Ohio Arts COUNCIL

30 EAST BROAD STREET, 33rd FLOOR
COLUMBUS, OHIO 43215-3414
614-466-2613

OAC.OHIO.GOV

Standard Operating Procedure
Accessing Sensitive Data
Ohio Arts Council
Agency grant files

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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 sensitive data contained in the hard copy materials of OAC individual artist and organizational grant recipients.

2. Overview:
This procedure only addresses the access of sensitive data, which may include sensitive personally identifiable information (SPII). For purposes of this procedure:
   - "Sensitive data" is the data identified in section 3 H of this procedure.
   - "Sensitive personally identifiable information" includes personally identifiable information that OAC has discretion not to release under public records law. For purposes of this procedure, it does not include "confidential personal information" under Ohio Revised Code 1347.15. Examples of "sensitive personally identifiable information" that the OAC keeps may include:

     - names
     - correspondence
     - addresses
     - phone numbers
     - employee home addresses and phone numbers

3. System Description:
   A. Name: Agency grant files

   B. Description: Hard copy records pertaining to grants to individuals and organizations.

   C. Purpose: Grant records track names and contact info for grant applicants and grantees, sometimes including correspondence between staff members and applicants, to facilitate management of application process and maintenance of grants awarded.

   D. Regulatory requirements: Chapter 126 of the Ohio Revised Code.

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

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

   G. Positions that access the system:

Position title	Permission level (Full access, limited access, etc.)	Sensitive data accessible with this permission level
Executive Director	All	All
Deputy Director	All	All
Grants Office Director	All	All
Grants Office Associate	All	All
Program Coordinators	All	All
Fiscal Spec	All	All

H. Description of Sensitive Data Contained in this System: Names, addresses, correspondence and other contact information for individual applicants and grantees, including contact info for the primary contact person(s) for grants to organizations.

I. Valid Reasons for Accessing Sensitive Data: To verify proof of residency for recommended grant recipients, complete required reporting processes and administer current grants.

4. Reporting Suspicious or Inappropriate Requests:
Employees are required to immediately report any suspicious or inappropriate actions where it is perceived that sensitive data may have been requested or accessed for non-business reasons in violations of this procedure or the Policy on Protecting Privacy. See *IT Policy (4), "Security Incident Response."*

5. Training:
A review of this procedure will be included on the agenda of annual OAC staff meetings. In addition, new employees must receive training on this standard operating procedure prior to accessing individual artist and organizational grant files which contain sensitive data.

6. Maintenance of this Procedure:
This procedure will be reviewed at least once annually to ensure it remains compliant with Ohio law and with any corresponding OAC policy.

7. Revision History:

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