



Standard Operating Procedure
Accessing Confidential Personal Information in a Paper-Based System
Ohio Arts Council
Individual artist files

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 proof of residency materials required of some OAC individual artist grant recipients.

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 proof of residency materials required of OAC individual artist grant recipients. The OAC has issued administrative rule 3379-15, regulating access to confidential personal information. This procedure applies those rules to hard-copy proof of residency materials required of OAC individual artist grant recipients.

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: Individual artist grant recipients proof of residency materials

B. Description: Individual artist grant recipients proof of residency materials include: photocopy of recipients driver's license or state ID, resume and dated proof of address that can be found on mortgage statement, W-2, tax form or utility bill.

C. Purpose: Individual artist grant recipients' proof of residency materials substantiate proof of residency requirements as set forth by OAC program guidelines.

D. Regulatory requirements: ORC Chapter 126

E. Authorizing access: Records may only be accessed by the OAC program coordinators directly involved with managing individual artist programs, deputy director or executive director.

F. Security: Records are stored in a locked filing cabinet with access only by authorized personnel.

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 |
| Individual Arts Grants and Services and Services (IAGS) Director | Full | All |
| IAGS Program Coordinator | Full | All |

H. Description of CPI Contained in this System: Driver License copy, resume, mortgage/lease or other financial information that proves current address.

I. Valid Reasons for Accessing CPI: To verify proof of residency for recommended grant recipients.

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 individual artist files 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 |
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