



**KEN PAXTON**  
ATTORNEY GENERAL OF TEXAS

May 10, 2019

Mr. Matthew Crouch  
Legal Counsel  
Harris County Appraisal District  
P.O. Box 920975  
Houston, Texas 77292-0975

OR2019-12621

Dear Mr. Crouch:

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# 764759 (ORR# 19-1510).

The Harris County Appraisal District ("HCAD") received a request for the iFile number pertaining to a specified address.<sup>1</sup> HCAD claims the requested information is excepted from disclosure under section 552.136 of the Government Code.<sup>2</sup> We have considered the claimed exception and reviewed the submitted information.

Initially, we note only the submitted iFile number is responsive to the request for information. This ruling does not address the public availability of any information that is not responsive to the request, and HCAD is not required to release this information in response to this request.

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<sup>1</sup>HCAD sought and received clarification of the information requested. *See* Gov't Code § 552.222 (if request for information is unclear, governmental body may ask requestor to clarify request); *see also* *City of Dallas v. Abbott*, 304 S.W.3d 380, 387 (Tex. 2010) (if governmental entity, acting in good faith, requests clarification of unclear or over-broad request, ten-day period to request attorney general ruling is measured from date request is clarified).

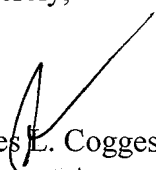
<sup>2</sup>We note HCAD did not comply with the requirements of section 552.301 of the Government Code. *See* Gov't Code § 552.301(b), (e). Nevertheless, because section 552.136 of the Government Code can provide a compelling reason to overcome the presumption of openness caused by a failure to comply with section 552.301, we will consider the claim of HCAD under that section.

Section 552.136(b) of the Government Code provides, “[n]otwithstanding any other provision of this chapter, a credit card, debit card, charge card, or access device number that is collected, assembled, or maintained by or for a governmental body is confidential.” Gov’t Code § 552.136(b). HCAD states the submitted iFile number can be used to access confidential property information of value to property owners and third party professionals involved in the protests of property tax appraisals. Based on these representations, we conclude the iFile number at issue is an access device number for purposes of section 552.136(a). Accordingly, HCAD must withhold the submitted iFile number under section 552.136(b) 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](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,



James L. Coggeshall  
Assistant Attorney General  
Open Records Division

JLC/gw

Ref: ID# 764759

Enc. Submitted documents

c: Requestor  
(w/o enclosures)