



STATE OF OHIO BOARD OF EMBALMERS AND FUNERAL DIRECTORS

CONFIDENTIAL PERSONAL INFORMATION POLICY

POLICY

This policy applies to all employees, Board members, and contractors for the Board. The policy is subject to review and modification as deemed appropriate by the agency.

Purpose and Scope

The purpose and scope of this policy is to implement a confidential personal information policy.

Definitions

- **Board or Board Employees:** Means the State of Ohio Board of Embalmers and Funeral Directors, its Board members, staff, and contractors.
- **Records:** includes any document, device, or item, regardless of physical form or characteristic, including an electronic record as defined in section [1306.01](#) of the Revised Code, created or received by or coming under the jurisdiction of any public office of the state or its political subdivisions, which serves to document the organization, functions, policies, decisions, procedures, operations, or other activities of the office

Policy

It is the policy of the Board to restrict access to non-public personal information to only those employees who need access to perform a specific, legitimate governmental objective on behalf of the Board. Legitimate governmental objectives of the Board include those functions set forth in Chapter 4717. and Administrative Rules adopted thereunder, and administrative support functions necessary to further those objectives, including but not limited to: an investigation of information related to violations of Chapter 4717. or rules adopted by the Board; adjudication of disciplinary actions; processing initial applications for, or renewal of, licenses, permits, or certifications.

1. Employees shall maintain confidentiality regarding non-public personal information acquired while employed by the Board, including but not limited to social security numbers of applicants, licensees, and Board employees. Confidentiality must be maintained both during and after employment with the Board as required by Ohio Ethics Law.
2. Access to non-public personal information shall be granted at the lowest level necessary that allows an individual to perform their assigned duties in order to minimize the potential impact to the public. Each

position in the agency shall be evaluated and assigned an access classification based upon the specific and legitimate duties of the position as it relates to the official governmental objectives of the Board.

a. The Executive Director shall serve as the Board's Data Privacy Point of Contact (DPPOC).

b. The DPPOC shall determine the level of access for each of the Board's position.

3. The Executive Director is the official custodian of the Board's records and is responsible for the Board's personal information system and CPI. Due to the performance of cross duties by all Board staff, all staff employees shall have access to all CPI in the Board's possession, with the exception of CPI contained in employee personnel records, for which only the Executive Director may access.

4. All investigative records transmitted to a Board Designate shall have CPI removed.

5. Employees shall carefully review all information released when complying with public records requests to ensure that non-public personal information is not included in the response. The DPPOC (Executive Director) will review all public records requests prior to the release of information.

6. Employees shall handle, store and transmit non-public personal information in a secure method approved by the Board.

7. Employees shall dispose of non-public personal information in a secure method approved by the Board and in compliance with the Board's records retention schedules or the State's general records retention schedules.

a. Optical Disks (CDs, DVDs), shall be shredded in the office prior to disposal in accordance with policies and procedures established by the Board for those documents.

b. BCI&I documents, database reports, and paper material shall be shredded utilizing the secured shredding bins provided.

c. Electronic Storage Media (i.e. tapes, drives, portable storage devices) shall be reformatted using an approved multi-pass over-write process if being reused or destroyed through Tech-Disposal prior to disposal or salvage.

8. The Board will comply with any written request from an individual for a list of Non-Public Personal Information that the Board keeps on that individual unless the Non-Personal Information relates to an investigation about the individual based on specific statutory authority. The Executive Director will review all such requests.

9. In the event an employee of the Board improperly accesses an individual's non-public sensitive information, the Board shall inform the individual in writing within 15 days of determination of such access.

10. Suspected or observed improper access should be reported to the Executive Director. If an employee suspects or observes inappropriate access by a manager, the employee shall report the access to the Board President. Employees of the Board who inappropriately access sensitive information for impermissible purposes are subject to disciplinary action as set forth in the Board's policies, including termination and/or legal action.