

CLEVELAND PUBLIC LIBRARY

Human Resources Committee

February 14, 2012

**RESOLUTION ADOPTING PERSONAL INFORMATION SYSTEM RULES FOR
CLEVNET AND CLEVELAND PUBLIC LIBRARY**

WHEREAS, Ohio Revised Code Section 1347.05 requires that local agencies, including library districts, adopt and implement rules that provide for the operation of personal information systems in accordance with the Chapter 1347 of the Ohio Revised Code; and

WHEREAS, Cleveland Public Library ("CPL"), on behalf of CLEVNET, maintains a computerized Integrated Library System ("ILS") containing personal information about CLEVNET library patrons in a manner which constitutes a personal information system under Ohio Revised Code Section 1347.01; and

WHEREAS, Cleveland Public Library's Human Resources Department maintains personal information about CPL employees in a manner which constitutes a personal information system under Ohio Revised Code Section 1347.01; and

WHEREAS, Cleveland Public Library's Department of Finance maintains personal information about CPL employees in a manner which constitutes a personal information system under Ohio Revised Code Section 1347.01; now therefore be it

RESOLVED, That the Board of Library Trustees hereby adopts the attached rules for the operation of the personal information system for CLEVNET, the Cleveland Public Library's Department of Finance, and the Cleveland Public Library's Human Resources Department, in accordance with Ohio Revised Code Chapter 1347, which rules have been drafted and approved by the Chief Legal Officer of the Cleveland Public Library.

PERSONAL INFORMATION RULES FOR THE CLEVNET SYSTEM

Ohio Revised Code Chapter 1347

PURPOSE

The Cleveland Public Library (“CPL”) is a local agency that owns and maintains a computerized Integrated Library System (“ILS”) containing personal information about CLEVNET library Patrons provided by CLEVNET Contract Libraries. The ILS is a personal information system that is part of a combination of systems as defined in Ohio Revised Code (“R.C.”) 1347.01. These Rules are adopted pursuant to R.C. 1347.05(B) and are intended to be procedures for the use and maintenance of the ILS.

The purpose of the ILS is to provide information necessary to manage the circulation of CLEVNET Contract Library materials in accordance with the circulation policies of the respective CLEVNET Contract Libraries. The ILS contributes to the efficiency of the CLEVNET Contract Libraries in implementing their circulation programs. The collection of Patron personal information is necessary in order to, among other things, identify persons who borrow library materials, and to notify these person of the status of borrowed materials and alert them of the availability of library materials.

APPLICATION

These rules apply to all CLEVNET Contract Libraries with respect to their use of and access to the ILS.

DEFINITIONS

Capitalized terms have the meanings ascribed to them in the CLEVNET System Agreement. The term “CLEVNET Contract Library” for purposes of this policy shall include CPL. Definitions contained in R.C. 1347.01 are attached hereto and incorporated into this policy as if fully rewritten herein.

PERSONAL INFORMATION

No CLEVNET Contract Library shall use personal information placed in the ILS unless the personal information is necessary and relevant to the performance of a lawful function of the CLEVNET Contract Library.

No CLEVNET Contract Library shall maintain or use personal information in the ILS that is not necessary and relevant to the functions that the CLEVNET Contract Library is required or authorized to perform by statute, ordinance, code, or rules, and CLEVNET Contract Libraries shall eliminate personal information from the ILS when it is no longer necessary and relevant to those functions. Personal information no longer necessary and relevant to the functions of the CLEVNET Contract Library shall be eliminated in accordance with applicable retention schedules of the Cleveland Public Library with regard to retention and purging of patron records, as it may be modified from time to time.

A copy of the current applicable retention schedule can be found at <http://www.cpl.org/LinkClick.aspx?fileticket=wmdhBCo8bJE%3d&tabid=242&mid=1492> . The Cleveland Public Library will notify all CLEVNET Contract Libraries in the event it modifies the attached retention schedule with regard to CLEVNET patron information.

Whenever a CLEVNET Contract Library requests that person supply personal information that will be placed into the ILS, the CLEVNET Contract Library shall provide that person with information relevant to the system, including the identity of the other agencies and organizations that have access to the information contained in ILS. Other agencies and organizations that have access to ILS information include all CLEVNET Contract Libraries and satellite library collections located at Cleveland State University, Case Western Reserve University, Cuyahoga County Community College, and John Carroll University libraries.

Each CLEVNET Contract Library must also inform a person who is asked to supply personal information for the ILS that the person is required by the CLEVNET Contract Library's policies to supply the information requested in order to access materials through CLEVNET.

PERSONAL INFORMATION MAINTAINED BY CPL

CPL has adopted a Circulation Policy that requires certain relevant personal information be provided by persons applying for and having a library card through CPL. This information includes:

- First and last name
- Address and P.O. Box
- Phone number
- Email address (optional)
- Date of birth
- Name of guardian or parent for juveniles
- Drivers license numbers
- Special status information (e.g. Golden Buckeye)
- Restrictions on borrowing library materials (if any)

CPL assigns a profile code and library card number to each cardholder's ILS account.

CPL updates personal information when Patrons notify CPL of changes to their personal information, and at least every two years when library cards are required to be renewed. Birth date information is monitored regularly for changes in status and borrowing privileges (i.e., minor to adult). CPL retains all personal information regarding a Patron cardholder as long as that card remains active, and purges personal information three (3) years after expiration or termination of a Patron's library card.

RESPONSIBILITY FOR SYSTEM

CPL designates the Director of Information Technology and CLEVNET, who is currently Robert Carterette, as the individual directly responsible for the operation of the ILS. Each individual CLEVNET Contract Library shall also designate an employee who has the responsibility to monitor and maintain the accuracy, relevance, timeliness and completeness of the personal information in the ILS as it pertains to the CLEVNET Contract Library, and shall develop procedures to assume the same.

AUTHORIZED ACCESS

CLEVNET Contract Libraries shall limit access to personal information contained in the ILS to those employees who have a legitimate and authorized work-related purpose, and shall inform employees that have any responsibility for the operation or maintenance of the ILS or the personal information placed into the ILS, of the applicable provisions of R.C. Chapter 1347 and this policy. CLEVNET Contract Libraries shall discipline any of its employees who engage in the unauthorized use or release of personal information contained in the ILS in accordance with respective CLEVNET Contract Libraries discipline policies.

PROTECTION OF PERSONAL INFORMATION

CPL takes reasonable precautions to protect personal information by providing firewalls for the ILS, by password protecting access to the ILS, by limiting the modification or deletion of ILS personal information to CLEVNET Contract Libraries, and by limiting access to locations where ILS equipment is operated and stored to designated CPL employees. CPL also regularly backs up personal information contained in the ILS and stores it off site with a reputable and bonded commercial storage facility.

Each CLEVNET Contract Library must also take reasonable precautions to protect personal information in the ILS from unauthorized modification, destruction, use or disclosure by its employees, Patrons, or unauthorized users.

RIGHTS OF INSPECTION

Each CLEVNET Contract Library must, upon the request and the proper identification of any person who is the subject of personal information in the ILS:

Inform the person of the existence of any personal information in the ILS of which the person is the subject;

Inform the person about the types of uses made of the personal information, including the identity of any users usually granted access to the system;

Permit any person who wishes to exercise a right provided above to be accompanied by another individual of the person's choice.

Provide an individual who is authorized to inspect personal information that is maintained in the ILS a copy of the personal information upon the individual's request, and may charge a reasonable fee for copying.

PUBLIC RECORDS LAW

These rules shall not be construed to prohibit the release of public records, or the disclosure of personal information in "records", as defined in section R.C. 149.43 et seq. The disclosure to members of the general public of personal information contained in a public record, as defined in R.C. 149.43, is not an improper use of personal information under these Rules or R.C. Chapter 1347.

DISPUTES

If any person disputes the accuracy, relevance, timeliness, or completeness of personal information that pertains to that person which is maintained by CPL in the ILS, the person may request CPL to investigate the current status of the information. CPL shall, within a reasonable time after, but not later than ninety days after, receiving the request from the person, make a reasonable investigation to determine whether the disputed information is accurate, relevant, timely, and complete, and shall notify the person of the results of the investigation and of the action that CPL plans to take with respect to the disputed information. CPL shall delete any information that it cannot verify or that it finds to be inaccurate. CLEVNET Contract Libraries shall cooperate with any such investigation conducted by CPL into such a request.

If the person is not satisfied with the results of CPL's actions, CPL shall provide the person those additional rights and follow those procedures as set forth in R.C. Section 1347.09.

BREACH OF SECURITY

Any CLEVNET Contract Library shall promptly notify CPL's Director of Technology and CLEVNET of any breach of security in the ILS of which it becomes aware, if personal

information was or reasonably is believed to have been, accessed and acquired by an unauthorized person and if the access and acquisition by the unauthorized person causes or reasonably is believed will cause a material risk of identity theft or other fraud to a resident of this state. CPL's Director of Technology and CLEVNET shall promptly provide notification as required in Divisions (B) and (C) of R.C. Section 1347.12.

CPL's Director of Technology and CLEVNET shall promptly provide notification in an expeditious manner to any CLEVNET Contract Library of a breach of security in the system, if the personal information provided by that CLEVNET Contract Library was, or reasonably is believed to have been, accessed and acquired by an unauthorized person and if the access and acquisition by the unauthorized person causes or reasonably is believed will cause a material risk of identity theft or other fraud to a resident of this state. The CLEVNET Contract Library shall promptly provide notification as required in Divisions (B) and (C) of R.C. Section 1347.12.

R.C. § 1347.01
1347.01 Definitions

As used in this chapter, except as otherwise provided:

(A) "State agency" means the office of any elected state officer and any agency, board, commission, department, division, or educational institution of the state.

(B) "Local agency" means any municipal corporation, school district, special purpose district, or township of the state or any elected officer or board, bureau, commission, department, division, institution, or instrumentality of a county.

(C) "Special purpose district" means any geographic or political jurisdiction that is created by statute to perform a limited and specific function, and includes, but is not limited to, library districts, conservancy districts, metropolitan housing authorities, park districts, port authorities, regional airport authorities, regional transit authorities, regional water and sewer districts, sanitary districts, soil and water conservation districts, and regional planning agencies.

(D) "Maintains" means state or local agency ownership of, control over, responsibility for, or accountability for systems and includes, but is not limited to, state or local agency depositing of information with a data processing center for storage, processing, or dissemination. An agency "maintains" all systems of records that are required by law to be kept by the agency.

(E) "Personal information" 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.

(F) "System" means any collection or group of related records that are kept in an organized manner and that are maintained by a state or local agency, and from which personal information is retrieved by the name of the person or by some identifying number, symbol, or other identifier assigned to the person. "System" includes both records that are manually stored and records that are stored using electronic data processing equipment. "System" does not include collected archival records in the custody of or administered under the authority of the Ohio historical society, published directories, reference materials or newsletters, or routine information that is maintained for the purpose of internal office administration, the use of which would not adversely affect a person.

(G) "Interconnection of systems" means a linking of systems that belong to more than one agency, or to an agency and other organizations, which linking of systems results in a system that permits each agency or organization involved in the linking to have unrestricted access to the systems of the other agencies and organizations.

(H) "Combination of systems" means a unification of systems that belong to more than one agency, or to an agency and another organization, into a single system in which the records that belong to each agency or organization may or may not be obtainable by the others.

PERSONAL INFORMATION RULES FOR THE CLEVELAND PUBLIC LIBRARY HUMAN RESOURCES DEPARTMENT

Ohio Revised Code Chapter 1347

PURPOSE

The Human Resources Department of the Cleveland Public Library maintains a collection of related records containing personal information about Cleveland Public Library (“CPL”) employees. This collection of personal information about CPL employees is stored in paper and electronic form, and is necessary in order to make sound personnel decisions including hiring, promotion, benefits and discipline, in accordance with the Human Resource Policies and Procedures of the Cleveland Public Library, and in accordance with state and federal laws.

These rules are adopted pursuant to Section 1347.05(B) of the Ohio Revised Code, and are intended to establish rules and procedures for the use and maintenance of the personal information system maintained by the Human Resources Department of CPL.

APPLICATION

These rules apply to all employees of CPL.

DEFINITIONS

“Personal information” is defined in R.C. 1347.01 as “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, name, identifying number, symbol, or other identifier assigned to a person.” All other definitions contained in R.C. 1347.01, which is attached hereto, are incorporated into this policy as if fully rewritten herein.

PERSONAL INFORMATION MAINTAINED IN THE SYSTEM

The Human Resources Department maintains personnel files and confidential files about Library employees, which files include, but are not limited to, the following personal information about employees in the personnel files:

First and Last Name of employee and immediate relatives
Gender of employee and immediate relatives
Address and P.O. Box
Phone numbers of employee and immediate relatives
Email addresses
Dates of birth of employee and immediate relatives

Social Security numbers of employee and immediate relatives
Drivers license number
Ethnicity
Bank account number for direct deposit
Education history
Wage information
Discipline
PIPs
Performance Appraisals
Commendation letters
Recommendation letters
Diplomas, degrees, certificates

The following personal information is retained by the Department of Human Resources separately from personnel files as confidential files:

Medical information
Confidential investigatory records
Form I-9
Tax information
Background checks
ADA Requests
Ease@Work referrals and progress reports
FMLA Certifications

This information is required by employees in order for the Department of Human Resources to execute its responsibilities. Only personal information that is necessary and relevant to rendering sound personnel decisions including hiring, promotion, benefits and discipline, in accordance with the Human Resource Policies and Procedures of the Cleveland Public Library, and in accordance with state and federal laws is collected and maintained.

The Human Resources Department verifies and updates personal information contained in the personnel files, as needed, and when it is notified of changes by employees, and eliminates personal information about employees from the files it maintains in accordance with the applicable retention schedules of CPL and applicable law when no longer necessary or relevant to the functions of the Department, such as when an employee terminates employment, retires, or dies.

RESPONSIBILITY FOR THE SYSTEM

The Human Resources Director shall be the individual directly responsible for the operation of the Human Resources Department's personnel files and confidential files in accordance with these Rules and the duties set forth in R.C. 1347.05. The Human Resources Director shall

consult with the Public Records Custodian of CPL before releasing any personal information contained in the personnel files or confidential files to members of the public. Any questions concerning the propriety of the release of information should be directed to the Chief Legal Officer of CPL or the Cuyahoga County Prosecuting Attorney.

AUTHORIZED ACCESS

Access to the personnel files and confidential files is limited to Human Resources Department personnel and those supervisory employees of CPL who have a legitimate and authorized work-related purpose. The Human Resources Director shall notify any other employees at CPL who have any responsibility for the operation or maintenance of the Human Resources Department personnel or confidential files or for the use of personal information maintained in the systems, of the provisions of R.C. Chapter 1347 and these Rules.

PROTECTION OF PERSONAL INFORMATION

CPL takes reasonable precautions to protect personal information from unauthorized modification, destruction, use, or disclosure by storing personnel files in a locked room and storing confidential files in a locked filing cabinet within a locked room. Electronically stored personal information is protected by providing firewall systems for those computerized records, by password protecting access to the computerized records and by limiting access to those employees who are issued passwords, along with strict security beyond entering the system from programs and modules to individual field access.

RIGHTS OF INSPECTION

In addition to the rights of employees with regard to personnel files as set forth in the applicable Union Contracts, the Human Resources Director shall, upon the request and the proper identification of any person who is the subject of personal information in personnel files or confidential files:

Inform the person of the existence of any personal information in the system of which the person is the subject;

Inform the person about the types of uses made of the personal information, including the identity of any users usually granted access to the system;

Permit any person who wishes to exercise a right provided above to be accompanied by another individual of the person's choice.

Provide an individual who is authorized to inspect personal information that is maintained in the system a copy of the personal information upon the individual's request, and may charge a reasonable fee for copying.

PUBLIC RECORDS LAW

These rules shall not be construed to prohibit the release of public records, or the disclosure of personal information in “records”, as defined in section R.C. 149.43 et seq. The disclosure to members of the general public of personal information contained in a public record, as defined in R.C. 149.43, is not an improper use of personal information under these Rules or R.C. Chapter 1347.

DISPUTES

If any person disputes the accuracy, relevance, timeliness, or completeness of personal information that pertains to an employee that is maintained by the Human Resources Department, the employee may request the Human Resources Director to investigate the current status of the information. The Human Resources Director shall, within a reasonable time after, but not later than ninety days after, receiving the request from the employee, make a reasonable investigation to determine whether the disputed information is accurate, relevant, timely, and complete, and shall notify the employee of the results of the investigation and of the action that the Human Resources Director plans to take with respect to the disputed information. The Human Resources Director shall delete any information that it cannot verify or that she or he finds to be inaccurate.

If the employee is not satisfied with the results of the Human Resources Director’s actions, the Human Resources Director shall provide the employee those additional rights and follow those procedures as set forth in R.C. Section 1347.09.

BREACH OF SECURITY

The Human Resources Director shall notify the Board of Trustees of the Cleveland Public Library of any breach of security of personal information in the personnel or confidential files and the Library Board of Trustees shall promptly provide notification as provided in Divisions (B) and (C) of R.C. Section 1347.12.

DISCIPLINE

Violation of this policy shall be deemed as grounds for disciplinary action pursuant to CPL’s Human Resources Manual and Policies, or under any other provisions of law providing for the discipline or removal of public library employees.

R.C. § 1347.01
1347.01 Definitions

As used in this chapter, except as otherwise provided:

(A) "State agency" means the office of any elected state officer and any agency, board, commission, department, division, or educational institution of the state.

(B) "Local agency" means any municipal corporation, school district, special purpose district, or township of the state or any elected officer or board, bureau, commission, department, division, institution, or instrumentality of a county.

(C) "Special purpose district" means any geographic or political jurisdiction that is created by statute to perform a limited and specific function, and includes, but is not limited to, library districts, conservancy districts, metropolitan housing authorities, park districts, port authorities, regional airport authorities, regional transit authorities, regional water and sewer districts, sanitary districts, soil and water conservation districts, and regional planning agencies.

(D) "Maintains" means state or local agency ownership of, control over, responsibility for, or accountability for systems and includes, but is not limited to, state or local agency depositing of information with a data processing center for storage, processing, or dissemination. An agency "maintains" all systems of records that are required by law to be kept by the agency.

(E) "Personal information" 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.

(F) "System" means any collection or group of related records that are kept in an organized manner and that are maintained by a state or local agency, and from which personal information is retrieved by the name of the person or by some identifying number, symbol, or other identifier assigned to the person. "System" includes both records that are manually stored and records that are stored using electronic data processing equipment. "System" does not include collected archival records in the custody of or administered under the authority of the Ohio historical society, published directories, reference materials or newsletters, or routine information that is maintained for the purpose of internal office administration, the use of which would not adversely affect a person.

(G) "Interconnection of systems" means a linking of systems that belong to more than one agency, or to an agency and other organizations, which linking of systems results in a system that permits each agency or organization involved in the linking to have unrestricted access to the systems of the other agencies and organizations.

(H) "Combination of systems" means a unification of systems that belong to more than one agency, or to an agency and another organization, into a single system in which the records that belong to each agency or organization may or may not be obtainable by the others.

**PERSONAL INFORMATION RULES FOR THE CLEVELAND PUBLIC LIBRARY
DEPARTMENT OF FINANCE**

Ohio Revised Code Chapter 1347

PURPOSE

The Department of Finance maintains a computerized payroll system containing personal information about Cleveland Public Library (“CPL”) employees. This collection of personal information about CPL employees is necessary in order to provide and process employee wages, benefits, bonuses and deductions, and report employee earnings to the appropriate taxing authorities in accordance with local, state and federal laws.

These rules are adopted pursuant to Section 1347.05(B) of the Ohio Revised Code, and are intended to establish rules and procedures for the use and maintenance of the personal information system maintained by the Department of Finance of CPL.

APPLICATION

These rules apply to all employees of CPL.

DEFINITIONS

“Personal information” is defined in R.C. 1347.01 as “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, name, identifying number, symbol, or other identifier assigned to a person.” All other definitions contained in R.C. 1347.01, which is attached hereto, are incorporated into this policy as if fully rewritten herein.

PERSONAL INFORMATION MAINTAINED IN THE SYSTEM

The Department of Finance maintains the following personal information about employees in the payroll system:

First and Last Name of employee and immediate relatives
Gender of employee and immediate relatives
Address and P.O. Box
Phone numbers of employee and immediate relatives
Email addresses
Dates of birth of employee and immediate relatives
Social Security numbers of employee and immediate relatives
Drivers license number
Ethnicity
Bank account number for direct deposit

This information is required by employees in order to provide payroll and benefits services to them.

Only personal information that is necessary and relevant to providing and processing employee wages, benefits, bonuses and deductions, and to report employee earnings to the appropriate taxing authorities in accordance with local, state and federal laws, is collected and maintained.

The Department of Finance updates personal information contained in the payroll system continually, as needed, and when it is notified of changes by employees, and eliminates personal information from the payroll system in accordance with the applicable retention schedules of CPL and applicable law when no longer necessary or relevant to the functions of the payroll system, such as when an employee terminates employment or changes benefit status.

RESPONSIBILITY FOR THE SYSTEM

The Chief Financial Officer shall be the individual directly responsible for the operation of the payroll system in accordance with these Rules and the duties set forth in R.C. 1347.05. The Chief Financial Officer shall consult with the Public Records Custodian of CPL before releasing any personal information contained in the payroll system to members of the public. Any questions concerning the propriety of the release of information should be directed to the Chief Legal Officer of CPL or the Cuyahoga County Prosecuting Attorney.

AUTHORIZED ACCESS

Access to the payroll system is limited to those supervisory employees of CPL who have a legitimate and authorized work-related purpose. The Chief Financial Officer shall notify any other employees at CPL who have any responsibility for the operation or maintenance of the payroll system or for the use of personal information maintained in the system, of the provisions of R.C. Chapter 1347 and these Rules.

PROTECTION OF PERSONAL INFORMATION

CPL takes reasonable precautions to protect personal information in the payroll system from unauthorized modification, destruction, use, or disclosure by providing firewall systems for those computerized records, by password protecting access to the computerized payroll records and by limiting access to those employees who are issued passwords, along with strict security beyond entering the system from programs and modules to individual field access.

RIGHTS OF INSPECTION

The Chief Financial Officer shall, upon the request and the proper identification of any person who is the subject of personal information in the payroll system:

Inform the person of the existence of any personal information in the payroll system of which the person is the subject;

Inform the person about the types of uses made of the personal information, including the identity of any users usually granted access to the system;

Permit any person who wishes to exercise a right provided above to be accompanied by another individual of the person's choice.

Provide an individual who is authorized to inspect personal information that is maintained in the payroll system a copy of the personal information upon the individual's request, and may charge a reasonable fee for copying.

DISPUTES

If any person disputes the accuracy, relevance, timeliness, or completeness of personal information that pertains to an employee in the payroll system, the employee may request the Chief Financial Officer to investigate the current status of the information. The Chief Financial Officer shall, within a reasonable time after, but not later than ninety days after, receiving the request from the employee, make a reasonable investigation to determine whether the disputed information is accurate, relevant, timely, and complete, and shall notify the employee of the results of the investigation and of the action that the Chief Financial Officer plans to take with respect to the disputed information. The Chief Financial Officer shall delete any information that she or he cannot verify or that it finds to be inaccurate.

If the employee is not satisfied with the results of the Chief Financial Officer's actions, the Chief Financial Officer shall provide the employee those additional rights and follow those procedures as set forth in R.C. Section 1347.09.

BREACH OF SECURITY

The Chief Financial Officer shall notify the Board of Trustees of the Cleveland Public Library of any breach of security in the computerized storage of personal information in the payroll system and the Library Board of Trustees shall promptly provide notification as provided in Divisions (B) and (C) of R.C. Section 1347.12.

DISCIPLINE

Violation of this policy shall be deemed as grounds for disciplinary action pursuant to CPL's Human Resources Manual and Policies, or under any other provisions of law providing for the discipline or removal of public library employees.

R.C. § 1347.01
1347.01 Definitions

As used in this chapter, except as otherwise provided:

(A) "State agency" means the office of any elected state officer and any agency, board, commission, department, division, or educational institution of the state.

(B) "Local agency" means any municipal corporation, school district, special purpose district, or township of the state or any elected officer or board, bureau, commission, department, division, institution, or instrumentality of a county.

(C) "Special purpose district" means any geographic or political jurisdiction that is created by statute to perform a limited and specific function, and includes, but is not limited to, library districts, conservancy districts, metropolitan housing authorities, park districts, port authorities, regional airport authorities, regional transit authorities, regional water and sewer districts, sanitary districts, soil and water conservation districts, and regional planning agencies.

(D) "Maintains" means state or local agency ownership of, control over, responsibility for, or accountability for systems and includes, but is not limited to, state or local agency depositing of information with a data processing center for storage, processing, or dissemination. An agency "maintains" all systems of records that are required by law to be kept by the agency.

(E) "Personal information" 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.

(F) "System" means any collection or group of related records that are kept in an organized manner and that are maintained by a state or local agency, and from which personal information is retrieved by the name of the person or by some identifying number, symbol, or other identifier assigned to the person. "System" includes both records that are manually stored and records that are stored using electronic data processing equipment. "System" does not include collected archival records in the custody of or administered under the authority of the Ohio historical society, published directories, reference materials or newsletters, or routine information that is maintained for the purpose of internal office administration, the use of which would not adversely affect a person.

(G) "Interconnection of systems" means a linking of systems that belong to more than one agency, or to an agency and other organizations, which linking of systems results in a system that permits each agency or organization involved in the linking to have unrestricted access to the systems of the other agencies and organizations.

(H) "Combination of systems" means a unification of systems that belong to more than one agency, or to an agency and another organization, into a single system in which the records that belong to each agency or organization may or may not be obtainable by the others.