

Employee PII, Confidentiality, Conflict of Interest & Ethics Acknowledgment



Compliance & Risk Management Ethics & Conflict of Interest

The College takes seriously every employee's responsibility to comply with College policies and procedures, laws and regulations, protect confidential and sensitive data, and maintain high ethical standards. By checking off the College's *Employee Compliance, PII, Confidentiality, Conflict of Interest & Ethics Acknowledgment*, you are acknowledging the following:

- College Policies & Procedures.** I hereby acknowledge, by this electronic sign off, that Cuyahoga Community College has informed me that in the course and scope of employment I am responsible for complying with [College Policies & Procedures](#).
- Ohio Fraud Reporting System & Whistleblower Protections.** I hereby acknowledge, by this electronic sign off, pursuant to [Ohio Revised Code 117.103](#), that I have been provided with information about the [Ohio fraud-reporting system](#) (physical or electronic) and included in that information are the protections afforded me as a classified or unclassified employee if I use [the fraud-reporting system](#) pursuant to [Ohio Revised Code Section 124.341](#). I have read and understand the information provided.
- Personally Identifiable Information (PII) & College Information Systems.** I hereby acknowledge, by this electronic sign off, that Cuyahoga Community College has informed me that in the course and scope of employment I may be responsible for using, handling, and accessing personally identifiable information (PII) either physically or within College information system(s) as outlined in [Ohio Revised Code Chapter 1347](#) and the [College's Personal Information Policy 3354:1-43-05](#). PII may include, but is not limited to (1) any information that can be used to distinguish or trace an individual's identity, such as name, social security number, date and place of birth, mother's maiden name, or biometric records; and (2) any other information that is linked or linkable to an individual, such as medical, educational, financial, and employment information. I agree to abide by all applicable law and College policy as it pertains to PII and understand that failure to comply could result in criminal and/or civil penalties and/or employee disciplinary penalties. Please reference the *Tri-C Guidance for Sending & Receiving Confidential & Secure Information (CSI) or Personally Identifiable Information (PII) Using Digital Resources* which is located on the last page of this document.
- College Confidentiality Agreement.** I hereby acknowledge, by this electronic sign off, I have read the [College's Confidentiality Agreement](#) and understand that my compliance with this Agreement is a continuing condition of my employment with Cuyahoga Community College.
- Ohio Ethics Laws.** I hereby acknowledge, by this electronic sign off, that I have received from Cuyahoga Community College a copy (physical or electronic) of the [Ohio Ethics Law and related statutes, Chapter 102., and Section 2921.42, of the Ohio Revised Code](#), in accordance with [Section 102.09\(D\) of the Ohio Revised Code](#). The link to the most current version of the Ohio Ethics Law was provided to me [here](#) and in the [Employee Resource Guide](#).
- Potential Conflict(s) of Interest/Significant Financial Interest(s).** I hereby acknowledge, by this electronic sign off, I have reviewed the College's [Conflict of interest policy 3354: 1-45-01](#); [Conflict of interest procedure \(NIH\) 3354: 1-45-01.1](#); and, [Conflict of Interest Procedure 3354.1-45-01.2](#);

and agree to disclose any potential conflicts of interest (COI) or significant financial interests (SFI) involving me or my immediate family with entities that are currently or seek to conduct business with the College by using the College's [PCOI/SFI Disclosure form](#). Also, if at any time during my employment with the College, I participate in any program receiving any funding from outside of the College, I agree to adhere to all ethical and conflict of interest provisions and directives delineated by the funding source.

- Financial Conflict of Interest / Significant Financial Interest. *For any employee participating in any HHS/NIH-funded grants, programs or research:*** I hereby acknowledge, by this electronic sign off, that I have read and agree to adhere to all requirements delineated by the HHS/NIH, including, but not limited to disclosing any potential conflicts of interest annually as required using the College's [PCOI/SFI Disclosure form](#) in accordance with [42 CFR 50, Subpart F, Promoting Objectivity in Research](#) (FCOI Regulation), as implemented in the 2011 [Final Rule](#) for grants and cooperative agreements. I understand that failure to disclose/mitigate any business relationship which presents or potentially presents a conflict of interest is subject to the College's [Corrective Action Procedure Section 3354:1-43-03.01](#).
- SFAS Code of Ethics. *For any employee with work duties that are a part of the College's Financial Aid & Scholarships department:*** I hereby acknowledge, by this electronic sign off, I have read, signed, and have provided my supervisor with a [Student Financial Aid & Scholarships Code of Ethics & Disclosure forms](#), I understand that my compliance with this Code is a continuing condition of my employment with Cuyahoga Community College, and, I agree to disclose any potential conflicts of interest involving me or my immediate family with any College affiliated individual(s) by using the College's [PCOI/SFI Disclosure form](#).
- Enrollment Center Code of Ethics. *For any employee with work duties that are a part of the College's Enrollment Center department:*** I hereby acknowledge, by this electronic sign off, I have read, signed, and have provided my supervisor with an [Enrollment Center Code of Ethics Agreement & Disclosure forms](#), I understand that my compliance with this Agreement is a continuing condition of my employment with Cuyahoga Community College, and, I agree to disclose any potential conflicts of interest involving me or my immediate family with any College affiliated individual(s) by using the College's [PCOI/SFI Disclosure form](#).



Tri-C Guidance for Sending & Receiving Confidential & Secure Information (CSI) or Personally Identifiable Information (PII) Using Digital Resources

At Cuyahoga Community College (Tri-C) employees and agents of the College have a responsibility to protect and securely send or receive confidential and secure information (CSI) and/or personally identifiable information (PII). This should only occur under specific circumstances.

If you come across a circumstance that requires you to send or receive CSI or PII – **STOP** - **first check with your supervisor** to determine if your College department or organizational unit has an existing process in place, and if so, follow that process. If not:

Consider why you need to send or receive CSI or PII outside of an established Tri-C process:

- Consider if the information you are sending or receiving is confidential/sensitive:
 - Does it contain birthdates, social security numbers, etc.?
- Consider if the information you are sending or receiving is covered by any laws or regulations, including, but not limited to:
 - HIPAA;
 - FTC Red Flags Rule;
 - FERPA;
 - Ohio Public Records Laws; and/or
 - other laws or regulation; and
 - seek help or guidance if you have not sent or received this type of data before.

Do not send CSI or PII via regular email, including through your Tri-C email account.

Do not respond to a public records request on your own – refer the request to the Office of Legal Services at 216-987-4865 or legal@tri-c.edu.

Do not send or receive CSI or PII that is College data outside of resources provided by the College's ITS department.

Do not store CSI or PII that is College data outside of resources provided by the College's ITS department.

If you cannot: identify an existing process, escalate or refer the matter; then, contact the [Tri-C Office of Safe & Secure Computing](#) for guidance.

Resources:

- [Tri-C Office of Safe & Secure Computing Kweb Site](#)
- [Tri-C Information Security Program](#)
- [Tri-C Employee Compliance, PII, Confidentiality, and Ethics Acknowledgements](#)
- [Tri-C Office of General Counsel & Legal Services – Student Education Records & FERPA \(Includes Student Directory Info\)](#)
- [Tri-C Procedure on student education records \(3354:1-30-02.2\)](#)
- [Tri-C Office of General Counsel & Legal Services – Public Records Requests](#)
- [Tri-C Public Records Policy \(3354:1-11-06\)](#)
- [Tri-C Public Records Procedure \(3354:1-11-06.1\)](#)
- [Tri-C Identity Theft Policy \(3354:1-20-09\)](#)
- [Tri-C Personnel Information Records Procedure \(3354:1-43-05.1\)](#)