



NCWDB Protection of Personally Identifiable Information (PII) ADOPTED JANUARY 18, 2019

The North Country Workforce Development Board (NCWDB) recognizes the importance of keeping personally identifiable information protected.

Protected PII is defined by the US Department of Labor as that which is disclosed could result in harm to the individual whose name or identify is linked to that information. Examples include social security numbers, addresses, home phone numbers, ages, birthdates, marital status, spouse names, educational history, biometric identifiers (fingerprints, voiceprints, iris scans etc.), medical information, financial information and computer passwords.

The following steps will be taken:

1. Prior to collection of PII or sensitive personal information:
 - a. Individuals shall be notified that such information will only be used for purposes of service under the WIOA-funded grant program and its attendant regulations. As part of the WIOA program application individuals shall sign a release acknowledging such.
 - b. Individuals shall also be notified that with written consent, such information may be shared with other partner organizations for purposes of referral and potential coordination of services beyond WIOA.
 - c. The individual may agree in writing to release all or portion of their information and be provided the opportunity to indicate what information may or may not be shared. The individual may also indicate if there are specific organization(s) to which their information may not be shared. The consent may be modified or revoked by the individual at any time by providing written notice. Customer initials should be obtained to document customer designations and subsequent changes.
 - d. Unless modified or revoked by the individual, written consent shall remain in effect four years from the date of last signature.
 - e. WIOA paid staff and other personnel who will have access to sensitive/confidential/proprietary/private data must be advised by the service provider of the confidential nature of the information, the safeguards required to the protect the information and the safeguards in handling such information. Written

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acknowledgements, such as confidentiality agreements, from staff and other partner personnel shall be kept by the WIA service providers.

2. Safeguarding of PII and sensitive information once obtained:
 - a. PII of WIOA participants shall not be transmitted by email or stored CDs, DVDs, thumb drives etc. unless it can be encrypted using federally approved standards.
 - b. All PII data of WIOA participants will be stored, at all times, in an area that is physically safe from access by unauthorized persons and the data will be processed using OSOS. Accessing, processing and storing of WIOA grant PII data on personally owned equipment, at off-site locations and by non-grantee managed IT services is strictly prohibited.
 - c. No PII or sensitive information will be used for any purpose other than necessary under the WIOA. Any information collected for customer service or continuous improvement efforts will be aggregated, reported anonymously without any connection to an individual.
 - d. No third-party market opinion surveys, research, panel or focus groups shall be granted access to PII and other sensitive WIOA participant information without prior written consent of the WDB.
 - e. PII and sensitive data will be destroyed by shredding documents and securely deleting sensitive electronic PII.