exchange Commission and state and federal law enforcement officials. We do not share social security numbers and certain disciplinary information.

The Division of Securities also conducts field audits of licensees and the information gained through those field audits is exempt from public disclosure.

The division also collects personally identifiable information pursuant to its enforcement function. All enforcement actions necessarily include personally identifiable information of not just the licensee but others including the complainant or alleged victims. All such files are treated as confidential while they are pending. Once the files are closed, all but the individuals' social security numbers become available for public inspection.

Record-filing

DFI acts as the public custodian of the charter documents creating certain Wisconsin business organizations. We have over 300,000 entities on file with the system. Of that there are 100,000 active Wisconsin organizations and 10,000 foreign (out-of-state) organizations.

DFI also reviews, processes and files financing statements for commercial and private business indebtedness, and indexes nearly all liens resulting from lending in the state of Wisconsin. These records contain information relating to the debtor, secured party and description of the subject property. We maintain 1.6 million records in this system.

The information in our UCC and Corporation sections is designed to be available for public consumption. We have no authority to withhold this information. These are public records.

If we do provide copies of records kept by DFI under this function we recover our costs pursuant to the open records law unless fees we charge are explicitly provided for such as in the case of the various business organizations statutes.

Conclusion

Regarding DFI as a whole, the only data we share with other agencies as a matter of course is with the Department of Revenue for delinquent taxpayers pursuant to statute. We will also be sharing data with the Department of Workforce Development regarding delinquent parents.

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Finally, information that is available to the public is already made available on the department's website. The information found there includes lists of the various entities chartered or licensed by the division.

With that, we would be happy to take any questions the Chair or members of the Committee may have.

SENATE PRIVACY, ELECTRONIC COMMERCE AND FINANCIAL
INSTITUTIONS COMMITTEE

Testimony of Linda Seemeyer

September 14, 1999

Chairman Erpenbach and members, thank you for the opportunity to appear before the committee today. I am Linda Seemeyer, Executive Assistant at the Wisconsin Department of Administration. This morning I will discuss the department's policies relating to data entry and collection, privacy, and sales.

The Department of Administration is comprised of nine divisions that perform services and oversight in a wide variety of areas including state payroll, procurement, low-income home energy assistance, dog racing, and state information technology management. There are instances where it is necessary to collect data that includes personally identifiable information such as names, home addresses, Social Security Numbers (SSNs), Internal Revenue Service Form 1099s, and personal financial information. The Department does not collect information beyond that which is necessary to perform its many duties

For instance, the Department collects Social Security Numbers for various purposes. State payroll requires the collection of such data for the simple reason that we must collect Social Security taxes. However, Social Security Numbers are also used in the context of the state's procurement system. When a vendor such as a sole proprietor does not have a Federal Employer Identification Number, that person's Social Security Number would be used as a vendor identifier. Furthermore, the Division on Gaming uses Social Security Numbers in the course of its oversight functions. Other personally identifiable information collected and maintained by the Department includes information related to unemployment compensation, worker's compensation information, personnel matters, and financial information submitted by EdVest program participants.

We do not sell lists containing personally identifiable information as a matter of course, however, the Department of Administration is subject to Wisconsin's Open Records Law, which presumes that most government records are open to public inspection. Gray areas do exist under the Open Records Law so as a matter of course, records requests received by the Department are referred to legal counsel for review to determine if the requested data or records contain material that is exempt from disclosure. In fact, DOA legal counsel processes about 200 information requests each year.

DOA does not sell lists or data it collects for administrative purposes, but such data may be released pursuant to Open Records requests. If the requested information is not protected from disclosure and the record is already available, no charge is assessed by the Department unless the record is a publication for sale. (Examples of publications for sale by the Department include the Wisconsin Blue Book, Wisconsin State Statutes and the Wisconsin State Telephone Directory). If the record is in a form that can be photocopied, the requester may be assessed a fee of 15 cents for each impression produced in response to the request.

While client agencies control their own data, the Division of Information Technology provides the mainframe computer services to those agencies. The Department has gone to great lengths to make state databases as secure as possible. Every entrance into the system is logged and that log is under constant scrutiny by agencies and DOA systems security personnel.

The Legislative Audit Bureau regularly reviews security procedures and is in the process of completing an audit at this time. In 1998, the LAB issued the following statement: "Overall, we found the Division has adopted sound security measures, policies, and procedures to minimize the risk of loss of data and resources at the data center."

Because Info Tech employees can encounter confidential information in the performance of their duties, each employee must sign a confidentiality agreement which,

in addition to any applicable legal sanctions, makes clear that abuse of information access privileges is cause for discipline up to and including termination.

If the committee is interested in learning more about policies and safeguards relating to DOA's information technology divisions, Dennis Vickers , who is Deputy Administrator of the Division of Information Technology is with me to answer any technical questions you may have.

That concludes my remarks. I would be happy to answer any questions you have.

Administrative Services

The Division of Administrative Services provides numerous support services to the department, including personnel, records and forms management, space and property management, financial management, computer services, printing, purchasing, mail and management planning. Its major functions for the department are to develop management information systems, prepare and monitor the departmental budget, provide recommendations to the secretary on policies and procedures, and perform internal audits. It pays the salaries and any associated fringe benefits for all district attorneys and their staff attorneys. It also reviews and pays the compensation of special prosecutors for the 71 district attorneys' offices. (Menominee and Shawano Counties share a district attorney.)

Personal Information Collected: SSN, Vendor 1099 forms, personnel records

- Bureau of Management Services.

- **In state purchasing transactions** businesses are identified by their Federal Employer Identification Number (FEIN) or **Social Security Number (SSN)** in the case of sole proprietorships.
- several forms are used that require a vendor's FEIN, or SSN
 - When a vendor complies the state's Contract Compliance Law (Section 16.765, Wis.Stats./Ch. Adm. 50, Wis.Adm.Code, regarding nondiscriminatory contracts) that vendor is identified in the Vendor Directory as an eligible vendor for three years or the life of the contract. The vendor is identified therein by name and FEIN or SSN.
 - DOA utilizes a form ("Notice to Vendor Filing Information") requesting vendor consent to list their FEIN and SSN in the Vendor Directory. Refusing consent means that a vendor does not appear in the directory and the state must request contract compliance information from the vendor each time a contract is entered with that vendor

- Bureau of Financial Management.

- **Social Security Numbers (SSN)** are used on **travel reimbursement** documents, but set up on WiSMART for all employees paid through central payroll. Travel records of employees are public but SSNs are deleted.
- Vendor FEIN numbers are maintained in WiSMART and used for vendor payments. Vendor FEINs are provided by vendors wanting to do business

with the state and are considered to be public records. Vendor payments are part of the public record.

- **Vendor Form 1099s** are kept but are stored as confidential IRS information. Section 77.61(5), Wis.Stats., prohibiting disclosure of tax records, would seem to apply.
- Bureau of Personnel.
 - The Bureau is governed by Section 230.13, Wis.Stats., relating to closed **personnel records**. Requests for information are referred to DOA legal counsel. Within the Bureau, cabinets containing personnel files, medical, and payroll information are locked
- Bureau of Computer Services.
 - When developing new computer systems data collection is limited to the extent possible. Personally identifiable information is masked in systems whenever possible. (Such information must be available to the systems developers who maintain systems.)
- State Prosecutors Office.
 - The State Prosecutors Office does not create or maintain individual criminal or other case records. Individual District Attorney offices create and maintain such records. All requests for information are referred to DOA legal counsel.

State Agency Services

The Division of State Agency Services manages state government purchasing and contracts and is responsible for graphic design, typesetting, printing, transportation, records management, minority business contracting and contract compliance. It also handles municipal cooperative purchasing, fuels procurement, contracting with sheltered work centers, federal and state surplus property disposition and recycling and waste reduction programs for state agencies. The division manages the state's self-funded programs for state liability and property insurance and workers' compensation protection. In addition, it assists agencies in controlling and reducing losses.

Personal Information Collected: SSNs, Worker's Compensation information

- Bureau of Transportation.
 - Bureau leases vehicles to individuals and individuals. Compiles Vehicle Auction Mailing List (mailing list of individuals who wish to be notified of auctions)
 - Recently that mailing list was provided under an Open Records Request
- Bureau of Integrated Document Services.
 - The Bureau manages mailing lists for subscribers to DOA and other agency publications. For instance, training services may seek the list of paid subscribers to the Current Opportunities Bulletin. Such requests are referred to DOA legal counsel.
 - Certain items are sold for profit: Wisconsin Blue Book, Wisconsin Statutes, Administrative Code, Wislaw (CD-ROM), Tax Bulletin, State of Wisconsin Compensation Plan, Wisconsin Current Opportunities Bulletins, Wisconsin State Telephone Directory.
- Bureau of Procurement.
 - The Bureau identifies vendors by their FEIN or SSN in the case of sole proprietors. Such numbers are made public in certain directories such as the Contract Compliance Directory and the list of ineligible vendors. Vendor consent to list SSN is obtained.
 - Vendor FEINs are provided by vendors wanting to do business with the state and are considered to be public records. Vendor payments are part of the public record.

- Bureau of State Risk Management.

- The BSRM collects pursuant to the state **workers' compensation** statute (Ch. 102, Wis.Stats.). Section 102.33(2)(b), Wis.Stats., prohibits the release of records that reveal the identity of an employee who claims worker's compensation benefits, the nature of the employee's claimed injury or medical condition, benefit information, or financial information such data is confidential.

Buildings & Police Services

The Division of Buildings and Police Services operates and maintains twenty-nine major buildings in seven cities throughout the state. These include the State Capitol, the Executive Residence and state office buildings in Madison, Wisconsin. The division is also responsible for all state real estate leasing, planning of office space, and engineering services. The Capitol Police force, which is part of this division, protects state buildings, property and employees, manages parking for 5,000 vehicles and provides security for the governor and other dignitaries.

Personal Information Collected:

- Engineering Bureau
- Capital Bureau
- Hill Farms Bureau
- Space Management Bureau
- Capitol Police Bureau
- Out-state Bureau
- Central Madison Bureau

Energy & Intergovernmental Relations

The Division of Energy and Intergovernmental Relations manages statewide energy planning and also maintains state agency ties with local, regional, and federal governments. Primary functions include advising the department and the governor on federal and state-local relations, state and regional energy and coastal management, and emergency energy policies and programs. The division reviews federal legislation and directs state lobbying efforts, prepares and reviews federal grant applications, administers federal energy conservation funds and federal oil overcharge repayment funds and operates the state energy information clearinghouse. Other activities include producing annual population estimates for Wisconsin municipalities and other demographic research, forecasting energy supply and demand, assisting in the development of proposed state and federal energy legislation, and developing energy conservation programs.

Personal Information Collected: None.

- Bureau of Intergovernmental Relations
- Bureau of Energy
- The Division does maintain mailing lists for newsletters. However, no SSNs are collected and such lists are never sold. Requests for such data would be referred to DOA legal counsel.

Executive Budget & Finance

The Division of Executive Budget and Finance provides fiscal and policy analysis to the governor for development of executive budget proposals and assists agencies in the technical preparation of budget requests. It reviews legislation and prepares or coordinates the fiscal estimates that accompany all expenditure bills. It also advises the State of Wisconsin Building Commission and the governor on the issuance of state debt and administers finances for the clean water revolving loan fund program. The division provides program and management evaluation, maintains the management information system for authorized state employee positions and keeps the governor's appointments register. It also established accounting policies and procedures, maintains the state's central payroll and accounting systems, monitors agency internal control procedures and produces the state's annual fiscal and financial reports.

Personal Information Collected: Personal financial information, residence addresses, SSNs, payroll deductions

- State Budget Office.
- Capital Finance Office.
 - The Capital Finance Office administers the College Tuition Prepayment Program (**EdVest**). Section 16.24(12)(b), Wis.Stats., allows the Department to keep **personal and financial information** pertaining to a purchaser of tuition units or a beneficiary of tuition units closed to the public. Although this is permissive, it is the Department's policy to keep all such program information confidential. Administrative rules related to the EdVest program are being drafted where this as yet unwritten policy will be codified.
- State Controllers Office.
 - A Master File is maintained by this office, which contains the payroll profile for each state employee including **name, SSN, home address, classification, and rate of pay and payroll deductions**. Internal rules and procedures are in place to guard against abuse of such information. Only those employees with direct payroll responsibilities have access to this information. Any requests for data from the Master File are referred to DOA legal counsel.

Gaming

The Division of Gaming regulates racing and on-track pari-mutuel wagering, bingo, raffles, crane games, and Class III Indian gaming and the tribal-state gaming compacts.

Personal Information Collected: Names, home addresses and telephone numbers, SSNs, criminal history, financial information, dates of birth, spousal information. Open records requests are referred to legal counsel.

- Bureau of Indian Gaming.
 - Individuals and business entities proposing to enter into a contract for gaming-related goods and services exceeding \$10,000 in any year must obtain a **Gaming-related Contractors Certificate** from the Division.
 - Information required serves as the basis for performing background reviews and eligibility determination. Such information includes **name, addresses, residency, telephone numbers, ownership structure, financial, tax litigation, criminal history, SSN and FEIN.**
- Bureau of Racing and Support Services.
 - Information collected in regulating **racing and pari-mutuel wagering** is used for determining licensure eligibility and the conduct of background reviews of individuals and business entities.
 - Information collected includes **applicant name, current and prior addresses, social security number, date of birth, criminal history, and spousal information** and background information in the pari-mutuel industry.
 - Section 562.05(1c), Wis.Stats., prohibits the Division from issuing a license without the applicant's SSN or FEIN.
 - Under Section 562.05(8m), Wis.Stats., the SSN or FEIN is conveyed to the Wisconsin Department of Revenue and Wisconsin Department of Workforce Development to determine tax liabilities and child/family support obligations.
 - Background information is also provided to law enforcement agencies to obtain disclosure on criminal violations and determine licensure eligibility. Section 562.05, Wis.Stats.

- In the case of **charitable gaming**, similar information is collected on individuals and organizations in the regulation of bingo and raffles conducted by charitable organizations for licensure eligibility purposes.
- Information collected includes **name, address, telephone number**, type of license sought, organization type, organization status, and officers of the organization. Section 563.12, Wis.Stats.
- Finally, **applicant name, address** and location are gathered for each **crane game** licenses.

Housing

The Division of Housing, created in Section 15.103(2) Wisconsin Statutes, by 1989 Wisconsin Act 31, provides housing assistance to benefit low- and moderate-income households. It offers state-funded housing grants or loans through local organizations, coordinates its housing programs with those of other state and local housing agencies, helps develop state housing plans and policies, and provides training and technical assistance. The division channels federal housing funds to local authorities and organizations and administers federal funds for the homeless. It also administers the federally funded Weatherization program, which provides energy conservation services, and the Low Income Home Energy Assistance Program (LIHEAP), which provides heating fuel payments, to needy households. In addition, the division regulates mobile home dealers and parks. The Division does not sell any data. Requests for information are referred to DOA legal counsel.

Personal Information Collected:

- Information collected by the Division is generally demographic and for purposes of grants to local units of government. Any personal information on applications for program assistance is not made public. The Division does not sell data and requests for records are referred to DOA legal counsel.
- Bureau of Energy Services.
- Bureau of Weatherization.
 - Low Income Home Energy Assistance Program (LIHEAP). Local agencies and tribes or their subcontracting agencies perform data entry. Such information is kept in a secure system accessed only by authorized personnel. The LIHEAP application provides information to applicants about the use of data. A release of information is obtained if a household is referred to a utility weatherization program.
- Bureau of Project Development.
 - Community Development Block Grant. This program awards funds to local units of government. The grant application requires the collection of household data, including family size, ages and condition of housing, and household income. Such information is collected via confidential survey and is not released to the public. Retention and disposition requirements apply to this data.
- Housing Cost Reduction Initiative. Various non-profit and for profit entities receive state-funded HCRI awards to assist low- and moderate-income

household to defray housing costs. Data regarding household size, ethnicity, female head of household, and condition of housing are collected to document eligibility.

- HOME Investment Partnerships Program. Homebuyers can obtain assistance through this program. Grantees must verify that recipients are income eligible.
- Homeless programs. Data is collected to determine applicant eligibility. Such information is kept on file by local units of government and used to prepare federally required reports and federal grant applications.
- Transitional Housing Program and State Shelter Subsidy Grant Program. Data collected for these programs include: age, gender, number of children, familial status, ethnicity, and veteran status.
- Emergency Shelter Grant. Participating agencies collect data on persons with disabilities, female heads of household, elderly, familial status, number of large families, minority-owned businesses, women-owned businesses, participant income, and prevention services.

Information Technology Services

The Division of Information Technology Services, created in Section 15.103 (3), Wisconsin Statutes, by 1991 Wisconsin Act 39, provides mainframe computer services to state agencies. Every state agency, except the University of Wisconsin System Board of Regents, must purchase all of its computer services from the division unless granted written authorization to procure services elsewhere.

Personal Information Collected: SSNs (encrypted)

- Bureau of Administrative Services
 - Bureau of Customer Technology Service
 - Bureau of Network Management
 - Bureau of Technical Support
- Almost all of the electronic information managed by the Division is collected automatically. Exceptions do exist, such as correspondence, problem tickets entered into the problem management system, change records entered into the change management system, asset information entered into asset files, etc. All electronic files retained by the Division are protected from inappropriate access through security software.
 - The only information maintained by the Division relating to individuals pertains to an **Internet-based program for filing sales tax returns** being developed by the Wisconsin Department of Revenue. Users have a single logon-ID and password for all Internet-based transactions they perform with the state. This file contains the taxpayer's name, address (generally business address) and an **encrypted version of the social security number**. The Division file is used to assist taxpayers in resetting lost passwords.

Technology Management

The Division of Technology Management provides a business and information technology planning model for use by all state agencies. The division also assists agencies in data processing and telecommunications planning, coordinates information technology procurement, operates statewide telecommunication networks, and establishes statewide technology standards and guidelines.

Personal Information Collected:

- Bureau of Information Presentation Management
- Bureau of Justice Information Systems
- Bureau of Statewide Systems Development
- Bureau of Technology Policy and Planning
- Bureau of Telecommunications Management

**Testimony to State Senate Committee
on Privacy, Electronic Commerce and Financial Institutions
September 14, 1999**

Good morning Senators, my name is Jesse Garza, General Counsel for the Wisconsin Technical College System Board. I am here to brief you and answer your questions on the policies and standards for collecting and securing records throughout the technical college system, some of which include personally identifiable information.

- I. The Wisconsin Technical College System has 16 districts encompassing 47 campuses statewide. We serve over 450,000 students/clients and currently have certified approximately 10,000 teachers/instructors, including approximately 200 at the Department of Corrections.
- II. The Technical College System Board as a state agency.
 - A. We maintain **PERSONNEL RECORDS** on each state employe and the state's Open Records Law and DER's guidance governs the release of such records.
 - B. The State Board does **CERTIFICATION** of district "educational personnel."
 - (a) Data collected from each district:
 - (1) Name
 - (2) SSAN – *redacted before release and internal use only*
 - (3) Transcripts – *not released b/c educational record*
 - (4) Documented work experience
 - (b) Retained for 50 years.
 - (c) Most inquires seek confirmation of certification, i.e., yes or no.
 - A. **Information collected from each district** is for reporting purposes. We receive approximately one request a year.
 - (a) Client Reporting System – student information, therefore FERPA controls
 - (b) Staff Accounting System – Public records
 - (c) Use = various reports such as AA/EEO federal compliance, state aid, district "comparison" reports. Reports done in the aggregate.
- III. At the District level:
 - A. Educational institutions, therefore **FERPA** and State law on pupil records **controls** release. Students have option of w/holding release of "directory information" except to U.S. military recruiters.
 - B. District employes = **public employes**, thus **Open Records Law** controls.
- IV. Our databases have **limited access** – "need to know basis" with firewalls.
- V. Neither the agency nor the districts "sell" lists of names.

LONGITUDINAL FOLLOW-UP INTRODUCTION

The longitudinal follow-up survey is conducted once every four years. The next survey is scheduled for fiscal year 1999-00 for the graduating class of 1993-94. The State Board selects the graduates reported on the six-month graduate follow-up for the districts to participate in the five-year longitudinal follow-up study. The file of graduates is available in early April through File Transfer Protocol (FTP) over the Internet. A DOT generated list of current addresses is available upon request. Call Carol Timbers at (608) 266-2790 to request the DOT address list.

The State Board creates longitudinal follow-up sample records in the same format the Department of Transportation (DOT) requires for obtaining current names and addresses. The client name field collected on the client reporting record is divided into first name, middle name or initial, and last name on the longitudinal sample record. This name conversion process also eliminates the special characters in the name that the DOT does not collect, thus making a match to DOT records more likely. Refer to s.10.2.1 for the longitudinal follow-up sample record description.

Districts have the option of requesting the graduates' current names and addresses from the Department of Transportation (DOT). The DOT uses the name, sex and date of birth data elements to find names and addresses. Dot returns an output record (the Longitudinal Follow-up Name and Address Record) for every input record. The *Records Found Code* (column 63) indicates whether or not a match was found. If there are multiple records (ties) for the same key, you will receive more than one Longitudinal Follow-up Name and Address record from DOT for the graduate. Ties are indicated by a T in the Record tie code (column 63) of the Longitudinal Follow-up Name and Address Record. Although the DOT discontinued collecting social security numbers a few years ago, they also attempt to match our student identification numbers. If a graduate has changed his or her name, the new name is in the current last, first and middle names data elements. If a graduate is deceased, the date of death will be present in Date of Death data element returned by DOT. The name and address record returned from the DOT is described in s.10.3.1-2.

After the longitudinal follow-up survey is completed, each district must **submit the longitudinal follow-up records to the State Board by October 15**. These records contain the answers chosen by each graduate to the questions on the longitudinal follow-up survey form. The State Board uses the longitudinal follow-up records to compile a statewide longitudinal follow-up report.

One record for each graduate in the longitudinal follow-up survey (whether respondent or non-respondent) must be submitted to the State Board. Only report graduates of associate degree (10), college parallel (20), short-term (30), one-year technical diploma (31) and two-year technical diploma (32) programs. The records will be edited and validated before being accepted for the State Board's files. Records with one or more errors will be rejected and available for correction through File Transfer Protocol (FTP) over the Internet. **All rejected records should be corrected and resubmitted to the State Board by December 1.**

Between October 15 and December 1, the State Board maintains a sequential longitudinal follow-up file for each district. The record key consists of the longitudinal year code, district number and student identification number. To change records previously accepted by the State Board, completely resubmit all valid longitudinal follow-up records. To correct records in error, districts need only submit those records with the appropriate corrections.

LONGITUDINAL FOLLOW-UP NAME AND ADDRESS RECORD

(The current names and addresses are obtained from the Department of Transportation's driver license file using the longitudinal follow-up sample records. These records are created and made available upon request.)

<u>Position</u>	<u>Description</u>
1-15	Input Last Name
16-25	Input First Name
26-35	Input Middle Name
36	Blank
37-42	<u>Birth Date</u>
37-38	Month
39-40	Day
41-42	Year
43-44	Blank
45-50	<u>Program Number</u>
51-52	Graduation Year
53	<u>Longitudinal Year Code</u>
	5 = Five year longitudinal survey
54-59	Blank
60-61	<u>County Code</u>
62	Record Found Code
	0 = Record not found
	1 = Record found on name, sex and date of birth
	2 = Record found on SS number

<u>Position</u>	<u>Description</u>
63	Record Tie Code T = Tie Blank = No tie
64-72	<u>Student Identification Number</u>
73	<u>Sex Code</u> M = Male F = Female
74-89	Current Last Name
90-100	Current First Name
101	Current Middle Name
102-121	Current Street
122-137	Current City
138-142	Current Zip
143-148	Date of Death, YYMMDD or zero's if none



Wisconsin Technical College System Board
Edward Chin, State Director

September 14, 1998

SEP 17 1999

The Honorable Jon Erpenbach
Wisconsin State Senate
20 South, Wisconsin State Capitol
Madison, WI 53703

Re: Follow-up to Testimony by the Wisconsin Technical College System Board to the
Committee on Privacy, Electronic Commerce, and Financial Institutions

Dear Senator Erpenbach:

Enclosed is a copy of the outline I used for my testimony to the Senate Privacy Committee on
September 14, 1999, as requested by your assistant.

Also, you had requested a copy of the security agreement that I believed we had with the Department
of Transportation (DOT) to "match" student information with DOT records for our 5-year follow-up
survey. I was in error with regard to my testimony and wish to correct it.

We do not have a security agreement, *per se*, with the DOT on matching student directory data with
DOT driver license information. Instead, we have in place a procedure, which I have enclosed, that
allows our Information Technology (IT) staff to send a file, electronically, and request a matching
run against our information. There is no physical computer tape or CD that is exchanged or delivered
to DOT to accomplish this task.

The DOT IT staff, in turn, run our request for a match and provide us with the information for items
#'s 74 through 148 listed in the attachment, *i.e.*, name, address, and if deceased, the date of death.
No other information is retrieved and DOT staff is limited in access to this file only. All other files
maintained by the Technical College System are secure and inaccessible to anyone save our staff.
Once matching is complete, the file is again accessed by our IT staff only. This matched information
is then given back to each technical college district for the follow-up survey.

Please do not hesitate to contact me with any questions you may have about this information. I can
be reached at (608) 267-9540.

Very truly yours,

A handwritten signature in cursive script that reads "Jesús G.Q. Garza".

Jesús G.Q. Garza
General Counsel

Enclosures (2)

**TESTIMONY BEFORE THE SENATE PRIVACY, ELECTRONIC COMMERCE
AND FINANCIAL INSTITUTIONS COMMITTEE**

**MARTHA KERNER, ADMINISTRATOR
DIVISION OF ADMINISTRATIVE SERVICES
DEPARTMENT OF COMMERCE**

SEPTEMBER 14, 1999

SENATOR ERPENBACH, MEMBERS OF THE SENATE COMMITTEE ON PRIVACY,
ELECTRONIC COMMERCE AND FINANCIAL INSTITUTIONS, MY NAME IS MARTHA
KERNER. I AM THE ADMINISTRATOR OF THE DIVISION OF ADMINISTRATIVE
SERVICES AT THE DEPARTMENT OF COMMERCE. I AM RESPONSIBLE FOR
SUPERVISING THE INFORMATION MANAGEMENT FUNCTION IN THE
DEPARTMENT.

THE OVERALL MISSION OF THE DEPARTMENT OF COMMERCE IS BASICALLY
TWO-FOLD: (1) TO FOSTER ECONOMIC GROWTH AND DEVELOPMENT

THROUGHOUT THE STATE, AND (2) TO PROMOTE THE HEALTH AND SAFETY OF THE PUBLIC.

WE FOSTER ECONOMIC GROWTH AND DEVELOPMENT THROUGH A VARIETY OF FINANCIAL AND ASSISTANCE PROGRAMS, AND WE PROMOTE PUBLIC HEALTH AND SAFETY BY ENSURING SAFE CONDITIONS IN PUBLIC AND PRIVATE BUILDINGS, AND FUNDING A SHARE OF THE ENVIRONMENTAL CLEAN-UP COSTS CAUSED BY PETROLEUM RELEASES FROM UNDERGROUND STORAGE AND HOME HEATING OIL TANKS.

IN ADMINISTERING THESE FUNCTIONS, THE DEPARTMENT COLLECTS AND MAINTAINS DATA ON ITS CUSTOMERS, NAMELY THE BUSINESSES AND INDIVIDUALS WHO CHOOSE TO PARTICIPATE IN, OR WHO ARE REGULATED BY OUR PROGRAMS.

FOR OUR BUSINESS FINANCING PROGRAMS, SUCH AS THOSE UNDER THE WISCONSIN DEVELOPMENT FUND, THE DEPARTMENT MAINTAINS A DATABASE TO TRACK THE GRANT AND LOAN PORTFOLIO. IT INCLUDES THE NAME AND LOCATION OF THE FIRM, THE DATE AND AMOUNT OF THE AWARD, AND THE CURRENT STATUS OF THE AWARD. IN EVALUATING FINANCIAL ASSISTANCE APPLICATIONS, WE COLLECT PERTINENT INFORMATION ON THE APPLICANT, INCLUDING CREDIT REPORTS (WHICH CONTAIN SOCIAL SECURITY NUMBERS), BUSINESS PLANS, AND FINANCIAL STATEMENTS.

WE DO NOT SELL ANY INFORMATION RELATED TO OUR BUSINESS FINANCING PROGRAMS. HOWEVER, WE DO RECEIVE OPEN RECORDS REQUESTS. IN RESPONDING TO THESE REQUESTS, WE DO NOT RELEASE PERSONAL OR PROPRIETARY INFORMATION SUCH AS CREDIT REPORTS, SOCIAL SECURITY NUMBERS (IN THE CASE OF SOLE PROPRIETORSHIPS OR PARTNERSHIPS) OR TAX IDENTIFICATION NUMBERS.

IN OUR REGULATORY PROGRAMS, WHICH ENSURE PUBLIC HEALTH AND SAFETY, WE MAINTAIN A "REGULATED OBJECTS" DATABASE. IT IS NECESSARY BECAUSE WE REGULATE A BROAD SPECTRUM OF BUILDING CONSTRUCTION-RELATED ACTIVITIES. THESE RANGE FROM ISSUING CREDENTIALS TO INDIVIDUALS OR BUSINESSES, SUCH AS SOIL TESTERS, ELECTRICIANS, AND ELEVATOR INSPECTORS TO APPROVING BUILDING PLANS . . . AND TO INSPECTING STRUCTURES AND SITES.

WE MAINTAIN INFORMATION ON THE CUSTOMER'S NAME, ADDRESS, AND PHONE NUMBER . . . ON THE LOCATION AND ATTRIBUTES OF THE REGULATED OBJECT OR SITE ON FEES AND BILLINGS AND ON THE STATUS AND HISTORY OF PLAN REVIEW AND INSPECTIONS. WHEN CREDENTIALS ARE INVOLVED, WE COLLECT THE INDIVIDUAL'S SOCIAL SECURITY NUMBER. THIS PERSONAL IDENTIFIER IS NECESSARY BECAUSE THE STATUTES NOW REQUIRE A SOCIAL SECURITY NUMBER FOR CREDENTIALS, SO THAT CHILD SUPPORT AND TAX DELINQUENCY CAN BE VERIFIED.

THE DEPARTMENT RECEIVES REQUESTS FOR THIS DATA. THE REQUESTS ARE MOST COMMONLY FOR LISTS OF INDIVIDUALS WITH VARIOUS CREDENTIALS. GENERALLY, THESE REQUESTS COME FROM BUSINESSES WHO WANT TO MARKET A PRODUCT OR SERVICE, OR WANT TO EXPAND INTO A NEW AREA OR PRODUCT LINE. IN THE CASE OF REQUESTS FOR CREDENTIAL LISTS, THEY OFTEN COME FROM BUSINESSES THAT ARE RECRUITING FOR A PARTICULAR SKILL.

WE DO CHARGE A STANDARD FEE OF \$25 FOR THESE LISTS. THE FEE IS GREATER FOR MORE CUSTOMIZED REQUESTS TO REFLECT THE ADDITIONAL COSTS THAT ARE INCURRED. IN RESPONDING TO REQUESTS INVOLVING CREDENTIALS, WE DO NOT PROVIDE SOCIAL SECURITY NUMBERS. WE ALSO DO NOT PROVIDE PLAN REVIEW INFORMATION FOR SECURITY-SENSITIVE BUILDING FACILITIES, SUCH AS JAILS, PRISONS, BATTERED WOMEN FACILITIES, POWER PLANTS AND OTHERS.

IN THE PETROLEUM ENVIRONMENTAL CLEAN-UP FUND AWARD PROGRAM (PECFA), WE MAINTAIN INFORMATION ABOUT PECFA CLAIMANTS IN A "TRACKER" DATABASE. IT INCLUDES SUCH INFORMATION AS THE NAME, ADDRESS, PHONE NUMBER, TAX IDENTIFICATION NUMBER, SITE LOCATION, SIZE OF THE AWARD, STATUS AND HISTORY.

WE DO NOT SELL ANY INFORMATION FROM THE DATABASE FOR PECFA. HOWEVER, WE RECEIVE NUMEROUS OPEN RECORDS REQUESTS. GENERALLY, THESE REQUESTS ARE FROM ATTORNEYS WHO ARE ENGAGED IN ENVIRONMENTAL WORK SEARCHING FOR CONTAMINATED PROPERTIES, AND FROM INDIVIDUALS AND AGENCIES WHO ARE SEEKING INFORMATION ABOUT PECFA COSTS, THE NUMBER OF PECFA SITES AND OTHER RELATED PROGRAM INFORMATION.

WE DO NOT RELEASE ANY INFORMATION ON SOCIAL SECURITY OR TAX IDENTIFICATION NUMBERS. THE DEPARTMENT CHARGES FOR THE COSTS OF PREPARING THE RESPONSE.

IN CONCLUSION, THE DEPARTMENT OF COMMERCE COLLECTS AND MAINTAINS INFORMATION TO ADMINISTER ITS FINANCIAL ASSISTANCE AND REGULATORY PROGRAMS. MOST REQUESTS FOR INFORMATION STEM THE OPEN RECORDS LAW. WE DO RELEASE SOME OF OUR LISTS OF CREDENTIALLED INDIVIDUALS AND BUSINESSES, IN ADDITION TO INFORMATION ABOUT THE STATUS AND LOCATION OF SOME OF THE REGULATED OBJECTS. BUT WE HAVE MEASURES IN PLACE TO PROTECT THE PROPRIETARY INFORMATION OF BUSINESSES AND PERSONAL INFORMATION OF INDIVIDUALS.

I WILL BE PLEASED TO RESPOND TO YOUR QUESTIONS.