

## ORC 1347.15 Implementation Plan

<b>1.0</b>	Agency:	[ ]
	Division (if applicable)	[ ]
	Data Privacy Point of Contact Name and Title:	[ ]
	Phone:	[ ]
	Email Address:	[ ]
	Date of Evaluation:	[ ]
	Director's Acknowledgement:	[ ]
		<i>[Type director's name]</i>

<b>2.0</b>	<b>Overall Agency Evaluation of Systems with Confidential Personal Information</b>		
	2.1. Estimated % of the Agency's Systems of Records that have been evaluated for personal information:		[ ]%
	If less than 100%, please provide a plan for completing the evaluation: [Enter information here ]		
	2.2. Please attach a list of Personal Information Systems of Record covered by ORC 1347.15		

<b>3.0</b>	<b>1347.15 Implementation – Access Policies and Rules</b>			
State agencies must regulate access to the confidential personal information (CPI) they keep by adopting rules that include the following criteria, lists, procedures and requirements (collectively, "access policies"). Please indicate the status of compliance with:				
3.1. Criteria for determining who has access to CPI and which supervisors authorize access;	Final Rule(s) Filed ( [ ] )	Yes ( [ ] )	Partial ( [ ] )	No ( [ ] )
If "partial" or "no," please provide a plan for completing compliance: [Enter information here ]				
3.2. A list of valid reasons for accessing CPI based on an agency's authority;	Final Rule(s) Filed ( [ ] )	Yes ( [ ] )	Partial ( [ ] )	No ( [ ] )
If "partial" or "no," please provide a plan for completing compliance: [Enter information here ]				
3.3. A list of statutes and rules requiring confidential treatment of personal information;	Final Rule(s) Filed ( [ ] )	Yes ( [ ] )	Partial ( [ ] )	No ( [ ] )
If "partial" or "no," please provide a plan for completing compliance: [Enter information here ]				

3.4.a. A procedure that requires new or upgraded computer systems to be able to record access to CPI by state employees and	Final Rule(s) Filed ( [ ] )	Yes ( [ ] )	Partial ( [ ] )	No ( [ ] )
If "partial" or "no," please provide a plan for completing compliance: [Enter information here ]				
3.4.b A procedure for logging each access (manually) until a new or upgraded computer system is acquired that also includes two exceptions for manual logging: Exception 1 – where access both (i) results from research, routine office procedures or incidental contact and (ii) is not directed at a specifically named individual whether individually or as part of a group; and Exception 2 – where access results from a request by the individual for information.	Final Rule(s) Filed ( [ ] )	Yes ( [ ] )	Partial ( [ ] )	No ( [ ] )
If "partial" or "no," please provide a plan for completing compliance: [Enter information here ]				
3.5. A procedure for allowing individuals to review the CPI about the individual;	Final Rule(s) Filed ( [ ] )	Yes ( [ ] )	Partial ( [ ] )	No ( [ ] )
If "partial" or "no," please provide a plan for completing compliance: [Enter information here ]				
3.6. A procedure for notifying individuals whose CPI has been improperly accessed; and	Final Rule(s) Filed ( [ ] )	Yes ( [ ] )	Partial ( [ ] )	No ( [ ] )
If "partial" or "no," please provide a plan for completing compliance: [Enter information here ]				
3.7. A requirement that the agency designate a data privacy point of contact to work with the chief privacy officer to ensure privacy protections and compliance,	Final Rule(s) Filed ( [ ] )	Yes ( [ ] )	Partial ( [ ] )	No ( [ ] )
If "partial" or "no," please provide a plan for completing compliance: [Enter information here ]				
3.8. A requirement that the agency complete a privacy impact assessment by the DPPOC, and	Final Rule(s) Filed ( [ ] )	Yes ( [ ] )	Partial ( [ ] )	No ( [ ] )
If "partial" or "no," please provide a plan for completing compliance: [Enter information here ]				

3.9. A requirement that the agency use a password or other authentication measure to protect electronic CPI.	Final Rule(s) Filed ( [ ] )	Yes ( [ ] )	Partial ( [ ] )	No ( [ ] )
If "partial" or "no," please provide a plan for completing compliance: [Enter information here ]				

<b>4.0</b> <b>1347.15 Implementation – Training and Awareness</b> Paragraphs (C)(2) and (D) of ORC section 1347.15 requires state agencies to:				
4.1. Establish a training program for all employees with access to CPI;		Yes ( [ ] )	Partial ( [ ] )	No ( [ ] )
If "partial" or "no," please provide a plan for completing compliance: [Enter information here ]				
4.2. Distribute to those employees the policies published in the rules;		Yes ( [ ] )	Partial ( [ ] )	No ( [ ] )
If "partial" or "no," please provide a plan for completing compliance: [Enter information here ]				
4.3. Obtain an acknowledgement of receipt of the policies from those employees; and		Yes ( [ ] )	Partial ( [ ] )	No ( [ ] )
If "partial" or "no," please provide a plan for completing compliance: [Enter information here ]				
4.4. Post a poster summarizing the policies in conspicuous places and post the policies on its web site.		Yes ( [ ] )	Partial ( [ ] )	No ( [ ] )
If "partial" or "no," please provide a plan for completing compliance: [Enter information here ]				