



Department of Commerce

Division of Unclaimed Funds

John R. Kasich, Governor
Jacqueline T. Williams, Director

September 28, 2015

Randall J. Meyer
Ohio Inspector General
James A. Rhodes Tower
30 East Broad Street – Suite 2940
Columbus, OH 43215

Re: Report of Investigation 2014-CA00018

Dear Mr. Meyer:

The Ohio Department of Commerce Division of Unclaimed Funds has completed its review of your office's recommendation contained in the above-referenced report issued on July 30, 2015. The Department respectfully submits this response to your recommendation.

Recommendation:

Determine if additional staff training for the proper accessing and retention of CLEAR® information is warranted.

Response:

The Division of Unclaimed Funds is planning for additional training on CLEAR® for its employees. It also has reviewed and updated its CLEAR® policy. The Department's Clear administrator will monitor employee search activity more frequently. In addition, the Division will consult with Westlaw to determine if more detailed reports of employee searches may be made available and retained for a longer period.

The Department further seeks to clarify that the Division of Unclaimed Funds' CLEAR® policy, the Department's policy on confidential personal information (CPI) and OAC 1301-1-03 permit Unclaimed Funds employees to conduct Clear searches not only when a claim is pending, but also to perform research to identify and locate the owner of unclaimed funds waiting to be claimed, provided such research activities are based on a valid reason directly related to the exercise of the Division's powers to collect and pay unclaimed funds, and are commensurate with the employees' duties and responsibilities in the Division.

Sincerely,


Jacqueline T. Williams
Director

2015 SEP 28 PM 3:45
OFFICE OF
INSPECTOR GENERAL