



KEN PAXTON
ATTORNEY GENERAL OF TEXAS

July 2, 2015

Ms. Maureen Franz
Deputy Chief Counsel
Texas Health and Human Services Commission
P. O. Box 13247
Austin, Texas 78711

OR2015-13431

Dear Ms. Franz:

You ask whether certain information is subject to required public disclosure under the Public Information Act (the "Act"), chapter 552 of the Government Code. Your request was assigned ID# 569814.

The Health and Human Services Commission (the "commission") received a request for the TIERS data dictionary. You claim the submitted information is excepted from disclosure under section 552.139 of the Government Code. We have considered the exception you claim and reviewed the submitted information.¹

Section 552.139 of the Government Code provides, in part:

(a) Information is excepted from [required public disclosure] if it is information that relates to computer network security, to restricted information under Section 2059.055 [of the Government Code], or to the design, operation, or defense of a computer network.

¹We assume that the "representative sample" of records submitted to this office is truly representative of the requested records as a whole. See Open Records Decision Nos. 499 (1988), 497 (1988). This open records letter does not reach, and therefore does not authorize the withholding of, any other requested records to the extent that those records contain substantially different types of information than that submitted to this office.

Gov't Code § 552.139(a). You assert release of the requested data dictionary would compromise the network security of the TIERS program. You also submit a letter from the state's Chief Information Security Officer (the "ISO"). The ISO informs us it is his "responsibility to assure the security of all information systems and data maintained by the state." The ISO states the TIERS data dictionary relates to the design and operation of "multiple interconnected information systems and the underlying network infrastructure that the information systems rely upon." The ISO further states "the information contained in the TIERS data dictionary could provide a roadmap for an attacker looking to exfiltrate [sic] confidential information from the TIERS system and expose sensitive personal information of Texas citizens." Based on these representations and our review of the information, we conclude the commission must withhold the requested information under section 552.139 of the Government Code.

This letter ruling is limited to the particular information at issue in this request and limited to the facts as presented to us; therefore, this ruling must not be relied upon as a previous determination regarding any other information or any other circumstances.

This ruling triggers important deadlines regarding the rights and responsibilities of the governmental body and of the requestor. For more information concerning those rights and responsibilities, please visit our website at http://www.texasattorneygeneral.gov/open/orl_ruling_info.shtml, or call the Office of the Attorney General's Open Government Hotline, toll free, at (877) 673-6839. Questions concerning the allowable charges for providing public information under the Act may be directed to the Office of the Attorney General, toll free, at (888) 672-6787.

Sincerely,



Ramsey A. Abarca
Assistant Attorney General
Open Records Division

RAA/eb

Ref: ID# 569814

Enc. Submitted documents

c: Requestor
(w/o enclosures)