

Standard Operating Procedure
Accessing Confidential Personal Information in a Paper-Based System
Ohio Arts Council
Hard-Copy Personnel Records

1. Purpose:

This standard operating procedure includes guidance and instructions that must be followed by the employees or contractors of the Ohio Arts Council (OAC) when accessing Confidential Personal Information contained in the paper-based hard copy personnel records maintained by the Executive Office.

2. Overview:

All state agencies, boards and commissions are required to implement Ohio Revised Code Section 1347.15 which includes provisions to protect the privacy and security of Ohio's citizens who have confidential personal information stored in a state-maintained, paper-based personal information system. The OAC has issued administrative rule 3379-15, regulating access to confidential personal information. This procedure applies those rules to hard-copy personnel records.

For purposes of this procedure:

- "Personal information," as defined by Ohio Revised Code (ORC) 1347.01, means any information that describes anything about a person, or that indicates actions done by or to a person, or that indicates that a person possesses certain personal characteristics, and that contains, and can be retrieved from a system by, a name, identifying number, symbol, or other identifier assigned to a person.
- "Confidential personal information" (CPI) is the data identified in section III H of this procedure.

3. System Description:

- A. Name: Hard-copy personnel records
- B. Description: Employee records maintained in hard copy include: employee separation/discipline/hiring documents, medical documents, policy acknowledgement forms, payroll, performance appraisal, professional development and training documents.
- C. Purpose: Personnel records are maintained in accordance with state and federal mandates and standards and constitute documentation of employees' comprehensive work history and performance.
- D. Regulatory requirements: ORC Chapter 126
- E. Authorizing access: Records may only be accessed at the discretion and in the presence of the executive and/or director deputy director.
- F. Security: Records are stored in the deputy director's office, which is kept locked when not occupied.

G. Positions that access the system:

Position title	Permission level (Full access, limited access, etc.)	CPI accessible with this permission level
Executive Director	Full	All
Deputy Director	Full	All
Executive Assistant	Limited	At ED/DD discretion
Fiscal Spec	Limited to hiring documents	At ED/DD discretion

H. Description of CPI Contained in this System: Employee Social Security Numbers, medical and health information (FMLA forms, etc.).

I. Valid Reasons for Accessing CPI: Personnel matters, hiring or discipline processes, performance appraisals or other matters related to employees' work history or performance.

4. Reporting Suspicious or Inappropriate Requests:

Employees are required to immediately report any suspicious or inappropriate actions where it is perceived that CPI may have been requested or accessed for non-business reasons in violations of this procedure or the Policy on Protecting Privacy. See *Incident Response for Access of Confidential or Sensitive Personally Identifiable Information for an Invalid Reason*.

5. Training:

A review of this procedure will be included on the agenda of an OAC staff meeting at least once annually with employee attendance documented. In addition, new employees must receive training on this standard operating procedure prior to accessing hard-copy personnel records which contain CPI.

6. Maintenance of this Procedure:

This procedure will be reviewed at least once annually to ensure it remains compliant with ORC Section 1347.15 and with any corresponding OAC policy.

7. Revision History:

Date	Description
05/22/2012	New standard operating procedure
7/1/2013	Review