

My name is Bill O'Donnell. I am a computer operator with DOJ. I operate the TIME System that the budget proposes to move to DOA. Now I have an obvious self-interest here and you should take what I say with a grain of salt. However, you should also see that this budget also contains a good deal of other people's self-interest, especially as it relates to DOJ and the Time System and you should treat the Governor proposals with an equal grain of salt.

Today, government is supposed to be following the lead of private industry and toward that end DOJ has purchased for the TIME System, Client/Server technology to replace our current mainframe technology. The trend in the computer industry is to replace mainframes, wherever possible, with Client/Server which is basically smaller, more powerful and more cost-effective. Mainframes serve an ever-shrinking niche of the computer market. I am amazed that this budget stops DOJ from converting to a technology that would use tax dollars more effectively.

What are we supposed to do with the Client/Server equipment now sitting in our computer room collecting dust? The budget more-or-less says we cannot even plug the machine in? And my understanding is that DOA will have to buy another computer to run the TIME System as their system is now operating at maximum capacity. They will also have to buy software to run the state control center and then spend more money to customize that software to make it compatible with what the law enforcement agencies in the state are using. And then they are going to have to hire 6 more people to run the TIME System which is a 24-hrs a day, 7 days a week, 365 days a year operation. Where is the savings, where is the advantage?

Economics aside, DOA has done a dismal job in handling the DOT files needed by law enforcement. When a cop stops a car on the street, they need answers fast. The TIME System gives them fast responses, the FBI gives them fast responses but not so DOA/DOT. Last week I called DOA and told them there was a problem with DOT and they said they'd take care of it. Then after 20 minutes I called DOA back and they said, "Oh, I'm sorry. I got involved in something else and forgot about you." And the Governor wants DOA to run the whole TIME System like this? Police officers deserve better than DOA.

And despite what you were told last week, if Johann Gutenberg were actually standing here before you today, I suspect he would tell you not to vest the awesome power of information in the hands of any monastery or any agency.

Moving the TIME System from Justice to DOA would be a mistake.

Bill O'DONNELL  
WI DEPT. OF JUSTICE  
TIME CONTROL CENTER  
266-7633



## INTERSECTION OF PUBLIC POLICY AND EMERGING TECHNOLOGIES

*The Wisconsin Experience*

In 1991 the Wisconsin Legislature and the Governor added to the progressive tradition of this state by creating the Wisconsin Privacy Council and the nation's first Privacy Advocate. That initiative was in response to mounting concerns over personal and information privacy in an electronic age. Since the official opening of the Office of the Privacy Advocate last April, unanticipated press and public interest at both the state and national level has developed. Agencies of the federal government are amongst those who have expressed interest in modeling the "Wisconsin experience".

Because of rapidly emerging electronic and telecommunications technologies, it is imperative that state and local governmental authorities balance values of open government and accountability with reasonable expectations of personal and information privacy. If technology is utilized to promote efficiency, streamline record keeping, track benefit recipients, cut costs and root out fraud, then fair information practices must be developed and followed. Last November the Privacy Council published a set of ethical principles to guide the sharing and comparing of databases containing personal information. It is believed to be the first such state-level effort in the nation. In her first year, the Privacy Advocate responded to nearly 100 complaints from citizens and constituents. The following questions are representative of the kinds of technology-driven concerns that are being raised.

- 1) Under what circumstances is it appropriate for units of government to link, cross-tabulate or track personal data? Are state agencies fully reporting all computer matching programs as required in Sec. 19.69 Stats.? Should the provider of information be informed when identifiable personal information obtained for one reason is subsequently used or disclosed for some secondary purposes?
- 2) Are citizens aware that they have the right under current Wisconsin law to access their own governmental records in order to review, copy and challenge the accuracy of their personal data?
- 3) Should providers of information be allowed some control over how personal data required by government is used, linked and shared? Should the receivers of identifiable data (in either the public or private sectors) be obligated to assume some responsibilities of information stewardship?
- 4) Was it the intent of the framers of Wisconsin's open records law that entire databases be accessible upon demand and at low cost to private commercial interests?
- 5) Wisconsin provides strong confidentiality protections for medical records. Is that confidentiality guaranteed when medical data is re-released or transmitted to third parties or outside state jurisdiction? Is patient consent to release their medical records truly informed, voluntary and ongoing? What are the implications for refusing to consent?
- 6) Are citizens aware that under some circumstances they may limit the release of their names and addresses from motor vehicle and title registration records? This opt-out option is permitted when there is a request for a list containing 10 or more names. Should such opt-out opportunities be expanded to other state and local agencies, or would this jeopardize Wisconsin's tradition of openness?

# PRINCIPLES FOR FAIR INFORMATION PRACTICES IN WISCONSIN STATE AND LOCAL GOVERNMENT

## Preamble

*Advances in computer and telecommunications technologies assure the continued growth of electronic information and transactional data that are collected, stored, analyzed, merged, linked and disseminated. The following principles were developed by the Wisconsin Privacy Council to provide guidance for the use of personal information in a nation-wide interactive information highway. The guidelines are intentionally broad and are not intended to address specific agency activities. Although the principles are fundamental to the integrity and confidentiality of personal information used in an Information Age, some may need to be adapted to specific circumstances on an agency by agency basis. Hopefully, they will also help guide policymakers and private companies alike to develop their own standards of fair information practices that attempt to balance two critical democratic values: individual privacy and the right to free speech.*

- No secret governmental record-keeping systems containing identifiable personal information should exist.
- In Wisconsin, there is a strong statutory presumption of open government at both the state and local levels. State laws governing open records and open meetings are based on that presumption, with exceptions clearly delineated by statute and legal precedent.
- A reasonable expectation of privacy and accuracy of identifiable personal information is a characteristic of a free society. The statutory definition of personal information is "any information that can be associated with particular individual through one or more identifiers or identifying circumstances".
- Requests by government for identifiable personal information that is not directly required by regulatory authority or statutory mandate should be clearly labeled as "voluntary."
- Any governmental authority that creates, maintains, uses, or disseminates public records containing identifiable personal information should establish specific procedures to ensure the accuracy of information. In addition, precautions should be taken to prevent its unauthorized disclosure, factual alteration, or distortion within the limitations of Wisconsin law.
- Governmental authorities should provide notice to individuals, to the extent permitted by law, when identifiable personal information obtained for one reason is used or disclosed for a secondary purpose. Absent such notice or other provisions in the law, an individual should have the means to prevent the secondary use or disclosure of his/her personal information.
- Except as otherwise provided by law, an individual should be able to determine, without undue difficulty and in a timely manner, what identifiable personal information exists in a governmental record-keeping system and how it has been, or will be, used. Governmental officials responsible for maintaining the record system should provide assistance in locating the personal information being sought.
- Except as otherwise provided by law, an individual should be informed about procedures for inspecting, copying and challenging the accuracy of any public record containing their identifiable personal information. It is desirable that corrected or updated information then be provided to all third parties who had previously obtained the information, assuming the identities of these parties are known. However, individuals have a responsibility not to abuse their privacy interests by making unreasonable, inappropriate or costly demands regarding their own personal information.
- Governmental authorities should determine, record, and maintain the source, date of collection, and date of personal verification for all identifiable personal information.

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## FRAMING A STATE INFORMATION POLICY IN A COMPUTER AGE

### PROPOSALS FOR CONSIDERATION

As Wisconsin approaches the 21st century, it is imperative that policy makers and lawmakers together develop an information policy which addresses both the benefits and potential abuses of technology. The challenge for government will be to maintain efficiency and cost effectiveness of programs and services, while also respecting individuals' concerns for personal and information privacy. The following proposals are intended to open the dialogue regarding a new information policy that considers technology when balancing the potentially conflicting values of openness, effectiveness and accountability with reasonable expectations of privacy.

- 1) Design a statewide information policy based upon the Wisconsin Privacy Council's Principles of Fair Information Practices for Wisconsin State and Local Government (published by the Office of the Privacy Advocate in November 1994).
- 2) Insure that providers of information are informed when personal data collected by governmental authorities for one reason are subsequently used for secondary purposes. Such a disclosure is required under Sec. 15.04 (m) Stats.
- 3) Require local government to justify all computer matching and merging programs and describe how shared data will be used. Although state agencies must report computer matching programs under Sec. 19.69, local units of government are not required to do so.
- 4) Promote the concept of information stewardship, acknowledging that both information providers and receivers share rights and responsibilities for the ethical handling of personal and sensitive data. The concept of stewardship allows the data provider to retain some control over how his/her own data is used and released.
- 5) Expand opt-out opportunities for citizens who are required to disclose identifiable information to the government. Model such opt-out programs after the Transportation Department which permits drivers to withhold disclosure of their identity when there is an open records request for 10 or more names.
- 6) Recognize the privacy implications of sharing protected personal information (especially confidential medical records) for the purposes of research, government audits, performance and program evaluations and benefit eligibility.
- 7) Implement policies and procedures to safeguard confidential data from unauthorized or inadvertent release which would constitute an invasion of privacy. Data managers and their supervisors must follow appropriate codes of conduct and institute computer security measures to protect the privacy of protected personal data.
- 8) Re-examine Wisconsin's open records law in light of emerging telecommunications and computer technologies. Consider whether personal and potentially stigmatizing information, such as a person's Social Security Number, home phone number and credit card numbers, could be excluded from a public record without jeopardizing underlying principles of openness and access. Question whether it was the intent of the law's framers that entire databases should be made available at low cost for private commercial gain.

# FAIR INFORMATION PRACTICES IN AN ELECTRONIC AGE

3/20/95

INFORMATION COLLECTION	INFORMATION USES	INFORMATION SHARING	INFORMATION RELEASE
<p>1) Minimize collection of unnecessary personal information by state and local units of government.</p>	<p>1) Formulate information policies based on standards of fair information practices.</p>	<p>1) Inform providers of information when personal data collected for one reason may subsequently be used for secondary purposes, as provided in Wisconsin by sec. 15.04 (m) Stats..</p>	<p>1) Consider the role of technology in balancing the values of openness and accountability in government with reasonable expectations of personal and data privacy.</p>
<p>2) Question whether disclosure of personal information that is required or requested is inappropriate, extraneous or objectionable.</p>	<p>2) Allow providers of information to access their own records. In Wisconsin, sec. 19.63 (1) Stats. permits data subjects to review, copy and challenge the accuracy of their own information.</p>	<p>2) Undertake background checks and computer searches only if mandated or in accordance with sound public policy rationale.</p>	<p>2) Consider privacy needs when personal information is exchanged or released through emerging technologies such as kiosks, gopher servers and other on-line information systems.</p>
<p>3) Clarify options for providers of information. For instance, if disclosure of the Social Security Number or home (versus business) address is optional, this should be clearly stated.</p>	<p>3) Consider expanding the amount of control providers of information retain over how their own data is shared and released, to the extent permitted by law.</p>	<p>3) Require computer matching and merging agreements for local units of government. Currently in Wisconsin, sec. 19.69 Stats. requires state agencies to sign agreements that justify and describe information to be matched or merged.</p>	<p>3) Implement policies and employee training procedures to prevent in-house breaches of confidentiality and unauthorized release of data.</p>
<p>4) Identify publicly all state databases containing identifiable personal information. In Wisconsin, sec. 19.63 (1)(d) Stats. requires that such a disclosure be made in the Registry of Records Series.</p>	<p>4) Expand opt-out opportunities for the release of personal information. Currently in Wisconsin, drivers may withhold their name and address when an open records request for motor vehicle data involves 10 or more names.</p>	<p>4) Institute special protections for confidential medical information that is shared or transmitted to third parties and/or outside the state.</p>	<p>4) Institute computer security measures to prevent inadvertent or unauthorized release of identifiable data. Security procedures should identify a security officer, a records custodian and a means of data protection.</p>

# Summary of Complaints Received by the Office of the Privacy Advocate - 1994

3/9/95

#	Date	Key Word	Issue or Inquiry	Outcome
1	Dec-93	Criminal Records	The return or expunging of identifiable materials (e.g. "mug shot" and fingerprints) if not convicted of a felony.	Tracked and negotiated pertinent legislative bills to resolve complainant concerns (AB 107, SB 60). Bills failed to pass during the 1994 legislative floor period, but may be re-introduced.
2	Jan-94	Criminal Records	Prisoner wanted identifiable information expunged if not convicted of a felony.	Same as complainant #1.
3	Feb-94	Sale of Data	Concerns expressed about: (1) the sale of identifiable data collected and stored by state agencies; (2) the cost of establishing and operating DOAs Division of Information Technology.	Sec. 19.71 Stats. prohibits the sale (for profit) of identifiable data unless specifically permitted by law. Also provided Division of Information Technology contact names for the requested cost figures.
4	Feb-94	SSN Overuse and Misuse	Concern expressed regarding the inability to obtain revolving credit after refusing to disclose ones Social Security Number (SSN).	Private business may request SSN, but non-disclosure may mean refusal of a service (e.g. credit card) or a product.
5	Mar-94	Sale of Data	Caller inquired about the availability of identifiable personal information on Wisconsin homeowners including: name, address, mortgage lender, amount of mortgage, type and date of mortgage.	Sec. 19.71 Stats. prohibits the sale, by state agencies or by financial institutions, of identifiable information on individual mortgage lenders and details about their mortgage which are confidential. However, trade associations may also have such data.
6	Mar-94	Sale of Data	General inquiry about the statutes regulating the sale of identifiable information by state and local agencies.	Sec. 19.71 Stats. prohibits the sale (for profit) of identifiable data unless specifically permitted by law.
7	Mar-94	Wisconsin Open Records Law	Caller was uncertain about the scope of Wisconsin's open records law which seems in conflict with his desire for information privacy.	Subchapter II of Chapter 19 in the Wisconsin statutes contains the state's open records prescriptions including the definition of an open record. Wisconsin government operates under a presumption of openness.
8	Mar-94	Privacy Statutes	Caller inquired about the statutory authority of the Office of the Privacy Advocate and whether there existed in Wisconsin other statutes affecting privacy matters.	Subchapter IV of Chapter 19 in the Wisconsin statutes spells out the authority of the Privacy Council and the Privacy Advocate and also contains several other privacy provisions. Sec. 43.30 Stats. protects library records, and sec. 895.50 Stats. defines "invasions of privacy".

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9	Apr-94	Computer Privacy	Concern regarding automated personal information being kept confidential in light of existing technology which permits it to be stored, linked, merged and networked.	Sec. 19.69 Stats. requires computer matching programs to be identified, justified and described to Wisconsin's PRFB. Chapters 146 and 153 protect patient confidentiality by providing criminal and civil liability for breaches of confidentiality.
10	Apr-94	Confidentiality of Medical Data	Question as to what confidentiality provisions exist to protect the confidentiality of welfare recipients.	Sec. 49.53 Stats. requires the appropriate county agency to maintain a monthly list of AFDC and general assistance recipients and the benefit level of each. This is a public record although recipients must be notified within 72 hours of record review.
11	Apr-94	Confidentiality of Medical Data	Director of a health support group inquired about the confidentiality of medical and treatment records.	Chapters 146 and 153 of the Wisconsin statutes, as well as sec. 895.50 Stats., protect patient confidentiality. The Fair Health Information Practices Act of 1994, (HR 1994) has been introduced at the federal level. Also referred caller to Rep. Martin Schneider of the Wisconsin State Legislature.
12	Apr-94	Confidentiality of Medical Data	Inquiry regarding the confidentiality of data relating to interdisciplinary medicine.	Same as complainant #11.
13	May-94	Whistleblower	Caller alleged harassment for revelations of SSN and Medicaid fraud and feared employer retaliation. Inquired about possible redress and privacy protections.	Sec. 19.57 (data collection) and sec. 19.69 (computer matching programs) Stats. contain the pertinent privacy provisions. Also, whistleblower protections are spelled out in sec. 895.65 Stats..
14	May-94	Privacy Statutes	Caller expressed concern about the privacy of identifiable data bases maintained by private organizations (including shoppers clubs and video stores) and public entities (i.e. library use history).	Sec. 43.30 Stats. protects library records, and federal law prohibits disclosure of video and movie rental in an identifiable manner. There are few, if any, prescriptions regulating the use and sale of identifiable data by and among private organizations.

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15	May-94	SSN Overuse and Misuse	Caller complained about being required to identify SSN along with tax ID number in her art business.	The 1976 Tax Reform Act permits governmental authorities to require SSN for tax, welfare and motor vehicle registration. Since 1961, the IRS has allowed the SSN to be used as the taxpayer ID number for wage/tax purposes.
16	May-94	Confidentiality of Financial Data	Caller complained that a copy of a recent credit report was attached to her employment termination notice.	Caller failed to provide requested documentation; thus no further information is available on this inquiry.
17	May-94	Unsolicited Mail	Caller complained that unsolicited mail was being received at a secondary address known only to utility companies. He felt this was evidence that mailing lists were being sold without customer consent.	MG&E confirmed that no identifiable information is sold, while Ameritech provided their written policy stating that only directory information is sold or shared.
18	May-94	Confidentiality of Medical Data	Caller complained that identifiable tumor registration information was shared with researchers. Her attending physician was contacted regarding enrollment in a survey research protocol which involved personal and potentially stigmatizing questions.	The Director of the Bureau of Public Health confirmed in writing that identifiable tumor registry data is shared only with authorized employees and researchers in compliance with written agreement and regulatory proscriptions.
19	May-94	SSN Overuse and Misuse	Caller complained about the misuse of the Social Security Number and inquired when the number could be "required" versus only "requested".	The Social Security Act of 1935, the Privacy Act of 1974, the Tax Reform Act of 1976, the Family Support Act of 1988, and the "Buckley Amendment" of 1974 all spell out when the SSN is "required" and when the number can only be "requested".
20	Jun-94	Confidentiality of Medical Data	Caller expressed concern that the Medical Release Authorization form was too broad and thus allowed too many people to review confidential, personal and stigmatizing medical information.	Privacy Advocate requested an attorney general opinion on the authorization section of the release form. The AG was asked to clarify whether names or organizations may be identified as having access to a medical report.
21	Jun-94	Workplace Surveillance	Caller expressed concern about surveillance of private sector employees. Questions were also raised about use of polygraphs and wire taps.	Sec. 968.27 Stats. (wire tap prohibitions) contains the only Wisconsin law regulating surveillance in the private sector workplace. Sec. 942.06 & 111.37 Stats. state that polygraphs may be used in a limited manner in employment situations with consent.



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22	Jun-94	Wisconsin Open Records Law	Caller inquired whether a faxed signature was acceptable for an open records request received by a state agency.	Department of Justice advised that a faxed signature was appropriate, in fact, no signature is required for an open records request.
23	Jun-94	Unsolicited Mail	Caller inquired how to remove his name from master direct marketers' lists.	Caller was referred to the Direct Marketing Association's Mail Preference Service (P.O. Box 9008, Farmingdale, NY 11735) or their Telephone Preference Service (P.O. Box 9014, Farmingdale, NY 11735).
24	Jun-94	Confidentiality of Financial Data	Caller alleged harassment by a HMO with whom he was involved in litigation. HMO lawyers allegedly revealed current credit and bank balances while attempting to convince caller to settle the dispute out of court.	Officials from the Office of the Commissioner of Banking confirmed that no statutory or regulatory language exists specifically prohibiting access to personal financial information, although they doubted that bank officials would release such data.
25	Jun-94	SSN Overuse and Misuse	Caller asked why the SSN is needed for renewal of a drivers license or on automobile title records.	DOT is permitted by federal law to require a driver's SSN in order to verify identity. In Wisconsin the SSN is not part of the drivers license number, nor is it disclosable under the open records law.
26	Jun-94	Centralized Data Bases	Caller inquired whether there existed in state government centralized data banks which could summarize all public records retaining identifiable information on him.	No centralized system of automated personally identifiable data bases exists in Wisconsin government, including the Division of Information Technology. Each agency maintains its own personal records, the confidentiality of which are guided by statute.
27	Jun-94	Caller ID	Caller expressed concern over the privacy implications of Caller ID which became effective in Wisconsin in July 1994.	Caller ID legislation permits per-call blocking and per-line blocking only by law enforcement, abuse shelters and victims of domestic abuse. Referred caller to the Public Service Commission hotline, 608-267-9780.
28	Jun-94	Confidentiality of Medical Data	Caller expressed concern about sharing of psychiatric information on employees seeking Medical Leave.	Sec. 895.50 Stats. and the Federal ADA apply to this situation. Medical information required for medical leave may only be shared with individuals identified on the medical release authorization form.

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29	Jun-94	Wisconsin Open Records Law	Caller inquired about statutory authority allowing DER to refuse an open records request to release the names, home addresses and home phone numbers of classified state employees who could be recruited for union membership.	Subchapter II of Chapter 19 in the Wisconsin statutes contains open records proscriptions including a "balance test" to refuse the release of information when the personal interests outweigh the public interest. This case eventually ended in litigation.
30	Jun-94	Confidentiality of Pharmacy Records	Caller inquired about my quoted statistic regarding the number of prescriptions per year that are shared or sold for commercial purposes.	The Hastings Center Report, November-December 1993, page 15 stated, "... nearly half of the 1.6 billion prescriptions filled each year in the US is passed along to data collectors who, in turn, sell information... to pharmaceutical companies."
31	Jun-94	Confidentiality of Personnel Records	Caller asked whether personnel records are generally considered to be confidential and if requests for information contained in personnel records would need to be evaluated under the Wisconsin Open Records "balance test".	Sec. 103.10-.13 and sec. 230.13 Stats. outline laws covering access to and confidentiality of the personnel records of public employees. Also sec. 19.35 Stats. may be applicable.
32	Jun-94	SSN Overuse and Misuse	Caller complained about having to disclose his SSN too often. He questioned what laws require the identification of a person's SSN.	Also see complainants # 15 and 28.
33	Jun-94	Caller ID	Caller who has a medical disability expressed concern as to how Federal Express' Caller ID was able to identify him.	Referred caller to the Public Service Commission hotline 608-267-9780 which responds to Caller ID questions and complaints.
34	Jun-94	Data Base Matching and Sharing	Caller questioned whether DILHR was permitting identifiable wage information to be matched and shared with the IRS.	After meeting with DILHR officials, a revised listing of its computer matching programs was forwarded. This revised list of data sharing agreements (dated August 26, 1994) included a matching program entitled "UC/IRS".
35	Jun-94	Workplace Surveillance	Complainant expressed concern about intrusive equipment being used in the workplace to monitor employees and their performance.	Sec. 230.86 Stats, prohibits disciplinary action based in whole or in part on wiretapping, electronic surveillance or one-way mirrors unless criminal activity is involved or suspected. No other statutes were found to regulate private sector surveillance.

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36	Jun-94	Disclosure of DMV Data	Complainant expressed concern over the release of identifiable motor vehicle information to marketers. He was unaware that he could "opt-out" of having his name disclosed when there is a request for data bases of 10 or more drivers.	Sec. 19.71 Stats. prohibits the sale of names or addresses, while sec. 341.06 (1m) Stats. permits an individual to request to have his/her name withheld when the disclosure involves 10 or more names/addresses. This form can be obtained at DOT upon request.
37	Jul-94	Disclosure of Student Information	A mother called expressing concern that a school official released to her estranged husband confidential counseling reports maintained by the school on her daughter.	A Madison School District attorney verified that a biological parent, whether the parent is the custodial parent or otherwise, has the right to review and obtain identifiable records on his/her child.
38	Jul-94	Confidentiality of Medical Data	Complainant expressed concern over being required to release personal, stigmatizing and "irrelevant" medical information to lawyers on a plaintiff. Included was counseling following a 1988 sexual assault which the caller felt was not germane to the case.	Chapters 146 and 153 of the Wisconsin statutes protect the confidentiality of patient records unless there is informed written consent for release of identifiable information. Exceptions include cases where "implied consent" or no consent is needed.
39	Jul-94	Wisconsin Open Records Law	County official inquired whether Wisconsin's Open Records Law would require him to release the names and home addresses of county public employees.	Subchapter II of Chapter 19 in the Wisconsin statutes spells out the proscriptions of Wisconsin's open records law, including the "balance test" which may be employed when personal privacy outweighs the public benefit. Also see # 26.
40	Jul-94	Data Base Matching and Sharing	City official inquired about the proper use of newly created identifiable data bases. Specifically as to what automated information can remain confidential and what may be matched or released.	Sec. 19.69 Stats. spells out proscriptions for computer matching programs and Wisconsin Open Records Law guides the release of public records. The Wisconsin Privacy Council's newly developed "Standards of Fair Information Practices" also provide guidance.
41	Jul-94	Disclosure of Personal Information	Municipal utility board member complained that local utility applications were asking for more personal information than was permitted under PSC regulation.	PSC 113 spells out what personal information a utility may "require" to initiate service, utility service may not be disconnected or denied for refusal to disclose additional information.

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#	Date	Key Word	Issue or Inquiry	Outcome
42	Aug-94	Confidentiality of Medical Data	Complainant expressed concern over the sharing and handling of a medical evaluation required as part of a back-to-work order.	Pending. Caller's employer was asked in writing to document company policy and procedures insuring the confidentiality and security of stigmatizing medical reports submitted as part of a back-to-work order.
43	Aug-94	Disclosure of DMV Data	Caller expressed concern that a stranger had obtained the name and address of his wife by copying down the license number of the family car which was traveling on a state highway.	Wisconsin's open records law permits the disclosure of identifiable information provided to DOT on motor vehicle titles, registration applications or renewals.
44	Aug-94	Confidential Faxes	Caller expressed concern that confidential records and information were being faxed without proper security protections in place.	DOA fax cover sheets include a warning about misuse or the unintentional receipt of faxes containing confidential information. The Office of the Privacy Advocate is preparing a "Fax Facts" sheet for general distribution to governmental officials.
45	Aug-94	Privacy Legislation	Caller inquired about existing or proposed privacy legislation in Wisconsin or at the federal level.	1991 Wisconsin Act 269 contains several privacy provisions. Sec. 43.30 Stats. protects the privacy of library use records; sec. 895.50 Stats. grants privacy in general terms; sec. 968.27 Stats. contains regulatory language regarding wire taps.
46	Aug-94	Birth Certificate	Complainant questioned why she, as a new mother, had to reveal her smoking and drinking habits in an identifiable manner in order to obtain a birth certificate for her infant.	The DHSS Division of Health does require disclosure of drinking and smoking habits on the application for certificates of birth (questions #48a and b). Written inquiry to the Section of Vital Statistics has been sent; to date no response has been received.
47	Aug-94	Wire Tapping	Inquiry about state and federal wire tap statutes.	Sec. 968.27 Stats. regulates wire tapping in Wisconsin. At the federal level the FCC permits taps only under court order if criminal activity is suspected or involved (18 U.S.C. 2510).
48	Aug-94	Residence Privacy	Caller inquired whether a tax assessor was permitted to enter her residence for tax assessment purposes.	Referred caller to the Madison Tax Assessment Office for clarification of city and federal regulations.

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#	Date	Key Word	Issue or Inquiry	Outcome
49	Aug-94	Drug Screen Protocols	Caller inquired about the existence of protocols to govern and protect employees subjected to alcohol and drug testing (urine) in either government agencies or private sector organizations.	Model protocols are being developed by federal agencies and national organizations. In Wisconsin the Dept. of Transportation is taking the lead in developing drug/alcohol screening protocols. Referred caller to chief counsel at DOT.
50	Aug-94	Confidentiality of Financial Data	Tenant called to complain that an application for apartment rental required disclosure not only of her financial institutions, but also her bank account numbers.	After checking with several financial institutions it became clear that banks would not release account information. This appears to be an excessive request by the property management company.
51	Sep-94	SSN Overuse and Misuse	Tenant called to complain that he had to disclose his SSN on an application for apartment rental.	Federal law allows private sector entities to request the SSN and refuse any service or product for failure to disclose.
52	Sep-94	SSN Overuse and Misuse	Caller was upset that he was required to disclose his SSN to the DOT at the time his car was registered.	Also see #15.
53	Sep-94	SSN Overuse and Misuse	Caller expressed concern that she was required to identify her SSN on a grocery store's check cashing card.	Also see #52.
54	Sep-94	Confidentiality of Medical Records	Attorney wrote on behalf of an anonymous client who felt her privacy was compromised when mental health clinic records were randomly reviewed by the DHSS as part of their internal audit of clinics qualifying for MA.	Sec. 51.30 (4) (b) Stats. applies to the confidentiality of medical information although exceptions are enumerated. This case is pending. The agency involved has been asked to justify its access to privileged identifiable medical records.
55	Sep-94	Medical Release Authorizations	Legislator asked the Privacy Advocate to assist him in drafting legislation to clarify and narrow medical information release authorizations used by insurance companies and others.	Request has been accepted and work is in progress.
56	Sep-94	Confidentiality of Medical Data	Planned Parenthood called to express concern over the requirement that they must share with the DHSS potentially identifiable family planning information for the purpose of "outcomes research" being conducted by the agency.	Case is pending.

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57	Sep-94	SSN Overuse and Misuse	Caller expressed concern about the use all or part of the SSN to help identify publicly posted student grades at a Wisconsin VTAE institution.	Case is pending.
58	Sep-94	Privacy on the Information Superhighway	Caller inquired about the existence of state or federal guidelines to maintain confidentiality of privileged or confidential personal information on the Internet.	Case is pending.
59	Sep-94	Disclosure of DMV Records	Complainant was angry that identifiable accident records were housed and disclosed by DOT even though he was not at fault in said accident and the second driver was issued a citation.	Sec. 346.70 Stats. requires accident reports to be filed with the DOT. Both culpable and non-culpable parties are identified in public DMV records although the culpable party is identified as such in these records.
60	Sep-94	Wire Tapping	Caller inquired whether there exists any statute prohibiting her from "wiring herself" to record conversations with a colleague with whom whom she is engaged in a personnel dispute. She asked if she could tape record conversations with this colleague.	Sec. 968.27 Stats. (the wiretap statute) is the only prohibition or regulation on this activity known to the Privacy Advocate. The caller was advised that a private attorney can offer counsel whether such taped conversations would be admissible in court.
61	Oct-94	SSN Overuse and Misuse	Complainant angry over the requirement to either disclose his SSN when purchasing a cellular phone or leave a \$600 deposit with the vendor.	Also see #5.
62	Oct-94	Wisconsin Open Records Law	Inquiry regarding the confidentiality of police contact files.	Contact at the Department of Justice confirmed that these records were open under Wisconsin's open records law.
63	Oct-94	Confidentiality of Medical Data	Caller wanted clarification of protections pertaining to the confidentiality of medical information involved with requests for medical leave, family leave, return-to-work, and other situations.	Case is pending.
64	Oct-94	Workplace Surveillance	Visitor wanted statutory and policy information about regulations governing workplace surveillance and employee monitoring.	Few, if any, state or federal statutes regulate workplace surveillance/employee monitoring outside of the wire tap laws. There have been some court cases, however, prohibiting the surveillance of an employee's behavior or habits off the work site.

Summary of Complaints Received by the Office of the Privacy Advocate - 1994

3/9/95

#	Date	Key Word	Issue or Inquiry	Outcome
65	Oct-94	SSN Overuse and Misuse	Complainant was angry over the need to reveal her SSN during pre-natal registration at the birthing unit of her local hospital.	This case is pending.
66	Oct-94	Wisconsin Open Records Law	State public official inquired whether records of individuals failing an occupational licensing exam administered out-of-state would need to be released under Wisconsin's open records law.	Sec. 19.36 (3) Stats. states that public records include any record produced or collected under a contract that is entered into by a state authority.
67	Oct-94	Workplace Surveillance	Visitor was conducting research on statutes and rules regulating workplace surveillance and/or employee monitoring.	Also see #65.
68	Oct-94	Drug Screen Protocols	Visitor shared materials describing newly implemented departmental policy for drug and alcohol screening protocols.	New federal law requires state agencies to implement alcohol screening protocols effective January 1, 1995.
69	Oct-94	SSN Overuse and Misuse	Caller expressed serious concern that SSNs were being pulled from public Federal Tax Lein records housed in County Clerks offices in Wisconsin. Her complaint focused on an Oklahoma credit reporting agency planning to sell those SSNs.	Discussed the issue of collecting SSN for UUC and/or Federal Tax Leins with officials at the Office of the Secretary of State. Received some assurance that their policy relating to collection and release of the SSN would be reconsidered.
70	Oct-94	SSN Overuse and Misuse	Caller representing an out-of-state credit reporting firm called to discuss the above mentioned complaint and Wisconsin's open records law.	Wisconsin's open records law permits agents from out-of-state businesses to collect personal information from Federal Tax Leins. This information includes SSNs.
71	Oct-94	Computer Matching	Employee asked whether it is necessary to disclose on state forms when personal information may be used for secondary purposes. Specifically if one agency enters into a matching program with another agency.	Sec. 15.04 (1) (m) Stats. requires that each state form soliciting identifiable personal information must conspicuously disclose whether that information will be used for any purposes other than the reason it was originally collected. This includes matched data bases.
72	Oct-94	SSN Overuse and Misuse	Caller questioned why he was required to disclose his SSN when making inquiries regarding entrance into a graduate program at UW-Madison.	Incomplete details regarding this particular inquiry keeps this question in "pending" status.
73	Oct-94	Fair Credit Reporting Act & the SSN	Caller had several questions about the provisions of the FCRA and other pending legislation in Congress.	Sen. Simon and Rep. Condit have both introduced bills regulating the sale/use of identifiable personal information, especially medical information.

Summary of Complaints Received by the Office of the Privacy Advocate - 1994

3/9/95

#	Date	Key Word	Issue or Inquiry	Outcome
74	Nov-94	SSN Overuse and Misuse	Caller was upset that his private sector business was requiring the disclosure of his SSN.	A private employer may require the disclosure of the SSN for tax withholding, compensation, investment plans, veterans records, etc..
75	Nov-94	SSN Overuse and Misuse	Caller objected to disclosing his SSN in order to obtain a mortgage.	Financial institutions may obtain a homeowner's SSN and/or taxpayer ID number for transactions involving taxes or payments.
76	Nov-94	SSN & Disclosure of DMV DATA	Caller objected to disclosing his SSN when registering his car.	Federal law permits state Departments of Transportation to require disclosure of SSN for identification verification in vehicle registration. In Wisconsin, the Division of Motor Vehicles collects the SSN but will NOT disclose it.
77	Nov-94	Wisconsin Open Records Law	Wisconsin public employees union initiated a law suit to obtain home addresses of certain classified employees from Department of Employment Relations who had denied an open records request.	In October 1994, the Dane County Circuit Court ruled that DER must disclose the home addresses of state employees for union recruitment activities once both parties agree to waiving certain employees who would be jeopardized by the release of information.
78	Nov-94	Disclosure of Student Information	State official called to inquire about upcoming DPI administrative rule proposals regarding the collection of identifiable student data, including SSNs, on high school students attending VTAE institutions.	Case is pending.
79	Nov-94	Disclosure of Personal Information	Caller objected to a department store requiring personal information such as home address, phone number, drivers license number, etc. upon returning merchandise.	Few, if any, laws exist regulating the collection or use of personal information by private sector commercial interests. Caller was advised to question the store's practices and object to the collection of personal information.
80	Dec-94	Wisconsin Open Records Law	Caller inquired as to whether the provider of personal information for a public record could request nondisclosure of the information.	Department of Justice contact was helpful in answering the questions of the caller.
81	Dec-94	Confidentiality of Medical Data	Visitor asked if the administration/registrar for UW-Madison could sell names and addresses for profit.	Sec. 19.71 Stats. applies to the sale of databases. UW Alumni Office contact confirmed that UW-Madison no longer sells lists.



Summary of Complaints Received by the Office of the Privacy Advocate - 1994

3/9/95

#	Date	Key Word	Issue or Inquiry	Outcome
82	Dec-94	SSN Overuse and Misuse	Caller asked about the ability of private vendors obtaining SSNs. After the purchase of a cellular phone, the store obtained her SSN from TRW.	Referred caller to congressional delegation, her state legislator, an OBC attorney, Rep Schneider, etc. to urge the involved legislative parties to combat the sale and release of SSNs in the private sector.
83	Dec-94	Privacy Legislation	Caller wanted information regarding privacy provisions embodied in Wisconsin and federal law.	Also see complainant #45.
84	Dec-94	SSN Overuse and Misuse	Caller inquired whether her agency could require the disclosure of the SSN to aid the pursuit of tracking indigency. The policy is being considered as a result of an audit by the LAB.	Wrote letter of inquiry to Department of Justice contact.
85	Dec-94	Sale of Data	Caller was uncertain about proscriptions relating to the sale of identifiable personal information.	Sec. 19.62, 19.71, 19.32, and 19.35(3) Stats. outline the authority over and collection of fees for the sale of identifiable personal information.
86	Dec-94	SSN Overuse and Misuse	Call on behalf of a foreigner visiting US on a tourist visa. Specifically, whether the visitor could obtain a Wisconsin drivers license without a SSN and without having a license in his home country.	After extensive phone discussion, the caller was referred to a source at the DMV.
87	Dec-94	Disclosure of Personal Information	Caller complaint regarding the requirement of local school board to submit legal documentation of divorces. Also being solicited was information regarding the frequency of student doctor/dentist appointments.	Caller is to send background documentation, with follow-up letters going to the EauClaire Health Department and possibly the school board asking for justification for this practice.
88	Dec-94	Wisconsin Open Records Law	Caller wanted information regarding open records rights as they pertained to seeking documentation on his neighbor's property. Specifically he wanted to affirm his suspicions that the DNR records are erroneous. He sent a formal letter requesting access.	Caller was informed that he was proceeding properly and legally. He sent the OPA a copy of his letter to the DNR and was told to inform the OPA if they were not responsive to his open records request.

SUMMARY OF COMPLAINTS RECEIVED BY THE OFFICE OF THE PRIVACY ADVOCATE - 1995 3/9/95

#	Date	Key Word	Issue or Inquiry	Outcome
1	Jan-95	SSN Overuse and Misuse	Caller wanted to join local moose lodge and was asked to disclose his SSN. Also touched upon other areas where the SSN is "required".	Caller was informed that this was an unjustified request for the SSN. But, due to a lack of regulation in the private sector, the consumer may be refused service for not disclosing the SSN.
2	Jan-95	SSN Overuse and Misuse	Caller was concerned because UCare was using her SSN as a patient identifier.	By calling UCare and expressing her concern, UCare immediately changed her identifier to a neutral number.
3	Jan-95	Disclosure of Personal Information	Caller wondered if the identifiable personal information collected on state forms needed a disclosure statement in accordance with sec. 16.04 Stats..	The answer is yes and the caller was sent model language to use in the disclosure statement.
4	Jan-95	Disclosure of Personal Information	Caller was upset that the Department of Regulation and Licensing had released her home address to a prisoner who inquired about her licensing record.	Discussed with caller ways that DR&L could alter the wording on the forms and developed some sample language to send to DR&L. The situation had been resolved between DR&L and the caller prior to the call.
5	Jan-95	Disclosure of Personal Information	Caller received the Privacy Council's "Principles" and wanted to know how the council planned to publicize the privacy provision permitting individuals to access and challenge the accuracy of their own identifiable personal information.	A small budget and staff makes this a difficult task. Press releases, hand-outs and brochures are the main media for the OPA at this juncture.
6	Jan-95	SSN Overuse and Misuse	Caller, a state employee, called to discuss the wide required disclosure of the SSN by the DOT and other public and private entities. Also discussed other privacy concerns of a computer era.	Advocate suggested that the caller apply for a position on the Council.
7	Jan-95	SSN Overuse and Misuse	Legislative constituent expressed concern that his 17-year-old daughter had to disclose her SSN to receive a photo ID. Also discussed various other entities that "require" the SSN to use, link and share information.	Sent caller the Milwaukee Sentinel series on privacy and information on the OPA. Legislator agreed to send information about the growth and expansion of the SSN
8	Jan-95	Wisconsin Open Records Law	Caller was concerned about occurrence at a closed hearing where a potentially "libelous" document was circulated about the caller. He had obtained a copy of the document through an open record request.	Advocate asked caller to outline his case and concerns in writing so that she may be better able to judge if the case came under her purview.

**SUMMARY OF COMPLAINTS RECEIVED BY THE OFFICE OF THE PRIVACY ADVOCATE - 1995 3/9/95**

#	Date	Key Word	Issue or Inquiry	Outcome
9	Jan-95	Disclosure of Personal Information	Client representative of IBM called for our "Principles" and to discuss the privacy implications of setting up public kiosks to allow access to personal information.	After a long discussion of the issues the Advocate offered her expertise and services. The representative said she would look into the fair information standards in place at IBM.
10	Jan-95	SSN Overuse and Misuse	Caller asked why the IRS and DOR include the SSN on the mailing label of tax forms.	Advocate forwarded the response from her contact at the Department of Justice
11	Jan-95	SSN Overuse and Misuse	State agency employee called to discuss the disclosure of SSN and Tak ID numbers of vendors on a circulated directory list of eligible vendors certified by the state.	1974 Privacy Act was faxed to the caller. It contains disclosure requirements as they pertain to individuals.
12	Jan-95	SSN Overuse and Misuse	State representative wrote on behalf of a constituent who was concerned about the SSN being on the mailing label of tax forms.	Also see complainant #10.
13	Feb-95	Remote Printers	Complainant was concerned about the confidentiality of remote printers which are being utilized with increasing frequency throughout state agencies. She herself had inadvertently sent a confidential printout to an incorrect printer.	Advocate thanked caller for alerting her about this "new" issue. Said this was a possible topic for a future "fact sheet" distributed by the OPA.
14	Feb-95	Surveillance	Caller was concerned that her home was electronically wired by the government and other unknown entities. Said the information was being transmitted from her home via satellites at Mitchell Airport.	Caller was advised to call her police department.
15	Feb-95	Wire Tapping	Caller inquired about pending legislation at the federal level concerning wire tapping.	Discussed the scope of the "Clipper" bill. Caller was referred to Robert Ellis Smith and Marc Rottenberg who work with and follow federal legislation. There is no pending legislation at the state level.
16	Feb-95	Workplace Surveillance	Reporter called to see if the OPA had handled many complaints regarding workplace monitoring.	Advocate shared anecdotes she has picked up on the topic and referred the reporter to other contacts who may have more experience with surveillance issues.
17	Feb-95	Disclosure of Student Information	Reporter called to ask whether federal or state law regulated the release of student information to the selective service.	Contact with the Oshkosh Board of Education disclosed that they would consider the military's request for pupil data.

SUMMARY OF COMPLAINTS RECEIVED BY THE OFFICE OF THE PRIVACY ADVOCATE - 1995 3/9/95

#	Date	Key Word	Issue or Inquiry	Outcome
18	Feb-95	Disclosure of Personal Information	Worker for the Victim Compensation Program expressed concern that the names of patrons were being released by the County Human Services Department to a private, non-profit entity without victim consent.	While outside her perview, the Advocate said the names are part of a public record. She suggested that the involved parties express their concerns to the department.
19	Feb-95	SSN Overuse and Misuse	Caller objected to the widely required disclosure of the SSN.	Advocate suggested she write to her legislator and will forward this concern to her council.
20	Feb-95	Disclosure of Student Information	Official inquired about the statutory protections at the state and federal level regarding the confidentiality of student records. Specifically, can GED test scores be identified on a student's GED certificate?	Contacted source at the Department of Justice.
21	Feb-95	Personal Privacy	Letter complaining about the "sloppy" practice by Ameritech leaving new phone books in the driveway or on the homeowner's front porch. The complainant, who does extensive traveling, was concerned that prowlers would be tipped that the house was unoccupied.	Spoke with the author of the letter. No further action was necessary.
22	Feb-95	Wisconsin Open Records Law	Caller inquired about state statutes concerning open records, specifically as they relate to privacy versus open information.	Chapter 19, Subchapter II of the statutes was sent to the caller. Also, caller was referred to the Legislative Reference Bureau and to a contact in the Department of Justice.
23	Feb-95	Privacy Legislation	Student called wanting advice and information for a paper addressing pending legislation and privacy issues.	Referred her to several legislators actively engaged in these issues.
25	Feb-95	Confidentiality of Medical Records	Caller expressed concern over an egregious breach of medical confidentiality when a state surplus computer was found to contain hundreds of medical records. He was concerned that he may be one of the 600 identified patients.	Wrote to both Rep Schneider and the source who discovered the records, asking that they address the caller's concerns.
26	Feb-95	Criminal Records	Caller, representing a client, wanted information about state law concerning the expungement of identifiable criminal data (such as mugshots and fingerprints), when a person has been arrested falsely and never tried.	Referred caller to Rep Balwin and Sen Risser who drafted corrective legislation in the past legislative session.
24	Mar-95	Disclosure of Personal Information	Caller wanted further information about the stigmatizing information required to obtain a birth certificate.	After getting the approval of a past complainant on this issue, the two were put in touch with each other.

**SUMMARY OF COMPLAINTS RECEIVED BY THE OFFICE OF THE PRIVACY ADVOCATE - 1995 3/9/95**

#	Date	Key Word	Issue or Inquiry	Outcome
27	Mar-95	GIS	Student expressed concern about the privacy implications of GIS and other large databases. Existing technology merges zipcodes, census blocks, consumer profile information, land data, and demographic information.	Discussed the privacy implications of enhanced technology.
28	Mar-95	Confidentiality of Medical Data	Physician complained on the behalf of patients for whom he has authorized the approval for disabled license plates. This information is being disclosed by the DOT and subsequently used by the private vendor in an invasive and fraudulent manner.	Advocate continues to research this concern.
29	Mar-95	Confidentiality of Medical Data	Former complainant (see #25)called a council member to forward his concerns.	Advocate and member decided that it may be important to write to medical and state entities that house medical records to ensure that proper policies and procedures are in place.
30	Mar-95	SSN Overuse and Misuse	Caller from the Bureau of Procurement wondered why a the SSN of a vendor needed to be revealed in contractual information distributed to local levels of government.	Also see complainant #11.
31	Mar-95	Disclosure of Personal Information	Caller expressed fear that the Department of Regulation and Licensing was giving out licensing information upon request, including her home address. One such requestor was a former patient of hers, now in a state prison.	Both the Advocate and the called contacted the DR&L to suggest that applicants for licenses should be given a choice between either home or business addresses.
32	Mar-95	Cost of Obtaining Public Records	Caller inquired why the City of Madison charges \$300 for a database of 145,000 voter registration names, an amount he considered excessive.	Sec. 19.645 and 19.646 Stats. allow governmental agencies to charge for services a "cost to cover the reproduction". Conferred with contacts in the Department of Justice, the Elections Board, Infotech and the City Clerks Office to analyze the cost involved.

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## Joint Finance Hearing March 27, 1995

Thank you ladies and gentlemen for agreeing to hear this plea for survival from one of the newest and smallest agencies of state government, the Wisconsin Privacy Council and its sole functionary, Carole Doeppers, the Privacy Advocate.

I am Bob Wills, chairman of the eight member citizen council. I will be followed by Carole Doeppers, an unclassified employee, who has served as Privacy Advocate for about a year and a half.

As background: You will recall that until recently Wisconsin has had little or no statutory privacy law. Then in the 1991 budget bill, new laws were created by the legislature relating to personal information that was contained in state and local government records.

These new laws were based primarily on proposals developed by the Legislative Council's Special Committee on Privacy and Information Technology.

Behind the committee's proposals was a growing awareness of the potential for governmental and business invasion of private lives as a result of the information revolution that was occurring as records were computerized, then networked.

It became apparent that as our health records, credit records, driving records, criminal records and all other records were gathered and shared, there was the potential for abuse of our privacy literally at the push of a few keys on a computer keyboard.

What to do about it? The Wisconsin legislature in 1991 created one of the first agencies of its type in the nation to confront the problem. It remains today a showcase pioneering example for other states.

The 1991 laws created the office of Privacy Advocate to help individuals in dealing with state and local authorities regarding their use of identifiable personal information and to advocate policies that protect personal privacy.

The legislation also created the Privacy Council to advise the Advocate and to make recommendations to the Governor and the Legislature.

The Council has functioned since July, 1993. One of its first priorities, of course, was to hire Carole Doeppers and to get her functioning on a daily

basis, establishing a presence in Madison and increasing the awareness of both state and local governments that someone was watching for abuses of invasion of personal privacy.

A second priority was the establishment of "Principles for Fair Information Practices" applicable to both state and local governmental units. We on the Council are proud of those principles. Beginning last October, they have been distributed to governmental officials throughout the state. We are handing out copies today for your review.

Briefly, while acknowledging the strong statutory presumption of open government in the state, the Principles emphasize the expectation for the privacy of personal information.

If I may make a brief personal digression: As some of you may remember, I have spent a large part of my career fighting for open records and open meetings in government. Yet I have also ardently supported the privacy of personal information. I have concluded that there need not be a conflict in these two seemingly contradictory goals.

I believe the rationale for this position is clearly laid out in the Council's Principles.

Initially, a goal for some members of the Council was the writing of similar Principles for the guidance of private businesses. However, there has not been unanimity among Council members as to whether it has the authority to move ahead in this area. A subcommittee has been formed to make recommendations this spring.

To reiterate, it is Carole Doeppers who through her daily contacts with the public and government officials carries the banner of the sanctity of personal information. Because of these daily contacts, she can recite a litany of abuses and will do so.

But first, let me make a final point: I believe every member of the Privacy Council is convinced of the need for some governmental representative to advocate the cause of those who feel they have been wronged by invasion or misuse of their private information by government. And I believe most would support the continuance of the Council.

If you conclude, however, that there is a necessity to eliminate the Council through the budget process, then I strongly urge that you continue to fund the position of Privacy Advocate.



I am sure that Carole Doeppers will argue that, since she is literally working where none has worked before, she needs the guidance and advice of the eight member citizen council. I will let her state her own case.

Thank you,

Robert H. Wills

Chairman, Wisconsin Privacy Council