



## County of Mercer Workforce Development Board

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# Mercer WDB Policy: Protection of Personally Identifiable Information (PII) Adopted: November 1, 2022

**Background:** The US Department of Labor Employment & Training Administration requires the protection of Personally Identifiable Information (PII) as outlined in TEGL 39-11. This TEGL states that “grantees must secure transmission of PII and sensitive data developed, obtained, or otherwise associated with ETA funded grants.”

**Policy:** The Mercer WDB has established a local policy for staff and service providers in the handling and protection of information that permits the identity of an individual to whom the identity applies, to be reasonable inferred by either direct or indirect means (USDOL, <http://www.dol.gov/dol/ppii.htm>). The policy ensures that steps are taken to ensure the privacy of PII obtained from customers and/or other individuals and to protect such information from unauthorized disclosure. The definitions and procedures to be taken are outlined below.

**Definition/Procedures:** PII is any information if disclosed that could result in harm to the individual whose name and identity is linked to that information. Protected PII includes but is not limited to the following: Name, Social Security Number, telephone number, address, age, birth date, marital status, spouse’s name, email address, educational history, financial information, computer passwords, and case number i.e. WFNJ

All PII obtained through grant shall be stored in an area that is physically safe from access by unauthorized persons at all times.

Persons who have access to sensitive, confidential/proprietary/ private data will be advised of the confidential nature of the information, the safeguards required to protect the information and that there are civil and criminal sanctions in place for non-compliance.

Access to PII created by any grant must be restricted to only those persons who in their official capacity to perform duties in connection with the scope of the work.

PII data obtained through a request must not be disclosed to anyone but the requesting individual.

Use appropriate methods of destroying sensitive PII in paper filed and securely deleting sensitive electronic PII. Immediately report any breach or suspected breach of PII to your Immediate Supervisor.

On all documentation, please use only the last (4) four digits of the social security number.

Non-sensitive PII includes a customer's name and AOSOS NJ Identification Number in combination. (This information may be transmitted electronically only between staff and partner agencies or staff and contracted service providers.)

**NOTE:** Policy created & followed by MCOTES staff effective Date: 7/1/15    Revised: 8/11/16 & 12/6/16