

Jim Doyle
Governor

Karen E. Timberlake
Secretary



State of Wisconsin
Department of Health Services

DIVISION OF LONG TERM CARE

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September 20, 2010

Mr. Fred Buhr
6112 Exchange Street
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Dear Mr. Buhr:

I have been asked to respond to your recent letter to Governor Jim Doyle. Thank you for your ongoing interest in the privacy and security of information collected by this Department for the Older Americans Act programs. Rachel Currans-Sheehan, Executive Assistant of DHS has also shared your comments to her at a meeting last month. We have reviewed your letter of August 30, 2010 carefully, and the Department's security and IT managers do not agree with your assessment of the security of the SAMS reporting system.

From the perspective of someone who is entering data into the system, it may not be evident what security is operating within the Internet-based system. I am attaching some of the key points that have been provided by our IT security team. There are an increasing number of web-based applications now being deployed by state government as we move away from mainframe systems such as HSRs, which are being phased out. The Department is also moving toward a system of encryption for electronic communication which will further protect the privacy of data.

Your urgent recommendation that the Office of the Governor assume administrative control of the Bureau of Aging and Disability Resources (BADR) is neither practical nor warranted. As the administrator responsible for oversight of the Division of Long-Term Care, which includes BADR, I can assure you that the bureau is well-managed by competent senior staff who work closely with the Division of Enterprise Services as well as the Administration on Aging to assure that programs are managed within the guidelines of the state and federal governments.

While a number of statements made in your letter are not accurate, it is not my intention to critique the points of view you have expressed. I simply want to reassure you and any other older people with whom you communicate that our data systems are well protected to assure privacy and security of personal health and social information. I'd like to point out that on the registration forms used at senior service sites, there is a disclaimer that indicates that an individual is not

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required to provide any information, beyond demographic, in order to receive services. They may also review and edit any information they feel is incorrect. If you wish to withdraw your record from the system, we would be happy to honor your request.

Again, thank you for your on-going interest in this important matter. We regret that you continue to be concerned about our aging services information system despite repeated exchanges of information, verifications and evidence of security audits. We will not appoint a "special administrator" for this particular DHS program. We will continue to monitor BADR and the senior information systems as we do all other programs.

Sincerely,



Susan Crowley
Administrator

Cc. Diane Welsh, Legal Counsel
Pat Cooper, Administrator, Division of Enterprise Services

Attachment

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Attachment

SAMS Brief

- **What is SAMS?**

SAMS stands for Social Assistance Management System. SAMS is a PC software package sold by a company called Synergy, Inc. Synergy has since been acquired by a company named Harmony.

- **What does the Department have to do with SAMS?**

A number of years ago the federal Administration on Aging developed an expanded reporting process called the National Program Information System (NAPIS) that states must use to report on expenditures under the Older Americans Act. NAPIS requires considerably more service-level detail than what had previously been required of states.

In order to meet the expanded federal reporting requirements the Bureau of Aging and Disability Resources had to establish a system to collect the service data from county and tribal levels where aging services are provided. BADR has purchased SAMS, and with the assistance of the Greater Wisconsin Agency on Aging Resources (GWAAR), purchased and distributed the product to all county and tribal aging units, and area agencies on aging in Wisconsin to aid in meeting the federal reporting requirements.

- **Why SAMS?**

SAMS was developed in concert with the state aging unit in Vermont specifically to meet the NAPIS requirements. It is presently used by 28 state units on aging and 350 area agencies on aging. BADR chose SAMS after consulting with other states and examining a number of software packages. SAMS was also recommended to BADR by departmental software consultants.

The Administration on Aging also awarded a federal contract to Harmony, the company that owns SAMS, to create the state reporting tool used by all states to report Older Americans Act data.

- **Personal identifying information is not used**

When the Department reports to the federal government, it is an aggregate report that shows the total number of unduplicated persons served in all aging programs and the unique characteristics of those individuals; there is **no personal identifying information** transmitted. The Department does not use the data for any purpose other than to meet the reporting requirements. The Wisconsin report is analyzed and compared to other states both in our region and nationally. The Administration on Aging also provides a report to Congress to demonstrate that targets established under the Older Americans Act are being met. Local aging units have also found the aggregate program reports they are able to generate to be useful management tools to report to their county boards and other funders.

- **What is Agingnetwork.Com?**

Prior to 2006, data was collected and maintained at the local level. Reports were submitted by county/tribal aging units to the area agencies on aging and then to the State. Local aging units found it difficult and sometimes expensive to operate the local systems, relying on the county IT department and, in the case of small counties, contract IT workers to be sure the most current version was installed in a timely fashion. To add to the challenge, aging units also used a variety of computers and operating systems.

In consultation with the area agencies on aging and county aging units, the Department made the decision to move to a web-based version of SAMS. The conversion of the local data into a single database began in 2005 and was completed in early 2006. The web-based version of SAMS is accessed through a web portal called Agingnetwork.com.

- **Security**

DHS staff routinely monitors SAMS on Agingnetwork.com to improve the SAMS product and the security surrounding SAMS. In response to a citizen inquiry, DHS engaged Harmony executive staff to review the citizen's security concern. It was determined the security concern did not compromise the security of the data in the SAMS application. At the request of DHS, Harmony employed a third party security audit firm to conduct a security assessment. The results were communicated to DHS staff. Some suggested minor improvements were noted and implemented but the audit found security to be fundamentally strong.