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Personally Identifiable Information Policy (PII)

Purpose:

To establish local parameters for assuring the handling and protection of personally identifiable information by all agency staff, as well as one stop partners. This policy is established consistent with WIOA statutes found at 20 CFR 683.220; the United States Department of Labor's Office of Employment and Training's release of TEGP 39-11 and the New Jersey Workforce Innovation Notice 6-15, which proscribe the requirements for protecting personally identifiable information for its customers and patrons.

Definitions:

PII: Information that can be used to distinguish or trace an individual's identity, either alone or when combined with other personal or identifying information that is linked or linkable to a specific individual.

Sensitive Information: Any unclassified information whose loss, misuse, or unauthorized access to or modification of could adversely affect the interests or the conduct of federal programs, or the privacy to which individuals are entitled under the Privacy Act.

Protected PII: Information that if disclosed could result in harm to the individual whose name or identity is linked to that information. Examples of protected PII include, but are not limited to, **Social Security Numbers (SSN), credit card numbers, bank account numbers, home telephone numbers, ages, birthdates, marital status, spouse names, educational history, biometric identifiers (fingerprints, voiceprints, iris scans, etc.), financial information and computer passwords.**

Non-Sensitive PII: Information, that if disclosed by itself, would not be expected to result in personal harm. Essentially, it is stand-alone information that is not linked or closely associated with any protected or unprotected PII. Examples of non-sensitive PII include information such as first and last names, e-mail addresses, business addresses, business telephone numbers, general education credentials, gender or race. Depending on the circumstances, however, a combination of these items could potentially be categorized as protected or PII.

Procedure:

In order to assure the protection of all *personally identifiable information*, for all customers, partners and associates, the following actions shall be taken:

1. All PII shall be kept in a secured location away from the public's eyes. Employees of the Atlantic County Workforce Development Board and the Atlantic County One Stop Career Center will secure all PII on a daily basis by assuring that all identifying information is placed in a locked location at end of day.
2. For purposes of maintaining identifiers for service delivery, whenever possible, workers will create unique identifiers for participant tracking. For current practices, those identifiers include the NJ numbers for AOSOS and the Case Numbers for public assistance recipients. In other circumstances, the last four digits of the social security number can be shared as an identifier. (Caution should be taken to avoid combining the last four of the social security number with a birthdate.)
3. Electronic transmission of PII, including e-mail and fax, is forbidden unless the information is encrypted following the instructions in TEGL 39-11 and WIN 6-15.
4. This policy and procedure will be incorporated into all memorandums of understanding, contracts, and agreements.
5. Forms, folders and other paper documents do not include SSNs.

THIS POLICY WILL BE REVIEW IN 90 DAYS
FR 9.13.22