

# Protection Of Personally Identifiable Information & Other Confidential And/Or Sensitive Customer Information

## Purpose

The purpose of this section is to address the security of Personally Identifiable Information (PII), both sensitive and non-sensitive, for services offered through the Workforce Innovation and Opportunity Act (WIOA) by NOVA and its sub-recipients

## Definitions

- PII – OMB defines PII as 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 interest or the conduct of Federal programs, or the privacy to which individuals are entitled under the Privacy Act.
- Protected PII and non-sensitive PII – the Department of Labor has defined two types of PII, protected and non-sensitive PII. The differences between protected PII and non-sensitive PII are primarily based on an analysis regarding the “risk of harm” that could result in the release of the PII
  1. Protected PII is 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 (SSNs), credit card numbers, bank account numbers, home telephone numbers, ages, birthdates, marital status, spouse names, educational history, biometric identifiers, medical history, financial information and computer passwords.
  2. Non-sensitive PII, is information that if disclosed, by itself, could not reasonably be expected to result in personal harm. It is stand-alone information that is no linked or closely associated with any protected or unprotected PII. Examples include

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information such as first and last names, e-mail addresses, business addresses, business telephone numbers, general education credentials, gender or race.

## Procedures

All NOVA staff, sub-recipient staff, grantees, partner staff, and any other individuals or groups involved in the handling of personally identifiable information as a result of WIOA, will protect PII in accordance with the law, and MUST:

- Annually sign a disclosure acknowledging the confidential nature of the data and agree to comply with safe and secure management of the data in accordance with federal and state requirements.
- Limit the accessibility of PII to staff who need it in an official capacity to perform their responsibilities under WIOA. Staff must not extract information from data sources for personal use/reasons.
- PII will be processed to as to protect the confidentiality of the record/documents and to prevent unauthorized access.
- PII will be retained for the required period of time per ETA guidelines, then destroyed.
- Contractors/partners/sub-recipients should have standard operating procedures in place to address the protection of PII.
- When any hard-copy PII or other confidential/or sensitive customer information is being transported between NOVA's various office locations, this information must be locked in a secure container provided by NOVA administration.
  - Prior to departing from one location to another, all hard-copy PII or other confidential and/or sensitive customer information being transported must be placed in the secure container and locked before leaving the facility.
  - The container will remain locked until the staff person arrives at the next location.

In the event that a NOVA or sub-recipient staff person is no longer employed by the organization, the combination lock on the secure container will be reset.

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## Personally Identifiable Information Acknowledgement

I have reviewed and acknowledge understanding of NOVA’s “Protection of Personally Identifiable Information & Other Confidential and/or Sensitive Information” policy and agree that all necessary steps will be taken to ensure the privacy and confidential nature of all personally identifiable information (PII) to protect the PII from unauthorized disclosure.

I further agree that all personally identifiable information will be stored in an area that is physically safe from access by unauthorized persons and will be managed with appropriate information technology (IT) services at all times.

All collection and use of any information, systems, or records that contain personally identifiable information (PII) will be limited to purposes that support the programs and activities conducted with WIOA funding through NOVA.

Access to software systems and files under my control containing PII will be limited to use in my responsibilities as an authorized staff person within the system. This includes the safeguarding of computer passwords and access to any/all computer information systems.

I agree to abide by regulations that govern the access, transportation of, use and disposal of PII in accordance with WIOA and NOVA.

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Name (print)

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Agency

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Signature

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Date